

# FY2021 HUD COC PROGRAM COMPETITION RENEWAL PROJECT APPLICATION

AGENCY PROFILE			
Legal Name of Agency	Community Rebuilders		
Project Name	Keys First		
Project Start Date	11/1		
Jeff King			
Title	Divisional Director		
Address 1120 Monroe NW, Suite 220 Grand Rapids MI 4950			
jking@communityrebuilders.org			
Phone	616 458 5102		

Chec	Check one:			
	Permanent Supportive Housing			
<b>/</b>	Rapid Re-Housing			
	Transitional Housing			
	Joint Transitional Housing / Rapid Re-Housing			
Rene	wal Application Option (check one):			
<b>'</b>	Standard Renewal (no change from FY2020)			
	Consolidation (must complete Renewal applications for each project)			
	Expansion (must complete New Project Application in addition)			

Authorized Representative: I hereby certify that the information contained in this proposal is true and accurate. Any falsification of information will render the application void, and the application will not be accepted. This application has been reviewed and authorized for submission by the agency's board of directors as of the date indicated.

Name: Anna Diaz	Title: VICE PRESIDENT
Date of Board/Local Planning Body Authorization:	
Date of Anticipated Board/Local Planning Body Authorization:	10/14/21

All projects requesting renewal must demonstrate they have met minimum project eligibility, capacity, timeliness, and performance standards to be considered for funding. For each data-related question below, domestic violence service providers may use data generated from a comparable database to HMIS.

#### **GENERAL PROJECT INFORMATION**

1a. Provide a narrative describing how the project's performance met the plans and goals established in the current project's application, the project's performance in assisting program participants to achieve and maintain independent living, and record of success. (Include focus populations and preferences as specified and/or allowed by the Notice of Funding Opportunity (NOFO) under which the project was initially funded.) If the renewing project has not yet started, provide a narrative of anticipated performance in these same areas based on experience with other related projects. (1000 word limit)

The goal of the Keys First program is to efficiently and effectively end homelessness for families who have been living on the streets or in emergency shelters with cost effective, consumer driven rapid rehousing services. Screening and Assessment for entry into this project is coordinated through Coordinated Entry. Families who are living on the streets or in shelters and lack the financial resources and support networks to obtain housing on their own and have incomes at or below 30% of AMI are prioritized for this rapid rehousing project.

Consistent with the housing first philosophy, this project has a low barrier intake process and accepts families with a variety of backgrounds and barriers to housing stability, including substance abuse, criminal histories and zero income.

Participants pay 30% of their adjusted income toward rent and may receive short or medium-term assistance based on need. Priority is placed on providing only the least amount of assistance needed by a household to obtain and maintain permanent housing. All household are assisted to obtain housing in the private rental market and are assisted to secure a lease in the neighborhood of their choice near amenities that they most desire or need. All units used meet HUD Housing Quality Standards and rent reasonableness. All participating households receive services from a trained Housing Resource Specialist (HRS).

All participants receive services from a trained Housing Resource Specialist (HRS) and our community-based network of providers. These community-based providers have joined forces on the Gathering Resources & Aligning Community Efforts (GRACE) Network, to address critical Social Determinants of Health (SDoH) by building a longitudinal social record of the assessments, needs, referrals, and responses made on behalf of the individuals seeking services. Family's in the Keys First program gain access to a curated network of healthcare, education, employment, nutrition and transportation services.

This Network joins together for the purpose of addressing the multitude of challenges persons experiencing homelessness face. This Network believes an aligned cross-sector system has an important role in improving overall health and equity for families experiencing homelessness. The

Network will align diverse services and resources, build capacity, advocate, and improve health and equity for all of our community.

Housing Resource Specialist support the continuity of assessment and planning from early intervention through permanent housing stability. Services are based on the Housing First, Strengths based model that values the consumer as a partner and expert about what is needed to obtain housing stability. Services are voluntary but a minimum requirement of monthly contact ensure specific steps to achieve goals are outlined and strengths and resources are identified and rallied to address any barriers that might interfere with housing.

