Central Virginia Continuum of Care
Review and Ranking Policies
HUD CoC Competition FY2016

Ranking and Review Policy

The ad hoc Ranking and Review Committee will convene upon organizations’ submission of their project application to review and prioritize projects based on the following factors:

• Review of Project Application

  The project’s application will be reviewed to ensure compliance with Housing First, alignment with HUD priorities, commitment to best practices, capacity to administer the project and demonstration of fiduciary responsibility.

  Completed for all project applications.

• New Project Eligibility Checklist (See Attachment 1)

  To help ensure compliance with regulatory guidelines and local competition requirements, all organizations applying for new project funds under the HUD CoC Competition must demonstrate they meet the New Project Eligibility checklist.

  Completed for new project applications only.

• Project Scorecard (Attachment 2) and Monitoring Visit (Attachment 3)

  As the project performance outcomes have recently been developed by the CVCoC, renewal projects will be evaluated based on HUD’s performance measures relative to the project type and the annual project report submitted to the Board by the Monitoring and Evaluation Committee. Applicants will complete and submit their project’s scorecard.

  Completed for renewal applications only with the exception of HMIS projects.

• Project Annual Performance Report (APR)

  Performance will be evaluated using data from the project’s most recent APR submitted for the last full operating year including match, utilization, priority subpopulations served, outcomes, and financial management.

  Completed for all renewal applications.

As new project applications will not have performance outcomes to complete the Project Scorecard, will not have had a monitoring visit and will not have an APR, all new project applications will be evaluated based on their project application and New Project Eligibility Checklist.
Ranking and Review Decision Making Process

This ranking process is intended to accomplish the following objectives:

- To prioritize those activities that are most successful in ending homelessness;
- To maximize funding available to end homelessness in Central Virginia;
- To direct new resources toward the most pressing needs for resources in the community;
- Addressing populations that have been underserved, and prioritizing assistance toward those with the greatest need;
- To provide an incentive for all funded providers to monitor and improve their performance in order to ensure continued funding with CoC resources.

Where there are multiple projects in a priority group, renewal projects will be ranked according to their scorecard, APR, project application, and monitoring visit report. New projects will be ranked according to their project application and New Project Eligibility Checklist.

- Priority Group 1: Permanent Supportive Housing
  - Renewal PSH projects
  - New PSH projects with chronically homeless dedicated beds

- Priority Group 2: Core CoC Services
  - HMIS
  - Planning

- Priority Group 3: Rapid Re-Housing
  - Renewal RRH projects
  - New RRH projects

- Priority Group 4: Transitional Housing
  - Renewal TH

- Priority Group 5: PH Bonus Projects
  - PSH Projects
  - RRH Projects

The Collaborative Applicant will submit the project applications, APRs, and New Project Eligibility Checklist to the ad hoc Ranking and Review Committee. The Chair of the Monitoring and Evaluation Committee will submit the scorecard and monitoring visit report to the ad hoc Ranking and Review Committee. All documents will be received by 2 business days prior to the Ranking and Review meeting. The ad hoc Ranking and Review Committee will review all documentation to ensure that all projects meet the requirements set forth in the Notice of Funding Availability and are in alignment with the CVCoC’s Strategic Plan to End Homelessness.

At the Ranking and Review meeting, the committee will rank the projects according to the above Priority Groups. Where there are multiple projects within one group, the committee will review the materials to determine which project is most effectively and efficiently meeting the CoC’s need. A vote will occur on each
Priority Group to determine rank within the Group starting with Priority Group 1. When all projects have been ranked, the ad hoc Ranking and Review Committee will vote on the final Priority Listing.

Following the committee meeting, the Collaborative Applicant will notify each project of its placement on the Priority Listing and the appeals process should they wish to appeal their ranking. The Chair of the Advocacy and Outreach Committee will notify the full CoC Membership via email and the listing will be publically posted on the United Way’s website.

