



CONTINUUM OF CARE BOARD AGENDA
Spokane Housing Authority (In Person)
April 22nd, 2026
3:00PM - 5:00PM
VIRTUAL
([CLICK HERE](#) FOR TEAMS LINK)

3:00PM

- Roll Call of Board Members; Approval of March Minutes; Approval of April Agenda
- Public Comments
- **Action Item**: Reallocation Policy Update (Jon Klapp)
- **Action Item**: Continuum of Care Charter Update (Jon Klapp/Arielle Anderson)
- **Action Item**: HMIS Data Quality Policies and Procedures (Amanda Martinez)
- 2026 CoC and CHHS Joint Retreat
- Collaborative Applicant Updates
- Jurisdiction Updates (County, City of Spokane, City of Spokane Valley)
- Sub Committee Updates (if applicable)

Adjournment

Spokane Regional Continuum of Care

Document Updates!

April 22nd, 2026



SPOKANE REGIONAL
Continuum of Care

Agenda

- Spokane Regional Continuum Reallocation Policy Revisions
 - Action Recommended – Approval of Revisions
- Spokane Regional Continuum of Care Charter Revisions
 - Action Recommended – Approval of Revisions
- HMIS Policies and Procedures Revisions
 - Action Recommended – Approval of Revisions

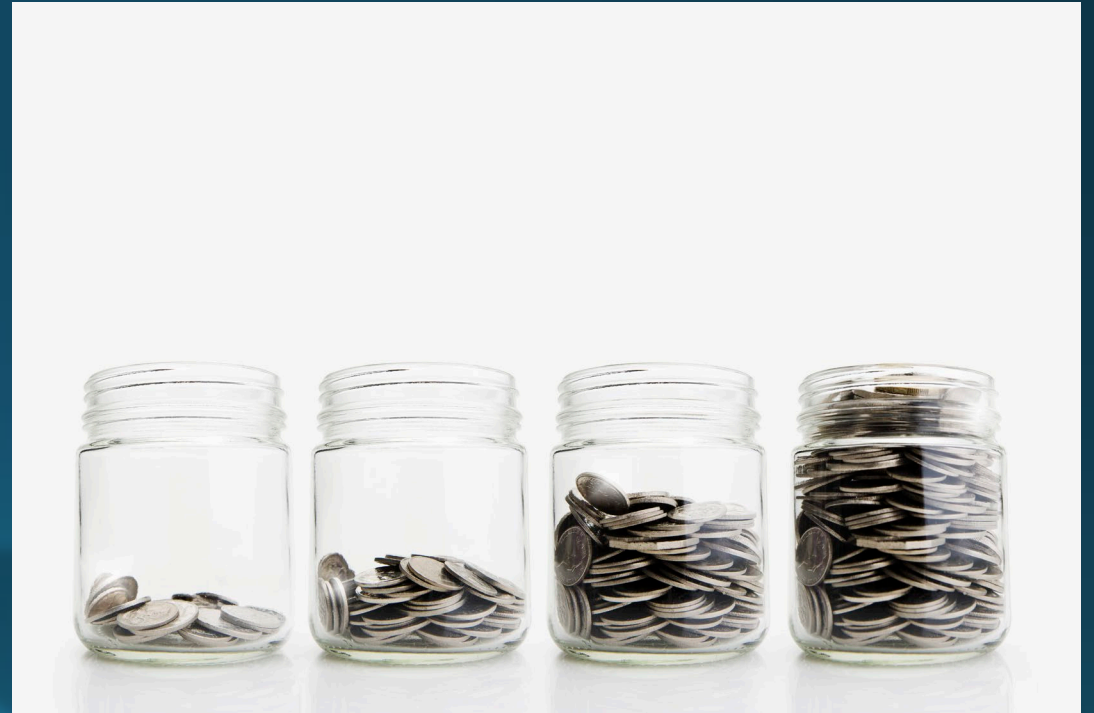
Continuum of Care Reallocation Policy

- Creating a structure for Fund-Utilization-Based reallocation
- Adding the Performance Management Plan as an explicit criteria
- Mechanism for minor fund shifts without a board action

Continuum of Care Reallocation Policy

Fund Utilization-Based Reallocation

- Successful model from other Continuums of Care
- Reasonable and consistently applied measures
- Quarterly milestone points
- Maximizes utilization of CoC dollars
- Reduces grant funds returned



Continuum of Care Reallocation Policy

Fund Utilization-Based Reallocation

Quarterly Fund Utilization Thresholds Table

Quarterly Review Timing	Expected % Spent	Spending Review Threshold
Q1: Through October	25%	15%-35%
Q2: Through January	50%	40%-60%
Q3: Through April	75%	70%-80%

Reallocation Review Workflow

1. Fund Utilization Monitored

- Based upon monthly reimbursement reviews by City staff

2. RFP Committee Reviews / Recommends

- Focused review of those outside of the threshold range
- Recommendation, citing cause, is created

3. CoC Board Makes Reallocation Decision

- CoC Board may approve or reject a recommendation from the RFP Committee

Continuum of Care Reallocation Policy

Performance Management Plan Integration

- The CoC will make all funding decisions based on alignment with HUD guidelines, priorities outlined in the 5 Year Plan/ Performance Management Plan performance measures, and unspent project funds.
- A determination for involuntary reallocation will be made on the following criteria:
 1. **Project Performance** takes into consideration the type of project, its performance relative to that type, ~~and timely expenditure of funds~~ using the performance measures described in the [Spokane Regional Continuum of Care's Performance Management Plan](#).

