

# Virginia Eviction Reduction Pilot (VERP) Program Guidelines and Application Instructions Grant Cycle: 2025-2026

Mandatory: How to Apply Webinar

August 16, 2024, 10AM and August 21, 2024, 2pm via Microsoft Teams

**Grant Application Due: September 18, 2024** 



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#### **Virginia Eviction Reduction Pilot Background**

Court and housing data consistently show that Virginia has higher-than-average eviction rates. According to the Princeton Eviction Lab, five of the top ten large cities in the United States with the highest eviction rates are in Virginia. These cities include Richmond, Hampton, Newport News, Norfolk, and Chesapeake. Virginia is also home to three of the top ten mid-size cities with the nation's highest eviction rates, which include Petersburg, Hopewell and Portsmouth. These high eviction rates are due to numerous factors, including the high cost of rent relative to income, with over half of rental households being cost-burdened. The eviction process in Virginia is also notably swift, often taking as little as 48 days from the time rent is due to the sheriff's eviction. Evictions have both immediate and long-term detrimental effects on individuals' education, health, and employment. They often result in people moving into poorer quality housing or experiencing homelessness, which exasperates financial burdens, health issues, disruptions to children's education and our workforce. Additionally, evictions negatively impact credit scores, which can hinder future housing opportunities and contribute to other persistent health and social determinants over time. The COVID-19 pandemic exacerbated housing insecurity, intensifying these adverse effects, and further destabilizing vulnerable populations.

#### **Virginia Eviction Reduction Pilot Design**

During Virginia's 2020 Special Session, the General Assembly passed, and the Governor signed, a budget allocating \$3.3 million to implement the Virginia Eviction Reduction Pilot (VERP). The Virginia Department of Housing and Community Development (DHCD) was tasked with designing and implementing VERP. The pilot's goal is to decrease eviction rates by addressing systemic barriers and incorporating best practices to ensure evictions are rare, their impacts brief, and the experience humane.

VERP's mission is to reduce eviction rates through a three-pronged approach:

- 1) Identify systemic barriers that contribute to high eviction rates.
  - Collaborating with community leaders including local courts, Sherriff departments and landlords - to shift the local policies, practices and flow of resources that contribute to Virginia's nation-leading eviction rates.
- 2) Engage vulnerable tenants before courts become involved.
  - Using data to identify tenants who are at high risk of eviction.
  - Educating tenants and landlords about their rights and responsibilities and referring tenants to free or low-cost legal assistance when necessary.
  - Providing short-term financial assistance on behalf of tenants at risk of eviction to help them pay rent and other bills to stabilize housing.
  - Offering mediation services to resolve disputes between landlords and tenants before the courts become involved.
  - Connecting tenants with mainstream services to help them balance their budget and stabilize their housing.
  - Implementing data-driven, proactive outreach to landlords and tenants in high evicting communities to inform them about available eviction prevention services.
- Divert evictions when court cannot be avoided.
  - Implementing best practice diversion services which include consistent, in-person court navigation services designed to give landlords and tenants time, information and resources to resolve housing disputes in a less harmful way.
  - Partnering with free or low-cost legal service organizations equipped to offer legal advice to self-represented litigants in eviction court.
  - Providing supportive services to assist tenants throughout the eviction process, ensuring they receive appropriate support. This may include payments on behalf of tenants for moving costs and deposits or first month's rent.
  - Developing educational workshops to inform tenants about the eviction process and their rights during court proceedings.

 Promoting collaboration between courts, landlords and social service agencies to create a comprehensive support network for tenants.

Reducing evictions in Virginia is crucial for the well-being of our communities. By lowering eviction rates, communities benefit from:

- Stabilized housing: Keeping more Virginians in their homes results in more stable communities and significantly reduces the educational, economic, health and societal costs associated with homelessness.
- Enhanced tenant-landlord relationships: Mediation and support services foster better communication and relationships between tenants and landlords, leading to more landlords being made financially whole and more amicable and sustainable housing arrangements.
- Economic benefits: Reducing evictions leads to safer neighborhoods, higher educational outcomes, and more equipped workforce for all Virginians.

Where we live impacts everything and stable housing is the foundation for education, work, health and safety.

#### **Funding**

The Department of Housing and Community Development (DHCD) will distribute up to \$6.1 million in state grant funds across a two-year funding cycle. These funds are intended to support local initiatives aimed at preventing and diverting evictions. Grantees must apply through a competitive grant process. The continuation of funding into the second year depends on the performance and compliance of the grantees in the first year of the grant cycle's funding.

DHCD mandates that grantees ensure their VERP-funded services do not result in duplication of funds and services, especially with homeless services. Before clients can qualify for VERP, grantees must assess their eligibility for other related programs to ensure responsible fiscal

management and avoid duplication of services. VERP funding must be coordinated with other available funding sources and should not be used to replace mainstream resources.

Communities involved in the Eviction Diversion Pilot Program (currently Danville, Hampton, Petersburg, and Richmond) can utilize VERP funds to implement their state-mandated pilot programs for eviction diversion, given that no other funding has been allocated for this purpose outside the City of Richmond.

#### **Grant Continuation/Second Year of Funding (2026)**

Grantees must have received VERP funding during the first year to be eligible for continued funding in the second year. Current grantees' eligibility for grant continuation will be evaluated at the end of the first year within the two-year grant cycle. Grant continuation is dependent on achieving satisfactory performance during the initial grant year. DHCD will work with grantees to ensure their understanding of the evaluation process and set clear expectations for grantee performance in the second year.

