


<b>Policy Title</b>	CoC Grant Significant Change & Amendment Policy
<b>Date Developed/Revised</b>	December 2016
<b>Date Adopted by CoC Board of Directors</b>	December 6, 2016
<b>Signed (CoC Board Chair)</b>	 Megha Takashima

**I. Policy Applies To**

The following policy applies to all recipient and/or sub-recipient organizations that receive HUD Continuum of Care (CoC) funding. The term “CoC funding” replaces the previously used terms “Supportive Housing Program” (SHP) and “Shelter Plus Care” (S+C).

**II. Background**

The Detroit Continuum of Care approves funding for the HUD Continuum of Care (CoC) grants on an annual, competitive basis. CoC grants are awarded based on the content of the grant application, which includes details specific to how the project will be administered and implemented. It is recognized that from time to time, changes need to be made to grants to ensure the projects are able to continue to successfully serve persons in the community.

In order for significant changes to be made to the grant, approval must be given by the entities that initially approved the grant. Therefore, a policy has been established that CoC grantees may not make significant changes to their CoC grants without prior approval of the Detroit CoC Board. After approval of the significant change is given by the CoC Board, the recipient may then proceed with making the request for the change from the local HUD Field Office.

**III. Process for Requesting Significant Change**

CoC grant recipients that desire to request a significant change to their CoC grants must take the following steps:

- 1) Submit the request for change to the CoC Lead Agency. This request will be submitted via the form and format as developed by the CoC Lead Agency. This form will be posted on the CoC Lead Agency website at [www.handetroit.org](http://www.handetroit.org).
- 2) Following receipt of the request for significant change, the CoC Lead Agency will forward the request, and any supporting document if needed, to the CoC Board for their review.
- 3) The CoC Board will decide on whether or not to approve the requested change within ten (10) business days.
- 4) The review and decision making by the CoC Board may occur via email, teleconference call, or in-person.
- 5) Following review and decision by the CoC Board, the CoC Lead Agency will respond in writing to the grant recipient whether the request for change is approved or denied. If the request is denied, rationale will be provided to the grant recipient on the reason for the denial.
- 6) If the request is approved, the grant recipient will contact the HUD Field Office to process the requested grant amendment.
- 7) The grant recipient will not implement any of the requested changes without prior approval from HUD.
- 8) Once approval for the changes is received from HUD, the grant recipient will provide documentation of this approval to the CoC Lead Agency.
- 9) The CoC Lead Agency will inform the CoC Board of the status of requested grant changes, once the request is made to HUD.

#### **IV. Significant Changes**

The above-referenced form and process will be used to request significant changes to a CoC grant, which include the following:

- Change of recipient (grantee)
- Change of sub-recipient (subgrantee)
- Change in project site
- Permanent change in the subpopulation to be served
- A permanent reduction in the total number of units funded under the grant or the number of persons to be served
- Permanent closure of the project funded by the CoC grant
- Grantee voluntary relinquishment of CoC grant
- Other significant changes requiring a grant amendment

#### **V. Grant Amendments Not Requiring CoC Board Approval**

Recipients and subrecipients are reminded that HUD requires a grant amendment for the following:

- Addition or elimination of eligible costs approved for the project
- Shift of more than 10% from one approved eligible cost category to another

If a recipient or subrecipient needs to make one or both of these changes to its project budget, it may do so without prior approval from the CoC Board. It is noted, however, that the project budget will be reviewed at the time of project renewal and additional information supporting the need for the budget change may be requested.

#### **VI. Policy Implications**

Detroit CoC recipients and subrecipients should note that if a grant amendment is requested of HUD, or if other significant changes are made to a project or grant, prior to receiving CoC Board approval, the CoC Board may make the decision to take action against the agency and/or project in question. Depending on the significance of the change made without CoC Board approval, this action may have an impact on further continued CoC funding for the project.

#### **VII. Exceptions and Changes to Policy**

The CoC reserves the right to make an exception to this policy and procedures based on communication from HUD that impact the Continuum of Care's ability to carry out the policy and procedures as described above. The CoC also reserves the right to amend this policy based on either changes to HUD's policies or regulations or changes to other Continuum of Care policies.