



FAIRFAX - FALLS CHURCH COMMUNITY PARTNERSHIP Continuum of Care Operations Policies

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15 SECTION 1: COC MEMBERSHIP OVERVIEW

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

20 Membership includes stakeholders, in alignment with 24 CFR Part 578.5, such as:

- | | | | |
|----|---------------------------------------|----|------------------------------------|
| 21 | • Affordable Housing Developer(s) & | 39 | • Advocates |
| 22 | Advocates | 40 | • Local Government Staff/Officials |
| 23 | • Businesses | 41 | • Local Jail(s) |
| 24 | • CDBG/HOME/ESG Entitlement | 42 | • Mental Health Service |
| 25 | Jurisdiction | 43 | Organizations & Advocates |
| 26 | • Disability Service Organizations & | 44 | • Other homeless subpopulation |
| 27 | Advocates | 45 | advocates |
| 28 | • Domestic Violence Service Providers | 46 | • Public Housing Authority |
| 29 | & Advocates | 47 | • School Administrators/Homeless |
| 30 | • Faith Based Organizations | 48 | Liaisons |
| 31 | • Homeless or Formerly Homeless | 49 | • Street Outreach Team(s) |
| 32 | Persons | 50 | • Substance Abuse Service |
| 33 | • Hospital(s) & EMS/Crisis Response | 51 | Organizations & Advoca |
| 34 | Team(s) | 52 | • Veteran Service Providers |
| 35 | • Human Trafficking Service Providers | 53 | • Universities |
| 36 | • Law Enforcement | 54 | • Youth Homeless Organizations & |
| 37 | • Lesbian, Gay, Bisexual, Transgender | 55 | Advocates |
| 38 | (LGBT) | | |

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

62 SECTION 2: COC MEMBERSHIP INVITATION AND OUTREACH

63 New members are invited to join the CoC annually through a public invitation process that
64 includes an announcement through Fairfax County’s Office to Prevent and End Homelessness’
65 email newsletter, which is accessible through Fairfax County’s website. Membership
66 invitations are shared throughout the year with any new agency or individual that becomes
67 involved in homeless services or that the CoC Collaborative Applicant and Lead agency is



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68 made aware of. The CoC encourages organizations serving culturally specific communities
69 experiencing homelessness (including but not limited to Black, Latino, Indigenous, other
70 People of Color, persons with disabilities, etc.), to join the CoC.

71 SECTION 3: COC MEETINGS

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

75 SECTION 4: COC LEAD AGENCY

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

82 OPEH has the following roles, responsibilities, and functions:

- 83 • As the Collaborative Applicant and CoC Lead Agency, OPEH submits the CoC
84 Registration, CoC Consolidated Application (which includes the CoC Application and
85 CoC Priority Listing), and applies for CoC planning funds on behalf of the CoC during
86 the CoC Program Competition
- 87 • Manages, coordinates, and monitors the day-to-day implementation of the strategic
88 plan to end homelessness, including system-wide evaluation of the community's
89 response to homelessness.
- 90 • Manages the Coordinated Entry System as well as the development and maintenance
91 of the Coordinated Entry System policies.
- 92 • Provides the information required to complete the Consolidated Plan(s) for the
93 geographic area.
- 94 • Oversees the ESG funding, including the allocation of ESG and monitoring of
95 subrecipients; serve as the applicant for ESG allocated through the State.
- 96 • Coordinates a Point-in-Time Count, at least annually, to identify the number of people
97 experiencing sheltered and unsheltered homelessness and complies with other
98 requirements established by HUD by Notice, including the annual CoC Program Notice
99 of Funding Opportunity (NoFO).
- 100 • Prepares and submits any system-wide HUD reports required of the CoC, including but
101 not limited to the Annual Homeless Assessment Report (AHAR), Longitudinal Systems
102 Analysis (LSA), System Performance Measures (SPMs), Point in Time Count (PIT), and



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- 103 Housing Inventory Count (HIC), and Consolidated Annual Performance and Evaluation
104 Report (CAPER).
- 105 • Coordinates an annual gaps analysis of the homeless needs and services available
106 within its geographic area, which includes a housing inventory.
 - 107 • Oversees the invitation of new membership to the CoC (see section 2)
 - 108 • Coordinates the bi-annual CoC meetings (see section 3)
 - 109 • Acts on behalf of the CoC in the absence of a functioning CoC Board.

110 SECTION 5: HOMELESS MANAGEMENT INFORMATION SYSTEM (HMIS) LEAD AGENCY

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

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



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140 SECTION 6: HUD COC PROGRAM: MONITORING & EVALUATION

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

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

150 The data is based on the Annual Performance Report (APR) the project submits to HUD and
151 includes several of the System Performance Measures (numbers served, length of time
152 experiencing homelessness, employment and income, exits to permanent housing). The Tool
153 highlights the priorities and strategic directions of both HUD and the Fairfax CoC.

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

160 **Monitoring & Evaluation Workgroup.** OPEH, the CoC Lead Agency, is responsible for
161 facilitating the Monitoring & Evaluation process, which includes convening the Monitoring &
162 Evaluation Workgroup.