Continuation Grant Application Evaluation Criteria		
<u>Criteria</u>	Scoring Elements	Maximum Points
Compliance	Successful execution of contractual obligations during the first year of funding.	20
Performance	Impact of VERP funding during the first year of funding.	30
TOTAL – Must have a combined compliance and performance of at least 30 points.		50

DHCD technical assistance is limited to normal business hours.

#### **Administrative Costs**

Administrative costs may not exceed 5% of the total grant award. Administrative costs may include accounting for the use of grant funds, preparing reports for submission to DHCD, obtaining program audits, data collection and reporting, similar costs related to administering

the grant after the award, and associated staff salaries. If the amount of funds expended is less than the contracted grant award, administrative costs will be capped at 5% of funds expended.

Failure to spend the full contracted grant award may result in having to return administrative funds.

#### **Grantee Eligibility**

Eligible grantees must be a nonprofit, unit of local government, or planning district commission (PDC) with a history of meeting the needs of lower-income households through financial assistance and housing support programs. Institutions of higher education may apply in collaboration with a local nonprofit or government unit. Landlords, including Public Housing Authorities, are ineligible to apply. At least one representative must attend a *How to Apply* webinar to be eligible.

#### **Required VERP Activities**

VERP grantees use proven best practices to promote housing stability for low- and moderate-income Virginia renters. Grantees are required to design their programs to ensure high access and low barriers to entry for eligible households who meet qualifying risk factors. The pilot's mandated services are essential components of VERP's strategy to prevent or divert evictions when possible. When an eviction cannot be avoided, VERP services play a large role in making the impact brief and the experience humane.

All VERP grantees must provide eviction prevention and diversion services, as well as develop and maintain relationships with decision makers capable of affecting systems change, all of which are defined below. Specific examples of each type of activity are provided later in these guidelines.

- Prevention services take place before an Unlawful Detainer is filed and the courts become involved.
- Diversion services take place after an Unlawful Detainer is filed and the courts have become involved.

 Systems change partnerships are relationships and activities that shift the conditions that perpetuate Virginia's nation leading rates of eviction.

If a grantee chooses not to provide both prevention and diversion services, they must enter a formal partnership with another eligible organization to provide the other service. For example, if an applicant proposes to only provide eviction prevention services, they must include documentation of their formal partnership with another eligible organization to provide eviction diversion services. All VERP grantees must develop, manage and maintain their own systems change partnerships. The following activities are required of all VERP grantees and are denoted as either prevention, diversion or systems change activities:

Flexible Financial Assistance (This is required as both a prevention and diversion activity.)

The vast majority of tenants served by VERP are moderately cost burdened – meaning they spend more than 30% of their income on rent – or severely cost burdened – meaning they spend more than 50% of their income on rent. According to the most recent U.S. Census Pulse Survey, 61% of Virginia renters surveyed experienced an increase in rent in the past year. In Virginia, 57% of renter households report more than a 7% increase in rent over the past year – which is roughly twice the 2023 rate of inflation. Most formal evictions occur due to non-payment or underpayment of rent. While this can sometimes be an ongoing problem due to low wages or underemployment, it is most often due to an external budget shock such as job loss or reduction of hours, or unexpected medical or transportation expenses. A core element of VERP is to provide flexible financial assistance on behalf of tenants to prevent or divert an eviction from happening.

Financial assistance must be offered in both the prevention and diversion stages of the eviction process and can include financial support for the following eligible expenses:

- Rent arrears
- Current month's rent
- Prospective rent

Please note that the financial assistance listed above is limited to a maximum of six months per household, per year.

Stabilization Services (These are required as both a prevention and diversion activities.)

Despite relatively flat wages, many low-income renters have found a way to stay up to date on rent but face financial challenges in other areas as a result. In these cases, stabilization support services can help households achieve a greater level of housing security and address several key expenses that may prevent a household from being able to get to and from work or attend work at all due to lack of childcare. For these reasons, VERP grantees are also required to offer financial assistance on behalf of eligible tenants for the following expenses:

- Utility payments not included as part of rent (up to six months)
- Medical expenses
- Transportation costs
- Childcare assistance (up to six months)
- Other expenses as approved on a case-by-case basis

Referrals to Mainstream Services (This is required as both a prevention and diversion activity.)

Grantees are required to develop referral protocols with their local Department of Social

Services (DSS) offices and others to connect eligible applicants to mainstream services that can help stabilize a household budget, including, but not limited to:

- Supplemental Nutrition Assistance Program (SNAP)
- Temporary Assistance to Needy Families (TANF)
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC)
- Low Income Home Energy Assistance Program (LIHEAP)
- Medicaid
- Virginia's Insurance Marketplace
- Medical Assistance Programs
- Percentage of Income Payment Plan (PIPP)
- Social Security Disability

- Unemployment Insurance
- Childcare assistance
- Child support
- Energy Assistance (EA)
- Virginia's Full Employment Program (FEP)
- Virginia's General Relief Program (GF)

# On-Site Court Navigation Services (This a required diversion activity.)

Ideally, evictions are prevented before an Unlawful Detainer is filed and before the court system becomes involved. When this does not happen, tenants must go to court to divert their eviction, but most do so without any legal counsel or representation. In fact, only three out of every 1,000 tenants facing eviction in Virginia are represented by an attorney. Eviction courts have come to be defined by their high volume, quick pace, lack of tenant engagement and dearth of legal representation for tenants. These courtrooms and their staff are overburdened and under pressure to process an enormous number of cases. The larger the docket, the faster a judge must move through cases.

