



State of Rhode Island,

City of Pawtucket, City of Providence

Consolidated Homeless Fund Partnership

Request for Proposals

2022-2023 Program Year

APPLICATION DEADLINE:

Friday, February 25, 2022 @ 4:00 PM

CONSOLIDATED HOMELESS FUND PARTNERSHIP c/o

Pheamo R. Witcher, Office of Housing and Com. Development

Table of Contents

I.	INTRODUCTION.....	3
II.	ESTIMATED ALLOCATIONS.....	3
III.	REQUEST FOR PROPOSAL TIMELINE.....	4
IV.	ELIGIBLE APPLICANTS.....	4
V.	DEFINITIONS.....	5
VI.	INELIGIBLE ACTIVITIES.....	9
VII.	ELIGIBLE ACTIVITIES & ELIGIBLE PROGRAM PARTICIPANTS.....	9
	1. Services Projects	
	2. Systems Projects	
VIII.	CHF/ESG PROGRAMMATIC REQUIREMENTS.....	15
IX.	CHF/ESG RECORDKEEPING REQUIREMENTS.....	18
X.	APPLICABLE RULES & REGULATIONS.....	19
XI.	CHF/ESG PERFORMANCE MEASUREMENT.....	19
XII.	RFP TERMS AND CONDITIONS.....	20
XIII.	APPLICATION INSTRUCTIONS.....	21
XIV.	APPLICATION SUBMISSION.....	21
XIV.	PROPOSAL SELECTION & PROJECT APPROVAL PROCESS.....	21
XV.	CHF/ESG ADMINISTRATIVE REQUIREMENTS.....	22

I. INTRODUCTION

To increase program performance and efficiency, while reducing administrative burden, the Emergency Solutions Grant (ESG) Entitlement Cities of Pawtucket and Providence have joined with the State of Rhode Island Office of Housing and Community Development, Housing Resources Commission, and the Department of Human Services to create the Consolidated Homeless Fund Partnership (CHFP). In accordance with program regulations published relative to the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act, as amended, the CHFP Partnership announce the anticipated availability of homeless funding through the Consolidated Homeless Fund Partnership (CHFP) competitive grant application process. The CHFP anticipates approximately \$17,671,578 est. in funds (please note that a portion of these funds will be used for Statewide Systems Projects) for the program year of March 31, 2022 to June 30, 2023. **The actual availability and amount of funds is contingent upon the availability of federal & state funding.**

II. ESTIMATED ALLOCATIONS

The CHFP anticipates the availability of federal and state funding from the following programs:

- City of Pawtucket, Emergency Solutions Grant Program (\$145,622) est.
- City of Providence, Emergency Solutions Grant Program (\$416,992) est.
- City of Providence, American Rescue Plan \$2,300,000) est.
- State of Rhode Island, Emergency Solutions Grant Program (\$656,824) est.
- State of Rhode Island, Title XX Homeless Funds (\$1,208,964) est.
- State of Rhode Island, ERA 2 Funds (\$6,000,000) est.
- State of Rhode Island, Fiscal Recovery Funds for Housing Stability (\$1,500,000) est. -please see attached description of eligible uses of funds
- State of Rhode Island, Housing Resources Commission Homelessness Resources (\$4,500,000) est. - **subject to HRC approval.**
- Other sources of funds may become available (to be announced as they become available).

Please note that local (Providence and Pawtucket) Emergency Solutions Grant Funds contributed to the CHFP must be distributed to programs serving those communities and are subject to local approvals. There is a guaranteed minimum allocation in those municipalities equivalent to their ESG allocation. Variations from estimated percentages and amounts may occur.

