

1 FAIRFAX COUNTY CONTINUUM OF CARE OPERATIONS

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42 **COC MEMBERSHIP OVERVIEW**

43  
44 The general CoC body includes any individual or organization that is committed to preventing and  
45 ending homelessness in the Fairfax-Falls Church community. Fairfax County’s CoC strives to ensure that  
46 membership includes a diverse and broad representation of all the necessary voices needed to  
47 accomplish the goal of making homelessness rare, brief and one time. Membership includes  
48 stakeholders, in alignment with 24 CFR Part 578.5, such as:

- Affordable Housing Developer(s) & Advocates
- Businesses
- CDBG/HOME/ESG Entitlement Jurisdiction
- Disability Service Organizations & Advocates
- Domestic Violence Service Providers & Advocates
- Faith Based Organizations
- Homeless or Formerly Homeless Persons
- Hospital(s) & EMS/Crisis Response Team(s)
- Human Trafficking Service Providers
- Law Enforcement
- Lesbian, Gay, Bisexual, Transgender (LGBT) Advocates
- Local Government Staff/Officials
- Local Jail(s)
- Mental Health Service Organizations & Advocates
- Other homeless subpopulation advocates
- Public Housing Authority
- School Administrators/Homeless Liaisons
- Street Outreach Team(s)
- Substance Abuse Service Organizations & Advocates
- Veteran Service Providers
- Universities
- Youth Homeless Organizations & Advocates

49 Members receive information relevant to the CoC, including meeting invitations, funding  
50 opportunities, training opportunities, and CoC updates. Fairfax County’s CoC operates in compliance  
51 with federal nondiscrimination and equal opportunity requirements. The CoC Lead ensures that  
52 meeting spaces are accessible, electronic formats are available to those with visual impairments, TTY is  
53 used to meet the needs of those with hearing impairments, and other disabilities can be  
54 accommodated upon request.

55  
56 **COC MEMBERSHIP INVITATION AND OUTREACH**

57  
58 New members are invited to join the CoC annually through a public invitation process that includes an  
59 announcement through Fairfax County’s Office to Prevent and End Homelessness’ listserv, which is  
60 accessible through Fairfax County’s website. Membership invitations are shared throughout the year  
61 with any new agency or individual that becomes involved in homeless services or that the CoC Lead  
62 agency is made aware of. The CoC encourages organizations serving culturally specific communities  
63 experiencing homelessness (including but not limited to Black, Latino, Indigenous, other People of  
64 Color, persons with disabilities, etc.), to join the CoC.

65  
66 **COC MEETINGS**

67  
68 Fairfax County’s CoC will hold meetings offered to full membership and other interested parties at  
69 least twice per year in which the date, time, and agenda will be made publicly available.

70 **COC LEAD AGENCY**

71  
72 The Office to Prevent and End Homelessness (OPEH) manages and coordinates the homeless services  
73 system as the CoC Lead Agency. OPEH was established in 2008 to serve as staff to the Continuum of  
74 Care and its governance. In this capacity, collaborates with other county agencies, non-profits, faith  
75 and business communities, and those with lived experience of homelessness to support the  
76 achievement of the community-wide vision that every person in the community can access and  
77 maintain safe and affordable housing.

