



APPLICATION INSTRUCTIONS

for

Domestic Violence Coordinated Entry Supportive Services Only Award

INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY

30 South Meridian Street, Suite 900

Indianapolis, IN 46204

<http://www.in.gov/ihcda/>

317-232-7777

ISSUE DATE: March 8, 2023

APPLICATION DEADLINE: March 31, 2023

OVERVIEW

IHCDA was created in 1978 by the Indiana General Assembly and is a quasi-public financially self-sufficient statewide government agency. IHCDA's programs are successful in large part because of the growing network of partnerships IHCDA has established with local, state, and federal governments, for-profit businesses and not-for-profit organizations. For-profit partners include investment banks, mortgage lenders, commercial banks, corporate investment managers and syndicators, apartment developers, investors, homebuilders, and realtors. Not-for-profit partners include community development corporations, community action agencies, and not-for-profit developers. For more information visit <http://www.in.gov/ihcda/>

MISSION STATEMENT

The IHCDA creates housing opportunities, generates and preserves assets, and revitalizes neighborhoods by facilitating the collaboration of multiple stakeholders, investing financial and technical resources in development efforts, and helping build capacity of qualified partners throughout Indiana.

VISION

At IHCDA, we believe that growing Indiana's economy starts at home. Everyone can agree that all Hoosiers should have the opportunity to live in safe, affordable, good-quality housing in economically stable communities. That's the heart of IHCDA's mission. Our charge is to help communities build upon their assets to create places with ready access to opportunities, goods, and services. We also promote, finance, and support a broad range of housing solutions, from temporary shelters to homeownership.

IHCDA's work is done in partnership with developers, lenders, investors, and nonprofit organizations that use our financing to serve low and moderate-income Hoosiers. We leverage government and private funds to invest in financially sound, well-designed projects that will benefit communities for many years to come. And our investments bear outstanding returns. The activities that we finance help families become more stable, put down roots, and climb the economic ladder. In turn, communities grow and prosper, broadening their tax base, creating new jobs, and maximizing local resources. IHCDA's work is truly a vehicle for economic growth, and it all starts at home.

ABOUT DOMESTIC VIOLENCE COORDINATED ENTRY SUPPORTIVE SERVICES ONLY AWARDS

The Indiana Housing and Community Development Authority is accepting applications from Indiana-based 501(c)3 not-for-profit organizations to fund Domestic Violence Coordinated Entry Supportive Services Only (DV CE SSO) Awards as detailed in this Application Instructions document.

FUNDING SOURCE

Funding for this grant application will come from Continuum of Care funding, commonly referred to as "CoC." CoC is funded through the U.S. Department of Housing and Urban Development through an annual competitive award process. IHCDA is awarded a Domestic Violence Coordinated Entry award through the Domestic Violence Bonus, and a portion of this is reserved to fund discretionary projects that will build the relationship between DV and non-DV service providers, reduce barriers to access for survivors, and decrease housing waiting times. CoC funds must be used to serve those experiencing homelessness as defined by HUD.¹

FUNDING SUMMARY

Through this award opportunity, IHCDA will award up to five awards of no more than \$30,000 each in CoC funding to not-for-profit organizations that provide homeless services in the Balance of State (BoS). An agency may only submit one application; however, the organization may be listed as a partner on other applications. The grant will have a seven-month term and is tentatively scheduled to begin on May 1, 2023 and expire on November 30, 2023.

¹ See Appendix E for HUD Homeless Category Definitions.

Once awarded, the applicant will be reimbursed for allowable costs on a month-by-month basis for costs related to the project that were incurred during the term of the grant agreement. The applicant must submit a monthly claim to IHCD A requesting reimbursement for charge by the 20th of the proceeding month in which those charges were incurred.

The award may wholly or partially fund the project; other funding may be used in conjunction with this award. **The award will require a 25% match commitment of non-grant funds for eligible costs that will be used to support the project.** Eligible costs are considered those enumerated in 24 CFR § 578.53². Eligible costs for match purposes will also include project administration costs which are enumerated in 24 CFR § 578.59³.

DV CE SSO projects must improve communication and collaboration between DV and non-DV service providers with the goal of reducing barriers to access for survivors and decreasing housing wait times. Participants served by this funding must meet the HUD definition of homelessness⁴ **and** be fleeing or attempting to flee domestic violence, dating violence, stalking, and/or human trafficking.

All awardees must be willing to work with IHCD A to document their project and share frameworks for resources that are developed in addition to any challenges. This is the first award cycle for this funding, and feedback will be used to improve the process for the future funding cycles.

This funding will be available to the awardee and their primary region of service for one award cycle, then awardee and their region will be ineligible to reapply for the next funding cycle. Awardees may be a partner to another applicant during the period in which they are ineligible to apply.

With this funding, IHCD A hopes to improve the relationship between DV and non-DV service providers in the Balance of State and more effectively deliver services quickly and efficiently to survivors of domestic violence.

APPLICANT ELIGIBILITY

In order to be eligible, an applicant must be a 501(c)3 not-for-profit corporation in good standing with the Indiana Secretary of State and have the ability to comply with financial requirements and internal controls required to receive and manage Federal funds. Any applicant selected through this process must have or obtain a Unique Entity Identifier (UEI) before it can receive any funding. Each applicant must also be registered and in good standing in the federal System for Award Management (SAM). If the applicant is the recipient of HUD or subrecipient of IHCD A CoC, Emergency Solutions Grant (ESG), Housing Opportunities for Persons with AIDS (HOPWA), or CARES Act funding, the applicant must be in good standing with HUD or IHCD A, with no active Performance Improvement plan.

IHCD A shall not award any grant until the applicant has been determined to be responsible. A responsible applicant must:

1. Have adequate financial and human resources to perform the project, or the ability to obtain them;
2. Be able to comply with the required or proposed delivery or performance schedule, taking into consideration all the applicants existing commercial and governmental business commitments;
3. Have a satisfactory performance record with IHCD A;

² See Appendix D for a list of eligible costs.