Notes regarding estimated allocations:

1. ERA 2 funds can be used to support eligible households or individuals (below 80% AMI), who are experiencing housing instability during or directly related to the Coronavirus pandemic, in maintaining or obtaining stable housing. Essential Services to unsheltered persons and services to eligible households may be provided through a variety of avenues including outreach services, shelter services, community services, and services offered at permanent supportive avenues including street outreach services, shelter services, community services, and services offered at permanent supportive housing properties. All assistance using ERA 2 funds must be for services that are part of a program to maintain or obtain housing.
2. While the Consolidated Homeless Fund has historically provided limited support of Diversion or new shelter capacity, substantially additional resources have been incorporated into this RFP, allowing significant new investments in these areas. The State is encouraging applications for expanded shelter capacity and

diversion activities. With regard to diversion programs, centralized distribution of assistance to households, before they enter the homeless shelter system, would be competitive. Such activities may be coordinated through an agency not traditionally funded by CHF.

3. Emergency Solution Grant and Title XX funds may be used to support emergency shelter, rapid rehousing, street outreach and essential services programs.
4. Housing Resources Commission funds may be available to support all program activities.

REQUEST FOR PROPOSAL TIMELINE

January 25, 2022	RFP Release Date
February 4, 2022 at 1:00 pm	RFP Information Session Via Zoom
February 11, 2022 at 4:00 p.m.	Deadline to Submit Questions. Submit questions via https://www.surveymonkey.com/r/DCVZCR3
February 18, 2022 at 4:00 p.m.	Answers to submitted questions will be posted at http://ohcd.ri.gov
February 25, 2022	Applications Due by 4:00 PM
On or about May 27 th , 2022	Awards Announced (contingent upon approval by HRC) Note: ERA2/Recovery awards will be announced and contracted for in March, 2022. Generally, projects not considered for ERA2/Recovery funding will begin in July 1 st .

Contracts for funding will be executed with the respective member of the Partnership controlling that funding and managing all aspects of contract administration. Final contract execution is subject to compliance with the requirements of the funding entity including good standing of all applicable audits and monitoring reports.

III. ELIGIBLE APPLICANTS

- Private nonprofit organizations (defined as tax-exempt secular or religious organization described in section 501(c)(3) of the Internal Revenue Code), units of local government, Public Housing Authorities (PHAs) and Community Action Agencies (CAPs).
- Has no part of its net earnings inuring to the benefit of any member, founder, contributor, or individual.
- Organizations that do not have any unresolved findings from the State of Rhode Island or HUD.
- Organizations that have standards of financial accountability that conform to 2 CFR 200.302, 'Financial Management' and 2 CFR 200.303, 'Internal Controls,' which includes systems and software that allow for effective control over, and accountability for, all funds, property, and other assets.

- Organizations that have a functioning accounting system that is operated in accordance with generally accepted accounting principles, or has designated an entity that will maintain such an accounting system; and
- Organizations that have among its purposes significant activities related to providing services or individuals and families who are homeless.

If the applicant fails to demonstrate that these requirements have been met, its proposal will not be reviewed. Applicants are encouraged to pool resources and collaborate on programs whenever possible. When this occurs the collaborating, group shall elect a lead applicant to apply for funds and serve as the fiscal agent.

IV. DEFINITIONS

- ***Administrative Costs***

Costs associated with the general management (some percentage of the executive director and accounting staff, the annual audit and other accounting fees, general liability and director's and officer's insurance), oversight, coordination, evaluation (HMIS Administrator), and reporting (HMIS Administrator) on program activities.

Allocable administrative costs must be charged to the grant based on a cost allocation plan.

- Non-Direct Service Personnel (personnel not serving clients directly).
- Other Operation Expenses that cannot be directly charged to the grant

- ***Continuum of Care***

The group composed of representatives of relevant organizations and content experts, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area. Rhode Island has a single Statewide Continuum of Care, The Rhode Island Continuum of Care.

- ***Direct Program Costs***

Costs that can be identified specifically with a particular project, service, or other direct activity whose benefit can be specifically identified within the program and directly serve/benefit the clients served (including the following sub-categories of expenses).

- Direct Service Personnel
- Direct Other Operation Expenses
- Client Assistance/Programming Costs

- ***Emergency Shelter***

Means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as a transitional shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under CHF.

