

# FY2021 HUD COC PROGRAM COMPETITION RENEWAL PROJECT APPLICATION

AGENCY PROFILE				
Legal Name of Agency  YWCA West Central Michigan				
Project Name	Project HEAL TH			
Project Start Date	1/1/2023			
Contact Person	Tom Cottrell			
Title	Chief Programming Officer			
Address	25 Sheldon Ave, SE Grand Rapids, MI			
Email	tcottrell@ywcawcmi, org			
Phone	(616) 426-3750			

Chec	k one:
	Permanent Supportive Housing
	Rapid Re-Housing
<b>/</b>	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: Tom Cottrell	Title: Chief Programming Officer
Date of Board/Local Planning Body Authorization:	
Date of Anticipated Board/Local Planning Body Authorization:	10/26/2021

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)

Project HEAL's transitional housing units are dedicated specifically to Category 4 homeless households (those fleeing domestic violence). We maintained 19 units of scattered-site transitional housing throughout the year. The program served a total of 37 households in 2020, stayers and leavers combined. Project HEAL functions with a Housing First philosophy and prioritizes serving survivors of domestic violence with the highest safety concerns and the least access to resources. Although not technically considered a "hard to serve" population, based on APR standards, the impact of trauma, of ongoing stalking, of ongoing legal proceedings, poor rental financial and rental histories, and isolation from natural supports can pose significant challenges to survivors in securing permanent housing. Despite the option to provide TH for up to 24 months for households, with a prioritization of safety and stability in permanent housing at exit, the current stay in Project HEAL averages 13 months.

Project HEAL functions on a master-lease system, with the YWCA holding the leases to apartments, and the clients subletting for the duration of their stay. Rents are based on a sliding fee using HUD formulas. Many clients pay no rent whatsoever initially. Rents are only recalculated annually or when there is a loss of income, so a client's increase in income while in residence, does not typically impact rent. Up to \$500 of rent paid is reimbursed to clients at exit. Ongoing domestic violence support services are provided by Project HEAL staff and/or YWCA domestic violence advocates and therapists during residency and after exit into permanent housing to help support ongoing recovery and successful independent housing.

We exceeded our first measure of housing stability with 93% (targeted goal 77%) of domestic violence survivors moving into safe and permanent housing. Our second goal was to a have clients increase total (earned and non-earned cash) income. We exceeded our targeted goal of 63%, ending with 67% of leavers increasing their income. It is worth noting that although 67% of clients increased their income, 50% of leavers increased their earned income. (Unfortunately, for some, an increase in employment income resulted in a decrease in their entitlement benefits; consequently, there was no net increase to household income, but an increase in earning potential and employment security.) All exiting households were enrolled in health care and nutrition support programs for which they were eligible. In addition to positive exiting situations, increased income and increased earned income our program also measure safety at exit. Of the individuals who exited and chose to participate in an exit interview 80% stated that they felt their safety concerns had reduced since program entry into TH Program.

It should be noted that Project HEAL's transitional housing services are integrated into the entirety of

YWCA victims' services array. Although each YWCA program is a separately budgeted service on paper, all programs work in concert to ensure safety and recovery for victims. Emergency response through our Advocacy Resource Services and Emergency Shelter typically provide the first point of contact for victims in crisis and fleeing violence. It is through these crisis services that Project HEAL is offered as one option in addressing the domestic violence faced by the victim household. Counseling and therapy services, focused on trauma resolution, and support groups focused on support and education are offered to Project HEAL participants (adults and children) through the YWCA Counseling Program. Long-term safety through supervised parenting time in the Safe Connections program, or through our Permanent Supportive Housing program may be needed for household exiting Project HEAL as a component of long-term safety planning. Attachment A reflects the funding support for some of the services that are most critical to the daily functioning of Project HEAL as leverage and match.

NOTE: For question #2, Project HEAL has no had a significant change since the last funding approval, but is asking for some reprogramming of funds in this application.

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:  $\frac{1/1/2020 - 12/31/2020}{1/1/2020 - 12/31/2020}$ 

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

Planned Number of Households Served	Actual Number of Households Served	Number of Stayers	Number of Leavers
19	37	17adult stayers	20adult leavers

If "ves", complete the chart below to indicate the change.