³ See Appendix D for a list of eligible costs.

⁴ See Appendix E for HUD Homeless Category Definitions.

4. Have a satisfactory record of integrity and business ethics;
5. Have the necessary organization, experience, accounting and operational controls, and technical skills, or the ability to obtain them;
6. Have the necessary production, construction, and technical equipment and facilities, or the ability to obtain them;
7. Have supplied all requested information;
8. Be legally qualified to contract in the State of Indiana, and, if it is an entity described in IC Title 23, it must be properly registered with the Indiana Secretary of State and owe no outstanding reports to the Indiana Secretary of State; and
9. Be otherwise qualified and eligible to receive an award under applicable laws and regulations, including not be suspended or debarred.

Awarded applicants must also comply with the terms and conditions set forth in Appendix F.

ELIGIBLE PROJECTS

To be considered, the project must meet the following requirements:

- a. Project must involve, at a minimum, the Regional CE Lead Agency and a DV service provider in the design;
- b. Project must be designed to serve persons experiencing homelessness as defined by HUD;
- c. Project must serve persons fleeing or attempting to flee domestic violence, dating violence, stalking, and/or human trafficking;
- d. Project must identify and remove barriers to accessing CE for survivors of DV;
- e. Project must attempt to decrease wait times for survivors to access housing; and
- f. Project budget must consist of eligible costs as enumerated in 24 CFR § 578.53

The project must engage with one of the following initiatives during the grant cycle. The applicant should focus on only one of the initiatives and build their application around that, even if the project may intersect with other initiatives. The target goal for the chosen initiative must be clearly identified and stated in the application. The applicant is encouraged to consider how the funding can be used to secure and develop infrastructure for the project after the funding ends.

The applicant may propose one of three project initiatives and may use one or multiple suggestions offered:

1. Landlord Engagement
 - Develop a method of effectively engaging with landlords in the region
 - Create a clearinghouse of landlords willing to work with program participants and meet HUD requirements (e.g. meet FMR/rent reasonableness, ensure property meets HQS, confidentiality, etc.) that can be utilized by housing programs
 - Identify a way to efficiently communicate with landlords and promote housing programs
 - Other
2. Mobile Delivery of Services
 - Make available alternative methods/locations for CE assessments for survivors of DV.
 - Provide services to those in the process of fleeing, such as food/meals, medical care, and legal services.
 - Provide transportation to a shelter or other safe location
 - Engage in mobile outreach
 - Other
3. Outside Partner

- Find and engage a partner typically outside of the homeless response system to decrease the barriers that survivors face in your area
 - School system, police, animal rescue/shelter, urgent care, hotel, etc.
- Identify and conduct outreach in new locations and/or use new methods
- Build long-term partnerships with partners that DV survivors are likely to interact with
- Other

HOW TO APPLY

To apply for DV CE SSO funding, the application must include the following required components.

1. Project Description (no more than 2 pages)
2. Completed application (Appendix A)
3. Copy of region-specific CE policies for DV survivors
4. Print Screen of current SAM.gov registration – must include UEI
5. Print Screen of Secretary of State registration
6. Homeless Representation on Board Form (Appendix B)
7. IRS 501(c)3 Determination Letter
8. Letter(s) of support from partners
9. Match commitment letter
10. MOU for in-kind match – services (if applicable)

The expectations for documents to be submitted with the application are described, by item, below.

PROJECT DESCRIPTION (2 PAGES)

The project description should offer a comprehensive layout of the timeline of the project. At a minimum, the description should include:

- Initiative type chosen and an overview of the project
- How those with lived experience and DV providers will be incorporated in the project design
- A timeline of when grant funds will be spent April – November
- Detail of how the grant funds will be spent to support the project
- When the project will begin serving survivors of DV

COPY OF REGION-SPECIFIC CE POLICIES FOR DV SURVIVORS

The applicant must include a copy of the policies that address CE for DV survivors in the BOS region in which the project will operate. The applicant should contact the CE Lead Agency for their region to obtain any policies.

PRINT SCREEN OF CURRENT SAM.GOV REGISTRATION

The applicant can obtain a current print screen of their registration by going to SAM.gov and pulling up their agency's entity registration. At the top of this page, there is a "download" button – click this and select PDF as the file type and select "download." This should contain the applicant's Unique Entity Identifier (UEI), which will be 12 characters.

PRINT SCREEN OF SECRETARY OF STATE REGISTRATION

The applicant can obtain a current print screen of their Secretary of State registration by going to inbiz.in.gov and logging in or selecting "business search." If selecting "business search," navigate to the "business entities" icon search the business name in the corresponding field. Select the appropriate Business ID and select "Print Entity Details" in the top right corner to download a PDF of the registration.

LETTER OF SUPPORT FROM PARTNER(S)

A letter of support should be included from each partner the project will involve. Partners for the purpose of this application are considered a Regional CE Lead Agency, service provider, or DV service provider. At a minimum, the project must involve a Regional CE Lead Agency and DV service provider. If a project will operate in more than one BoS Region, then a letter of support must be obtained from each Regional CE Lead Agency. The letter of support should be on the partner agency's letterhead, signed by an executive, and include the following:

- Name of agency
- Location of agency ([BoS Region](#))
- Type of agency (Regional CE Lead, homeless service provider, DV service provider)
- How the agency was involved in the application
- How the agency will be involved in implementing the project

MATCH COMMITMENT LETTER

Cash Match

Cash match is when the awardee spends actual funds on eligible CoC Program costs. Cash counts as match only if the subrecipient can demonstrate that a payment of funds was made to cover the cost of CoC Program eligible activities expended during the grant term.