Court navigation services are a proven way to reduce evictions and limit the impact of an eviction when it cannot be diverted. These services benefit the tenant, their landlord and the courtroom staff themselves by:

- Increasing the likelihood that the landlord will receive payment for past-due rent
- Creating opportunities for both parties to avoid significant time, energy, and costs associated with eviction proceedings
- Giving tenants more time to access available financial resources in their community
- Reducing the size of a courtroom's dockets and the staffing resources needed to support them
- Allowing tenants more time to locate their next housing solution if an eviction cannot be prevented

All VERP grantees are required to provide court navigation services, which happen inside the courthouse. Grantees and their partners use the formal court process to provide tenants and landlords the time, information, and resources to resolve their housing disputes in the least harmful way possible. The following services are examples of court navigation best practices. After VERP funding awards are made, DHCD staff will work with each grantee to identify the court navigation services most appropriate for their local community. These services may include but are not limited to:

### Navigational Direction/Information

Provide information about where to go in the courthouse or other basic procedural information such as the correct courtroom, or how to check the court's computer terminal.

#### Referrals or Direct Connections

- Connect self-represented litigants to available on-site Legal Aid, pro bono attorneys or onsite mediators. This could include announcing the presence of legal assistance or accompanying a self-represented litigant to the Legal Aid's office within the courthouse if applicable.
- Provide referral options to free or low-cost legal assistance.
- Connect self-represented litigants to existing court-based services provided by the clerk's office, certified mediation services or language interpretation services.
- Provide referral options for assistance to meet non-legal need(s) including organizations
  that can assist them with healthcare, childcare, food access, transportation, job assistance
  and financial counseling.

#### Legal and Procedural Information

- Provide information about courthouse rules and protocols, roles of courtroom personnel,
- Prepare self-represented litigants for what to expect during and after their court hearing.
- Assist self-represented litigants with using web-based resources, including assistance with self-guided research or self-help materials, where available.

#### **Options Guidance**

- Screen for VERP financial assistance eligibility.
- Assess other non-legal needs and share available options to meet those needs within the community.

#### Language Access

 Assist self-represented litigants with connecting to court-approved interpreters who can provide assistance in their native or first language.

<u>Data-driven, Proactive Outreach</u> (This is required as both a prevention and diversion activity.)

More data about who is most at risk of eviction is available than ever before. VERP grantees

must make use of this data to proactively seek out households who may need their help.

Outreach activities should take place before Unlawful Detainers are filed (prevention) and after
the court become involved (diversion). These may include, but are not limited to:

- Partnering with local landlords to include information about VERP with all 5 Day Pay or Quit notices.
- Using publicly available information available through local court dockets to reach tenants
   with an upcoming eviction trial to ensure they are aware of:
  - Their court dates
  - The importance of appearing in court
  - What to expect in court
  - Their eligibility for VERP financial assistance and other services
- Canvassing or door knocking in high evicting neighborhoods or properties to make high risk tenants aware of VERP resources.
- Mailing resource information to households living in high evicting neighborhoods or properties.
- Coordinating with local schools to make families with children aware of VERP resources in their local community.
- Advertising or tabling at grocery stores, food shelves, low-income health clinics, dollar stores, or other mass discount stores in high-evicting neighborhoods.

- Leveraging nontraditional, grassroots community messengers to share information online or elsewhere.
- Promoting VERP services clearly on an organization's website, social media, and through 2 1-1 Virginia.
- All promotional materials should be available in the five most spoken languages in a grantee's community.

# Partnerships for Systems Change

The root causes and conditions that perpetuate Virginia's nation-leading eviction rates cannot be solved by any one organization or funding source alone. Given the limited resources available through VERP, grantees will not be able to reduce evictions in their local areas by addressing the issue only on a household-by-household basis. While providing flexible financial assistance is essential in the short-term, VERP grantees have proven that they are also well positioned to establish and maintain relationships with landlords, property managers, attorneys, judges, sheriffs and other courthouse staff which shift the broader conditions affecting eviction rates in their local areas.

In the 2025-2026 VERP funding cycle, all grantees will be required to:

- Identify at least 2-3 systemic barriers within their local community.
- Determine who has the positional and decision-making authority at a local level to reduce or eliminate said barriers.
  - These individuals or organizations should have the ability to influence or shift the
    policies, practices and/or flow of resources impacting the systemic barriers
    identified by the grantee.
- Design and implement a plan to measurably reduce the systemic barriers identified.
  - Grantees should hold quarterly meetings with the identified individuals or organizations to maintain coordinated efforts, measure progress made towards their goals and address obstacles toward progress

#### **Optional VERP Activities**

Post-eviction Support Services

Part of VERP's goal is to make the impact of evictions brief and the experience more humane when they cannot be prevented. One way to do that is to provide financial assistance on behalf of a tenant to cover moving costs and/or storing their belongings. This is an optional activity within VERP, however only for households with incomes between 31% and 80% AMI. Other resources exist through local Continuums of Care for households below 31 percent AMI.