The Housing Resource Specialist provides services throughout program participation and for six months post exit from rental assistance. Services are designed to enhance participant's housing stability and self-sufficiency. HRS's assist with linkages and utilization of community resources and assist the household with the development of a homeless risk prevention plan. The non-housing related service needs of households are brokered via referral and linkages to mainstream community resources.

These mainstream services include, but are not limited to employment services, mental health services, legal advocacy, disability services, primary health care, substance use disorder services, counseling, etc. This project achieves national recognition for its rapid rehousing outcomes, 98% of participants exited to permanent housing in this contract year. Families served are able to exit homelessness despite the difficult rental market and quickly secure housing of their choice. Significantly our model of service delivery has allowed us to serve many more households than we are contracted to serve. We served 82 households and were contracted to serve 26. This is a testament to our ability to partner with households and rally community resources and natural supports to assist families to maintain housing effectively and efficiently.

This project serves many youths as defined by HUD. There were 9 youth led (18-24-year old) households were served in this project. 203 children were served in this contract year; these were children who were living in shelters or places unfit for human habitation who now have a place to call home. There were 49 adults served that are survivors of domestic violence.

It's also a very cost effective project with the average amount of financial assistance provided to stabilize a family being \$3,772.00. The strengths-based housing first model is employed to be able to achieve these successful outcomes. Each family partners with a Housing Resource Specialist and together they achieve, safe and stable permanent housing. As part of continuous quality improvement, we utilize feedback surveys, focus groups and reliance on data.

We are aware of the potential for racial disparity amongst service deliverers and continually monitor demographics to ensure that we are serving all groups fairly and equitably. In 2019-20, this project served the following demographic groups: 51% Black or African American, 33% White, 15% Two or more races, 20% Hispanic. Based on program survey respondents reported they felt supported by their Housing Resource Specialist and survey respondents reported that Community Rebuilders helped them to obtain decent, safe and sanitary housing of their choosing.

1b. Use the last completed grant year APR for this and all other data/outcome measure questions. If the renewing project has not yet started, indicate the planned number of units.

Please provide project start and end date:  $\underline{11/1/2019\text{-}10/31/2020}$ 

Planned Number of Households Served	Actual Number of Households Served	Number of Stayers	Number of Leavers
26	82	125	180

2. Has the p	roject had any significant changes since the last funding appr	oval?			
☐ Yes	$\square$ Yes $\blacksquare$ No If "yes", complete the chart below to indicate the change.				
Charle					
Check					
change		Previous	New		
type					
	Decrease in the number of persons served				
	Change in number of units				
	Change in project site location				
	Change in focus population				
	Change in component type				
	Change in grantee/applicant				
	Line item or cost category budget changes more than 10%				
	Other:				

If change was made, include as many of the following that apply as attachments to your application:					
Attached (check)					
	Attachment: Written communication to HUD requesting the significant change				
	Attachment:	HUD's written approval o	f the change requested		
			approval of the requested	change	
	,		- th	0-	
	_	SECTION I: Proi	ect Effectiveness		
			rans, Chronically Homeless		
	iolence Survivo	ors)? Enter the number of	units dedicated or prioritize	ed for each population at	
turnover.					
			Number of Units		
		Dedicated	Dedicated Plus	Prioritized	
Veterans					
	y Homeless				
Families		96			
Youth	Vi alamaa				
Domestic	violence				
4. Housing F	First				
		re that participants are NO due to the following:	OT screened out (or		
Having too	o little or not e	nough income		■ Yes □ No	
Active sub	stance use or h	nistory of substance use		■ Yes	
				■ Yes	
Having a c	riminal record	(other than for state-man	idated restrictions)	□ No	
History of	victimization (	e.g. domestic violence, se	xual assault, childhood	■ Yes	
abuse)				□ No	
b. Does the project ensure that participants are not terminated from the program for the following reasons?					
Failure to participate in supportive services				■ Yes □ No	
■ Yes				■ Yes	
Failure to	Failure to make progress on a service plan			□ No	
		An immunication		■ Yes	
Loss of Inc	Loss of income or failure to improve income			□ No	
Any other	activity not co	vered in a lease agreemer	nt typically found for	■ Yes	
unassisted	unassisted persons in the project's geographic area				

c. In addition to the answers above, does the project follow a "Housing First" Approach? Please describe. (500 word limit)

