



FY2021 HUD COC PROGRAM COMPETITION RENEWAL PROJECT APPLICATION

AGENCY PROFILE	
Legal Name of Agency	County of Kent
Project Name	Shelter Plus Care TRA
Project Start Date	07/01
Contact Person	Chad Coffman
Title	Program Manager
Address	300 Monroe Ave, Grand Rapids, MI 49503
Email	Chad.Coffman@KentCountyMI.gov
Phone	(616) 632-7967

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: Mandy Bolter	Title: Kent County Board Chair
Date of Board/Local Planning Body Authorization:	
Date of Anticipated Board/Local Planning Body Authorization:	June 2022

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)

Kent County operates as the fiduciary for the Shelter Plus Care project. Our sub-recipient, Community Rebuilders provides housing and services to the participants of the Shelter Plus Care project. Community Rebuilders has successfully executed this Shelter Plus Care contract for over 20 years.

The Shelter Plus Care Tenant Based Rental Assistance (TRA) program served a total of 96 households during this operating year, which is 3 households above the contracted amount. Housing stability measures were exceeded despite an extremely low vacancy rate in our community.

Strong relationships have been developed with private landlords, allowing leases to be negotiated and rents to be maintained at or below FMR. TRA served 15 Veterans during the operating year which contributed to the goal of ending Veteran Homelessness in Kent County. TRA also served 50 children during the operating year. 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 2020-2021, this project served the following demographic groups: 88 African American participants, 62 white participants, 4 American Indian participants, and 19 participants identifying as multiple races. These accomplishments were achieved using Housing First and Strengths Based practices.

Consistent with the housing first philosophy, this project has a low barrier intake process and accepts households with a variety of backgrounds and barriers to housing stability, including substance abuse, criminal histories and zero income. Screening and assessment for entry into this project is conducted by our community's coordinated entry. Resources are targeted and prioritized based upon community priorities and in alignment with the community's plan to end homelessness. Chronically homeless persons who are living on the streets or in shelters and lack the financial resources and support networks to obtain housing on their own shall be prioritized for this project. All participating households are assisted to obtain housing in the private rental market and to secure a lease in the neighborhood of their choice. HUD Housing Quality Standards and rent reasonableness are the applicable standards to ensure housing is safe, decent and affordable.

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. Participants in Shelter Plus Care TRA 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 persons experiencing homelessness. The Network will align diverse services and resources, build capacity, advocate, and improve health and equity for all of our community. Services are voluntary and coordinated with a broad array of community-based service providers.

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: 7/1/2020 - 6/30/2021

Planned Number of Households Served	Actual Number of Households Served	Number of Stayers	Number of Leavers
93	96	159	14

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
<input type="checkbox"/>	Decrease in the number of persons served		
<input type="checkbox"/>	Change in number of units		
<input type="checkbox"/>	Change in project site location		
<input type="checkbox"/>	Change in focus population		
<input type="checkbox"/>	Change in component type		
<input type="checkbox"/>	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)	
<input type="checkbox"/>	Attachment: Written communication to HUD requesting the significant change
<input type="checkbox"/>	Attachment: HUD's written approval of the change requested
<input type="checkbox"/>	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			
Chronically Homeless	33		120
Families			
Youth			
Domestic Violence			

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	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Active substance use or history of substance use	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Having a criminal record (other than for state-mandated restrictions)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
History of victimization (e.g. domestic violence, sexual assault, childhood abuse)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

b. Does the project ensure that participants are not terminated from the program for the following reasons?	
Failure to participate in supportive services	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Failure to make progress on a service plan	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Loss of income or failure to improve income	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Any other activity not covered in a lease agreement typically found for unassisted persons in the project's geographic area	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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, employment training, or jobs?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
At least annual follow-ups with participants to ensure mainstream benefits are received and renewed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Do project participants have access to SSI/SSDI technical assistance provided by the applicant, a subrecipient, or partner agency?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Has the staff person providing the technical assistance completed SOAR training in the past 24 months.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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

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.

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)

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.

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 **APR 8b** divided by total contracted units.) 96%

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

a. Total amount authorized within eLOCCS	1030191
b. Remaining balance in eLOCCS	1026589.78
c. Percentage recaptured <i>Divide answer b. by answer a. and multiply by 100</i>	99.7

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%			

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	<input checked="" type="checkbox"/>	Families	<input checked="" type="checkbox"/>
Veterans	<input checked="" type="checkbox"/>	Youth (18-24)	<input checked="" type="checkbox"/>
Domestic Violence	<input checked="" type="checkbox"/>		

Scope of Project		Annual Households Served	
Total units	93	Households with at least one adult and one child	23
Total beds	153	Adult households without children	73

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):*

33%

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):*

43%

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

36%

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

24%

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)

100%

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)

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 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] - Total persons whose destinations excluded them from the calculation [APR 23.c.]])

99%

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

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? *APR 19a1 row 1, last column*

4%

b. PSH Only Project Stayers: What percent of project stayers had new or increased other (non-employment) income? *APR 19a1 row 3, last column*

50%

c. Project Leavers: What percent of project leavers had new or increased earned income? *APR 19a2 row 1, last column*

0%

d. Project Leavers: What percent of project leavers had new or increased other (non-employment) income? *APR 19a2 APR 19a1 row 3, 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	\$ 1,065,888	95	% \$	\$
Supportive Services	\$	%	\$	\$
Operating Costs	\$	%	\$	\$
HMIS	\$	%	\$	\$
Project Administration (limited to 7%)	\$ 55,623	5	% \$	\$
Total Project Cost	\$ 1,121,511	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)
Multiple Human Services Organizations	<input type="checkbox"/> Cash <input checked="" type="checkbox"/> In Kind	<input checked="" type="checkbox"/> C <input type="checkbox"/> PP	07/01/2022	\$275,678	%25	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Cash <input type="checkbox"/> In Kind	<input type="checkbox"/> C <input type="checkbox"/> PP		\$	%	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Cash <input type="checkbox"/> In Kind	<input type="checkbox"/> C <input type="checkbox"/> PP		\$	%	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Cash <input type="checkbox"/> In Kind	<input type="checkbox"/> C <input type="checkbox"/> PP		\$	%	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Cash <input type="checkbox"/> In Kind	<input type="checkbox"/> C <input type="checkbox"/> PP		\$	%	<input type="checkbox"/> Yes <input type="checkbox"/> No
	<input type="checkbox"/> Cash <input type="checkbox"/> In Kind	<input type="checkbox"/> C <input type="checkbox"/> PP		\$	%	<input type="checkbox"/> Yes <input type="checkbox"/> No
Total leveraged from other sources				\$ 275,678	% 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 *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, 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: https://www.hud.gov/program_offices/spm/gmomgmt/grantsinfo/fundingopps to ensure eligibility.

Agency: County of Kent

Acknowledged By: Susan Cervantes

Title: Kent County Community Action Director

Date: 10/11/2021