Continuation of VERP Local Advisory Committees

Previously funded VERP grantees have established Local Advisory Committees (LACs) to better coordinate local resources and address systemic barriers to reducing evictions in their community. These activities remain an optional eligible VERP funded activity and include:

- Convening key stakeholders to actively reduce evictions in their community through communication and coordination.
- Working with local partners and decision makers to plan or implement coordinated eviction prevention and diversion efforts.

#### **Client Eligibility**

VERP funding may only be used to serve individuals whose incomes are at or below 80 percent Area Median Income (AMI). Grantees are required to establish policies and procedures that clearly state client eligibility, risk factors and the program's approach to meeting client needs. DHCD requires grantees to use an eligibility form designed to identify households most at risk of eviction. An eligibility template can be found in the <a href="Attachments">Attachments</a> section of the application and include:

- Household headed by a person of color
- Single female head of household
- Number of recent moves within the past 12 months
- Age of the head of household and whether children are present in the home
- Involvement of child services or foster care
- Non-leaseholder status

- Domestic violence
- Frequency of law enforcement involvement at the unit
- Tenants living in large multi-family properties
- A household's housing cost burden
- Imminent eviction (received an Unlawful Detainer)

Grantees are free to weigh risk factors and add risk factors to those listed above but cannot remove any of the DHCD identified risk factors. Any additional risk factors added by the grantee must be data driven and discussed with DHCD before implementation. Regardless of the form or type of risk factors used by the grantee to determine eligibility, a household must present with a minimum of three risk factors. Grantees are allowed to raise the minimum number of risk factors for eligibility based on local needs and required triaging efforts. Successful VERP grantees will demonstrate a commitment to screening clients into the program, rather than using eligibility criteria that restricts households' access unnecessarily.

### **Program Requirements**

#### Data collection and evaluation

Virginia lacks a statewide, real-time understanding of evictions across the commonwealth. Access to statewide eviction data is important for understanding current eviction trends and measuring the impact of eviction prevention and diversion programs. DHCD works with a third party to help evaluate the impact of the VERP program. Grantees will be required to collaborate with this third party for data collection, reporting and interviews to successfully evaluate the program.

#### Reporting

VERP grantees will be required to submit bi-annual reports (four total during the grant period) in CAMS. These reports will be used to assess the impact of the grantee's program and the overall effectiveness of the pilot. Grantees must ensure that data is complete and accurate. Grantees that fail to meet reporting requirements and deadlines are considered non-compliant which may affect future grant reimbursements and other DHCD funding opportunities.

Grantees must be able to track and report program activities, participant data, and spending separately from other activities. Grantees will report on outputs, such as the number of persons served and demographic characteristics of persons served, program funds expended by activity type, as well as outcomes related to program requirements.

#### Financial and Compliance Requirements

Grantees must have established standard accounting practices including internal controls and fiscal accounting procedures as well as track agency and program budgets by revenue sources and expenses. Grantees with outstanding audit findings, IRS findings, unresolved DHCD monitoring findings and/or concerns, or other compliance issues are not eligible for funding. Grantees will not be eligible to receive allocations if any of these conditions occur within the grant period. Although DHCD will collaborate with all interested parties, where appropriate, to resolve findings and compliance issues, it will be the responsibility of the Grantee to assure good standing.

Grantees without recent funding agreements will be subject to an organizational assessment prior to the execution of any DHCD funding agreement. An assessment includes a review of organization finances, accounting standards, internal controls, grievance policies, record keeping policies, confidentiality practices, conflict of interest policies, and fair housing practices. DHCD reserves the right to require and conduct organizational assessments of any proposed grantee prior to the execution of any agreement.

All grantees must be registered in DHCD's Centralized Application and Management System (CAMS) and are required to submit one of the following financial documents:

- Financial Statement
- Reviewed Financial Statement prepared by an independent Certified Public Accountant (CPA)
- Audited Financial Statement prepared by an independent CPA, or
- An OMB A-133 Audit (Single Audit) prepared by an independent CPA.

The threshold requirements outlined below are the minimal standards required by DHCD. All organizations funded by DHCD are encouraged to undertake the highest level of fiscal management review to ensure practices and procedures are fully examined and evaluated.

Threshold Requirement	Document
Total annual expenditures ≤ \$100,000,	Financial Statement prepared by organization
regardless of source	(does not require preparation by a CPA)
Total annual expenditure between \$100,001 and \$300,000, regardless of source	Reviewed Financial Statement prepared by an Independent Certified Public Accountant (CPA)
Total annual expenditures > \$300,000,	Audited Financial Statement prepared by an
regardless of source	Independent CPA
Federal expenditures ≥ \$750,000	2 CFR 200 Subpart F Audit - prepared by an
	Independent CPA

Grantees shall file the required financial document in CAMS within nine (9) months after the end of their fiscal year or 30 days after it has been accepted (Reviewed Financial Statement, Audited Financial Statement, and OMB A-133 Audit only) - whichever comes first. The full DHCD Audit Policy, including an explanation of the specific document requirements, can be found online at <a href="https://www.dhcd.virginia.gov/sites/default/files/Docx/audit-policy/dhcd-financial-statement-audit-policy-2019.pdf">https://www.dhcd.virginia.gov/sites/default/files/Docx/audit-policy/dhcd-financial-statement-audit-policy-2019.pdf</a>.

#### Subgrantee Agreements

Subgrantees are allowable with VERP. Any applicable agreements or Memoranda of Understanding (MOUs) must be submitted with the application for this pilot and are subject to DHCD approval. DHCD will contract with the grantee only. Grantees are held fully responsible for all reporting, submission of remittances, and maintaining all source documentation and program records. Grantees must monitor a subgrantee's program compliance, and all state and federal requirements.