**Reallocation and Ranking Appeals Process**

An ad hoc Reallocation/Ranking Appeals Committee will be formed by 3-5 CoC non-conflicted members to review all appeals and will make recommendations to the CoC Board. The Appeals Committee will be selected from the CoC Board or its designees. These individuals will have no conflict of interest in serving. Applicants may appeal any of the following decisions of the CoC Board:

- Placement of a project in Tier 2
- Reduction of a renewal grant amount
- Reallocation of a renewal grant

Applicants wishing to submit an appeal must notify the Collaborative Applicant’s representative, Denise Crews at dcrews@lyncag.org by two days after the priority listing has been communicated. An appeal can be in the form of a letter, a memo or an email and must state the following:

- Agency name
- Project name
- Reason for appeal (no longer than 2 pages)
- Documentation to support the appeal

Applicants will be notified of the outcome no later than 2 business days after the appeal has been received.

Attachment 1

**New Project Eligibility Checklist**

Central Virginia Continuum of Care CoC Competition FY2016

Name of Proposed Project:________________________________________________________

Name of Organization:__________________________________________________________
Primary Contact Person: __________________________________________________________

Telephone: ________________________________________________________________

Email: _________________________________________________________________

1. New Project Type:
   - ☐ permanent supportive housing
   - ☐ rapid re-housing
   - ☐ centralized intake

2. Priority subpopulation:
   - ☐ chronically homeless
   - ☐ veterans
   - ☐ households with children
   - ☐ unaccompanied youth

3. Describe your experience working with the priority subpopulation checked off above:
   - __________________________________________________________
   - __________________________________________________________
   - __________________________________________________________

4. Is your agency eligible to apply for funding through HUD? __ yes _____ no

5. Is your agency a 501(c)3 or eligible government entity? __ yes _____ no

6. Does your agency have any outstanding findings from HUD or the State on any other projects your agency operates? __ yes _____ no

7. Does your agency have any recent audit findings (within the last 24 months)? __ no ___ yes (attach if yes)

8. Does the agency currently participate or agree to participate in Coordinated Homeless Intake and Access (CHIA)? __ yes _____ no

9. Does your agency agree to use Housing First principles in the implementation of the project?
   - ☐ Voluntary Service Model?
   - ☐ No drug testing or sobriety requirements?
   - ☐ No income requirements for entry or maintenance?
   - ☐ No restrictions based on criminal history?
   - ☐ Emphasis on project maintenance and housing stability?
10. Does your agency participate or agree to participate in the Homeless Management Information System? If you currently participate, attach a recent Data Quality Report Card for any projects currently participating. __ yes ___ no

11. Does your agency participate in the Central Virginia Continuum of Care through the following:

- [ ] CoC Membership
- [ ] Committee Membership
- [ ] Community Case Review Membership
- [ ] Board

All of the information submitted to the CoC Board of the Central Virginia Continuum of Care is a true representation of my project.

______________________________________________
Signature of Organization CEO/Executive Director

Date
**Central Virginia CoC Scorecard FY2016**

Name of Proposed Project: __________________________________________________________

Name of Organization: ____________________________________________________________

Primary Contact Person: __________________________________________________________

Telephone: _____________________________________________________________________

Email: ________________________________________________________________________

<table>
<thead>
<tr>
<th>Part A: Type of Program</th>
<th>Maximum Points</th>
<th>Source</th>
<th>Project Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Permanent Supportive Housing</td>
<td>10</td>
<td>Project application</td>
<td></td>
</tr>
<tr>
<td>Rapid Re-Housing</td>
<td>7</td>
<td>Project application</td>
<td></td>
</tr>
<tr>
<td>Supportive Services Only (coordinated entry)</td>
<td>5</td>
<td>Project application</td>
<td></td>
</tr>
<tr>
<td>Transitional Housing</td>
<td>0</td>
<td>Project application</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part B: Priority Sub-populations</th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Serves one of the CoC’s subpopulations (CH, Veterans, Youth, Families including DV)</td>
<td>5</td>
<td>Project application</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part C: HMIS Implementation</th>
<th>Max Points</th>
<th>HMIS Annual Data Quality Report Card</th>
</tr>
</thead>
<tbody>
<tr>
<td>Did project meet standards in:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accuracy (2 points)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Completeness (2 points)</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>Timeliness (2 points)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Technical Standards (2 points)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Part D: Performance Measures</th>
<th>Max Points</th>
<th>APR</th>
</tr>
</thead>
<tbody>
<tr>
<td>85% occupancy/utilization</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>100% literally homeless prior to entry</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>25% all adult leavers gained/increased earned income</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>35% all adult leavers gained/increased non-employment income</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Description</td>
<td>Points</td>
<td>Reporting Period</td>
</tr>
<tr>
<td>-----------------------------------------------------------------------------</td>
<td>--------</td>
<td>-----------------</td>
</tr>
<tr>
<td>90% all adult participants have noncash benefits</td>
<td>10</td>
<td>APR</td>
</tr>
<tr>
<td>Less than 10% of leavers exit to shelter/street/unknown</td>
<td>7</td>
<td>APR</td>
</tr>
<tr>
<td>25% of stayers gained/increased earned income</td>
<td>7</td>
<td>APR</td>
</tr>
<tr>
<td>35% all adult stayers gained/increased non-employment income</td>
<td>7</td>
<td>APR</td>
</tr>
<tr>
<td>90% of participants exit to PH</td>
<td>10</td>
<td>APR</td>
</tr>
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</table>