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

170 SECTION 7: HUD COC PROGRAM: REALLOCATION

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



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

182 **Types of Reallocation:**

183 **A. Voluntary Reallocation.** OPEH will ask HUD CoC Program grantees annually of their
184 interest in voluntarily reallocating funding, in whole or part, during the annual review
185 of the Grant Inventory Worksheet (GIW). Agencies should consider (1) if the project is
186 continuing to improve the homeless services system, and (2) if 100% of the HUD CoC
187 Program funding was used in the latest operating year. HUD CoC Program grantees
188 should notify OPEH in writing of their intent to reallocate by the deadline established
189 each year.

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

202 **SECTION 8: HUD COC PROGRAM: SIGNIFICANT PROJECT CHANGES**

203 **Background.** Section 578.105 of the HUD CoC Program Interim Rule sets forth the parameters
204 for 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
209 activity,



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- 210 • a reduction in the number of units, and
211 • a change in the subpopulation served.

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
214 program participants and continue to meet local priorities established. The significant change
215 must be submitted to the HUD Field Office for approval as per the HUD CoC Program Interim
216 Rule.

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

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

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

231 **Identifying a New Recipient**

- 232 **A. Subrecipient.** If a subrecipient is currently involved in the operation of the project and
233 there is no current audit or monitoring issues, the subrecipient will be given automatic
234 preference to assume operations of the project as the recipient. This is intended to
235 reduce the disruption to program participants. Fairfax County’s Office to Prevent and
236 End Homelessness (OPEH), the CoC’s Lead Agency, has the authority to approve the
237 transition.
- 238 **B. New Applicants.** If there are no subrecipient(s) involved or interested in serving as the
239 recipient, the CoC will be notified of the opportunity to apply to operate the existing
240 project. Applicants will be considered based on their eligibility to administer HUD CoC
241 Program funding, organizational and financial capacity, expertise in serving the target
242 population, and experience in administering federal grant funds. The Selection &
243 Ranking Subcommittee will be responsible for selecting the new recipient and will
244 follow the process established for selecting applicants for new funding opportunities.



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

254 SECTION 9: HUD COC PROGRAM: NEW FUNDING OPPORTUNITIES

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

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

265 The Selection & Ranking Subcommittee reviews the applications submitted for the new
266 funding opportunities and selects the new project(s) to move forward in the CoC's
267 Consolidated

268 **Application.** All applicants are notified in writing whether or not their applications were
269 accepted for inclusion in the CoC Consolidated Application and ranked on the CoC Priority
270 Listing at least 15 days before the close of the HUD CoC Program competition or in
271 accordance with the expectations defined in the NOFO.

272 SECTION 10: HUD COC PROGRAM: COC PRIORITY LIST

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

277 The Monitoring & Evaluation Tool score is the primary consideration in determining (1) if
278 renewal projects should be included in the CoC's Consolidated Application and, (2) the order
279 of the projects in the CoC Priority List. The Monitoring & Evaluation Tool demonstrates a



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280 preference to projects that fully utilize the federal funding, adhere to best practices, and
 281 achieve the highest outcomes. Each project application, including both new and renewal
 282 projects, must clearly demonstrate that it is meeting the needs of the homeless services
 283 system, is contributing to ending homelessness in the CoC, and aligns with the local priorities
 284 identified through the annual gaps analysis. The Selection & Ranking Subcommittee is
 285 responsible for developing the CoC Priority List and uses the following approach:

#	Project Type	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	1st 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 1st Time Renewals.	Bonus projects should be ranked in order of score according to the New Project Application and in accordance with local priorities established.

286

287 SECTION 11: EMERGENCY SOLUTIONS GRANT (ESG)

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

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



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

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

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

319 HMIS data should also be used to identify the number of individuals served in the most
320 recently completed fiscal year by each subrecipient in homelessness prevention. The
321 individuals should be de-duplicated by subrecipient agency.

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

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

332 SECTION 12: VIRGINIA HOMELESS SOLUTIONS GRANT (VHSP)

333 **Background.** Virginia Homeless Solutions Program (VHSP) is administered by the Virginia
334 Department of Housing and Community Development (DHCD) Homeless and Special Needs
335 Housing (HSNH) division to support the development and implementation of localized



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336 emergency crisis response systems and to ensure homelessness is rare, brief, and non-
337 recurring through coordinated community-based activities. Fairfax County's Office to Prevent
338 and End Homelessness in the Department of Housing and Community Development applies for
339 the funding on behalf of the Continuum of Care as the CoC Lead Agency. The role of the CoC,
340 as defined in the Virginia HSNH Funding Guidelines, is to promote a community-wide goal of
341 ending homelessness, provide funding for efforts to rehouse those who are homeless,
342 promote access to mainstream programs, and optimize housing stabilization. The
343 responsibilities include governance and structure, system coordination and planning,
344 designating and operating the HMIS, and designing a coordinated entry system.

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

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