Continuum of Care Reallocation Policy

Minor Fund Shifts

- Specifically applicable to subrecipients with multiple projects
- Limited to <10% of a budget line item
- Original scope of work must be maintained
- These shifts are contained to current funding year
- Executable rapidly, without CoC Board/RFP Committee action

Continuum of Care Reallocation Policy

Recommended Board Action

- Motion to approve the Reallocation Policy as revised, effective 4/22/2026



Continuum of Care Charter

- Update area 1: Conform with current practices
- Update area 2: Incorporate 5 Year Plan
- Update area 3: General document cleanup

*Last updates to the CoC Charter were in September of 2020

Continuum of Care Charter

Conforming with Current Practices

- Attendance Requirement Notifications
- Backfilling of Vacant Positions
- Open Public Meeting Standards
- Subcommittee Reporting to Executive Committee

Continuum of Care Charter

Incorporate 5 Year Plan

- Goals and Objectives
 - Equitable/accountable/transparent response system
 - Prioritize those with the most significant barriers/risk of harm
 - Prevent episodes of homelessness whenever possible
 - House everyone in a stable setting that meets their needs
 - Strengthen the homeless provider workforce

Continuum of Care Charter

Recommended Board Action

- Motion to approve the CoC Charter Revisions, effective 4/22/2026



HMIS Policies and Procedures

- Most recent version approved in October 2025
- Current Update
 - Formatting changes to be compliant with new ADA requirements
 - Language update to be in alignment with state regulations on informed consent
 - Addition of a Data Quality Plan to meet regulatory requirements.

HMIS Policies and Procedures

Recommended Board Action

- Motion to approve the HMIS Policies and Procedure Revisions



Thank you!

CoC Program Competition Reallocation Policy



SPOKANE REGIONAL
Continuum of Care

Spokane Regional Continuum of Care: CoC Projects Reallocation Policy

Purpose

To establish a project reallocation policy for projects funded by the Continuum of Care (CoC) with U.S. Department of Housing and Urban Development (HUD) dollars that allows the Spokane Regional CoC to make strategic and timely improvements to its portfolio of projects.

Reallocation allows the CoC to impact the Homeless Response System by reallocating excess funding or moving funding from lower performing projects. Reallocated funds can either be moved to higher performing projects or new projects. By eliminating or reducing projects that are underperforming or are more appropriately funded by other sources the CoC can create new, evidence-based projects. Reallocation is particularly important to the Homeless Response System when new resources are not available.

Reallocation can be done through either voluntary or involuntary reallocation based on the CoC's published reallocation process. HUD examines and favorably considers a CoC's ratio of reallocation when scoring a CoC's application, as it demonstrates to HUD that CoCs are consistently evaluating the effectiveness of the funding awarded to a CoC's projects and working to ensure that all HUD CoC funded projects are being used to ensure homelessness is rare, brief, and non-recurring. CoC planning grants, Coordinated Entry grants, and HMIS grants are not subject to reallocation.

The CoC will make all funding decisions based on alignment with HUD guidelines, priorities outlined in the 5 Year Plan, performance measures, and unspent project funds.

Reallocation Policy

a. Voluntary Reallocation

A subrecipient, as defined in 24 CFR §578.3, may voluntarily reallocate its existing project by reducing its project's annual renewal amount in whole or in part, as defined in 24 CFR §578. A recipient that voluntarily reallocates an existing project and wishes to create a new, eligible project, may submit a new project application to the Spokane Regional CoC. Solicitation for voluntary reallocation will be made during the annual application process prior to the opening of the CoC competition which typically occurs during the summer or early fall. Solicitation for voluntary reallocation will occur once the Grant Inventory Worksheet (GIW) is released by HUD. If necessary, individual meetings will be scheduled with each participant to discuss project performance, HUD CoC priorities, and other factors that may affect future funding for each project.

b. Involuntary Reallocation

The CoC will make reasonable efforts to ensure that projects are meeting performance standards and fulfilling the requirements of CoC guidelines prior to enforcing involuntary

reallocation. If, after reasonable corrective efforts have been made, there continues to be deficiencies in project performance, then the Spokane Regional CoC may recommend the project for involuntary reallocation.