Community Rebuilders aims to make homelessness rare, brief and nonrecurring. Homelessness is first and foremost a housing crisis and can be addressed through the provision of safe and affordable housing. That is why we use a Housing First approach. We are "consumer ready" - participants do not have to address other problems, such as mental health issues, or complete treatment services prior to being housed. Sobriety and criminal history do not prevent participants from successfully connecting to housing.

Community Rebuilders has been providing housing first services in the community for 15 years. This work has been guided by the belief that people need a safe place of their choosing to live before attending to anything less critical, such as getting a job, budgeting properly, or attending to substance use issues. The Housing First approach views housing as the foundation for life improvement and enables access to permanent housing without prerequisites or conditions beyond those of a typical renter.

We commit to all of the persons we serve, that we shall not;

- 1. Require people experiencing homelessness to address all of their problems, including behavioral health problems, or to graduate through a series of service programs before they can access housing
- 2. Mandate participation in services either before obtaining housing or in order to retain housing

Our approach is validated by data and the feedback of our consumers.

Community Rebuilders most recently completed an independent evaluation of Housing First services in March of 2021. 47 households were included in the independent 3rd party evaluation conducted by Public Sector Consultants with support from an Invest Health grant provided through Spectrum Health Healthier Communities.

Overall outcomes indicated that highly vulnerable households were successfully able to obtain the safe and decent housing of their choosing - then connect to critical services in the community that support health, well-being and long-term housing stability.

Demographics for the head of household in the evaluation group.

Black or African American 70%
White 30%
Male 50%
Female 50%
Median Age 51

At entry, 53% of evaluation households had experienced four or more episodes of homelessness and 30% had three or more disabling conditions. In total, 88% of households met the HUD definition of chronic homelessness.

Through the implementation of a Housing First model, program participants were assisted with quickly increasing their income (38%), improving their health and access to healthcare (51%) and improving access to food and transportation (51% and 50% respectively). Across all households served in similar Housing First projects, 97.6% of households remained in their project or exited from their project to stable housing.

Our Housing First approach works because it prioritizes access to safe and affordable housing that is chosen by the service recipient. That choice supports neighborhood and community integration, honors self-determination and ensures every household can identify housing that meets their unique needs.

Housing First is a proven solution to dissolve homelessness. Community Rebuilders is a HUD Best Practice Award recipient, and our approach has served as a model for communities across the country.

### *5.* Supportive Services

Does the project include the following supportive service activities?	
Transportation assistance to clients to attend mainstream benefit appointments,	■ Yes
employment training, or jobs?	□ No
At least annual follow-ups with participants to ensure mainstream benefits are	■ Yes
received and renewed?	□ No
Do project participants have access to SSI/SSDI technical assistance provided by	■ Yes
the applicant, a subrecipient, or partner agency?	□ No
Has the staff person providing the technical assistance completed SOAR	■ Yes
training in the past 24 months.	□ No

6. Describe how the project aligns with the objectives and goals outlined in the <u>CoC Compass</u>. (500 word limit; not scored.)

The Keys First project aligns with the goals and objectives outlined in the CoC compass. The program understands the importance on understanding the impact that homelessness has on one's life. At Community Rebuilders we pride ourselves on working with households to quickly identify housing,

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intentionally identifying ones's strengths and utilizing those skills to obtain and maintain housing. Our goals and strategies are in alignment with National standards of not only making homeless rare, brief and non reoccurring but also ensuring we are leading by best practices, and allowing the data to quide our work.

Community Rebuilders specializes in providing solutions for ending homelessness and increasing community well-being. We use data to direct and assess our impact, ensuring our projects produce equitable outcomes; including the overall equity of core CoC vitals. We seek perspectives of person with lived experience. We implement practices that foster and strengthen equity. Our programs facilitate access to essential services, reduce destabilization and foster community. This is all while making the rental market accessible and affordable.

Our work is driven by the effort to make homelessness rare, brief, and non-recurring throughout the community. This is made possible through the belief that housing is a basic human right that everyone should have access to without precondition. We value sharing openly and transparently the data and outcomes of our projects and services.

The Keys First Housing project aligns with the core objectives and goals outlined in the CoC compass. The project intentionally collaborates with CoC partners

7. All recipients of HUD CoC Program funding are required to participate in Coordinated Entry. Did the project take 100% of all referrals from Coordinated Entry (or community process if Category 4 homeless) in the past grant year *or* will it once the grant year begins? (Verified by HMISreports)

Yes	П	Nο

8. Describe the training applicant and sub-applicant staff have undergone or will undergo as well as agency policies or procedures related to diversity, equity, and inclusion as it pertains to service provision. (500 word limit)

Community Rebuilders' success is built on a firm philosophical foundation that relies on the resiliency and strengths of the individuals served and our community. In 2006, we adopted a housing first, strengths-based model of service delivery and created a Housing Resource Specialist certification that has been duplicated across the state and in locations across the country.

The Housing Resource Specialist (HRS) certification is built upon a social justice framework that honors self-determination; equitable partnerships and acknowledgment of historical injustices.

Training is rooted in a strength-based approach from a social justice perspective. This evidenced-based approach includes intersecting sets of practices, including; fostering authentic democratic relationships, exploration of strengths and the power of natural support systems.

Community Rebuilders and sub-grantee staff receive quarterly trainings; including cultural competency. This training helps staff to avoid well-intentioned but alienating behavior and teaches to pay attention to those cues that speak discomfort. Training emphasizes respect and acceptance of our consumers as collaborators determining their outcomes. This model encourages staff to adopt a more dynamic interactive view of culture and communication while paying attention to important cues that could improve the helping process. Training staff how to make this collaboration happen is the cornerstone to creating culturally competent services.

Our monitoring of sub-grantee's includes evaluation of outcomes and metrics on the demographics of households served, ensuring equity in performance measures.

We observe consumer feedback surveys ensure we continually meet or exceed project goals. These project goals are driven by equity in outcomes of program participants served. This includes evaluating key performance indicators such as the rate of positive exits from services based on race and ethnicity.

Exit rates based on race from all Community Rebuilders projects: January 1, 2019 - June 30, 2021.\*

All persons served 94.7%

Non-white (HUD) 95.6%

White (HUD) 92.6%

\*HMIS

We gain wisdom from the experience of the consumers we serve, the community at large, promising and evidenced-based practices, and out of the box ideas that may seem nontraditional but just might work. This makes us a flexible and nimble organization with diverse partnerships and ideas. We believe and have demonstrated that with collaboration and commitment to our core values we can make homelessness rare, brief and nonrecurring.

We are deliberate in considering how actions, programs and policies impact different social groups and understand that effective and meaningful social equity practices are not void of historical and social context.

We engage in ongoing efforts to produce a culture that values social equity. A culture which values issues of equity dedicates resources (human and financial) to develop strategies to implement highly comprehensive approaches for social equity measurement.

We understand that effective and meaningful social equity practices are not void of historical and social context. Considerations of both historical and social contexts offer meaning to measurement data and a clearer picture to evaluate and understand shifts in equity. Ultimately, it is only when equity is experienced by those who are most marginalized, underrepresented or not represented that true social equity is achieved.

9.	9. What was the project's utilization rate? (Average of Quarterly Point- in-Time Co	unts in <mark>AP</mark> I	<mark>R</mark> 8b divided	d by
	total contracted units.) 100%			

10. Expenditure of Funds: Use last completed HUD FY year.

a. Total amount authorized within eLOCCS	918,834
b. Remaining balance in eLOCCS	0
c. Percentage recaptured Divide answer b. by answer a. and multiply by 100	0

11.	Were drawdowns mad	de to eLOCCS at	least quarterly?	(Demonstrated in	eLOCCSattachment)
	■ Yes □ I	No			

**HMIS Participation** (If the renewing project has not completed a full year, share information from the last completed year of another HUD funded project or similarly designed project through this agency)

12. Indicate how many APR Data Quality Elements (DQE) have 5% or less null or missing values (APR Q06; use data from alternative system if DV program):

Data Quality Element APR 6a6d.			
Nu	mber of elements with 5%	or less null or missing val	ues
DQE 6a.	DQE 6b.	DQE 6c.	DQE 6d.
6 5		3	3
Total the numbers above, divide by 18, multiply by 100 for a percent: 94%			

HUE	) Monitoring			
13.		cipient have any HUD monitoring f	findings in any of the agend	cy's projects?
		explain below findings in detail for	the Funding Review Panel	Include details on the
	•	of the finding, resolution and corre		
ŀ	o. Has your orga	anization been monitored by HUD	in the past three (3) years?	?
		Yes □ No		
,	fues include a	s attachments: Monitoring report	from HIID your organizati	on's response to any
•	findings, do	cumentation from HUD that finding	· · · · · · · · · · · · · · · · · · ·	
,		cumentation. lost recent monitoring by an entity	other than HIID for foder	al or state funding /ESG
,	-	and include as attachments: Moni		
		cumentation from entity that findi		
	<del>-</del> '	cumentation.	8 0 0000	,
	pact on Homel		+	
	. wnich popula situation)	tion(s) does the project serve? (no	t scorea, taken into conside	eration in a tie score
,	orcuation,			
	Chronically ho	omeless	<b>V</b>	
	Veterans	Youth (18-24)	V	
	Domestic Vio	lence 🔽		
ı	Ca	and of Ducinet		halda Camiad
	Total units	cope of Project	Annual House Households with at	noias Servea
	Total units	26	least one adult and one	82
			child	
	Total beds	00	Adult households	0
		90	without children	0
Se	rving High Nee	d Populations (If the renewing pro	iect has not completed a fu	ull year, share information
	~ ~	pleted year of another HUD funded	· · · · · · · · · · · · · · · · · · ·	•
ag	ency)			
15.	What perce	entage of the households served m	et "hard to serve" criteria (	defined as having zero
i	ncome at start,	entry? (APR 18. Add values for No	Income and divide by total	l in third to last row):
	44%			
16.	What percent	age of the households served met	"hard to serve" criteria de	fined as having two (2) o
r	more physical o	r mental health conditions known	at start/entry (APR 13.a.2.	add totals for two and
t	three or more c	onditions, then divide by total):		
	5%			

17. What percentage of the households served were chronically homeless? (APR Q26a. divide total chronically homeless households by total households):
18. What percentage of the households served were families experiencing homelessness? (APR Q8a. divide total households with adults and children by total households): 100%
Section II. Project Performance
<b>Performance Data</b> (If the renewing project has not completed a full year, share information from the last completed year of another HUD funded project or similarly designed project through this agency)
19. Length of Stay (Joint TH/RRH projects – complete either option B or Cbelow)
a. Permanent Supportive Housing: Calculate the percentage of leavers that remained in project more than 180 days (APR 22a.1 add the number of leavers staying 181 days or more and divide by total number of leavers)
b. Rapid Re-Housing: Calculate the percentage of participants that took 60 days or less from project entry to lease up (APR 22c add the number of persons who moved in in 60 days or less and divide by total persons moved into housing)  80%
c. Transitional Housing: Calculate the average length of project stay in days (APR 22b)
20. Exits to Permanent Housing (Joint TH/RRH projects – complete either option B or Chelow)
a. Permanent Supportive Housing: Calculate the percentage of participants who remained in project, or exited to positive housing destinations. ([Total persons exiting to a positive housing destination [APR 23c.] + total number of stayers [5a.9.]] divided by [total persons served [APR 5a.1] - Total persons whose destinations excluded them from the calculation [APR 23.c.]])
b. Rapid Re-Housing: Calculate the percentage of participants who exited to positive housing destinations (APR 23c)
98%
c. Transitional Housing: Calculate the percentage of participants who exited to positive housing destinations (APR 23c)

21	New or increased income and Earned income
a.	PSH Only Project Stayers: What percent of project stayers had new or increased earned income within the project contract year? <i>APR 19a1 row</i> 1, last column
b.	PSH Only Project Stayers: What percent of project stayers had new or increased other (non-employment) income? <i>APR 19a1 row</i> 3, last column
c.	Project Leavers: What percent of project leavers had new or increased earned income? APR 19a2 row last column
	29%
d.	Project Leavers: What percent of project leavers had new or increased other (non-employment) income? APR 19a2 APR 19a1 row 3, last column
	25%

# **Financial Information**

# **PROJECT BUDGET**

Activity	Requested Funds	% of Requested Funds	Other Funding	Total Project Cost
Acquisition	\$	%	\$	\$
New Construction	\$	%	\$	\$
Rehabilitation	\$	%	\$	\$
Leasing	\$	%	\$	\$
Rental Assistance	\$ 431,736	47 %	\$	\$ 431,736
Supportive Services	\$ 391,463	43 %	\$	\$ 391,463
Operating Costs	\$	%	\$	\$
HMIS	\$ 41,200	4 %	\$	\$ 41,200
Project Administration (limited to 7%)	<sub>\$</sub> 54,435	6 %	\$	54,435 \$
Total Project Cost	\$ 918,834	100 %	\$	\$ 918,834

## Attachment A

Identify all match and leveraging funds. Only those dollars or non-cash contributions (in-kind) that directly support the project should be listed. This may include federal, state, or local government funds, private funds, grants, and/or other sources, including donations. Worksheet should reflect information in eSnaps application.

Match must be at least 25% of total funding requested. Documentation of match must be provided with the application.

Resource	Cash or In Kind	Committed or Planned/ Pending	Available (MM/YY)	Amount/ Value	% of HUD Project Award	Serves as CoC Program Match? (Y/N)
Multiple Human Services Organizations	☐ Cash <b>I</b> n Kind	■ С □ РР	11/01/2022	\$229,709	%25	■ Yes □ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	□ Yes □ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	☐ Yes ☐ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	□ Yes □ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	☐ Yes ☐ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	☐ Yes ☐ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	☐ Yes ☐ No
Total leveraged from other sources			\$ 279,709	% 25		

Attach additional forms as necessary

#### Attachment B

Attachments listed below are required but unscored. Failure to include any documentation that is required may result in disqualification of the application. *Please submit each document as a separate attachment numbered in accordance with the list below.* 

## All projects must include:

■ #1: Annual Progress Report (APR) for the project's most recent completed contract year, or the most recently completed contract year for another HUD-funded project or similar project if the renewing project has not yet completed a full year. Other structured outcome report for non-HMIS participating agencies are allowed (i.e. domestic violence agencies).
■ #2: Line of Credit Control System (LOCCS) report showing drawdowns and final balance
■ #3: Project Application submitted in <i>e-snaps</i>
■ #4: Documentation of all match
Each applicant must include one of the following two (#5):
■ Monitoring report from US Department of Housing and Urban Development (HUD)
$\square$ Monitoring report from an entity other than HUD for federal or state funding (ESG, CDBG, etc.)
If relevant include (#6):
$\square$ A: Organization's response to any findings
$\square$ B: Documentation from HUD (or other entity) that finding or concern has been satisfied
$\square$ C: Any other relevant documentation
$\hfill\square$ D: Written communication to HUD requesting the significant change indicated in question 2.
☐ E: HUD's written approval of the change requested in question 2.

#### Attachment C

#### **General Administration Requirements and Terms for HUD Financial Assistance Awards**

The agency certifies to the Grand Rapids Area Coalition to End Homelessness that it and its principals are in compliance with the following requirements as indicated by checking the box.

- Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity. See the Federal Register dated February 1, 2012, Docket No. FR 5359-F-02 and Section 2 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Affirmatively Furthering Fair Housing. See Section 1.b of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Compliance with Fair Housing and Civil Rights. See Section 1.a. of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency (LEP). See Section 1.d. of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Economic Opportunities for Low- and Very Low-income Persons (Section 3). See Section 1.c. of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Accessible Technology. See Section 1.e. of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Conducting Business in Accordance with Core Values and Ethical Standards/Code of Conduct. See Section 14 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards Ensuring the Participation of Small Disadvantaged Businesses, and Women Owned Business. See Section 3 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Equal Participation of Faith-based Organizations in HUD Programs and Activities. See Section 4 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Real Property Acquisition and Relocation. See Section 5 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- OMB Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. See Section 7 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Eminent Domain. See Section 11 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Accessibility for Persons with Disabilities. See Section 12 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Participation in HUD-Sponsored Program Evaluation. See Section 6 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards

- Environmental Requirements. Notwithstanding provisions at 24 CFR 578.31 and 24 CFR 578.99(a) of the CoC Program interim rule, and in accordance with Section 100261(3) of MAP-21 (Pub. L. 112-141, 126 Stat. 405), activities under this NOFA are subject to environmental review by a responsible entity under HUD regulations at 24 CFR part 58. Yes
- *Drug-Free Workplace.* See Section 8 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Safeguarding Resident/Client Files. See Section 9 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards *Compliance with the Federal Funding Accountability and Transparency Act of 2006 (Pub. L. 209-282) (Transparency Act), as amended.* See Section 10 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Lead-Based Paint Requirements. For housing constructed before 1978 (with certain statutory and regulatory exceptions), CoC Program recipients must comply with the requirements of the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4801, et seq.), as amended by the Residential Lead-Based. No
- Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851, et seq.); and implementing regulations of HUD, at 24 CFR part 35; the Environmental Protection Agency (EPA) at 40 CFR part 745, or State/Tribal lead rules implemented under EPA authorization; and the Occupational Safety and Health Administration at 29 CFR 1926.62 and 29 CFR 1910.1025. No
- Violence Against Women Reauthorization Act of 2013: Implementation in HUD Housing Programs (24 CFR Parts 5, 91, 92, 93, 200, 247, 547, 576, 880, 882, 883, 884, 886, 891, 905, 960, 966, 982, and 983). See Section 6 of the General Administrative Requirements and Terms for HUD Financial Assistance Awards
- Attestation that all attachments as required by HUD are uploaded in *e-snaps*. See Notice of Funding Opportunity for the 2021 Continuum of Care Program Competition FR-6500-N-25.

This list is not exhaustive of all HUD requirements. Applicants are encouraged to review the General Administrative Requirements and Terms for HUD Financial Assistance Awards, found at: <a href="https://www.hud.gov/program\_offices/spm/gmomgmt/grantsinfo/fundingopps">https://www.hud.gov/program\_offices/spm/gmomgmt/grantsinfo/fundingopps</a> to ensure eligibility.

Agenc	, COMMUNITY REBUILDERS
Ackno	wledged By:
	VERA BEECH EXECUTIVE DIRECTOR
_	10/11/21
Date:	10/11/21