• **Homeless Individual or Family**

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - i. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.
 - ii. An individual or family living in a supervised 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, or local government programs for low-income individuals); or
 - iii. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - i. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance.
 - ii. No subsequent residence has been identified; and
 - iii. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing.
- (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:
 - i. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance.
 - iii. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - iv. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or ;
- (4) Any individual or family who:
 - i. Is fleeing, or is 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, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence.
 - ii. Has no other residence; and
 - iii. Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

- **Chronically Homeless**

(1) An individual who:

- i. Is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
- ii. Has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one year or on at least four separate occasions in the last 3 years, where each homeless occasion was at least 15 days; and
- iii. Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000 (42 U.S.C. 15002)), posttraumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability.

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) before entering that facility; or

(3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1), including a family whose composition has fluctuated while the head of household has been homeless.

- **Diversion**

For people without safe housing tonight, at the front door of our homelessness service system.

- a. The conversation should precede any Coordinated Entry (CE) assessment that aims to understand vulnerability for the purpose of permanent housing prioritization.
- b. Should happen before they go through the coordinated entry process.

- **Homeless Management Information System (HMIS)**

Means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect sub recipient level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

- **Homelessness Prevention**

For people at risk of homelessness who currently have a safe place to stay but are at imminent risk of homelessness.

- a. For ESG, ESG CV, COC, and other HUD funded projects, HUD's category 2 Definition of imminent risk.
- b. For private/flex funded projects; the term imminent will be kept flexible to meet the needs of our clients.
- c. For ERA 2 funds the following criteria applies:
 - One or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due directly or indirectly, to coronavirus pandemic.
 - One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; and
 - The household is a low-income family (as such defined in section 3(b) of the United States Housing Act of 1937 (42 U.S.C. 1437 a (b))).²

- **Housing First**

An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service

participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

- **Internal Controls**

A combination of policies, procedures, personnel, defined responsibilities, and records that allow an organization to maintain adequate oversight and control of its finances.

- **Major Rehabilitation**

Rehabilitation that involves costs **in excess of 75% of the value** of the building before rehabilitation. Buildings assisted at this level must be maintained as a shelter for the homeless for not less than a ten-year period.

- **Permanent housing is defined as**

- Rental house or apartment (no subsidy)
- Public Housing
- Section 8 Housing
- Shelter Plus Care
- HOME Subsidized house or apartment
- Other Subsidized house or apartment
- Homeownership
- Moved in with family or friends (non-temporary basis)

- **Private Nonprofit Organization**

Means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

- **Program Income**

Shall have the meaning provided in 24 CFR 85.25. Program income includes any amount of a security or utility deposit returned to the sub-recipient.

- **Program Participant**

Means an individual or family who is assisted by the CHF program.

- **Rapid Exit/Rapid Resolution**

For people experiencing literal homelessness, sheltered or unsheltered.

- a. Can happen before they go through the Coordinated Entry process, but right after they have entered our system.
- b. Can also be targeted at people who are waiting for housing resources but only need limited assistance.

- **Rapid Re-Housing**

Activities designed to end the incidence of homelessness quickly. Primarily, the funds can be used for rental assistance, first month's rent, security, or utility deposits for obtaining permanent housing, as well as relocation and stabilization services, which could include housing case managers who develop landlord relationships, assist with housing search and monitor progress on housing plans for mid-term assistance.

- **Shared or Common Direct Costs**

An expense whose benefit can be specifically identified with more than one program.

- **Sub-recipient**

Means a unit of general-purpose local government or private nonprofit organization to which a recipient makes available CHF funds.

- **Transitional Housing**

For the purpose of CHF assistance, housing that extends past the “3 days to 3 months” reasonable period for temporary housing (emergency shelter). HUD defines transitional housing as having the “purpose” of moving homeless individuals and families to permanent housing within 24 months. (42 U.S.C. 11384(b)).

- **Unit of General-Purpose Local Government**

Means any city, county, town, township, parish, village, or other general-purpose political subdivision of a State.