### **Confidentiality Policy**

All Grantees shall ensure the confidentiality of the name of any individual assisted and any other information regarding individuals receiving assistance. The grantee's confidentiality policy should, at minimum, address:

- How staff will gather, record, and store confidential information
- The consent process for the release of confidential information
- Protocols for responding to breaches of confidentiality
- Privacy standards related to data collection and use of participant information for program reporting

#### <u>Grievance and Termination Policy</u>

Any individual receiving or applying for assistance must receive written notification of the Grantee's grievance policy if requested. Grievance policies must be board-approved and provide specific procedures to be followed for any disputed decision affecting this assistance. If a program participant contacts DHCD regarding their grievance, the agency will direct them back to the grantee for their grievance policy. The grantee must be prepared to provide documentation of the grievance record for all project participant grievances. Grantees may terminate assistance to a program participant who violates program requirements and resume assistance to a project participant whose assistance was previously terminated. Termination must include a formal process that recognizes the rights of individuals receiving assistance to the due process of law. This process must include at least two levels. The initial level of the process should be held by the grantee organization wherein the grievance is reviewed or heard by an individual other than the person (or subordinate of that person) who made or approved the termination decision. Should the client or household disagree with the decision made by the initial reviewer, a second level must be available for an appeal. This two-level process, at a minimum, must consist of:

 Written notice to the project participant containing a clear statement of the reasons for termination 2. Prompt written notice of the final decision to the project participant.

#### Recordkeeping

Grantees must keep all records and make all reports (including those pertaining to services received, project participant housing status, race, ethnicity, gender, and disability status data) that DHCD requires within the specified period. All contractual and program participant records must be maintained for a minimum of five years. Records should include program records such as:

- Documentation or match requirement
- Financial records such as bank statements
- Program participant records
- Copies of canceled checks/bank statements or expenses associated with the program
- Record of all program participants that are screened and classified as ineligible for a service provided
- This must include documentation of the reason for the determination of ineligibility

#### Method of Payment

All grantees must be registered in CAMS and have approved audits to receive reimbursement. Remittances are submitted in CAMS; however, any grantee with unresolved findings or compliance issues may have reimbursement suspended. DHCD recommends that grantees receive funds via electronic transfer. Instructions on establishing an account with the Virginia Department of Accounts (DOA) are located on their website through the selection of Electronic Data Interchange (EDI) from the link on the right-hand side of the DOA main webpage. The EDI guide can then be accessed through a link under the Trading Partner Information section.

#### Fiscal Management

Grantees must ensure compliance with regulations and requirements pertaining to the following key areas of fiscal management:

Allowable costs

- Source documentation
- Internal controls
- Budget controls
- Cash management
- Cost allocation plans
- Accounting records
- Procurement
- Property asset controls
- Audits

Grantees must only use funds for eligible activities and in accordance with the DHCD-approved program budget. Any changes from the planned expenditures must be approved in advance by DHCD through a CAMS budget amendment. Funds may not be used for activities other than those authorized in the guidelines and approved by DHCD. Reimbursements are based on the date the payment is made by the grantee. All expenditures must be in accordance with program conditions such as funding ceilings and other limitations on eligible costs.

Internal controls refer to the combination of policies, procedures, defined responsibilities, personnel, and records that allow an organization to maintain adequate oversight and control of its finances. Internal controls reflect the overall fiscal management system of an organization or agency. Budget controls, cash management, cost allocation plans, accounting records, procurement, and property controls are subsets of the overall financial system.

Grantees will be monitored for compliance with the program requirements and documentation. A financial compliance monitoring may include, but not limited to, the following:

- An organizational chart showing titles and lines of authority for all individuals involved in approving or recording financial (and other) transactions
- Written position descriptions that describe the responsibilities of all key employees

- A written policy manual specifying approval authority for financial transactions and guidelines for controlling expenditures
- Written procedures for the recording of transactions, as well as an accounting manual and a chart of accounts
- Adequate separation of duties to ensure that no one individual has authority over an entire financial transaction
- Hiring policies to ensure that staff qualifications are equal to job responsibilities and that individuals hired are competent to do the job
- Access to accounting records, assets, blank forms, and confidential records is adequately controlled, such that only authorized persons can access them
- Procedures for regular reconciliation of its financial records, comparing its records with actual assets and liabilities of the organization
- Accounting records/source documentation
- Cash management procedures
- Cost allocation plans
- Procurement procedures
- Property Controls
- Annual Audit

To ensure DHCD monitoring processes follow The Violence Against Women Act (VAWA), domestic violence service providers must adopt a formal check request policy to ensure appropriate use of grant funds. The Grantee must use a check request form as the primary method of requesting checks or cash in connection with an authorized expense incurred on behalf of grant-funded programs or project participant expenses. Check requests describe the expense, list the amount of the expense, and should follow the following steps:

- 1. Use a standardized check request form to include a description of the expense, the title of the corresponding eligible grant activity, the amount of the expense, and the payee.
- 2. Get requisite approval from the supervisor.