Sources of cash that may be used as match include:

- Grants from private, local, state, and federal resources (if not statutorily prohibited by source)
- Cash resources
- Revenues from fundraising efforts organized by the recipient or subrecipient
- Recipient or subrecipient staff working on grant eligible activities who aren't paid from the CoC Program grant but are paid from other agency resources

When cash match will be used written documentation should be provided on the source agency's letterhead, signed, and dated by an authorized representative, and, at a minimum, should include the following:

1. Amount of cash to be provided to the recipient for the project
2. Specific date the cash will be made available
3. The actual grant and fiscal year to which the cash match will be contributed
4. Time period during which funding will be available
5. Allowable activities to be funded by the cash match

In-Kind Match

In-kind match is the value of any real property, equipment, goods, or services contributed to a CoC Program grant that would have been an eligible CoC Program activity if the subrecipient paid for them directly with CoC Program funds. In-kind match can be donations provided directly by the subrecipient.

The awardee must document that the in-kind donation was provided, record the value of the donation, and ensure that it was used to match CoC Program eligible activities. If in-kind services are included as a match, a Memorandum of Understanding is required.

Written documentation of the donation of in-kind goods and/or equipment must be provided on the source agency's letterhead, signed, and dated by an authorized representative of the source agency, and must, at a minimum, include the following:

1. Value of donated goods to be provided to the recipient for the project
2. Specific date the goods will be made available
3. The actual grant and fiscal year to which the match will be contributed
4. Time period during which the donation will be available
5. Allowable activities to be provided by the donation
6. Value of commitments of land, buildings, and equipment – the value of these items is one-time only and cannot be claimed by more than one project or by the same project in another year

MOU FOR IN-KIND MATCH - SERVICES

An MOU is a written document that must establish unconditional commitment, upon selection to receive a grant, by the third party to provide the services, the specific service to be provided, the profession of the persons providing the service, and the hourly cost of the service to be provided. At a minimum, a MOU must be executed between a subrecipient and a third-party service provider and include the following information:

1. Agency information:
 - o Subrecipient’s identifying information with point(s) of contact
 - o Service provider’s identifying information with point(s) of contact
2. Unconditional commitment of third-party provider to provide the service
3. Description of services to be provided
4. Scope of services to be provided and by whom
 - o Specific contract to be matched
 - o Length of time services provided/term of contract
 - o Point-in-time number of clients receiving service
 - o Total clients receiving service over grant term
 - o Qualification of persons providing service
 - o Estimated value of services provided (such as hourly rate)
5. Documentation of services match
 - o Documentation requirements and responsibilities of service provider and recipient
 - o Timeliness standards of service provider and recipient for providing services to individuals

APPLICATION REVIEW, EVALUATION, & SELECTION

Evaluation of all applications will be completed by IHCDCA based on Applicants submitting all required documents, strength of responses to the prompts provided in Appendix A, and Applicant’s demonstrated ability to carry out the required services. Applicants must also be responsive and responsible as described in this document. Selection of an Applicant is at the sole discretion of IHCDCA.

Please note: IHCDCA will also take into consideration the Applicant’s past performance under CoC, ESG, HOPWA, Cares Act, and other IHCDCA grants and programs, to determine whether Applicant has a history of complying with the policies, procedures, or directives over the past five (5) years.

APPLICATION TIMELINE

March 8, 2023 Application Instructions released to the general public.

March 14, 2023 Applicant Q&A Session (Teams call)

- Time: 2:00pm ET – 2:45pm ET
- Phone number: +1 317-552-1674

- Conference ID: 827 603 564#
- Or access via computer: [Click here to join the meeting](#)

March 31, 2023 Applicant must submit proposal by 5:00 p.m. in PDF format.

April 7, 2023 Tentative selection is made for Board Approval.

April 27, 2023 Tentative selection is taken to the Board for approval.

APPLICATION SUBMISSION INSTRUCTIONS

Applicant's proposal must be submitted via email with the subject line "DV CE SSO Funding Application – Your Organization's name". All documents must be submitted in PDF only. Applications should be sent to CommunityServices@ihcda.IN.gov.

The deadline for submission is Friday, March 24, 2023 at 5:00 PM EST.

Applications that miss the submission deadline and/or do not contain all of the required forms/documents as listed in this document will be determined ineligible for further consideration.

Applicants are advised that materials contained in applications are subject to the Access to Public Records Act ("APRA"), IC 5-14-3 et. seq., and the entire response may be viewed and copied by any member of the public.

Appendix A: Application

Section 1: Project Applicant Information:

Name of Organization:	
Physical Address:	
Address 2:	
City, State, Zip Code:	
IHCDA CoC Region:	
Organization Type:	<input type="checkbox"/> Units of Local Government <input type="checkbox"/> Non-profit 501(c)(3) <input type="checkbox"/> PHA <input type="checkbox"/> Other: _____
UEI Number (SAM.gov):	
Employer or Tax Identification Number:	
Is the subrecipient a Faith-Based Organization?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Has the subrecipient ever received a federal grant, either directly from an agency or through a State/local agency?	<input type="checkbox"/> YES <input type="checkbox"/> NO
Contact information for executive officer:	
Name:	
Title:	
Phone:	
Email:	
Contact information for person completing this application (if different):	
Name:	
Title:	
Phone:	
Email:	
Contact information for person responsible for managing the project (if different):	
Name:	
Title:	
Phone:	
Email:	

I hereby certify that all information that I have completed and submitted as a part of this application is true and correct and accurately reflects the agency's proposed project. Additionally, I certify that I am legally authorized to sign and submit this information to the Indiana Housing and Community Development Authority on behalf of said agency. I understand that any misrepresentation of information or failure to disclose information requested as a part of this application process and may be grounds for recapture of grant funds awarded or received by the agency based on fraud or omission.

Signature of Authorized Official

Date

Name (Typed or printed)

Title (Typed or printed)

Section 2: Eligibility, Requirements, and Threshold Questions

Your project must meet all the following criteria in order to be considered for funding.