00	=		
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		
<b>✓</b>	Line item or cost category budget changes more than 10%		Х
	Other:	·	

■ No

☐ Yes

If change was made, include as many of the following that apply as attachments to your application:								
Attached (check)								
V	Attachment:	Attachment: Written communication to HUD requesting the significant change						
	Attachment:	HUD's written approval o	of the change requested					
V	N/A: HUD has	s not vet provided writte	n approval of the requested	change				
	,	, ,	- Prince of the second					
		SECTION I: Pro	ject Effectiveness					
		oriority populations (Vete	erans, Chronically Homeless units dedicated or prioritize					
			Number of Units					
		Dedicated	Dedicated Plus	Prioritized				
Veterans								
Chronicall	y Homeless							
Families								
Youth								
Domestic	Violence	19 (100%)						
4. Housing F	irst							
		re that participants are N due to the following:	OT screened out (or					
Having too	o little or not e	nough income		■ Yes □ No				
Active sub	ostance use or h	nistory of substance use		■ Yes □ No				
Having a c	riminal record	(other than for state-ma	ndated restrictions)	■ Yes				
History of abuse)	victimization (	e.g. domestic violence, se	exual assault, childhood	■ Yes				
4.0007				<u></u> □ 140				
	b. Does the project ensure that participants are not terminated from the program for the following reasons?							
Failure to	Failure to participate in supportive services							
Failure to	Failure to make progress on a service plan							
Loss of inc	Loss of income or failure to improve income							
Any other	activity not co	vered in a lease agreeme	nt typically found for	□ No ■ Yes				
4114331315	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)

As a domestic violence service provider, the YWCA prioritizes safety for all consumers. Project HEAL works in conjunction with the YWCA's domestic violence emergency shelter, and Safe Haven Ministries' shelter to meet the immediate safe housing needs of families fleeing violence. Project HEAL accepts referrals from shelters, and other community agencies and YWCA domestic violence programming, once the need for the 24/7 protections provided by an emergency domestic violence shelter has been vetted and the survivor can be housed safely in the community. The Transitional Housing component of Project HEAL is specifically designed around quick and barrier free access to safe temporary housing, with access to the program very much aligned with the Housing First philosophy. As a Transitional Housing program, though, the move to permanent housing is based on each participant's own determination about their capacity to manage this change successfully. This level of self-determination and empowerment is critical when designing programming for trauma survivors. Achieving a sense of normalcy and safety for a household, by moving into an apartment as soon as possible, irrespective of barriers that might confound accessing traditional mainstream housing stock, is the initial focus of the TH program. By using a scattered site, master-leasing strategy, program participants need not qualify for their own lease. A poor rental history, criminal record, lack of financial resources, utility arrearages, missing documents, unemployment, credit scores ruined by the assailant, and other barriers that might impact traditional client-held leasing, do not significantly impact a survivor's access to TH through Project HEAL. In fact, when we do need to prioritize entry for multiple applicants, households with the greatest number of barriers and the highest safety risk factors are chosen. Once safely housed, family advocates assigned to each household, work with survivors to develop a strengths-based service plan that will position the household to successfully transition to safe permanent housing of their choosing. The Project HEAL HUD budget has significant funding devoted to the Supportive Services line item, stemming from the belief that once safe and housed, survivors can begin their recovery from assault and address any barriers that might exist to acquiring permanent housing. In addition to providing ongoing safety planning and emotional support, family advocates ensure that survivors have access to medical services, mental health services, entitlement benefits, workforce development supports, educational supports and legal services. Each survivor's path to recovery and permanent safe housing is unique. Family advocates may engage multiple times each week around a service plan, or only monthly, depending on the plan and need for support presented by the survivor.

Project HEAL maintains approximately 44 active apartment units throughout the community, only a portion of which are supported by this grant. An advantage of master-leasing units is the capacity of the program to move survivor households to alternate units if their location is discovered by the assailant and stalking or other threats of violence arise. Tenant held leases would not allow for this level of safety and flexibility.

## 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 <u>CoC Compass</u>. (500 word limit; not scored.)
- The mission of the YWCA West Central Michigan is our action plan: eliminating racism, empowering women and girls and promoting peace, justice, freedom and dignity for all. As such, every element of the Coalition Compass has resonance with the YWCA mission, particularly as it relates to our orientation to serving survivor households facing a housing crisis due to violence.

Regarding alignment with Compass objectives and goals:

The YWCA prioritizes being part of a Thriving Coalition. We have been an active member of the CoC since its inception striving to ensure that CoC actions genuinely encompass the needs of domestic violence survivors and are predicated on inclusion. We bring their voices to the table, so they are not lost in the bureaucratic discussions. We currently hold membership on the Steering Committee, chair the Coordinated Entry Committee, participate on the Family Functional Zero and Youth Committees and are a part of the Implementation Team for the Strategic Plan. The YWCA has continuously worked with CoC members to ensure that alternate access strategies for DV survivors are integrated into our community plan. Over decades, the YWCA has invested time and finances in our partnerships within the CoC supporting the growth and functionality of a Thriving Coalition.

The YWCA, as a Federally-funded DV provider is not able to participate in HMIS, due to the restriction in the Violence Against Women Act, yet we embrace the importance of data to learn from the experience of survivors. Through the PIT and APRs we contribute survivor experiences to the pool of information. This data management requires independent investment in an alternate data management system. Whenever requested (and allowable) we provide additional data regarding our service population, not captured in HMIS community data, so that analyst can have a more comprehensive picture of our community's array of services and participants.