- 3. Attach receipts and/or invoices. Make sure the amount requested matches the amount to be spent or reimbursed.
- 4. Submit to appropriate finance personnel who will verify information provided, review back-up documentation, file documentation, and prepare check(s). Once filed, the Check Request forms and attached receipts and/or invoices must have any project participant-level personally identifying information redacted.
- 5. All check requests must have at least two signatures: the requestor and the authorizer. The authorizing signature must be a director or manager that has budgetary oversight for the program incurring the expense. All significant (over \$5,000), unusual, and nonrecurring transactions must be reported to the CEO.

#### Time Sheets

Employee time sheets must reflect actual hours (not percentages) worked based on the cost allocation plan. Timesheets must be signed and dated by the employee and the supervisor with first-hand knowledge of the work performed or equivalent electronic approval. If the expenditures are paid for by more than one source (e.g., federal, public, private) the split costs should be accurately tracked within the Grantee's accounting system.

#### Accounting Standards

In addition to establishing a system of accounting sufficient to accurately record and report transactions, adequate source documentation must be maintained as support for these transactions. Source documentation includes but is not limited to the following:

- Purchase Requisitions
- Purchase Orders
- Contracts
- Contract Invoices
- Bank Statements
- Canceled Checks
- Draw downs

- Payment Vouchers
- Employee Time Sheets
- Travel Advance Requests
- Travel Reimbursement Vouchers
- Vendor Invoices
- Journal Voucher Entries
- Cash Receipts

All source documents must be coded by reference number so that a clear link exists between the fiscal records and these documents. Coding may include the check number used to make the payment, the journal entry in which the transaction was recorded or the page number from the cash receipt journal. Purchase order numbers and payment voucher numbers may also be used to provide the necessary audit link. Supporting documents can be copies or originals but must be sufficient in detail to support the transaction and to justify it as an allowable grant expense. Grantees must keep copies of the source documents and be made available for DHCD review upon request for a minimum of five (5) years. Grantees must maintain proof of cancellation (e.g., copy of check's backside, bank statement, or photocopy of check's cancellation) for all payments. While these are not required in the project participant files, they must be readily available for monitoring purposes.

# **Internal Controls**

The grantee must have appropriate internal controls in place to:

- Safeguard assets
- Prevent waste, fraud, and mismanagement
- Promote efficiency of operations
- Whistleblower protections

Effective internal controls to the extent possible must include the following procedures:

 Segregation of duties among employees to prevent one person from having complete control over all phases of any transaction

- Workflow procedures for processing all transactions from one employee to another. This
  must provide a cross check of work, but not a duplication of effort
- Rotation of duties among employees to allow for control over any one given phase and ensure that other employees can fill in when a position becomes vacant
- The procedures used should be clearly detailed and documented for all individuals to follow and as an aid in training new employees
- All assets, records, and checks must be properly protected using locks, safes, and other measures to ensure security

### Monitoring

DHCD is responsible for monitoring all program activities conducted by a grantee to ensure that the program requirements are met. Monitoring can include both programmatic and financial reviews. Grantees must make available organizational and project related records to DHCD with notice. Grantees are responsible for all programmatic and contractual terms. The grantee is responsible for ensuring that these terms and requirements are met regardless of partnership arrangements or MOUs with other organizations. Results from the monitoring of Grantees will be shared with the Grantee's executive leadership and their board of directors.

# Conflicts of Interest

Grantees and partners must have conflict of interest policies that clearly prohibit personal gain or benefit and meet other program requirements.

### Organizational Conflicts of Interest

The provision of any type or amount of assistance may not be conditional on a household's acceptance or occupancy of housing owned by the grantee, subgrantee, parent organization, or subsidiary. An organization may not both participate in decision-making related to determining eligibility and receive any financial benefit. For example, a grantee, subgrantee, parent organization, or subsidiary may not both administer financial assistance (rent, utilities, etc.) and use the assistance for households residing in units owned by the entity.

# *Individual Conflicts of Interest*

Individual conflicts of interest apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the Grantee or its Subgrantee. For the procurement of goods and services, the Grantee and/or its Subgrantee must comply with the agency code of conduct and conflict of interest policies. Individuals (employees, agents, consultants, officers, or elected or appointed officials of the Grantee or Subgrantee) may not both participate in decision-making related to determining eligibility and receive any financial benefit. This financial benefit may not be received by the specific individual, any member of their immediate family or a business interest. The restriction applies throughout tenure in the position and for a one-year period following tenure.

Upon written request of the grantee, DHCD may grant an exception to the restrictions in the paragraph above on a case-by-case basis when it determines that the exception will serve to further the goals of the program and promote the efficient use of program funds. In requesting an exception, the grantee must provide a disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made.

#### Non-Discrimination in Housing and Community Development

Grantees must comply with all applicable fair housing and civil rights requirements. In addition, grantees must make known that rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about and equal access to the financial assistance and services provided under this program. A statement of such must be included in the *Project Participant Agreement*, signed by the project participant, and maintained in the project participant file.

#### Affirmatively Furthering Fair Housing

Grantees have a duty to affirmatively further fair housing opportunities for classes protected under the Fair Housing Act. Protected classes include race, color, national origin, religion, sex, disability, and familial status. In addition, Virginia's Fair Housing Law further protects "elderliness," individuals aged 55 or older, from housing discrimination and the Virginia Values Act extends existing state non-discrimination protections for housing based on sexual orientation and gender identity. Examples of affirmatively furthering fair housing include: (1) marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency; (2) making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities (see, for example, HUD's rule on effective communications at 24 CFR 8.6); (3) providing fair housing counseling services or referrals to fair housing agencies; (4) informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1-800-669-9777; and (5) recruiting landlords and service providers in areas to which housing choice is expanded. In addition, housing discrimination complaints may be reported to the Virginia Fair Housing Office at the Department of Professional and Occupational Regulation at (888) 551-3247.