Federal Requirements

- Federal Education Requirements (Required for homeless individuals and families per 42 USC 11431 et seq.)
 - Are the proposed project policies and practices consistent with the laws related to providing education services to homeless individuals and families? Please attach a copy of this project's policies with relevant sections highlighted. YES NO
 - Does the project have a designated staff person to ensure that homeless children are enrolled in school and receive educational services as appropriate? Please attach a copy of this project's policies with relevant sections highlighted. YES NO
 - If applicable, describe the reasons for non-compliance with educational laws, and the corrective action to be taken prior to grant agreement execution.

- Does the agency maintain a drug-free workplace per HUD regulations (24CFR Subpart F)? YES NO
- Does the agency participate in any federal lobbying as prohibited by HUD regulations (24 CFR part 87)? YES NO
- Does the agency comply with Title VI of the Civil Rights Act with respect to Fair Housing and Equal Opportunity? YES NO
- Does this project use one or more properties that have been conveyed through the Title V Process? YES NO
- Does the project adhere to processes for conducting Housing Quality Standards inspections? YES NO
- Does the project identify properties built prior to 1978, and disclose the potential for Lead-Based Paint? YES NO

Agency Eligibility*

- Is the agency registration current in SAM? Yes No
SAM: <https://www.sam.gov/portal/SAM/##11>
- Is the agency registration current with Indiana's Secretary of State? Yes No
Indiana SoS: <https://inbiz.in.gov/BOS/Home/Index>
- Does the agency have outstanding federal delinquent debt? Yes No
 - If yes, is there a negotiated repayment schedule? Yes No
 - If yes, is the repayment schedule not delinquent? Yes No
 - If yes, have you made other satisfactory arrangements? Yes No
- Is the agency a federally debarred contractor? Yes No
- Does the agency have Homeless participation on governing board? Yes No
(There is at least one person with a lived experience of homelessness on the governing board. (See Appendix B: Participation of Homeless Individual Form).)
- Does the agency have any outstanding findings on its annual financial audit? Yes No

If you have HUD funding, has your agency been monitored by HUD in the last 12 months?

Yes No

If yes, were there any findings from the monitoring? Yes No

If there were findings, please describe the findings and your agency's corrective actions to satisfy the findings and attach a copy of the corrective action plan that you submitted to HUD.

Project Eligibility*

- Project commits to using DV Bonus funds to serve only individuals and/or families, including unaccompanied youth, who are residing in emergency shelter, or a location not meant for human habitation AND qualify under the domestic violence criteria in paragraph (4) of the HUD definition of homelessness, including persons fleeing or attempting to flee human trafficking⁵.
 YES NO (note that projects indicating "no" are not eligible to apply under this RFA)
- Project commits to using the Housing First model.⁶
 YES NO (note that projects indicating "no" are not eligible to apply under this RFA)

*If your response to any of these questions is "No", please provide additional information describing any circumstances that may have contributed to the outcome:

⁵ See Appendix C, E for additional information.

⁶ See Appendix C for additional information.

Section 3: Application

Dollar Amount Requested (up to \$30,000): _____

What best describes the applicant? (select one)

- CE Lead Service Provider DV Service Provider

What will the project address? (select one)

- Landlord Engagement Mobile Delivery of Services 3rd Partner

Please provide a brief description of the project:

What is the anticipated target/goal the project intends to reach during the grant timeframe?

How will progress on the target/goal of the project be monitored?

This funding will not be available for immediate renewal the following year. How will this project put the infrastructure in place to ensure the longevity of the project?

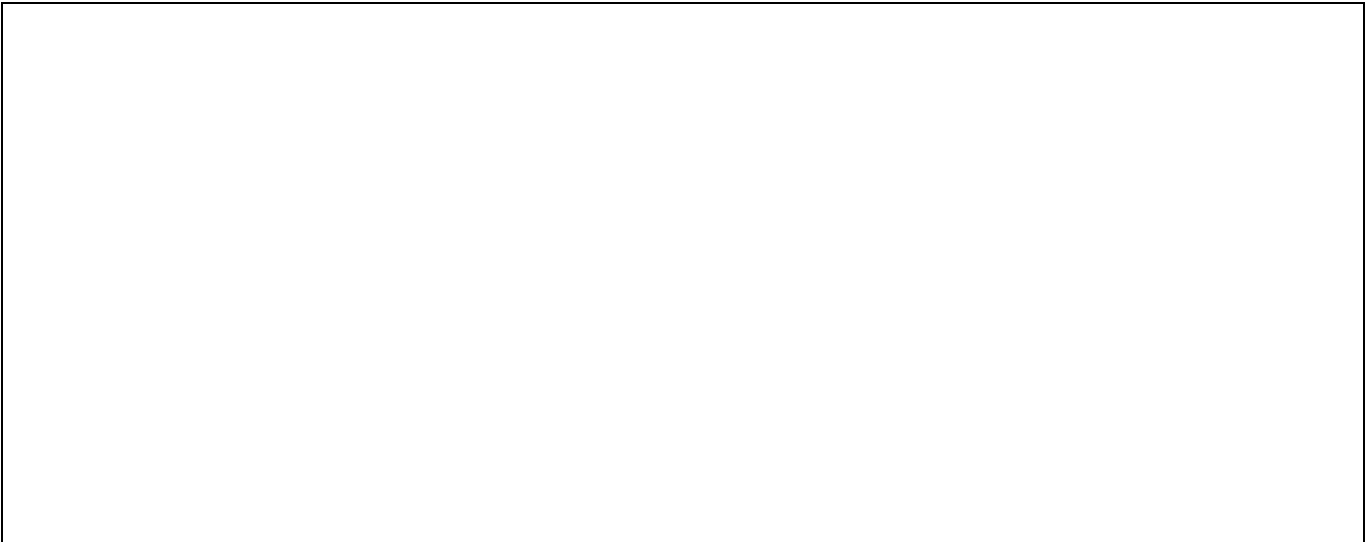
Domestic Violence Provider and Coordinated Entry Partnership

How many DV survivors are in your region? How was this number calculated?

What needs do you see with regards to DV survivors accessing CE in your region?

A large, empty rectangular box with a thin black border, intended for a written response to the question above.

What is the average wait-time for DV survivors in your region to get access to housing? How will this project reduce that time?

A large, empty rectangular box with a thin black border, intended for a written response to the question above.

At a minimum, the following partners must be involved:

- Regional CE Lead
- Local DV Service Provider(s)
 - *If there is not an active local DV service provider, the applicant may work with a DV service provider from a nearby region or city.*

How will you involve partners in your region?

How will this project strengthen relationships and communication between DV and non-DV entities with respect to coordinated entry and ensure they stay strong after the funding period ends?

This funding must be used to ensure the delivery of services to survivors of domestic violence. How will the project ensure that this funding only serves eligible populations?

Please include a project description and letter(s) of support from the partner(s) you listed above. See *How to Apply* for information on what should be included. For CE Lead contact information, please refer to the [IHCDA website](#).

Section 4: Budget

Funds may only be used to assist program participants for whom the subrecipient of funds is not providing housing or housing assistance.

Eligible costs under this award are enumerated under 24 CFR § 578.53. Please see Appendix D for detail on eligible costs.

Will this project leverage funds from sources other than the DV CE SSO Grant? Yes No

If yes, please list what other sources will be used, whether they are already secured or tentative, and the total amount from each other source:

Please fill out the table on the next page to the best of your ability based on your anticipated program budget for the time period between award date and November 30, 2023. IHCD recognizes that this budget is likely to change over the course of project implementation; the applicant may work with IHCD to complete one reasonable budget modification during the award period if necessary.

This budget should include all costs that will be charged to the DV CE Award. Please note if all or a portion of a line item will be provided through a partner agency. If more space is needed, you may include an additional page with your application explaining your budget.

Line Item	Budget	Notes (if needed)
Annual Assessment of Service Needs		
Assistance with Moving Costs		
Case Management		
Child Care		
Education Services		
Employment Assistance and Job Training		
Food		
Housing Search and Counseling Services		
Legal Services		
Life Skills Training		
Mental Health Services		
Outpatient Health Services		
Outreach Services		
Substance Abuse Treatment Services		
Transportation		
Utility Deposits		
Total Budget		

Section 5: Certification of Applicant

Please sign noting your agreement with the following:

I understand that funding will be made available to reimburse the organization for all allowable project-related costs. Funding will not be paid in advance.

The organization is incorporated as a 501c3 and serves low-income individuals, families, and communities in Indiana.

If awarded funding, the organization's board of directors will sign off on the project.

The organization is prepared to actively work with IHCDA to measure the project's outcomes and document lessons learned while implementing the project.

Appendix B

Indiana Balance of State Continuum of Care Program Participation of Homeless Individuals on Board of Directors Certification

Agency Name: _____

Grant Number(s): _____

Address: _____

Phone and email: _____

Pursuant to 24 CFR 578.75(g) organizations receiving Continuum of Care Program (“CoC”) funding must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the sub-recipient, to the extent that such entity considers and makes policies and decisions regarding any project, supportive services, or assistance. This requirement is waived if a sub-recipient is unable to meet such requirement and obtains HUD approval for a plan to otherwise consult with homeless or formerly homeless persons when considering and making policies and decisions.

I, _____, hereby certify that the above-listed agency:

- Does have a homeless/formerly homeless representation on our current Board of Directors or auxiliary board.
- Does **NOT** have a homeless/formerly homeless representation on our current Board of Directors or auxiliary board.*

*If the agency does not have a homeless/formerly homeless representation has the agency received approval from HUD for an alternate plan to consult with homeless or formerly homeless person when considering making policies and decisions?

- Yes; please submit copy of the plan and the approval from HUD with this form.
- No; contact IHCDA immediately to discuss a plan to comply with 24 CFR 578.75(g).

I understand that any misrepresentation or failure to accurately respond to the questions contained in this form may disqualify me from receiving additional CoC funding, may be grounds for termination of CoC funding to the Agency and/or repayment of any CoC funding that the Agency received based on misrepresentation, an inaccurate or misleading response, fraud or omission.

Agency Representative: _____
(printed name and title)

Signature _____ Date: _____

Appendix C: Glossary of Terms

Balance of State (BoS)

The Indiana Balance of State Continuum of Care includes 91 of the 92 counties in the state. These counties are categorized into 16 individual regions, which are overseen by regional planning councils and the chairperson(s) that lead them. These councils meet regularly to develop and implement strategies for homelessness alleviation. Each region is in contact with and shares a Memorandum of Understanding with the IN-502 BOS CoC Board of Directors.

Category 4

HUD defines four categories under which individuals and families may qualify as homeless. Category 4 is individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. HUD has clarified that persons who are fleeing or attempting to flee human trafficking may qualify as homeless under paragraph 4, and therefore may be eligible for certain forms of homeless assistance under the CoC Program, subject to other restrictions that apply. HUD considers human trafficking, including sex trafficking, to be “other dangerous or life-threatening conditions related to violence against the individual or family member.” Where an individual or family is fleeing, or is attempting to flee human trafficking, that has either taken place within the individual’s or family’s primary night-time residence or has made the individual or family afraid to return to their primary night-time residence; and the individual or family has no other residence; and lacks the resources or support networks to obtain other permanent housing; HUD would consider that individual or family to qualify as homeless under paragraph 4 of the definition.

Centralized Point of Access

A central location within a geographic area where individuals and families present to receive homeless housing and services.

Continuum of Care (CoC)

The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effect utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

Coordinated Entry (CE)

Coordinated entry processes help communities prioritize assistance based on vulnerability and severity of service needs, to ensure that people who need assistance the most can receive it in a timely manner. The CE system connects those experiencing

homelessness to housing. CE changes a CoC from a project-focused system to a person-focused system.

De-Centralized Point of Access

Two or more locations within a geographic area where individuals and families present to receive homeless housing and services.

Diversion

Light touch case management approach to ending homelessness that encourages and helps households to come up with their own solutions to housing crises. Diversion is not a program; Diversion is a process that enables the client to identify ways to end their housing crises. Diversion is empowering

Domestic Violence Service Provider

Refers to any service provider in the BoS that serves survivors of domestic violence. Must be a registered 501(c)3.

Housing First Principles

Housing First is a programmatic and systems approach centering on providing homeless people with housing quickly and then providing services as needed using a low barrier approach that emphasizes community integration, stable tenancy, recovery, and individual choice.

Low barrier approach to entry:

Housing First offers individuals and families experiencing homelessness immediate access to permanent supportive housing without unnecessary prerequisites. For example:

- Admission/tenant screening and selection practices do not require abstinence from substances, completion of or compliance with treatment, or participation in services.
- Applicants are not rejected on the basis of poor or lack of credit or income, poor or lack of rental history, minor criminal convictions, or other factors that might indicate a lack of “housing readiness.”
- Blanket exclusionary criteria based on more serious criminal convictions are not applied, though programs may consider such convictions on a case-by-case basis as necessary to ensure the safety of other residents and staff.
- Generally, only those admission criteria that are required by funders are applied, though programs may also consider additional criteria on a case-by-case basis as necessary to ensure the safety of tenants and staff. Application of such additional criteria should be rare, and may include, for example, denial of an applicant who is a high-risk registered sex offender by a project serving children, or denial of an applicant who has a history of domestic violence involving a current participant.

Lead Agency

An agency in each of the 16 Regions that will serve as the Managing Entity of its Region's Prioritization List. The Lead Agency will lead the implementation of Coordinated Entry and will commit resources and staffing to administer assessments, analyze assessment results and support referrals to housing interventions. Lead Agencies will also serve on the Indiana Balance of State Coordinated Entry Steering Committee, as the systems are launched, managed and evaluated.

Service Provider

Refers to any homeless services provider in the BoS. Must be a registered 501(c)3.

Supportive Services Only

Supportive Services Only (SSO) projects allow recipients to provide supportive services—such as conducting outreach to sheltered and unsheltered homeless persons and families and providing referrals to other housing or other necessary services—to families and individuals experiencing homelessness. The recipient may only assist program participants for whom the recipient or subrecipient of the funds is not providing housing or housing assistance.

Appendix D: Eligible Costs

[24 CFR § 578.53 Supportive services.](#)

(a) In general. Grant funds may be used to pay the eligible costs of supportive services that address the special needs of the program participants. If the supportive services are provided in a supportive service facility not contained in a housing structure, the costs of day-to-day operation of the supportive service facility, including maintenance, repair, building security, furniture, utilities, and equipment are eligible as a supportive service.

(1) Supportive services must be necessary to assist program participants obtain and maintain housing.

(2) Recipients and sub recipients shall conduct an annual assessment of the service needs of the program participants and should adjust services accordingly.

(b) Duration.

(1) For a transitional housing project, supportive services must be made available to residents throughout the duration of their residence in the project.

(2) Permanent supportive housing projects must provide supportive services for the residents to enable them to live as independently as is practicable throughout the duration of their residence in the project.

(3) Services may also be provided to former residents of transitional housing and current residents of permanent housing who were homeless in the prior 6 months, for no more than 6 months after leaving transitional housing or homelessness, respectively, to assist their adjustment to independent living.

(4) Rapid rehousing projects must require the program participant to meet with a case manager not less than once per month as set forth in § 578.37(a)(1)(ii)(F), to assist the program participant in maintaining long-term housing stability.

(c) Special populations. All eligible costs are eligible to the same extent for program participants who are unaccompanied homeless youth; persons living with HIV/AIDS; and victims of domestic violence, dating violence, sexual assault, or stalking.

(d) Ineligible costs. Any cost that is not described as an eligible cost under this section is not an eligible cost of providing supportive services using Continuum of Care program funds. Staff training and the costs of obtaining professional licenses or certifications needed to provide supportive services are not eligible costs.

(e) Eligible costs.

(1) Annual Assessment of Service Needs. The costs of the assessment required by § 578.53(a)(2) are eligible costs.

(2) Assistance with moving costs. Reasonable one-time moving costs are eligible and include truck rental and hiring a moving company.

(3) Case management. The costs of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant(s) are eligible costs. Component services and activities consist of:

- (i) Counseling;
- (ii) Developing, securing, and coordinating services;
- (iii) Using the centralized or coordinated assessment system as required under § 578.23(c)(9).
- (iv) Obtaining federal, State, and local benefits;
- (v) Monitoring and evaluating program participant progress;
- (vi) Providing information and referrals to other providers;
- (vii) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- (viii) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(4) Child care. The costs of establishing and operating child care, and providing child-care vouchers, for children from families experiencing homelessness, including providing meals and snacks, and comprehensive and coordinated developmental activities, are eligible.

- (i) The children must be under the age of 13, unless they are disabled children.
- (ii) Disabled children must be under the age of 18.
- (iii) The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(5) Education services. The costs of improving knowledge and basic educational skills are eligible.

- (i) Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED).
- (ii) Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies, and instructional material; counseling; and referral to community resources.

(6) Employment assistance and job training. The costs of establishing and operating employment assistance and job training programs are eligible, including classroom, online and/or computer instruction, on-the-job instruction, services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is also an eligible cost.

(i) Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.

(ii) Services that assist individuals in securing employment consist of:

(A) Employment screening, assessment, or testing;

(B) Structured job skills and job-seeking skills;

(C) Special training and tutoring, including literacy training and pre-vocational training;

(D) Books and instructional material;

(E) Counseling or job coaching; and

(F) Referral to community resources.

(7) Food. The cost of providing meals or groceries to program participants is eligible.

