# FAIRFAX COUNTY CONTINUUM OF CARE OPERATIONS

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COC MEMBERSHIP OVERVIEW

The general CoC body includes any individual or organization that is committed to preventing and ending homelessness in the Fairfax-Falls Church community. Fairfax County’s CoC strives to ensure that membership includes a diverse and broad representation of all the necessary voices needed to accomplish the goal of making homelessness rare, brief and one time. Membership includes 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

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

COC MEMBERSHIP INVITATION AND OUTREACH

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

COC MEETINGS

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

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

OPEH has the following roles, responsibilities, and functions:

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

HMIS LEAD AGENCY

The Office to Prevent and End Homelessness (OPEH), as the HMIS Lead Agency, has the following roles, responsibilities and functions:

- Staffs the management of the HMIS;
- Designates a single HMIS to be used by the CoC to meet HUD’s data collection, management, and reporting standards;
Reviews the comparable database(s) proposed to be used by domestic violence homeless projects, including any ongoing enhancements, to assess for compliance with HUD Data Standards prior to selection and implementation;

- Provides oversight of the day-to-day administration of the HMIS system and any necessary corrective action to ensure that the partners comply with federal requirements of HMIS;

- Maintains written HMIS Policies and Procedures and monitor to support compliance;

- Ensures HMIS data element collection is compliant with the current HMIS Data Standards, Data Dictionary and corresponding Program Manuals;

- Develops security and privacy policies including Data Sharing Agreements and HMIS End-User Agreements;

- Executes and maintains a written HMIS Agency Participation Agreement with each Agency, including the requirements of the security plan and privacy policy with which the Participating Agency must abide;

- Provides training resources and technical support on the HMIS application, requirements, security, and privacy policies;

- Develops Data Quality processes for partners to maintain high-quality data completion and accuracy;

- Encourages and supports partner participation;

- Ensures HMIS application is capable of producing required reporting;

- Produces system-wide reporting required by HUD;

- Ensures HMIS system integrity and availability;

- Manages and maintains mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons.

**HUD COC PROGRAM: MONITORING & EVALUATION**

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

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

The data is based on the Annual Performance Report (APR) the project submits to HUD and includes several of the System Performance Measures\(^1\) (numbers served, length of time experiencing

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\(^1\) [System Performance Measures - HUD Exchange](https://www.huduser.gov/)
homelessness, employment and income, exits to permanent housing). The Tool highlights the priorities and strategic directions of both HUD and the Fairfax County CoC.

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

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

HUD COC PROGRAM: REALLOCATION

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

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

Types of Reallocation

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

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\(^2\) [COC Program Interim Rule](https://exchange.hud.gov) - HUD Exchange

\(^3\) [Homeless Emergency Assistance and Rapid Transition to Housing Act](https://exchange.hud.gov) - HUD Exchange
B. Performance Based Reallocation. Performance-based reallocation of HUD CoC Program funding may be considered when projects are determined to be underperforming or do not contribute substantially to meeting the goals of the Continuum of Care for preventing or ending homelessness. The Monitoring & Evaluation Tool will be used to identify projects that produce the lowest scores. The projects that produce the lowest scores will be notified in writing by the Fairfax County's Office to Prevent and End Homelessness (OPEH), the CoC’s Lead Agency, of the need to improve their performance. The project will develop a plan to improve performance. As needed, OPEH will conduct a more intensive monitoring process with projects producing low scores, including but not limited to file reviews and technical assistance. Projects that do not improve scores the following year may be considered for reallocation by the Selection & Ranking Subcommittee.

HUD COC PROGRAM: SIGNIFICANT PROJECT CHANGES

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

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

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

Reasons a Recipient May Change. A change of recipients may be requested in the following scenarios, including but not limited to:

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

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

**Identifying a New Subrecipient**

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

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

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

**HUD CoC Program: New Funding Opportunities**

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

Once the NOFA or NOFO is released for the annual competition, Fairfax County’s Office to Prevent and End Homelessness (OPEH), the CoC’s Lead Agency, notifies the community of the
opportunity to apply for new funding, including the amount of funding available, the eligible project type, as well as the criteria developed to evaluate the applications. The CoC’s gaps analysis is used to identify local priorities.

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

HUD COC PROGRAM: COC PRIORITY LIST

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

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

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

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

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

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

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

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

The number of individuals served in projects eligible for rapid rehousing and in homelessness prevention are combined. The subrecipient should be awarded a percentage of the total ESG funding based on the percentage of clients each subrecipient serves.

Because not all providers contracted through Fairfax County’s Office to Prevent and End Homelessness to operate homelessness prevention and rapid rehousing projects receive the allocation of ESG funding awarded by the Commonwealth of Virginia through the Virginia Homeless Solutions Program (VHSP), the VHSP rental assistance funding is combined to the ESG rental assistance prior to applying the percentages. This helps ensure that funding for homelessness prevention and rapid rehousing rental and financial assistance from the largest and second largest sources are distributed equitably across Fairfax County.

VIRGINIA HOMELESS SOLUTIONS GRANT (VHSP)

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

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

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