The existence of domestic violence is predicated on disempowerment and lack of equity and freedom. The YWCA's actions are founded in the recognition that systemic racism and social injustice further impact the experiences of domestic violence victims in seeking help and respite. Our services to victims are effective because we begin with this belief structure and only hire staff (all staff, not just HEAL personnel) who embrace it as well. Our onboarding of new employees, and ongoing training, is heavily focused on building awareness of the dynamics of oppression and racial justice. With this, our partnerships with survivors springs from genuine empathy and understanding and foundational to our program design is empowerment. This mission has carried over to our involvement with the CoC and particularly our input into the development of the Strategic Plan.

Historically, through advocacy in various committees and ad hoc work groups, and through formal training on trauma informed care to individual CoC member organizations and to the CoC at large, the YWCA has helped to shape policy and use the CoC as a vehicle for awareness-building and change.

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 □ 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)
- The YWCA has policies that reflect our mission that are specific to, not only, non-discrimination with regard to all protected classes, but proactive inclusion. Some examples of this include:
- o Procedures within the demographic components of our electronic filing system allow for multiple pronoun choice, self-defined gender, self-defined national origin, and even the choice of name or birthday, as well as the option to leave any field blank. Clients are invited to identify themselves as they choose, or withhold information if this suits them better.
- o Our recipient rights information, including our proactive stance on inclusion, is displayed on overhead monitors in our lobbies as well available to all clients in written form.
- o The YWCA prioritizes diversity in hiring and pays a premium to bi-lingual staff.
- o In program service assessments, trauma associated with oppression and discrimination that clients may have experienced throughout their lives is included in the trauma assessment along with sexual assault and domestic violence, as we recognize the profound impact all of these experiences have on life direction.
- o All artwork in the building must be reflective of the mission of the organization—reflecting our value of diversity, inclusion or empowerment of women.
- The onboarding and ongoing training of all YWCA staff reflects our mission to end racism, (or any form of oppression) as they create barriers to genuine empowerment of survivors. Examples of formal efforts include:
- o Required attendance of the Institute for Healing racism as an element of onboarding
- o The New Service Provider training module on Cultural Lens providing background on how racism has limited opportunities for people of color, including housing, and how such discrimination exists today.
- o New Service provider training modules on services to survivors with intellectual and developmental disabilities and services to survivors identifying as LGBTQ---both including a description of the specialized programming that the YWCA has for survivors identifying with a disability or as LGBTQ.
- o Annual all-staff training on diversity, equity and inclusion with the 2020 training presented by ERACCE.
- o A required 18 module course "Reflections on Racial Justice" that was internally developed by CURE to build agency awareness of how our work is guided by these principles.
- o Committee for Understanding Racial Equity (CURE) is an internal staff-led committee of the YWCA that focuses on awareness and growth of agency personnel through various training and thought events throughout the year.
- o Stand Against Racism annual event building community and internal awareness through celebration and education.
- o Conversations and Tea a twice monthly event involving facilitated discussions between staff members regarding how issues of social and racial justice and advocacy are woven through the work of the organization.
- o Incorporated into the YWCA strategic plan are three goals specific to anti-racism work.
  - **Efficient Use of Funding** (If the renewing project has not completed a full year, share information from the last completed year<u>of another HUD funded</u> 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.) 89%
- 10. Expenditure of Funds: Use last **completed** HUD FY year.

a. Total amount authorized within eLOCCS	399,368.00
b. Remaining balance in eLOCCS	2,062.60
c. Percentage recaptured Divide answer b. by answer a. and multiply by 100	0.5%

11. Were drawdowns made to eLOCCS at least quarterly? (Demonstrated in eLOCCS atta	chment)
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■ 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 6a6d.							
Number of elements with 5% or less null or missing values							
DQE 6a. DQE 6b. DQE 6c. DQE 6d.							
4 2 3 4							
Total the numbers above, divide by 18, multiply by 100 for a percent: 72% (for safety, some data is not collected)							