#### **Ineligible and Prohibited Activities**

Grantees that own housing units may not use VERP funds for rental assistance in any units owned by the grantee or a subsidiary. Grantees must consult with DHCD for how best to address the needs of tenants living in any grantee-owned units.

#### **Application Process**

After attending the mandatory *How to Apply Webinar*, VERP applications must be submitted through DHCD's Centralized Application and Management System (CAMS). Grantees should carefully follow all submission instructions and ensure completeness and accuracy. The *CAMS User Guide* provides detailed instructions for submission.

Applications will be accepted on or before **September 18, 2024.** All applications must be submitted to DHCD through the online application and project management system called <u>CAMS</u> (Centralized Application and Management System). Allow for up to two business days for responses to any CAMS help desk request. Applications must be submitted in CAMS on or before 11:59 PM on September 18, 2024.

#### **Application Submission**

VERP applications must be submitted through DHCD's <u>Centralized Application and Management</u>

<u>System</u> (CAMS). Grantees should carefully follow all instructions for submission.

- Applications submitted with incorrect or missing information will be reviewed "as is."
- A grantee organization must have a registered CAMS organizational profile to apply for VERP funding. Once an organization has an approved profile, individual users may be given access to CAMS by the organization's profile manager.
- Grantees may submit applications at any time prior to the deadline. DHCD will only review
  applications submitted in CAMS prior to the established deadline.
- CAMS will send the grantee an email notification when an application has been submitted and received.
- All work in CAMS should be frequently saved.
- Applicants may allow multiple users to edit and review application materials. Applicants are fully responsible for controlling security access to CAMS when the application is submitted to DHCD.
- Once the applicant begins work on the application CAMS will save the application as
   <u>Incomplete</u>. The applicant may return repeatedly to CAMS to work on this application. Please
   be sure all work on the application is saved in CAMS. The application will remain as an
   incomplete application until the applicant chooses to submit the application. Once the
   application is submitted the status will change from Incomplete to <u>Pending</u>.
- Chrome is the recommended browser.

#### **Project Information**

The grantee must login to CAMS and select the VERP application and follow these steps to apply:

- 1. Select "Apply" to prompt a Project Name. Be careful to enter a project name that DHCD can easily identify. Note that you cannot edit this name after you leave this screen.
- 2. Select "Continue" to generate an Application ID number.
- 3. Select "Continue" to view the Project Information tab.
- 4. On the Project Information page, the Organization Name will be pre-populated based on your organization's profile. Any errors or needed updates to the organizational profile must be made by the individual named as the profile manager for your organization.
- 5. On the Project Information page, enter the Project Primary Contact information. This is the name and contact information of the individual DHCD should contact regarding questions about the project.
- 6. Enter the Place of Primary Performance, which is the location where the project (primary office or service location) will be situated, and the Primary Service Area, which is the locality(ies) the project is intended to target.
- 7. Use the Print option at the top right-hand corner to produce a PDF that can be printed or saved. This document will include all the information you have entered and saved in the application.

Tip: To print an application with all the questions displayed, go to the "Narrative Information" tab, and enter "NA" into each text box. This will generate a complete copy of the application, including all the narrative questions, which you can then use outside of CAMS.

#### **Project Budget**

In the "Project Budget" tab, enter basic budget information. Input the requested funding amount in the "DHCD Request" box and the match amount in the "Other Funding" box.

### Narrative Information

Follow these steps for the narrative questions:

- 1. Go to the narrative questions section. Note that there are size limits for the text boxes.
- 2. DHCD suggests working in Word to draft your responses. This allows you to spell-check and check the size of the text before copying and pasting into the CAMS text boxes.
- 3. Once you complete the narrative information, print the questions by selecting the Print tab at the top of the page and review each for accuracy.
- 4. You can edit this information until you submit the application for review.
- 5. The CAMS text boxes only accommodate text responses. Do not paste graphics, tables, or charts into the narrative section. Instead, include them in a separate attachment.
- 6. Use the CAMS attachment section to provide any additional information that cannot fit in the narrative text boxes.

Specific narrative questions and instructions are as follows:

- 1. Tell us about the eviction rates and local needs for the locality(ies) that your proposed program would serve.
- 2. Describe your organization's experience with eviction prevention.
  - a. Include examples of providing high-access, low-barrier housing and financial assistance and services to low-income households.
- 3. Name 2-3 systemic barriers to eviction prevention in your local community and the individuals or organizations with the positional and decision-making authority to reduce or eliminate said barriers.
- 4. Describe your organization's proposed ideas for measurably reducing the barriers identified (understanding that final plans will be developed and agreed upon in coordination with local leadership).
- 5. Explain how you will target VERP resources, including:
  - a. How you plan to screen clients for VERP eligibility while maintaining a low-barrier, high-access approach to services.