(8) Housing search and counseling services. Costs of assisting eligible program participants to locate, obtain, and retain suitable housing are eligible.

(i) Component services or activities are tenant counseling; assisting individuals and families to understand leases; securing utilities; and making moving arrangements.

(ii) Other eligible costs are:

(A) Mediation with property owners and landlords on behalf of eligible program participants;

(B) Credit counseling, accessing a free personal credit report, and resolving personal credit issues; and

(C) The payment of rental application fees.

(iii) Housing counseling, as defined in § 5.100, that is funded with or provided in connection with grant funds must be carried out in accordance with § 5.111. When recipients or sub recipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of Housing counseling, as defined in § 5.100, and therefore are not required to be carried out in accordance with the certification requirements of § 5.111.

(9) Legal services. Eligible costs are the fees charged by licensed attorneys and by person(s) under the supervision of licensed attorneys, for advice and representation in matters that interfere with the homeless individual or family's ability to obtain and retain housing.

(i) Eligible subject matters are child support; guardianship; paternity; emancipation; legal separation; orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking; appeal

of veterans and public benefit claim denials; landlord tenant disputes; and the resolution of outstanding criminal warrants.

(ii) Component services or activities may include receiving and preparing cases for trial, provision of legal advice, representation at hearings, and counseling.

(iii) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(iv) Legal services for immigration and citizenship matters and issues related to mortgages and homeownership are ineligible. Retainer fee arrangements and contingency fee arrangements are ineligible.

(10) Life skills training. The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance abuse, and homelessness are eligible. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are the budgeting of resources and money management, household management, conflict management, shopping for food and other needed items, nutrition, the use of public transportation, and parent training.

(11) Mental health services. Eligible costs are the direct outpatient treatment of mental health conditions that are provided by licensed professionals. Component services are crisis interventions; counseling; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(12) Outpatient health services. Eligible costs are the direct outpatient treatment of medical conditions when provided by licensed medical professionals including:

(i) Providing an analysis or assessment of an individual's health problems and the development of a treatment plan;

(ii) Assisting individuals to understand their health needs;

(iii) Providing directly or assisting individuals to obtain and utilize appropriate medical treatment;

(iv) Preventive medical care and health maintenance services, including in-home health services and emergency medical services;

(v) Provision of appropriate medication;

(vi) Providing follow-up services; and

(vii) Preventive and noncosmetic dental care.

(13) Outreach services. The costs of activities to engage persons for the purpose of providing immediate support and intervention, as well as identifying potential program participants, are eligible.

(i) Eligible costs include the outreach worker's transportation costs and a cell phone to be used by the individual performing the outreach.

(ii) Component activities and services consist of: initial assessment; crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; actively connecting and providing people with information and referrals to homeless and mainstream programs; and publicizing the availability of the housing and/or services provided within the geographic area covered by the Continuum of Care.

(14) Substance abuse treatment services. The costs of program participant intake and assessment, outpatient treatment, group and individual counseling, and drug testing are eligible. Inpatient detoxification and other inpatient drug or alcohol treatment are ineligible.

(15) Transportation. Eligible costs are:

(i) The costs of program participant's travel on public transportation or in a vehicle provided by the recipient or subrecipient to and from medical care, employment, child care, or other services eligible under this section.

(ii) Mileage allowance for service workers to visit program participants and to carry out housing quality inspections;

(iii) The cost of purchasing or leasing a vehicle in which staff transports program participants and/or staff serving program participants;

(iv) The cost of gas, insurance, taxes, and maintenance for the vehicle;

(v) The costs of recipient or subrecipient staff to accompany or assist program participants to utilize public transportation; and

(vi) If public transportation options are not sufficient within the area, the recipient may make a one-time payment on behalf of a program participant needing car repairs or maintenance required to operate a personal vehicle, subject to the following:

(A) Payments for car repairs or maintenance on behalf of the program participant may not exceed 10 percent of the Blue Book value of the vehicle (Blue Book refers to the guidebook that compiles and quotes prices for new and used automobiles and other vehicles of all makes, models, and types);

(B) Payments for car repairs or maintenance must be paid by the recipient or subrecipient directly to the third party that repairs or maintains the car; and

(C) The recipients or sub recipients may require program participants to share in the cost of car repairs or maintenance as a condition of receiving assistance with car repairs or maintenance.

(16) Utility deposits. This form of assistance consists of paying for utility deposits. Utility deposits must be a one-time fee, paid to utility companies.

(17) Direct provision of services. If the service described in paragraphs (e)(1) through (e)(16) of this section is being directly delivered by the recipient or subrecipient, eligible costs for those services also include:

- (i) The costs of labor or supplies, and materials incurred by the recipient or subrecipient in directly providing supportive services to program participants; and
- (ii) The salary and benefit packages of the recipient and subrecipient staff who directly deliver the services.

§ 578.59 Project administrative costs.

(a) Eligible costs. The recipient or subrecipient may use up to 10 percent of any grant awarded under this part, excluding the amount for Continuum of Care Planning Activities and UFA costs, for the payment of project administrative costs related to the planning and execution of Continuum of Care activities. This does not include staff and overhead costs directly related to carrying out activities eligible under § 578.43 through § 578.57, because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) General management, oversight, and coordination. Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

(A) Preparing program budgets and schedules, and amendments to those budgets and schedules;

(B) Developing systems for assuring compliance with program requirements;

(C) Developing agreements with subrecipients and contractors to carry out program activities;

(D) Monitoring program activities for progress and compliance with program requirements;

(E) Preparing reports and other documents directly related to the program for submission to HUD;

(F) Coordinating the resolution of audit and monitoring findings;

(G) Evaluating program results against stated objectives; and

(H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

(2) Training on Continuum of Care requirements. Costs of providing training on Continuum of Care requirements and attending HUD-sponsored Continuum of Care trainings.

(3) Environmental review. Costs of carrying out the environmental review responsibilities under § 578.31.

Appendix E: HUD Homeless Definition



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing

Appendix F: Additional Terms and Conditions

- I. By submitting its proposal, Applicant certifies that neither it nor its principal(s) is presently in arrears in payment of its taxes, permit fees or other statutory, regulatory or judicially required payments to the State of Indiana or the United States Treasury. Applicant further warrants that it has no current, pending or outstanding criminal, civil, or enforcement actions initiated by either the State or Federal Government pending against it, and agrees that it will immediately notify IHCDCA of any such actions.

- II. **Conflict of Interest.** Applicant must disclose any existing or potential conflict of interest relative to the performance of the services resulting from this application, including any relationship that might be perceived or represented as a conflict. By submitting its proposal, Applicant affirms that it has not given, nor intends to give at any time hereafter, any economic opportunity, future employment, gift, loan, gratuity, special discount, trip, favor, or service to a public servant or any employee or representative of same, in connection with this application. Any attempt to intentionally or unintentionally conceal or obfuscate a conflict of interest will automatically result in the disqualification of the Applicant's proposal or immediate termination of an awardee's agreement. IHCDCA will determine whether a conflict of interest exists and whether an apparent conflict of interest may reflect negatively on IHCDCA, should IHCDCA select Applicant. Further, IHCDCA reserves the right to disqualify any Applicant on the grounds of actual or apparent conflict of interest.

- III. Awarded applicants must comply with all applicable federal, state, and local laws, rules, regulations, and ordinances, including the below requirements, and enter into written agreements with IHCDCA that will include but not be limited to such requirements.
 1. **Compliance with Laws.** Applicant and its agents must abide by all ethical requirements that apply to persons who have a business relationship with the State as set forth in IC §4-2-6 *et seq.*, IC §4-2-7, *et seq.* and the regulations promulgated thereunder. If the Applicant has knowledge, or would have acquired knowledge with reasonable inquiry, that a state officer, employee, or special State appointee, as those terms are defined in IC §4-2-6-1, has a financial interest in the Award, the Applicant shall ensure compliance with the disclosure requirements in IC §4-2-6-10.5.
 2. **Confidentiality of State Information.** The Applicant understands and agrees that data, materials, and information disclosed to the Applicant may contain confidential and protected information. The Applicant covenants that data, material, and information gathered, based upon or disclosed to the Applicant for the purpose of this project will not be disclosed to or discussed with third parties without the prior written consent of IHCDCA. In addition to the covenant made above in this section and pursuant to 10 IAC 5-3-1(4), the Applicant and IHCDCA agree to comply with the provisions of IC §4-1-10 and IC §4-1-11. If any Social Security number(s) is/are disclosed by Applicant, Applicant agrees to pay the cost of the notice of disclosure of a breach of the security of the system in addition to any other claims and expenses for which it is liable under the terms of this contract.
 3. **Employment Eligibility Verification.** The Applicant cannot knowingly employ an unauthorized alien. The Applicant shall require its contractors who perform work for the Applicant pursuant to the project to certify to the Applicant that the contractor does not knowingly employ or contract with an unauthorized alien.

4. The Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended.
5. **Debarment and Suspension (Executive Orders 12549 and 12689; 2 CFR § 180)**—A contract award (see 2 CFR § 180.220) must not be made to parties listed on the government-wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), “Debarment and Suspension.” SAM Exclusions contain the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.
6. **Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)**—Entities that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier must certify to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.
7. Equal Participation of Faith-Based Organizations (24 CFR § 5.109).
8. Conflict of Interest, including conflict of interest requirements under 2 CFR § 200.317, 2 CFR § 200.318, and 24 CFR § 578.
9. Prohibition on Certain Telecommunications and Video Surveillance Services or Equipment (2 CFR § 200.216). Effective August 13, 2020, 2 CFR § 200.216 applies to all Federal grant programs.
10. Domestic Preferences for Procurements (2 CFR § 200.322).
11. Uniform Administrative Requirements (2 CFR § 200) to the extent consistent with the provisions of the McKinney-Vento Act and 24 CFR 578, including using a financial management system that complies with 2 CFR 200 and using cost principles and providing for audits in accordance with the provisions of 2 CFR 200.501.
12. Confidentiality requirements in accordance with HMIS and other CoC and IHCD policy requirements.
13. Violence Against Women Reauthorization Act of 2013 and the implementing regulations at 24 CFR Part 5.
14. Affirmatively Furthering Fair Housing 24 CFR § 578.93(c).
15. Accessibility and Integrative Housing and Services for Persons with Disabilities 24 CFR § 578.93(d).
16. Nondiscrimination and Equal Opportunity (24 CFR § 5.105(a)).
17. Meaningful Access to the CoC Program for Limited English Proficient Persons
18. Equal Access to Housing Regardless of Sexual Orientation, Gender Identity, or Marital Status (24 CFR § 5.105 and 5.106).
19. **Lead-Based Paint Requirements.** When providing education or counseling on buying or renting housing that may include pre-1978 housing, the Applicant must inform clients of their rights under the Lead Disclosure Rule (24 CFR Part 35, subpart A), and, if the focus of the education or counseling is on rental or purchase of HUD-assisted pre-1978 housing, the Lead Safe Housing Rule (subparts B, R, and as applicable, F-M).
20. Trafficking Victims Protection Act of 2000, As Amended (22 U.S.C. 7104).

21. **Mandatory Disclosure.** The Applicant must disclose, in a timely manner, in writing to IHADA all violations of Federal criminal law involving fraud, bribery, or gratuity violations potentially affecting the Award. The Applicant's failure to make these disclosures may subject to the Applicant to remedies of non-compliance set forth in 2 CFR 200.338.
22. Continuum of Care Program requirements at 24 CFR § 578 and Title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11381-11389), as applicable to supportive services.
23. **Recordkeeping.** The Applicant must maintain sufficient records to enable HUD to determine whether it is meeting the requirements of the Continuum of Care Program.