A determination for involuntary reallocation will be made on the following criteria:

1. **Project Performance** takes into consideration the type of project, its performance relative to that type, using the performance measures described in the Spokane Regional Continuum of Care's Performance Management Plan.
2. **Inventory Utilization and Effectiveness** factors bed/unit operating capacity and cost effectiveness relative to project type and population served. Reallocation will automatically be considered for any project utilizing less than 80% of its bed/unit capacity for either the most recently completed project term/grant year, or the current year's Housing Inventory Count (HIC).
3. **Fund Utilization and Effectiveness** takes into consideration the proportion of a grant award which has been utilized and/or is likely to be utilized by the conclusion of the program year funded by the grant.
 - **Expected fund utilization rates per quarter are:**
 - **End Quarter 1 – Between 15% and 35% of budget expended**
 - **End Quarter 2 – Between 40% and 60% of budget expended**
 - **End Quarter 3 – Between 70% and 80% of budget expended**
 - **Fund utilization that is below the expected rate for a quarter will lead to a financial utilization improvement plan being implemented for the following quarter. Failure to improve to a utilization rate that is within the expected range will result in a reallocation of the portion of project funds that would bring the project's rate of spending into the expected rate**
 - **For example, a project who has spent 34% of it's funds as of quarter 2, would have 6% of its funds moved for reallocation to bring it up to the expected 40% minimum spending rate**
4. **Extent of participation in CMIS (or comparable database)** including but not limited to: bed coverage, data quality, participation in Coordinated Entry, and contribution to System Performance Measures.
 - All CoC-funded programs, including Victim Service Providers (VSPs), are expected to accept housing referrals solely from Coordinated Entry. VSPs may operate a comparable CMIS database but are still required to accept referrals directly from Coordinated Entry for CoC-funded programs.
 - Must contribute to meeting local System Performance Measurement goals, including data quality goals
5. **CoC Funding Priorities** as determined by the most recent CoC Notice of Funding Opportunity (NOFO) and/ or other HUD published priority listings, and NN-CLC determined local funding priorities.

The CoC Funding and RFP Committee, a sub- committee of the Spokane Regional CoC will evaluate all projects requesting funding in consultation with Collaborative Applicant staff, the most recent CoC Program Competition NOFO, HUD System Performance Measures to determine if any projects eligible for renewal should be reduced or eliminated. The Committee makes decisions about involuntary reallocation(s) during the CoC Rating and Ranking Committee meeting and the final Rating and Ranking recommendation is presented to the Spokane Regional CoC for approval.

Recipients who administer a project that has been selected for involuntary reallocation will receive notification, including the reasons for the reallocation, from the Collaborative Applicant

in writing.

c. Reallocation Conditions

For voluntary and/ or involuntary allocations, an entire grant can be reallocated, or a percentage of the grant can be voluntarily or involuntarily reallocated. For voluntary reallocation, the grantee must indicate total percentage or dollar amount of their current award to be reallocated to other projects.

d. Reallocation Appeal Process

Subrecipients selected for involuntary reallocation may appeal the decision in writing to the Spokane Regional CoC within seven (7) business days after notification of selection for involuntary reallocation. The written notification should provide justification for the continued need for the project(s) in question to maintain funding at its current renewal demand.

The RFP Committee in collaboration with the full CoC Board will review all appeals and provide a final recommendation to the subrecipient within fourteen (14) business days of receipt of the appeal.

e. Reallocated Funds

CoC program funds potentially available through involuntary reallocation will be considered for reallocation to existing projects first, followed by the development/request for one or more new projects.

f. Eligible Projects

The CoC may use reallocated funds to create the following projects:

1. New Permanent Supportive Housing (PSH) projects where all beds will be dedicated for use by chronically homeless individuals and families as defined in 24 CFR §578.3,
2. New Rapid Rehousing (RRH) projects for homeless individuals and families who enter directly from the streets or emergency shelters, youth up to age 24, and persons who meet the criteria of paragraph (4) of the definition of homelessness in 24 CFR §578.3,
3. New Joint Component projects which include Transitional Housing (TH) and Rapid Rehousing (RRH) in a single project to serve individuals and families experiencing homelessness, as defined in 24 CFR §578.3,
4. New dedicated Homelessness Management Information System (HMIS) projects as allowed per at 24 CFR §578.3 or
5. Other eligible project types stated in the current year's HUD CoC NOFO.

g. Wind-Down Responsibilities for Reallocated Projects

It is the responsibility of the agency whose original project is being reallocated to successfully place those currently receiving housing into another comparable or better housing and/ or services situation. New projects will accept clients from a project being wound-down if the projects serve the same demographic population(s). The Spokane Regional CoC will assemble a committee to support any projects being wound-down that request assistance from the Board in placing their existing clients into a new housing situation. However, the current grantee bears ultimate responsibility for successful placement of clients impacted by the dissolution of the project being wound-down.