### Part D: Compliance

<table>
<thead>
<tr>
<th>Description</th>
<th>Points</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>No recaptured funds</td>
<td>10</td>
<td>Provider report</td>
</tr>
<tr>
<td>Match equals or exceeds 25%</td>
<td>5</td>
<td>APR</td>
</tr>
<tr>
<td>No HUD findings on a monitoring visit within 24 months</td>
<td>5</td>
<td>Provider report</td>
</tr>
<tr>
<td>HUD drawdowns within 90 days</td>
<td>5</td>
<td>Provider report</td>
</tr>
<tr>
<td>Penalty for late APR</td>
<td>-5</td>
<td>Provider report</td>
</tr>
<tr>
<td>No findings on Monitoring Report from annual site visit</td>
<td>5</td>
<td>Monitoring report</td>
</tr>
<tr>
<td><strong>Maximum Score</strong></td>
<td>135</td>
<td></td>
</tr>
</tbody>
</table>
Note: This tool was established using the Continuum of Care (CoC) regulations as established by the US Dept. of Housing and Urban Development (HUD) (See attached link – CoC regulations – 24 CFR Part 578)

Agency:

Project Monitored:

Grant Number:

Monitoring Date:

Contract Year Monitored:

Total Grant Amount:

Number of Households Served PIT:

Type of CoC Funds:

Program Type:

Review Team Participating in Visit:
1. Visual Observation

1) Are financial records and valuables secured in limited access area?
   ☐ Yes ☐ No
   Guidance: Recipients shall adequately safeguard all such assets and assure they are used solely for authorized purposes.

   Reviewer Comments:

2) Are client files maintained in a confidential manner?
   ☐ Yes ☐ No
   Guidance: Recipients shall adequately safeguard charts and assure they are used solely for authorized purposes. Reviewer will look for evidence of locked charts and for proper safeguarding of client names and other confidential materials. 578.103(b) Confidentiality

   Reviewer Comments:

3) Drug free work place statement
   ☐ Yes ☐ No
   Guidance: Agency must have a drug free work place statement that complies with the requirements of 24 CFR 21.200 and has been posted in an area visible to all employees engaged on the CoC award.

   Reviewer Comments:
2. Monitoring Checklist
   a. Match/Leverage Documentation

4) **Required match** - Is the required match met? All above funds must be matched by at least 25% of funds or in-kind contributions from other sources. [578.53(a)]
   - ☐ Yes  ☐ No
   
   *Guidance: Agency must demonstrate by cash receipt in accounting records or Memorandum of Understanding (MOU) as specified below for in-kind that the required match was met for the program year being monitored.*

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Reviewer Comments:

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5) **In-Kind Match MOU** - If the match has been met in whole or in part by services provided by a third party, is there a MOU that indicates: the hourly rate for the services (must be consistent with those paid for similar services); specific service to be provided; and profession of persons providing the service [578.73(c)(3)]
   - ☐ Yes  ☐ No

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Reviewer Comments:

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6) **Eligibility of match** - If match is met by in-kind contributions, would the services, goods, equipment, real property that is providing the match have been an eligible expense under Subpart D of the HEARTH CoC program? [578.73(c)(1)]
   - ☐ Yes  ☐ No

   *Guidance: For each component type (e.g. Rental Assistance, Supportive Services, Operating) eligible activities are defined in Subpart D of the HEARTH Interim Rule. Match must be used only for eligible activities.*

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Reviewer Comments:
7) **Documentation of in-kind match** - Does the grantee have documentation of the service hours provided where these hours are used as in-kind match? [578.73(c)(3)(ii)]

- Yes
- No

**Guidance:** Volunteer services shall be documented and, to the extent feasible, supported by the same methodology used by the recipient for employees; the basis for determining the value of personal services must be documented.