- **Value of the Building**

The monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established

V. INELIGIBLE ACTIVITIES

The following costs and activities **are not eligible** for funding under the CHFP:

- Depreciation, bad debts, and late fees.
- Public relations or fundraising.
- Recruitment, staff training, entertainment, conferences and retreats not specifically related to the goals of the CHFP funded project.
- Any activities not explicitly detailed in this manual.
- Payment of client credit card or another consumer debt.
- Payment of client mortgage costs and mortgage arrears.
- Cash assistance paid directly to participants.

VI. ELIGIBLE ACTIVITIES & ELIGIBLE PROGRAM PARTICIPANTS

A. Service Projects

Proposal submissions are being encouraged through this RFP process for: Emergency Shelter Activities (in accordance with HUD’s Interim Rule for Homeless Emergency Assistance and Rapid Transition to Housing Appendix1), Street Outreach, Rapid Rehousing, State Rental Assistance and Homelessness Prevention activities.

as described below:

1. **Street Outreach** - Funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people (*“unsheltered homeless people” means individuals and families who qualify as*

*homeless under paragraph (1)(i) of the “homeless” definition under § 576.2.) for the purposes of connecting them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. The eligible costs and requirements for essential services consist of engagement; case management; emergency health and mental health services (**services that are typically paid for with Medicaid funds are not eligible for funding**); transportation and services for special populations.*

2. **Emergency Shelter** – Funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters. Each of these are described as follows:
- Shelter Operations** – Eligible costs are the costs of maintenance, including (minor or routine repairs) rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter.
 - Essential Services** – CHFP funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows: Case Management, Childcare, Education Services, Employment Assistance and Job Training, Outpatient Health Services, Legal Services, Life Skills Training, Mental Health Services, Substance Abuse Treatment, Transportation and Services for Special Populations.
 - Shelter Construction/Renovations** – Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a governmental entity or private nonprofit organization.

Individuals and families defined as Homeless under the following categories are eligible for assistance under Emergency Shelter:

- *Category 1-Literally Homeless*
- *Category 2-Imminent Risk of Homeless*
- *Category 3 –Homeless Under Other Federal Statutes*
- *Category 4- Fleeing/Attempting to Flee DV*

3. **Rapid Rehousing and State Rental Assistance**

- Rapid Rehousing Programs are designed to help those who are homeless quickly transition out of homelessness (less than 28 days after entering shelter) into permanent housing.** The primary goal is to stabilize program participants in housing as quickly as possible and to provide wrap-around services after the family or individual obtains housing. Individuals or households receiving this type of assistance must have an income (s) at or below 30% of AMI. Enrollment in a rapid rehousing program should rely heavily on a guided case management plan to ensure long term stability for program participants.
- Rental Assistance Programs are designed to help the chronically homeless achieve housing stability.** The primary goal is to address the barriers and challenges that cause individuals and families to be chronically homeless, while also working to stabilize program participants in housing through the provision of wrap around services after the family or individual obtains housing.

Rapid Rehousing and State Rental Assistance may be provided to program participants who meet the criteria under category (1) of the “homeless” definition in § 576.2 or who meet the criteria under category (4) of the “homeless” definition and live in an emergency shelter or other place described in category (1) of the “homeless” definition.

Rapid Rehousing and State Rental Assistance must be provided in accordance with the housing relocation and stabilization services requirements in § 576.105, the short-and medium-term rental assistance requirements in § 576.106, and the written standards and procedures established under § 576.400. Rapid Rehousing and Rental Assistance may include tenant-based and/or project-based rental assistance. Eligible costs include:

a) Financial Assistance-

- i. **Security Deposits-** CHF funds may pay for a security deposit that is equal to no more than 1 months' rent.
- ii. **Moving Costs-** CHF funds may pay for reasonable moving costs, such as truck rental or hiring a moving company.
- iii. **Rent-** CHF funds may be used to provide up to 24 months of rapid rehousing and/or state rental assistance during any three-year period. Project based rental assistance is allowed, provided that the property is not owned by the Sub recipient/Contractor.
- iv. **Landlord Risk Mitigation Funds** – Funds to reimburse landlords for damages to a unit beyond the amounts covered by a security deposit. No more than an incidental amount should be set aside for landlord risk reduction funds. Only State rental assistance funds may be used for landlord mitigation services.

b) Services Costs -Subject to the general restrictions under § 576.103 and § 576.104, CHF funds may be used to pay the costs of providing the following services:

- i. **Housing Search and Placement/Housing Navigators** - Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
- ii. **Housing Stability Case Management-** CHF funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. **This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.**
- iii. **Financial Literacy/Credit Repair-** CHF funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Applicants applying for Rapid Rehousing and Rental Assistance funds must utilize the coordinated assessment system as required under 576.400 to evaluate individuals and families applying for or receiving rapid rehousing and rental assistance.