HUD Monit	oring								
13. a. Doe		-	•	IUD monitoring f	inding	s in any	of the agend	cy's projects?	
	☐ Yes ➡ No If yes, explain below findings in detail for the Funding Review Panel. Include details on the							s on the	
	nature of the finding, resolution and corrective actions taken, if any.								
b. Has y	b. Has your organization been monitored by HUD in the past three (3) years?  ☐ Yes ■ No								
								,	
				onitoring report f HUD that findin		-	_		
	-	umentati		i nob that illium	g or co	Jiiceiii i	ias peeli sat	isileu, aliu aliy	other
			_	ring by an entity	other	than Hl	JD for feder	al or state fund	ling (ESG.
				achments: Moni					_
				entity that findi					
rele	vant doc	umentati	on.						
Impact or	Homolo	cenoce							
-			es the pr	oject serve? (not	t score	d taken	into conside	eration in a tie	score
situatio		(3) do	es the pi	ojece server (mor	. 50010	a, taken	THE CONSTAC		<i>yeore</i>
Chror	ically ho	meless		Families			]		
Veter				Youth (18-24)			•		
Dome	stic Viole	ence	V						
Takal		pe of Pro	oject		11			holds Served	
Total	units	19				seholds v		34	
					least one adult and one child				
Total	beds	02			Adul	t housel	nolds	2	
		82			with	out child	dren	3	
Serving H	igh Need	Populati	ions (If t	he renewing proj	iect ha	ıs not co	mpleted a fu	ıll year, share i	nformatior
from the l	ast comp	leted yea	ar of ano	ther HUD funded	l proje	ct or sin	nilarly desigr	ned project thro	ough this
agency)									
	•	_		eholds served me					_
	at start/e	entry? <i>(Al</i>	PR 18. A	dd values for No	Incom	e and di	vide by tota	l in third to last	row):
54%									
		_		olds served met				_	
•	•			onditions known	at star	t/entry	(APR 13.a.2.	add totals for	two and
	more co	naitions,	tnen div	ide by total):					
10%	_10%								

17. What percentage of the households served were chronically homeless? (APR Q26a. divide total chronically homeless households by total households):  0%
18. What percentage of the households served were families experiencing homelessness? (APR Q8a. divide total households with adults and children by total households): 92%
Section II. Project Performance
<b>Performance Data</b> (If the renewing project has not completed a full year, share information from the lacompleted 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 Chelow)
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)
c. Transitional Housing: Calculate the average length of project stay in days (APR22b)  362 days
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)
c. Transitional Housing: Calculate the percentage of participants who exited to positive housing destinations (APR 23c)  96%

2	1. 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 1, last column  50%
d.	Project Leavers: What percent of project leavers had new or increased other (non-employment) income? APR 19a2 APR 19a1 row 3, last column

## **Financial Information**

# **PROJECT BUDGET**

Activity	Requested Funds	% of Requested Funds	Other Funding	Total Project Cost
Acquisition	\$	%	\$	\$
New Construction	\$	%	\$	\$
Rehabilitation	\$	%	\$	\$
Leasing	\$ 200,000	50.0 %	\$ 29,213	\$ 229,213
Rental Assistance	\$ 0	0 %	\$	\$ 0
Supportive Services	\$ 146,490	36.7 %	\$ 2,457	\$ 148,947
Operating Costs	\$ 27,000	6.8 %	\$ 5,800	\$ 32,800
HMIS	\$ o	0 %	\$	\$ o
Project Administration	25,878	6.5 %	14,000	39,878
(limited to 7%)	Ψ	6.5 %	Ψ	
Total Project Cost	\$ 399.368	100 %	\$ 51,470	\$ 450,838

## 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)
MDHHS/TANF (multi-year)	🗗 Cash 🗌 In Kind	■ C □ PP	10/21	<sup>\$</sup> 43,213	% 10.8	■ Yes □ No
Dept. of Justice (multi-year)	■ Cash □ In Kind	■ C □ PP	10/21	\$ 2,457	% 0.6	■ Yes □ No
client rent	■ Cash □ In Kind	□ C ■ PP	01/23	\$ 5,800	% 1.5	■ Yes □ No
MDHHS/FVPSA	■ Cash □ In Kind	■ C □ PP	10/21	\$ 46,590	%na	☐ Yes ■ No
United Way	■ Cash □ In Kind	□ С ■ РР	6/23	\$ 70,000	<sup>%</sup> na	☐ Yes ■ No
	☐ Cash ☐ In Kind	□ C □ PP		\$	%	☐ Yes ☐ No
	☐ Cash ☐ In Kind	□ С □ РР		\$	%	☐ Yes ☐ No
*match calculation excludes leasing	☐ Cash ☐ In Kind	□ С □ РР		\$	%	☐ Yes ☐ No
Total leveraged from other sources				\$ 168,060	% 12.9*	

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):
$\square$ 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
$\square$ B: Documentation from HUD (or other entity) that finding or concern has been satisfied
$\square$ C: Any other relevant documentation
■ D: Written communication to HUD requesting the significant change indicated in question2.
$\square$ 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.

Agency: YWCA West Central Michigan	1
Tom Cottrell Digitally signed by Tom Cottrell DN: cn=Tom Cottrell, o=YWCA West Central Michigan, ou, email=toottrell@ywcawcmi.org, c: Date: 2021.10.11 14:48:55-04'00'	=US
Title: Chief Programming Officer	
Date: 10/11/21	