**Reviewer Comments:**

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8) **Documentation of leverage** - Does the grantee have required documentation of leveraging as defined in the NOFA under which the project was funded?

- Yes
- No

**Guidance:** Commitment letter(s) on file are dated and meet other requirements as per the relevant NOFA and demonstrate a minimum of 150 percent leveraging. A written commitment may include signed letters, memoranda of agreement, or other documented evidence of a commitment. All written commitments must be signed and dated by an authorized representative, and should include the name of the contributing organization, the type of contribution (cash, child care, case management, etc.), the value of the contribution, and date the contribution will be available. It is also important that the written commitment include the project name and be addressed to the project applicant or subrecipient.

**Reviewer Comments:**

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b. **Administrative costs and requirements**

9) **Administration fee - Review** - APR and grant application for amounts requested for admin expenses. Calculate the percentage that administrative costs represent of the total grant. Percent of administrative funding: ________ (VHSP restricted to 3% or less / HUD 7% or less)

- Yes
- No

**Reviewer Comments:**
10) **Eligibility of Administrative Costs** - If administrative funds are used for general management, oversight and coordination, has the grantee included the entire salary, wages and related costs of persons whose primary activity is program administration or has it pro-rated the share of time of each person whose job includes any administrative function. Has the grantee used only one of these methods for each fiscal year grant? [578.89(a)(1)]
- Yes
- No

Documentation: Draw down report available for review

**Reviewer Comments:**

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11) **Allocation of Administrative costs** - Have administrative costs been allocated to the following eligible activities: general management, oversight and coordination including travel costs associated with monitoring; contracts for legal, accounting or audit services; costs for goods and services required for administration of the program including equipment rental and purchase, insurance, utilities, supplies, rental and maintenance of office space; Training on Continuum of Care requirements (providing or participating in HUD sponsored trainings); or Environmental Review [578.59(a)]
- Yes
- No

**Reviewer Comments:**

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12) **Staff eligibility for administrative costs** - Does a randomly selected review of administrative personnel costs reveal that staff paid from CoC funds are working on eligible CoC funded activities? [578.59]
- Yes
- No

**Guidance:** If personnel costs are assigned to administration, reviewers will look for backup (e.g. time sheets) that shows staff was working on administrative activities for the time billed.

**Reviewer Comments:**

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13) **Homeless Participation** - Does the grantee meet the participation requirements? (Each grantee and sub-grantee must have at least one homeless or formerly homeless individual on the board of directors or equivalent policy making entity. Each grantee and sub-grantee must to the maximum extent practicable involve homeless people through employment or volunteer services.) [578.75(g)]

- Yes
- No

**Reviewer Comments:**

14) **Nondiscrimination and equal opportunity requirements** - Does the project comply with nondiscrimination and equal opportunity requirements in 24 CFR 5.105(a)? [578.93 (a)]

- Yes
- No

**Guidance:** Recipients, subrecipients and partner agencies are subject to federal civil rights laws, including Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act of 1975, and the Americans with Disabilities Act of 1990.

**Reviewer Comments:**

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C. **Financial Management**

15) **Internal controls** - Do the fiscal records indicate that the grantee has effective internal control over, and accountability for, all grant funds, property and other assets? [84.21(b) and 85.20(b)] (Team will review audit / management letter. For VHSP show documentation that audit was uploaded to CAMS within 6 months of fiscal year end)

- Yes
- No

**Documentation:** Audit and management letter

**Reviewer Comments:**

16) **Recording of expenses** - Do the grantees accounting records identify expenditures according to eligible activities [578.37-578.59]

- Yes
- No

**Reviewer Comments:**
17) **Expenditure eligibility** - Review drawdown detail to see if transactions reveal that CoC expenditures were for eligible costs and that the transactions were supported by adequate source documentation? [578.37-578.59; 84.21(b); and 85.20(b)]
   - Yes
   - No