4. Diversion and Prevention

The costs of homelessness diversion and prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. All payments made on behalf of program participants will be paid directly to the landlord and/or other eligible vendor. Eligible costs include:

a) Financial Assistance-

- i. **Rental Application Fees** - funds may pay for the rental housing application fee that is charged by the owner to all applicants.
- ii. **Security Deposits-** funds may pay for a security deposit that is equal to 1 months' rent.

- iii. **Moving Costs** – funds may be used to pay for moving costs, such as truck rental or hiring a moving company.
- iv. **Rental Assistance/Rental Arrears** – The recipient may provide a program participant with up to 18 months of rental/rental arrears assistance. Assistance may be tenant-based or project-based (project-based rental assistance is only available for units not owned by the contractor).
- iv. **Financial Literacy/Credit Repair** - CHF funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.
- v. **Eviction Prevention/Mediation Programs** -funds may be used to design programs that are designed to bridge gaps between landlords and tenants and result in landlords and tenants coming to agreement/resolution before eviction takes place.

We encourage providers to work with clients to find other sources of funds to provide utility assistance.

- b) Services Costs -Subject to the general restrictions under § 576.103 and § 576.104, CHF funds may be used to pay the costs of providing the following services:
 - i. **Housing Search and Placement/Housing Navigators** - Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing.
 - ii. **Housing Stability Case Management**-CHF funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. **This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.**
 - iii. **Credit Repair**-CHF funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

Individuals and families who meet the following Emergency Rental Assistance (ERA) Criteria established by the US Department of Treasury qualify for assistance under homelessness prevention:

- a. One or more individuals within the household has qualified for unemployment benefits or experienced a reduction in household income, incurred significant costs, or experienced other financial hardship during or due directly or indirectly, to coronavirus pandemic.
- b. One or more individuals within the household can demonstrate a risk of experiencing homelessness or housing instability; and
- c. The household is a low-income family (as such defined in section 3(b) of the United States Housing Act of 1937 (42 U.S.C. 1437 a (b))).²

ERA funds can be used to support eligible households or individuals (below 80% AMI), who are experiencing housing instability during or directly related to the Coronavirus pandemic, in maintaining or obtaining stable housing. Essential Services to unsheltered persons and services to eligible households may be provide through a variety of avenues including outreach services, shelter services, community services, and services offered at permanent supportive avenues including street outreach services, shelter services, community services, ad services offered at permanent supportive housing properties. All assistance using ERA 2 funds must be for services that are part of a

program to maintain or obtain housing.

Housing First Focus

Service projects (Emergency Shelter, Street Outreach, Essential Services and Homelessness Prevention Programs) that focus on the development of supportive service partnerships that ensure Housing First are encouraged. Such projects should focus on ending chronic homelessness, providing homeless families and individuals stable housing, improving health outcomes, and reducing costs associated with emergency department visits. Provision of wraparound services through comprehensive partnerships with Federally Qualified Health Centers, Community Mental Health Centers, Home Stabilization Providers, Medical Professionals, Health Equity Zones, and other Systems of Care services are strongly encouraged and should focus on preventing the following scenarios:

- Medicaid expenditures increase to large sums of healthcare dollars that could be avoided
- Overdoses continue to worsen, and additional deaths result for our minority populations
- Families are separated more often, and additional children are placed into foster care
- HIV viral suppression deteriorates, and infectious disease, such as COVID-19 spreads
- LTSS rebalancing efforts stall and many patients end up unnecessarily in nursing homes
- Veterans are further impacted, marginalized, subjected to trauma, and unsupported
- Reincarceration rates increase, and further systemic oppression occurs

B. Systems Projects

The CHFP supports a wide range of activities designed to assist persons at-risk of /or experiencing homelessness every year **by developing programs and initiatives to meet the goals of Opening Doors Rhode Island**, which are to:

- Increase the supply of and access to permanent housing that is affordable to very low-income households.
- Retool Homeless Crisis Response System to be more effective in preventing/ending homelessness.
- Increase economic security for those who are homeless or at risk of becoming homeless.
- Improve Health and Housing Stability.
- Increase Leadership, Collaboration and Civic Engagement

Opening Doors Rhode Island outlines a program to significantly transform the provision of services to homeless people in Rhode Island. Consistent with new federal direction and policy, the plan seeks to sharply decrease the numbers of people experiencing homelessness and the length of time people spend homeless. The purpose of this Request for Proposal is to solicit proposals from organizations that address **key components of a systems development and capacity building program** to meet the objectives of Opening Doors Rhode Island.

The descriptions below outline the key program elements and services the selected grantee(s) will provide. Applicants should use these descriptions when designing their proposed programs. However, applicants may suggest modifications and/or additions that will in their estimation make their program(s) more feasible or effective. Applicants may also propose that they will subcontract one or more elements of their program to other applicants, provided that those partners have been identified and described in the submission. The Applicant will identify and/or develop:

1. **Rapid Exit and Diversion Services** – A vendor to provide effective Rapid Exit and Diversion services that prevents homelessness for people seeking shelter by helping them identify immediate alternate housing arrangements,

and if necessary, connecting them with services and financial assistance to help them return to permanent housing. For the purposes of this RFP, diversion services may include, but are not limited to:

- a. Provide diversion and referral services to ensure that individuals and families can stabilize without entering shelter, whenever possible.
- b. Provide “light touch” financial assistance, when appropriate, to stabilize individuals and families to help them avoid entering emergency shelter
- c. Manage a protocol/referral list (to be shared systemwide) of appropriate diversion resources to prevent admission to emergency shelter or non-permanent housing; and
- d. Help providers system-wide to understand diversion techniques and strategies.

2. System-Wide Housing Navigation Services – The CHFP through this RFP is seeking an agency/organization that will employ 2-3 Systemwide Housing Navigators who will work with the Coordinated Entry System to provide housing relocation services (Search and Placement) for homeless individuals and families. To accomplish this, the Housing Navigator agency shall:

- a. Continually research and identify available rental housing opportunities in RI that are suitable for individuals and families transitioning out of homeless shelters.
- b. Develop a statewide inventory of affordable rental housing units.
- c. Identify units that meet the needs of clients on the Coordinated Entry Prioritization List.
- d. Conduct outreach to and negotiation with landlords & property managers to ensure the availability of units.
- e. Assess housing units for compliance with permanent housing standards.
- f. Work with CHF and CoC funded agency staff to make units available to clients who qualify for designated units.
- g. Assist case management staff and other providers in making housing placements for shelter residents; and
- h. Provide other services and guidance to support successful tenancies.

3. Innovative Projects to meet one or more goals of Opening Doors RI – Innovative projects that are designed to achieve one or more goals of Opening Doors RI are encouraged. The goals of Opening Doors RI are as follows:

- Increase the supply of and access to permanent housing that is affordable to very low-income households.
- Retool Homeless Crisis Response System to be more effective in preventing/ending homelessness.
- Increase economic security for those who are homeless or at risk of becoming homeless.
- Improve Health and Housing Stability.
- Increase Leadership, Collaboration and Civic Engagement

Some examples of innovative projects that support Opening Doors RI are as follows:

- Providing centralized leadership for homeless outreach.
- Implementing a plan for leadership coordination and reducing duplication of services among shelters; and
- Systemwide diversion activities to prepare for, prevent, and respond to COVID 19 (ESG Coronavirus Relief Funds may be made available to support this activity).

Final scopes of work may vary based on the processes proposed and agreed to by the CHF Partnership, the HRC and the CoC.