- b. How you will leverage any existing eviction prevention and diversion programs in your community (if applicable).
- 6. If using an assessment tool separate from the one included in this application, describe what factors you will be using, citing data sources to substantiate those risk factors.
- 7. Describe how your organization plans to or is already engaging with your local/regional court system and how you plan to structure your court navigation program, using the potential court navigation services listed in these guidelines as a blueprint.
- 8. Tell us about what barriers may exist for making court navigation services a success in your local community.
- Share any existing court navigation services or partnerships that already exist in your proposed service area.
- 10. Describe in detail how your organization proposed to provide the following required activities described in these guidelines:
  - a. Distributing financial assistance on behalf of tenants in both the prevention and diversion phases
  - b. Providing stabilization services in both the prevention and diversion phases
  - c. Referring tenants to mainstream services, including any existing or proposed referral protocols with providing agencies
  - d. Performing data-driven, proactive outreach activities
  - e. Offering post-eviction support services (optional)
  - f. Continuing any Local Advisory Committee activities, if applicable (optional)
- 11. Describe your organization's referral protocols for connecting households to mainstream services as described in these guidelines.
- 12. Describe how your organization will provide outreach to vulnerable households and how you will assure equitable access to these resources.
- 13. Understanding that the needs of your community will be greater than the resources

  VERP can provide, describe how you will triage eligible households ensuring that

  access to your VERP funded services is not provided on a "first come, first served" basis.

- 14. Describe your organization's plans to partner with your local Legal Aid office or other organization providing free or low-cost legal services.
- 15. Describe your organization's proposed VERP management team.
- 16. Describe how your organization will coordinate with other organizations to meet the needs of clients.
- 17. If your program has a regional component (i.e., serves more than one locality), describe how you plan to coordinate resources throughout your service area.
- 18. If your organization has previously received VERP funding, describe the impact VERP has made on your community thus far and how additional funding will improve your eviction prevention and diversion efforts in your community.

# <u>Attachments</u>

Several attachments are required for the application. The "Attachment" tab lists all necessary documents. For detailed instructions, including file types and size limits, refer to the CAMS User Guide. The required application attachments for both the CY2025 and CY2026 application cycles include the following:

Application Attachments		
Name of Attachment	Requirement	
Implementation Timeline	A timeline from award date to full implementation. This should include expected services delivery start date and at least quarterly Advisory Committee meetings.	
VERP Policies and Procedures	If not finalized, provide a draft. These should include court navigation policies and procedures.	
Intake Form	Optional if using DHCD template	
Eligibility Form (Assessment Form)	Optional if using DHCD template	
Any MOUs, Letters of commitment or Related Agreements	Attach all that are applicable to application	
Match Documentation	Board-approved match documentation required	
Advisory Committee	Attach a list of members including (name and who they represent)	
Optional Attachments	Grantee additional attachments	

In some cases, CAMS allows only one attachment to be saved, such as "Other Funding Documentation." In these instances, the grantee must combine multiple sources of documentation into a single document or file for upload.

#### Additional Information

The "Additional Information" tab allows the grantee to provide any information not previously requested in the other sections of the application.

### **Local Match**

Although not required, applications with local match contributions (both in-kind and cash) will receive a scoring preference. Local COVID or other emergency resources can count toward this

local match commitment. Grantees are encouraged to secure local and regional funds to support emergency response and long-term needs. Grantees **will not** receive a scoring preference without documentation of the matching contributions.

#### **Geographic Targeting**

Preference will be given to grantees serving localities with high eviction rates, including:

- Accomack County
- Chesapeake
- Chesterfield
- Danville
- Hampton
- Henrico County
- Hopewell
- Newport News
- Norfolk
- Petersburg
- Portsmouth
- Prince George County
- Richmond
- Virginia Beach

Grantees should coordinate with local stakeholders and submit a Memorandum of Understanding (MOU) or agreement for DHCD approval to receive scoring preference.

# <u>Application Evaluation</u>

All applications received by the deadline will be reviewed by a DHCD panel and scored based on local need (20 points), program approach (45 points), and Grantee capacity (35 points).

Applications must score at least 60 points, including at least 45 points in combined approach and capacity points to be considered for funding. Up to 15 additional points have a regional

scope (5 points), provide a local match (5 points), and/or serve at least one priority area (5 points).		
points).		

VERP Application Evaluation Criteria		
<u>Criteria</u>	Scoring Elements	Maximum Points
Need	<ul> <li>Local eviction rates and needs</li> <li>Targeted localities</li> </ul>	20
	<ul> <li>Policies and procedures</li> <li>Partnerships for systems change</li> <li>Providing required VERP prevention and diversion services</li> <li>Local collaboration</li> <li>Triaging eligible households</li> </ul>	35
Approach	<ul> <li>Proposed court         navigation services and         partnerships</li> <li>Partnership with free or         low-cost legal service         providers</li> <li>Collaboration between         courts and service         provider(s)</li> <li>Outreach</li> </ul>	10
Capacity	<ul> <li>Experience serving low-income households</li> <li>Providing financial assistance</li> <li>Partnerships for systems change</li> <li>Coordination with other local service providers</li> <li>VERP Mid and Final Year Report outcomes, as applicable (for current VERP Grantees only)</li> </ul>	35
	approach and capacity score of 45 ore of at least 60 points.	100
	(Scoring Preference)	
	(serves more than one locality)	5
Local Match		5
	see geographic targeting on pages 4 and 5)	5

Note: DHCD technical assistance is limited to normal business hours.

# Conclusion

The Virginia Eviction Reduction Pilot (VERP) is designed to address systemic issues in the eviction process, provide essential support to at-risk households and foster collaborative efforts to reduce evictions across Virginia. Through strategic funding, coordination, and innovative practices, VERP aims to make evictions rare, their impacts brief and the experience humane.