18) **Payroll documentation** - Are charges for salaries and wages based on payrolls documented by appropriate time sheets (including timesheets indicating actual times worked) and approved by responsible official of the grantee? [OMB Circular A110 & A122]
   - Yes
   - No

19) **Allocation of salaries** - If salaries involve payments from more than one CoC activity line (i.e., Rental Assistance, Leasing, Operating Costs, and Supportive Services) can payments for wages be clearly tracked to the eligible CoC activities? [84.21(b) and 85.20(b)]
   - Yes
   - No

20) **Program Income** - Has program income (if applicable) earned by grantee been added to funds committed to project by HUD and used for eligible activities under 24 CFR Part 578 [578.97(b)]
   - Yes
   - No

21) **Indirect costs** - If indirect costs have been charged, does the grantee have an indirect cost rate proposal that is in accordance with OMB Circulars A-87 or A-122, as applicable? [578.63]
   - Yes
   - No
22) **Separation of duties** - Is there evidence that financial duties are separated so that no one individual has complete authority over a financial transaction? [OMB Circular A110 & A122]

- Yes
- No

**Reviewer Comments:**

23) **LOCCS** - Does withdrawal information from the Line of Credit Control System (LOCCS) match the information from the CoC grantee’s drawdown voucher requests? [OMB Circular A110/A122]

- Yes
- No

**Reviewer Comments:**

24) **Travel** - Review a sample of travel expenditures. Were they necessary and proper? Was reimbursement in accordance with Government Services Administration (GSA) policies? [OMB A-122]

- Yes
- No

**Reviewer Comments:**

25) **Equipment** - Does the grantee maintain equipment records that contain information required (item, date acquired, cost, serial number, Federal share of acquisition)? When was the last physical inventory taken? [85.32 & 84.34]

- Yes
- No

**Reviewer Comments:**
26) **Conflicts of interest** - Does the grantee meet the conflict of interest requirements (no financial interests or benefit from assisted activity on part of staff (or person with whom the staff member has immediate family or business ties) during his/her tenure with organization and one year following his/her tenure. This includes procurement, rent reasonableness determinations and housing quality inspections for a property owned by the grantee or sub-grantee)? [578.95]
   ☐ Yes ☐ No

Documentation: Agency/Program policy statement

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**Reviewer Comments:**

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**D. Reporting and Contract Requirements**

27) **APR** - Was the most recent APR submitted to HUD no later than 90 days from the date of the end of the project’s grant term? [578.103 (e)]
   ☐ Yes ☐ No

**Reviewer Comments:**

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28) **Close-out** - Were all close out reports required by HUD submitted no later than 90 days from the date of the end of the project’s grant term and as instructed in the closeout certification issued by HUD? [578.109 (b)]
   ☐ Yes ☐ No

Balance Remaining indicated on Closeout Certification: $__________________________

**Reviewer Comments:**

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29) **Grant amendment** - If there was a significant change made that required a grant amendment, is an executed amendment on file? Significant changes include, a change of recipient, a shift in a single year of more than 10 percent of the total amount awarded under the grant for one approved eligible activity category to another activity and a permanent change in the subpopulation served by any one project funded under the grant, as well as a permanent proposed reduction in the total number of units funded under the grant. [578.105 (a)]

- Yes
- No

Reviewer Comments:

33) **Number of Participants** - Is the number of participants served during the grant period consistent with the number in the approved application?

- Yes
- No

Documentation: Copy of grant application

Reviewer Comments:

34) **Goals and accomplishments** - Summarize the program accomplishments for the grant year. Are those consistent with goals stated in the application?