VII.CHF/ESG PROGRAM REQUIREMENTS

A. All Service Projects

1. Policies and Procedures

Sub-recipients/Contractors must have policies and procedures in place to ensure that the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented to ensure that CHF/ESG funds are used in accordance with these requirements. In addition, sufficient records must be established and maintained to enable the CHF and HUD to determine whether CHF/ESG requirements are being met.

2. Homeless Status

Sub-Recipients/Contractors must maintain and follow written intake procedures to ensure compliance with the homeless definition in § 576.2. The procedures must require **documentation at intake of the evidence (see Appendix 3, Reference Table 2 for additional information regarding documenting homeless status) relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.** However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

3. Program Participant Records

In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

- a. The services and assistance provided to that program participant, including, as applicable, the security deposit and rental assistance payments made on behalf of the program participant;
- b. Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at § 576.101 through § 576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and
- c. Where applicable, compliance with the termination of assistance requirement in § 576.402.

4. Centralized or Coordinated Assessment Systems and Procedures

CHF Sub-Recipients/Contractors must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care in accordance with the requirements established by HUD.

5. Shelter and Housing Standards

The records must include documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports.

6. Services and Assistance Provided

The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its sub-recipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

7. HMIS

The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its sub-recipients.

8. Conflicts of Interest

The recipient and its sub-recipients must keep records to show compliance with the organizational conflicts-of-interest requirements in § 576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in § 576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

9. Homeless Participation

The recipient must document its compliance with the homeless participation requirements under § 576.405.

10. Faith-Based Activities

Sub-recipients must document their compliance with the faith-based activities requirements under § 576.406.

11. Other Federal, State, Local and Private Assistance

CHF funded programs must assist each program participant, as needed, to obtain other Federal, State, local and private assistance available to assist program participants in obtaining housing stability including, but not limited:

- Medicaid
- Supplemental Nutrition Assistance Program
- Women, Infants and Children (WIC)
- Federal-State Unemployment Insurance Program
- Supplemental Security Income (SSI)

12. Confidentiality of Records

All CHF Funded programs must uphold all privacy protection standards established by the Consolidated Homeless Fund.

13. Termination Policies

If a program participant violates program requirements or no longer meets minimum eligibility requirements for program assistance (i.e., income change), the subrecipient may terminate assistance. To terminate assistance, the minimum required process must consist of:

- A written notice to the program participant containing a clear statement of the reasons for termination; and
- A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.
- Termination does not bar the subrecipient from providing further assistance later to the same family or individual.

14. Grievance Procedure

Each CHF funded program shall have a grievance procedure and shall implement the procedure when applicable.

15. Areawide Systems Coordination Requirements

Subrecipients must coordinate and integrate to the maximum extent practicable CHF funded activities with other programs targeted to the homeless people in the area covered by the continuum of care to prevent and end homelessness in that area.

16. Non-Discrimination/Equal Opportunity/Affirmative Outreach

CHF funded programs shall comply with the requirements for non-discrimination, equal opportunity and affirmative outreach identified in 576.407.

17. Faith-Based Activities

CHF funded providers shall not require program participants to engage in inherently religious activities as part of the CHF funded program and/or services.

B. Homelessness Prevention and Rapid Rehousing/State Rental Assistance

1. Documentation of Income Determination

For each program participant who receives rapid re-housing assistance and/or state rental assistance for longer than one year, the following documentation of annual income must be maintained:

- a. Income evaluation form containing the minimum requirements specified by HUD and completed by the sub-recipient; and
- b. Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement, see Appendix 3, Reference Table 3 for additional information regarding documenting income and expenses);
- c. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- d. To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

2. Rental Assistance Agreements and Payments

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

3. Fair Market Rent (FMR) Requirement

HUD establishes FMRs annually to determine rent ceilings. HUD FMRs can be found at <https://hud.user.gov/portal/datasets/fmr.html>. Gross rent for units supported by CHF may exceed fair market rent established for the area, provided that the unit meets cost reasonableness requirements.