- 78  
79 OPEH has the following roles, responsibilities, and functions:
- 80  As the Collaborative Applicant and CoC Lead Agency, OPEH submits the CoC Registration, CoC  
81 Consolidated Application (which includes the CoC Application and CoC Priority Listing), and applies  
82 for CoC planning funds on behalf of the CoC during the CoC Program Competition
  - 83  Manages, coordinates, and monitors the day-to-day implementation of the strategic plan to end  
84 homelessness, including system-wide evaluation of the community's response to homelessness
  - 85  Manages the Coordinated Entry System as well as the development and maintenance of the  
86 Coordinated Entry System policies.
  - 87  Provides the information required to complete the Consolidated Plan(s) for the geographic area
  - 88  Oversees the ESG funding, including the allocation of ESG and monitoring of subrecipients; serve as  
89 the applicant for ESG allocated through the State
  - 90  Coordinates a Point-in-Time Count, at least annually, to identify the number of people experiencing  
91 sheltered and unsheltered homelessness and complies with other requirements established by  
92 HUD by Notice, including the annual FY CoC Program NOFA (NOFO).
  - 93  Prepares and submits any system-wide HUD reports required of the CoC, including but not limited  
94 to the Annual Homeless Assessment Report (AHAR), Longitudinal Systems Analysis (LSA), System  
95 Performance Measures (SPMs), Point in Time Count (PIT), and Housing Inventory Count (HIC), and  
96 Consolidated Annual Performance and Evaluation Report (CAPER).
  - 97  Coordinates an annual gaps analysis of the homeless needs and services available within its  
98 geographic area, which includes a housing inventory.
  - 99  Oversees the invitation of new membership to the CoC (see section 12)
  - 100  Coordinates the bi-annual CoC meetings (see section 12)
  - 101  Acts on behalf of the CoC in the absence of a functioning CoC Committee.

102  
103 **HMIS LEAD AGENCY**

- 104  
105 The Office to Prevent and End Homelessness (OPEH), as the HMIS Lead Agency, has the following roles,  
106 responsibilities and functions:
- 107  Staffs the management of the HMIS;
  - 108  Designates a single HMIS to be used by the CoC to meet HUD's data collection, management, and  
109 reporting standards;

- 110  Reviews the comparable database(s) proposed to be used by domestic violence homeless projects,  
111 including any ongoing enhancements, to assess for compliance with HUD Data Standards prior to  
112 selection and implementation;
- 113  Provides oversight of the day-to-day administration of the HMIS system and any necessary  
114 corrective action to ensure that the partners comply with federal requirements of HMIS;
- 115  Maintains written HMIS Policies and Procedures and monitor to support compliance;
- 116  Ensures HMIS data element collection is compliant with the current HMIS Data Standards, Data  
117 Dictionary and corresponding Program Manuals;
- 118  Develops security and privacy policies including Data Sharing Agreements and HMIS End-User  
119 Agreements;
- 120  Executes and maintains a written HMIS Agency Participation Agreement with each Agency,  
121 including the requirements of the security plan and privacy policy with which the Participating  
122 Agency must abide;
- 123  Provides training resources and technical support on the HMIS application, requirements, security,  
124 and privacy policies;
- 125  Develops Data Quality processes for partners to maintain high-quality data completion and  
126 accuracy;
- 127  Encourages and supports partner participation;
- 128  Ensures HMIS application is capable of producing required reporting;
- 129  Produces system-wide reporting required by HUD;
- 130  Ensures HMIS system integrity and availability;
- 131  Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end  
132 users, program managers, agency executive directors, and homeless persons.

### 133 134 **HUD COC PROGRAM: MONITORING & EVALUATION**

135  
136 **Purpose.** To ensure effective and efficient use of their region’s HUD Continuum of Care (CoC) Program  
137 Funding, all recipients of HUD CoC Program funding in the Fairfax CoC are monitored annually by  
138 Fairfax County’s Office to Prevent and End Homelessness (OPEH), the CoC’s Lead Agency.

139  
140 **Monitoring & Evaluation Tool and Scoring.** The Monitoring & Evaluation Tool used by the CoC is  
141 designed to provide a comprehensive review of the agency and project and includes agency capacity,  
142 compliance with federal regulations, use of the federal funding (including fully spending the HUD CoC  
143 Program dollars), housing capacity and utilization, implementation of best practices connected to  
144 services and policies, data quality, and outcomes.

145  
146 The data is based on the Annual Performance Report (APR) the project submits to HUD and includes  
147 several of the System Performance Measures<sup>1</sup> (numbers served, length of time experiencing

---

<sup>1</sup> [System Performance Measures - HUD Exchange](#)

148 homelessness, employment and income, exits to permanent housing). The Tool highlights the priorities  
149 and strategic directions of both HUD and the Fairfax County CoC.

150  
151 A Monitoring & Evaluation Tool must be completed for each individual project and submitted to OPEH  
152 by the established Monitoring & Evaluation schedule. OPEH reviews and scores each Tool. Scoring  
153 methodology is outlined directly in the Tool for transparency. The score is used by the Selection &  
154 Ranking Subcommittee to (1) accept renewal projects for inclusion in the CoC's Application, and (2)  
155 develop the CoC Priority List (ranking) during the annual competition for HUD CoC Program funding.

156  
157 **Monitoring & Evaluation Workgroup.** OPEH, the CoC Lead Agency, is responsible for facilitating the  
158 Monitoring & Evaluation process, which includes convening the Monitoring & Evaluation Workgroup.  
159 The Monitoring & Evaluation Workgroup is comprised of recipients of HUD CoC Program funding as  
160 well as other non-profit representatives and community members that are a part of the CoC. The  
161 Monitoring & Evaluation Workgroup is responsible for reviewing and updating the Monitoring &  
162 Evaluation Tool annually. After the annual Monitoring & Evaluation Tools have been submitted to  
163 OPEH and scored, the Monitoring & Evaluation Workgroup reviews the results monitoring (with  
164 identifying names of agencies and projects omitted) to ensure integrity of process.

## 165 166 **HUD COC PROGRAM: REALLOCATION**

167  
168 **Purpose.** The Fairfax County CoC is committed to maximizing the effectiveness of the financial  
169 resources to house as many individuals and families as possible. To that end, reallocation of existing  
170 resources is a tool that may be used.

171  
172 **Reallocation Definition.** Reallocation is a process to shift funds, in whole or part, from existing eligible  
173 renewal projects to create one or more new projects, or to expand eligible renewal projects, without  
174 decreasing the CoC's ARD. New projects or expanded projects created through reallocation must meet  
175 the requirements set forth in the HUD CoC Program Interim Rule<sup>2</sup> and related HUD CoC Program  
176 Notice of Funding Availability or Opportunity. Reallocation action will be taken with the goal of  
177 alignment with the HUD and HEARTH ACT<sup>3</sup> policy guidance, performance criteria specified in the  
178 annual HUD NOFA or NOFO with emphasis on local needs, data, and project performance.

### 179 180 **Types of Reallocation**

181  
182 **A. Voluntary Reallocation.** OPEH will ask HUD CoC Program grantees annually of their interest in  
183 voluntarily reallocating funding, in whole or part, during the annual review of the Grant Inventory  
184 Worksheet (GIW). Agencies should consider (1) if the project is continuing to improve the homeless  
185 services system, and (2) if 100% of the HUD CoC Program funding was used in the latest operating

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<sup>2</sup> [CoC Program Interim Rule - HUD Exchange](#)

<sup>3</sup> [Homeless Emergency Assistance and Rapid Transition to Housing Act - HUD Exchange](#)

186 year. HUD CoC Program grantees should notify OPEH in writing of their intent to reallocate by the  
187 deadline established each year.

188  
189 **B. Performance Based Reallocation.** Performance-based reallocation of HUD CoC Program funding  
190 may be considered when projects are determined to be underperforming or do not contribute  
191 substantially to meeting the goals of the Continuum of Care for preventing or ending  
192 homelessness. The Monitoring & Evaluation Tool will be used to identify projects that produce the  
193 lowest scores. The projects that produce the lowest scores will be notified in writing by the Fairfax  
194 County's Office to Prevent and End Homelessness (OPEH), the CoC's Lead Agency, of the need to  
195 improve their performance. The project will develop a plan to improve performance. As needed,  
196 OPEH will conduct a more intensive monitoring process with projects producing low scores,  
197 including but not limited to file reviews and technical assistance. Projects that do not improve  
198 scores the following year may be considered for reallocation by the Selection & Ranking  
199 Subcommittee.

200

#### 201 **HUD COC PROGRAM: SIGNIFICANT PROJECT CHANGES**

202

203 **Background.** Section 578.105 of the HUD CoC Program Interim Rule sets forth the parameters for  
204 grant and project changes. Paragraph (b) defines significant project changes as:

- 205  a change of recipient,
- 206  a change of project site,
- 207  additions or deletions in the types of eligible activities approved for a project,
- 208  a shift of more than 10 percent from one approved eligible activity to another eligible activity,
- 209  a reduction in the number of units, and
- 210  a change in the subpopulation served.

211

212 OPEH should be notified in the event the project assesses the need to make any of the  
213 aforementioned changes. The significant change must be necessary to better serve the program  
214 participants and continue to meet local priorities established. The significant change must be  
215 submitted to the HUD Field Office for approval as per the HUD CoC Program Interim Rule.

216

217 **Reasons a Recipient May Change.** A change of recipients may be requested in the following  
218 scenarios,<sup>4</sup> including but not limited to:

- 219  A recipient agency chooses to no longer continue administering the CoC Program grant,
- 220  A recipient agency is no longer able to administer the CoC Program grant,
- 221  A CoC decides that a recipient agency should no longer be allowed to administer the CoC  
222 Program grant. This could be due to a history of monitoring findings, and poor performance, for  
223 example.

224

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<sup>4</sup> [Key Considerations for CoCs in Changing Recipients \(hudexchange.info\)](http://hudexchange.info)

225 **Assessing Project Design.** Fairfax County’s Office to Prevent and End Homelessness (OPEH), the  
226 CoC’s Lead Agency, will use the Monitoring & Evaluation Tool data to determine if the project  
227 meets the threshold to continue to be funded as originally designed or if reallocation should be  
228 considered. The reallocation process will be followed should it be determined that the project is  
229 under-performing or not meeting community needs identified through the gaps analysis.

230

### 231 **Identifying a New Subrecipient**

232

233 **A. Subrecipient.** If a subrecipient is currently involved in the operation of the project and there is  
234 no current audit or monitoring issues, the subrecipient will be given automatic preference to  
235 assume operations of the project as the recipient. This is intended to reduce the disruption to  
236 program participants. Fairfax County’s Office to Prevent and End Homelessness (OPEH), the  
237 CoC’s Lead Agency, has the authority to approve the transition.

238

239 **B. New Applicants.** If there are no subrecipient(s) involved or interested in serving as the  
240 recipient, the CoC will be notified of the opportunity to apply to operate the existing project.  
241 Applicants will be considered based on their eligibility to administer HUD CoC Program funding,  
242 organizational and financial capacity, expertise in serving the target population, and experience  
243 in administering federal grant funds. The Selection & Ranking Subcommittee will be responsible  
244 for selecting the new recipient and will follow the process established for selecting applicants  
245 for new funding opportunities.

246

247 **Coordination with the HUD Field Office.** Once a new recipient agency has been selected by the  
248 CoC, a request must be submitted in writing to the HUD Field Office for a significant change to the  
249 project application. The request should include a description of how the new recipient will continue  
250 to administer the grant. The request must also have documentation verifying the new recipient is a  
251 CoC Program eligible applicant. The HUD Field Office may review any outstanding financial audits,  
252 monitoring findings, results from investigations by the Office of the Inspector General, or other  
253 documents to ensure that there are no capacity issues. HUD must approve this change and execute  
254 a grant agreement amendment before the new recipient can begin operating the project.

255

### 256 **HUD COC PROGRAM: NEW FUNDING OPPORTUNITIES**

257

258 The NOFA or NOFO for the HUD CoC Program competition notes that CoCs may use up to 5 percent of  
259 their Final Pro Rata Need (FPRN), or 25 percent of the CoC’s Preliminary Pro Rata Need (PPRN) minus  
260 its Annual Renewal Demand (ARD), whichever is greater to create one or more new project  
261 applications for the following types of projects: PH-PSH, PH-RRH, Joint TH and PH-RRH component,  
262 HMIS, and SSO-CE.

263

264 Once the NOFA or NOFO is released for the annual competition, Fairfax County’s Office to  
265 Prevent and End Homelessness (OPEH), the CoC’s Lead Agency, notifies the community of the

266 opportunity to apply for new funding, including the amount of funding available, the eligible  
 267 project type, as well as the criteria developed to evaluate the applications. The CoC’s gaps  
 268 analysis is used to identify local priorities.

269  
 270 The Selection & Ranking Subcommittee reviews the applications submitted for the new funding  
 271 opportunities and selects the new project(s) to move forward in the CoC’s Consolidated  
 272 Application. All applicants are notified in writing whether or not their applications were  
 273 accepted for inclusion in the CoC Consolidated Application and ranked on the CoC Priority  
 274 Listing at least 15 days before the close of the HUD CoC Program competition or in accordance  
 275 with the expectations defined in the NOFA or NOFO.

276  
 277 **HUD COC PROGRAM: COC PRIORITY LIST**

278  
 279 As part of the annual COC competition, each CoC is required to submit a project list to HUD that  
 280 includes its new and renewal projects in order of priority. Projects high on the list are likely to be  
 281 funded by HUD while projects lowest on the list run the risk of not receiving funding.

282  
 283 The Monitoring & Evaluation Tool score is the primary consideration in determining (1) if  
 284 renewal projects should be included in the CoC’s Consolidated Application and, (2) the order of  
 285 the projects in the CoC Priority List. The Monitoring & Evaluation Tool demonstrates a  
 286 preference to projects that fully utilize the federal funding, adhere to best practices, and  
 287 achieve the highest outcomes. Each project application, including both new and renewal  
 288 projects, must clearly demonstrate that it is meeting the needs of the homeless services  
 289 system, is contributing to ending homelessness in the CoC, and aligns with the local priorities  
 290 identified through the annual gaps analysis. The Selection & Ranking Subcommittee is  
 291 responsible for developing the CoC Priority List and uses the following approach:  
 292

| # | Project Type                  | Ranking Approach   | Ranking Approach Justification   |
|---|-------------------------------|--|--|
| 1 | Renewal Projects              | Ranked first in order of Monitoring & Evaluation (M&E) Score (highest to lowest) | All Renewal Projects will be ranked above New Projects IF assessed to meet community need and M&E threshold.   |
| 2 | Reallocation                  | <i>If expansion project:</i> rank directly below Renewal Project being expanded  | Reallocation is a shift of existing renewal funding. If the reallocation is an expansion, should be ranked directly below the project it is expanding. |
| 3 | 1 <sup>st</sup> Time Renewals | Ranked below Renewal Projects, above New Projects                                | Only Renewal Project(s) not in operation. Rank below renewals IF all Renewal Projects are assessed to meet community need and M&E threshold.           |



|   |              |  |   |
|---|--------------|--|---|
| 4 | New Projects | Rank below Renewal, Reallocation (if expansion), and 1 <sup>st</sup> Time Renewals | Bonus projects should be ranked in order of score according to the New Project Application and in accordance with local priorities established. |
|---|--------------|--|---|

293

294 **EMERGENCY SOLUTIONS GRANT (ESG)**

295

296 **Background.** The Emergency Solutions Grants Program (ESG) is a federal block grant authorized by  
 297 subtitle B of the McKinney Vento Homelessness Assistance Act. ESG is funded by the US Department  
 298 of Housing and Urban Development and, as an urban county, Fairfax County is a recipient. The grant  
 299 funding is administered by the Office to Prevent and End Homelessness in the Department of  
 300 Housing and Community Development.

301

302 The Code of Federal Regulations § 576.400(a) states that recipients “must consult with each  
 303 Continuum of Care that serves the recipient's jurisdiction in determining how to allocate ESG funds  
 304 each program year; developing the performance standards for, and evaluating the outcomes of,  
 305 projects and activities assisted by ESG funds; and developing funding, policies, and procedures for  
 306 the administration and operation of the HMIS.” The following document articulates the Fairfax  
 307 Continuum of Care’s (CoC) recommendations for allocating annual ESG funding. Additional  
 308 recommendations regarding the performance standards, outcomes, and HMIS will be developed at a  
 309 later date.

310

311 **Priorities.** ESG is the largest source of rental assistance and financial assistance supporting  
 312 homelessness prevention and rapid rehousing in Fairfax County. Both project types are critical  
 313 strategies to prevent and end homelessness in the Fairfax CoC therefore the CoC recommends that  
 314 ESG funding remains limited to the homelessness prevention and rapid rehousing ESG program  
 315 components, along with eligible administrative activities. The recommendation only applies to the  
 316 regular annual award and does not apply to supplemental ESG funding, such as the grant funding  
 317 appropriated through the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

318

319 **Allocation Approach.** The Fairfax CoC recommends that ESG funding is awarded to subrecipients  
 320 contracted by the Office to Prevent and End Homelessness to provide homelessness prevention and  
 321 rapid rehousing assistance. The following steps are recommended by the CoC to determine the  
 322 percentage of ESG funding allocated to each subrecipient annually:

- 323  Homeless Management Information System (HMIS) data should be used to identify the number of  
 324 individuals served in the most recently completed fiscal year by each subrecipient in project types  
 325 eligible for rapid rehousing (emergency shelters including overflow, hotel, and hypothermia  
 326 prevention, as well as street outreach). The individuals should be de-duplicated by subrecipient  
 327 agency.

- 328  HMIS data should also be used to identify the number of individuals served in the most recently  
329 completed fiscal year by each subrecipient in homelessness prevention. The individuals should be  
330 de-duplicated by subrecipient agency.
- 331  The number of individuals served in projects eligible for rapid rehousing and in homelessness  
332 prevention are combined. The subrecipient should be awarded a percentage of the total ESG  
333 funding based on the percentage of clients each subrecipient serves.
- 334  Because not all providers contracted through Fairfax County's Office to Prevent and End  
335 Homelessness to operate homelessness prevention and rapid rehousing projects receive the  
336 allocation of ESG funding awarded by the Commonwealth of Virginia through the Virginia  
337 Homeless Solutions Program (VHSP), the VHSP rental assistance funding is combined to the ESG  
338 rental assistance prior to applying the percentages. This helps ensure that funding for  
339 homelessness prevention and rapid rehousing rental and financial assistance from the largest and  
340 second largest sources are distributed equitably across Fairfax County.

341

#### 342 VIRGINIA HOMELESS SOLUTIONS GRANT (VHSP)

343

344 **Background.** Virginia Homeless Solutions Program (VHSP) is administered by the Virginia Department  
345 of Housing and Community Development (DHCD) Homeless and Special Needs Housing (HSNH)  
346 division to support the development and implementation of localized emergency crisis response  
347 systems and to ensure homelessness is rare, brief, and non-recurring through coordinated  
348 community-based activities. Fairfax County's Office to Prevent and End Homelessness in the  
349 Department of Housing and Community Development applies for the funding on behalf of the  
350 Continuum of Care as the CoC Lead Agency. The role of the CoC, as defined in the Virginia HSNH  
351 Funding Guidelines, is to promote a community-wide goal of ending homelessness, provide funding  
352 for efforts to rehouse those who are homeless, promote access to mainstream programs, and  
353 optimize housing stabilization. The responsibilities include governance and structure, system  
354 coordination and planning, designating and operating the HMIS, and designing a coordinated entry  
355 system.

356

357 **Priorities.** VHSP is the second largest rental assistance resource in Fairfax County used for both  
358 Homelessness Prevention and Rapid Rehousing. Both project types represent critical strategies to  
359 prevent in end homelessness in the Fairfax Continuum of Care and therefore the use of VHSP funding  
360 is limited to Homelessness Prevention, Rapid Rehousing, and eligible Administrative Activities.

361

362 **Grantees.** Because the CoC has the ability to consider both ESG and VHSP in the allocation of funding,  
363 the application submitted by Fairfax County's Office to Prevent and End Homelessness will be limited  
364 to existing grantees contracted through Fairfax County's Office to Prevent and End Homelessness to  
365 operate homelessness prevention and rapid rehousing projects. In the event that there is a change in  
366 contracted providers, the allocation will be transitioned to the new provider in the next renewal or  
367 application for VHSP funding.