- Yes
- No

Documentation: List of goals vs. accomplishments

Reviewer Comments:

E. **Housing Assistance**

35) **Housing Quality Standards** - Has all housing assisted through leasing or rental assistance with CoC funds been inspected prior to occupancy and re-inspected at least annually? [587.75(b)]

- Yes
- No
36) Habitability Standards - Has all assisted housing not required to be inspected using Housing Quality Standards been inspected for habitability prior to occupancy and re-inspected at least annually?
   ☑ Yes ☐ No

Reviewer Comments:

38) FMR Ceilings - If CoC grant funds are used to lease individual units, has the grantee observed the limitation that rents may not exceed Fair Market Rents? [578.49(b)]
   ☑ Yes ☐ No

Reviewer Comments:

39) Security Deposits - If the grantee uses CoC funds for security deposits, are the amounts of the deposits not in excess of two months’ rent? [578.49(b) and 578.51(a)]
   ☑ Yes ☐ No

Documentation: List of deposits paid by CoC funds

Reviewer Comments:

40) Environmental Review - Has the grantee complied with environmental review requirements (Grantee will not acquire, rehabilitate, convert, lease, provide sponsor or project based rental assistance, repair, dispose of, demolish or construct property or expend HUD funds until an Environmental Review under 24 CFR part 50 has been completed and the grantee has received HUD approval of the property)? [578.31]
   ☑ Yes ☐ No
Guidance: Monitors will review files for evidence of environmental review and notice of HUD approval.

Reviewer Comments:

41) Program fees - Grantee may not charge program participants any fees other than rent. Has the grantee complied with this requirement? [578.87(d)]
   ○ Yes ○ No

Reviewer Comments:

f. Participant eligibility

Chronic Homelessness

42) A. Designated - If the project has designated/prioritized chronically homeless beds, does the correct portion of households assisted meet the definition of chronic homelessness and has the grantee maintained documentation that applicable households served meet HUD’s definition of chronic homelessness? [578.3]
   ○ Yes ○ No

Reviewer Comments:

43) B. Minimum commitment - Does every household newly admitted meet the definition of chronically homeless and does the project use the order of priority established in HUD Notice CPD-14-012: Prioritizing Persons Experiencing Chronic Homelessness and Other Vulnerable Homeless Persons, which defines which chronically homeless people get priority access to PSH beds, [CT BOS Policies and Procedures – Applies to PSH only beginning January 2015]
   ○ Yes ○ No
44) **Rapid rehousing** - Has rental assistance been provided for longer than 24 months. [578.37(a)].
   - Yes ☐
   - No ☐

45) Have case managers met with program participants at least monthly? [578.37(a)]
   - Yes ☐
   - No ☐

46) **Rapid Rehousing** - Have supportive services been provided to participants for a period not in excess of six months after rental assistance stops (RRH) [578.53(b)]
   - Yes ☐
   - No ☐

47) **Termination of Assistance** - Review files of participants who have been terminated from the CoC program. Has the grantee met HUD requirements for terminating assistance (provide formal due process, written copies of rules, written notice of termination with clear statement of reasons for terminating, opportunity to appeal decision, and receiving written notification of final decision)? [578.91]
   - Yes ☐
   - No ☐

**Reviewer Comments:**
48) **Involuntary separation of families** - The age and gender of a child under age 18 must not be used as a basis for denying any family’s admission to a project or for separation when entering a project (projects serving families only). Does program being monitored meet these conditions? [578.93/2013 CoC Application]

- Yes
- No

Documentation: Agency/Program policy statement

**Reviewer Comments:**

49) **Equal Access** - Does program comply with HUD Final Rule on Equal Access?

- Yes
- No

**Reviewer Comments:**

**g. Services**

50) **Ineligible costs** - Services provided under ‘supportive services’ must be specifically identified under 578.53(e). Services provided may not exceed the scope of allowable services.

- Yes
- No

**Reviewer Comments:**

51) **Housing First** - All permanent supportive housing and rapid re-housing must follow Housing First principles, including: housing is not contingent on compliance with services; tenants may only be terminated for lease violations or failure to carry out obligations under the Virginia Residential Landlord Tenant Act and many only be evicted from their units based on a valid court order; and services are provided post-housing placement to promote housing stability. Does project follow Housing First principles?

- Yes
- No

**Reviewer Comments:**
52) A. Procedures - Has the grantee/sub-grantee developed written procedures to ensure: all client records containing identifying information are kept secure and confidential; address of any family violence project will not be made public; address or location of any housing or program participant will not be made public? [578.103(b)]
   ☑ Yes ☐ No

53) B. Releases - Is information sharing evidenced in chart authorized by a current release of information? [578.103(b)]
   ☑ Yes ☐ No

Documentation: Agency/Program policy statement

Reviewer Comments: