FY2021 HUD COC PROGRAM COMPETITION
RENEWAL PROJECT APPLICATION

AGENCY PROFILE	
Legal Name of Agency	Heartside Nonprofit Housing Corporation
Project Name	Commerce Apartments
Project Start Date	February 1, 2022
Contact Person	Rebecca Long
Title	Director of Asset Management
Address	101 Sheldon Blvd. SE Ste. 2, Grand Rapids, MI 49503
Email	rlong@dpgr.org
Phone	616-855-0426

Check one:

☑ Permanent Supportive Housing

☐ Rapid Re-Housing

☐ Transitional Housing

☐ Joint Transitional Housing / Rapid Re-Housing

Renewal Application Option (check one):

☑ 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: Jeremy DeRoo	Title: President
Date of Board/Local Planning Body Authorization:	N/a
Date of Anticipated Board/Local Planning Body Authorization:	December 1, 2021

*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)*

Commerce Apartments provides 42 units of single occupancy Permanent Supportive Housing, 100% of which are dedicated to housing chronically homeless individuals. Commerce Apartments operates as a true low barrier, Housing First project, and receives 100% of its referrals from Coordinated Entry. Originally the project was staffed by two full-time Pine Rest Christian Mental Health Services on-site case managers, but due to statewide mental health budget cuts, which directly affect the Network 180 funding for these two positions, these positions were eliminated in February 2018. As of October 2018, Dwelling Place funds one on-site Resident Services Coordinator (RSC) to replace the case management services lost by Pine Rest's staff departure. As before with Pine Rest's staff, this RSC is available on an as needed basis to better connect residents with mainstream services. Our RSC provides and/or facilitates on-site life skills training in various fields including but not limited to, employment, health care awareness, nutrition, women's groups and social activities. In addition to our RSC, Pine Rest still operates their Community Services Clinic out of Commerce apartment's commercial space, thus making the availability of mental health and substance abuse outpatient services more accessible for the project's vulnerable population. In addition to the ongoing services listed above, Commerce Apartments offers many Community Building and Engagement programs in such arenas as community gardening, leadership development, volunteer opportunities, visual and performing arts, and peer support. It is our goal to give our residents both on-site and off-site outlets and opportunities for engagement not only in their own building community but also in the neighborhood and community as a whole, opportunities to foster socialization, overall life enrichment, and to increase housing stability. All of these efforts have been tested, and the regular modus operandi and service delivery has been forced to change since the onset of the COVID-19 pandemic in 2020. In mid March 2020 our on-site staff began to rotate shifts with portions of their week spent working remotely to increase social distancing. Maintenance practices were changed to only emergency and unit turn work orders with staff and resident safety in mind, and mitigating measures to greatly reduce staff one-on-one interactions with residents and encourage social distancing were implemented. In the absence of regular staff and resident in-person interaction, Dwelling Place instituted portfolio-wide Resident Wellness Surveys, during which every resident was contacted and surveyed to assess the effects of the pandemic on each individual resident. This included assessing the impact of the pandemic on their income, their health, their social isolation and their access to healthcare, basic and essential needs such as food and transportation, and PPE, their ability to access the internet and if so, what types of devices they were using to do so. This survey was conducted in the Spring and Fall of 2020, and vulnerability scores were generated based on resident's response,

follow-up care was then targeted to those with the highest demonstrated need and vulnerability, and strategies for virtual engagement and assistance were created based on individual property and population needs. Outdoor engagement activities such as community gardening that were deemed safer and provided more opportunity for social distancing were imperative during this time to help combat social isolation and its effects. In addition to impacts to service delivery, the pandemic and corresponding Statewide Stay at Home Orders also greatly affected operations of the property, particularly processes, partners and stakeholders who contribute to unit turns. Court system limits to essential functions and furloughs at city and state housing authorities on whom we're dependent to process probate decisions to reclaim units and to process and approve new resident applications were both affected. Statewide Stay at Home orders also affected vendor availability necessary for many elements of unit turns. All of these disruptions contributed to lengthy turn times, which ultimately led to a lower project utilization rate for the grant period. In spite of these challenges, the project's performance measures, indicators of our success rate helping project participants maintain independent living, increased from prior reported grant periods. The HUD Housing Stability Measure goal, established in the project's application was 79%, during the last reported grant period, as noted in the APR, the project accomplished a 93% success rate in this category. The Total Income Measure goal established as 57% in the project's application, was exceeded as well with the project's last completed APR noting a success rate of 90% who maintained or increased their income (from all sources) as of the end of the operating year or program exit. In addition, there were 13 grant period program participants, or 28%, who entered the project with zero income. Of those individuals, only 2 of them reported zero income at annual assessment, and all of those who moved out had income at that time. Only 4% of participants reported zero income as of their most recent assessment or exit. Lastly, 43% of program participants have called Commerce Apartments home for more than three years. The level at which this project has exceeded the original project performance goals set forth in its application, is a testament to the importance of our on-site support staff, and the site staff as a whole, as they collaborate to continue to bring enriched, safe, affordable, supportive housing to our residents. Environmental Review is currently in process for this project.

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: 2/1/2020 - 1/30/2021

Planned Number of Households Served	Actual Number of Households Served	Number of Stayers	Number of Leavers
42	47	35	12

2. Has the project had any significant changes since the last funding approval?

☐ Yes ◼ No If "yes", complete the chart below to indicate the change.

Check change type		Previous	New
☐	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 of the change requested
☐	N/A: HUD has not yet provided written approval of the requested change

SECTION I: Project Effectiveness

3. Does the project serve priority populations (Veterans, Chronically Homeless, Families, Youth, Domestic Violence Survivors)? Enter the number of units dedicated or prioritized for each population at turnover.

	Number of Units		
	Dedicated	Dedicated Plus	Prioritized
Veterans	N/a	N/a	N/a
Chronically Homeless	42	N/a	N/a
Families	N/a	N/a	N/a
Youth	N/a	N/a	N/a
Domestic Violence	N/a	N/a	N/a

4. Housing First

a. Does the project ensure that participants are NOT screened out (or denied project entry) due to the following:	
Having too little or not enough income	■ Yes ☐ No
Active substance use or history of substance use	■ Yes ☐ No
Having a criminal record (other than for state-mandated restrictions)	■ Yes ☐ No
History of victimization (e.g. domestic violence, sexual assault, childhood abuse)	■ Yes ☐ 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
Failure to make progress on a service plan	■ Yes ☐ No
Loss of income or failure to improve income	■ Yes ☐ No
Any other activity not covered in a lease agreement typically found for unassisted persons in the project's geographic area	■ Yes ☐ No

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

Commerce Apartments operates as a true low barrier, Housing First project, whereby it does not deny an indiviudal entry into the program based on income, substance use, credit, domestic violence, or criminal history (other than for state mandated restrictions), nor does it mandate that a resident must meet with the available on-site support services, or terminate their housing for failure to increase/obtain their income, abide by a service plan, or for being a victim of domestic violence. All criminal history screening is performed by Michigan State Housing Development Authority (MSHDA), the project's subsidy provider. Commerce Apartments, and Dwelling Place's three PSH projects (Commerce, Ferguson and Verne Barry Place) as a whole, work to move a prospective participant into permanent housing quickly. To help facilitate this, each referral is assisted by an entire property/project team. Property Managers and Resident Services Coordinators (RSC) work together to gather required documentation and process applications quickly. Staff meet weekly in Blended Management meetings to coordinate and review referrals, and a Referral Review team consisting of Property Managers, RSCs, upper level Management, and partner agency representatives including shelters, outreach, and Coordinated Entry, meets every other week to review the progress of referrals and coordinate services to help gather required documentation, ensure faster processing and clear lines of communication, and ultimately coordinate the move in process.

5. Supportive Services

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

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

As a Housing First, Permanent Supportive Housing project that dedicates 100% of its beds and units to house chronically homeless individuals, Commerce Apartments aligns with the CoC Compass goals on multiple levels. Like the beliefs set forth in Coalition Compass, Commerce Apartments operates on the belief that housing is a fundamental human right and that all people can be successful in housing, no matter their history with housing or life factors. The property does not screen for crimanl background at the project level, this is only done by MSHDA, the state housing authority and subsidy provider. Therefore, only convictions that fall under state mandated criminal screening criteria and HUD mandated criteria are considered, the knowledge of what is in this criminal background is not communicated to project staff. In addition, there are no pre-conditions to becoming housed - there aren't any treatments or classes that must be taken before a potential participant is considered housing eligible. Commerce Apartments, and all 3 Dwelling Place PSH properties as a whole, are constantly working towards becoming better Intentional Collaborators. This is achieved through our bi-monthly Referral Review meetings where outside agency partnership has proven critical in

gathering necessary homeless, identification, and disability documentation to move a prospective participant into housing quickly. A common occurrence at these meetings is a revelation of an ID held at partnering shelter agency, or additional homeless documentation from an outreach worker - items that often serve as the last piece of missing documentation needed to prove a participant's eligibility and move that participant through the process faster. Our workflows and times to process new applications improved dramatically when we started involving those partner agencies three years ago. In addition to the Referral Review meeting, Dwelling Place has also been integral in the development and implementation of FUSE (Frequent Users System Engagement). A multi-agency endeavor to provide supports and house those individuals who are frequent users of health care, particularly emergency hospital systems, in an effort to provide housing stability in the hopes that this will translate to less utilization of emergency services and ultimately health stability. Commerce Apartments, as well as Dwelling Place's two other PSH projects, Ferguson Apartments and Verne Barry Place, are committed to providing resources to house members of this population who fit the eligibility of the projects, and forward this initiative.

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 HMIS reports)

◼ Yes ☐ No

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)*

Diversity, Equity and Inclusion (DEI) work has been a major initiative of the organization since August of 2018. Dwelling Place aspires to raise community awareness and celebrate the genuine diversity present in the residents we serve and believes that the organization's capacity to serve the community will be enhanced if we work towards maintaining a board and employees whose demographic makeup closely parallels that of the neighborhoods and communities we serve. The current Dwelling Place Diversity, Equity, and Inclusion Plan, board approved on August 5, 2020, and included as an attachment for your review, outlines the organization's Core Values and Beliefs, as well as the background of the organization's DEI work, plans and goals outlined for 2020 – 2023. The Diversity, Equity, and Inclusion Council, formed in 2018, is a sitting Committee of the Board of Directors and includes participation from multiple organizational departments and board members. One of the largest DEI initiatives to date was a staff and board-wide workshop titled, "Understanding Systemic Racism: A Framework for Positive Action," which was held on August 21, 2020. This workshop, held virtually due to the pandemic, was led by Dr. Steve Robbins, a "diversity expert" who has led workshops for worldwide organizations such as Walmart and Coca Cola, whose background in communication science, social psychology and cognitive neuroscience creates the foundation from which he teaches. This 3-hour workshop led staff and board members through the subtle, hidden aspects of racism and systemic racial bias via interactive exercises, insightful videos, and informed dialogue. The workshop's intent is to take care of the knowledge and understanding components while also providing action steps that flow from a better understanding and felt knowledge of racism and related issues. In addition to this organizational-wide training, several members of the Support Services Department have taken part in trainings since 2020 including but not limited to: Introduction to Advanced Ethics: Cultural Humility and Cultural Competence, Introduction to Advanced Ethics: Social Justice and Ethics, Racism and Belonging a NeighborWorks America training presented by Build Healthy Places Network, Delivering Culturally and Linguistically Appropriate Care in a Community Mental Health Setting, Racial Justice Institute Network Webinar: Preventing Evictions for Communities of Color During COVID-19, Engaging people with complex health and social needs in advocacy (and beyond), and Workplace Diversity, Inclusion & Racial Sensitivity. In the words of a few of our Resident Service Coordinators these trainings have translated to changes in service delivery for our residents in many forms – "Realizing that the environment our residents have been in, trauma they've experienced, the part of the world they're from, all shape who they are and how they do things and make decisions, helps me to have empathy and work with them more effectively." Another quote from one of our RSCs regarding Diversity vs. Inclusion relays, "Being able to understand that there is a difference and just because we say we want to help a population of people, doesn't mean that our policies and ways that we work with them are always inclusive."

Efficient Use of Funding *(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)*

9. What was the project's utilization rate? (*Average of Quarterly Point- in-Time Counts in CAPER 8b divided by total contracted units.)* 85%, please see explanation in 1a.

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

a. Total amount authorized within eLOCCS	$245,536
b. Remaining balance in eLOCCS	$0.00
c. Percentage recaptured *Divide answer b. by answer a. and multiply by 100*	0%

11. Were drawdowns made to eLOCCS at least quarterly? (*Demonstrated in eLOCCS attachment*)

■ Yes ☐ 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 6a.-6d.			
Number of elements with 5% or less null or missing values			
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% (17 of 18)			

HUD Monitoring

13. a. Does the recipient have any HUD monitoring findings in any of the agency's projects?

☐ Yes ☑ No

If yes, explain below findings in detail for the Funding Review Panel. Include details on the nature of the finding, resolution and corrective actions taken, if any.

b. Has your organization been monitored by HUD in the past three (3) years?

☐ Yes ☑ No

If yes, include as attachments: Monitoring report from HUD, your organization's response to any findings, documentation from HUD that finding or concern has been satisfied, and any other relevant documentation.

If no, provide most recent monitoring by an entity other than HUD for federal or state funding (ESG, CDBG, etc.) and include as attachments: Monitoring report, your organization's response to any findings, documentation from entity that finding or concern has been satisfied, and any other relevant documentation.

Impact on Homelessness

14. Which population(s) does the project serve? *(not scored, taken into consideration in a tie score situation)*

Chronically homeless	☑	Families	☐
Veterans	☐	Youth (18-24)	☐
Domestic Violence	☐		

Scope of Project		Annual Households Served	
Total units	42	Households with at least one adult and one child	0
Total beds	42	Adult households without children	42

Serving High Need Populations *(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)*

15. What percentage of the households served met "hard to serve" criteria defined as having zero income at start/entry? *(APR 18. Add values for No Income and divide by total in third to last row)*:

28% (13 of 47)

16. What percentage of the households served met "hard to serve" criteria defined as having two (2) or more physical or mental health conditions known at start/entry *(APR 13.a.2. add totals for two and three or more conditions, then divide by total)*:

70% (33 of 47)

17. What percentage of the households served were chronically homeless? *(APR Q26a. divide total chronically homeless households by total households)*:

   100% (47 of 47)

18. What percentage of the households served were families experiencing homelessness? *(APR Q8a. divide total households with adults and children by total households)*:

   0% (the project serves chronically homeless individuals)

Section II. Project Performance

Performance Data *(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 C below)***

   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)*

   83% (10 of 12)

   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)*

   N/a

   c. Transitional Housing: Calculate the average length of project stay in days *(APR 22b)*

   N/a

20. Exits to Permanent Housing ***(Joint TH/RRH projects – complete either option B or C below)***

   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])*

   93% (39 of 42)

   b. Rapid Re-Housing: Calculate the percentage of participants who exited to positive housing destinations *(APR 23c)*

   N/a

   c. Transitional Housing: Calculate the percentage of participants who exited to positive housing destinations *(APR 23c)*

   N/a

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? *APR 19a1 row 2, last column*

0%

b. PSH Only Project Stayers: What percent of project stayers had new or increased other (non-employment) income? *APR 19a1 row 4, last column*

89.66%

c. Project Leavers: What percent of project leavers had new or increased earned income? *APR19a2 row 2, last column*

0%

d. Project Leavers: What percent of project leavers had new or increased other (non-employment) income? *APR 19a2 APR 19a1 row 4, last column*

75%

Financial Information

PROJECT BUDGET

Activity	Requested Funds	% of Requested Funds	Other Funding	Total Project Cost
Acquisition	$	%	$	$
New Construction	$	%	$	$
Rehabilitation	$	%	$	$
Leasing	$	%	$	$
Rental Assistance	$	%	$	$
Supportive Services	$	%	$	$
Operating Costs	$ 255,871	95 %	$	$
HMIS	$	%	$	$
Project Administration (limited to 7%)	$ 13,370	5 %	$	$
Total Project Cost	$ 269,241	100 %	$	$

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)
Program Income	■ Cash ☐ In Kind	■ C ☐ PP	11/22	$67,311	%25	■ Yes ☐ No
Program Income	■ Cash ☐ In Kind	☐ C ■ PP	01/23	$ 87,599	%33	☐ 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				$ 154,910	% 58	

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 *e-snaps*

▣ #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)

▣ Monitoring report from an entity other than HUD for federal or state funding (ESG, CDBG, etc.)

If relevant include (#6):

☐ A: Organization's response to any findings

☐ B: Documentation from HUD (or other entity) that finding or concern has been satisfied

☐ C: Any other relevant documentation

☐ 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, and983).* 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: https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps to ensure eligibility.

Agency: Heartside Nonprofit Housing Corporation

Acknowledged By: Jeremy DeRoo

Digitally signed by Jeremy DeRoo
DN: cn=Jeremy DeRoo g=Jeremy DeRoo c=US United States i=US United
States o=Dwelling Place of Grand Rapids ou=Main Office e=jderoo@dpgr.org
Reason: I agree to the terms defined by the placement of my signature in this
document
Location:
Date: 2021-10-11 15:59-04:00

Title: President

Date: October 11, 2021