4. Cost Reasonableness Survey

A cost reasonableness survey must be completed for each unit supported by CHF funds. The cost reasonableness survey must include at least three units in the same, general location, condition, and size as the subject unit. A copy of the cost reasonableness survey must be included in the program participant's case file/folder.

5. Utility Allowance Guidelines

The sub-recipient must determine the amount of utility allowance to be used in the calculation of gross rent. The local public housing authority maintains a utility allowance chart which considers the number of bedrooms and types of utilities in a unit (e.g.; gas and/or Calculating Gross Rent-whether a household is seeking to maintain its current housing or relocate to another unit to avoid homelessness, or exiting homelessness into new permanent housing, the process for determining acceptable rent amounts is the same, the gross rent (rent plus appropriate utility allowance- a utility allowance is a projection of the cost of utilities the client will pay monthly while renting their unit.)

6. Use with Other Subsidies

Financial assistance under paragraph 24 CFR 576.105 cannot be provided to a program sub recipient who is receiving the same type of assistance through other public sources or to a program sub recipient who has been provided with replacement housing payments under the URA, during the period covered by the URA payments.

7. Lease

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant.

8. Unit inspections

Unit inspections are required for any household receiving either short-term or long-term rental assistance. Unit inspections may be conducted virtually.

VIII.CHF/ESG RECORDKEEPING REQUIREMENTS

Sub-recipients must document their compliance with the Federal requirements in § 576.407 and § 576.409, as applicable, including:

- a. Documentation of Homeless Status.
- b. Records demonstrating compliance with the **nondiscrimination and equal opportunity requirements** under § 576.407(a) and the affirmative outreach requirements in § 576.407(b), including: (i) Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and
- c. Documentation required under 24 CFR 5.168 in regard to the recipient's **Assessment of Fair Housing** and the certification that the recipient will affirmatively further fair housing.
- d. Records demonstrating compliance with the **uniform administrative requirements in 2 CFR part 200.**
- e. Certifications and disclosure forms required under the **lobbying and disclosure requirements in 24 CFR part 87.**
- f. **Data on emergency transfers requested under § 576.409**, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.
- g. Sub-recipients must keep documentation showing that ESG grant funds were spent on **allowable costs in accordance with the requirements for eligible activities under “ §§ 576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.**
- h. Sub-recipients must retain records of the **receipt and use of program income.**

- i. Sub-recipients must document its compliance with the homeless participation requirements under § 576.405.
- j. Sub-recipients must document their compliance with the faith-based activities requirements under § 576.406.
- k. Verification of rent reasonableness.
- l. Verification that the housing meets Housing Quality Standards (HQS) and Lead standards.
- m. Housing Assessment and plan (completed at least annually).
- n. Copy of lease agreement; and
- o. Documentation of need for supportive service assistance.

IX.APPLICABLE RULES AND REGULATIONS

The ESG rules in 24 Code of Federal Regulations (CFR) §574 provide general standards for eligible activities such as determining program eligibility, housing quality standards, and standards regarding household rent payments. Sub-recipients must also comply with other state and federal policies, including, but not limited to:

- [American Rescue Plan Act 2021 \(Public Law No: 117-2\)](#)
- The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009 (S. 896)
- 24 CFR part 576: [Emergency Solutions Grant Program](#)
- 24 CFR part 121: [Homeless Management Information System \(HMIS\)](#)
- [2 CFR Part 200 Uniform Administrative Requirements](#)
- [24 CFR 5.609: Annual Income](#)
- [Annual Median Income: https://www.huduser.gov/portal/datasets/il/il16](#)
- The Fair Housing Act 42 U.S.C. 3601-3607
- 24 CFR part 982: [Fair Market Rent and Rent Reasonableness](#)
- HUD Fair Market Rents: [https://www.huduser.gov/portal/datasets/fmr.html](#)
- Lead-Based Paint: [http://www2.epa.gov/leadand 24 CFR part 35](#)
- Lead-Based Paint pamphlet:
[http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_11875.pdf](#) CFRs cited are amended from time to time and can be found at: [http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&tpl=%2Findex.tpl](#)
- Social Service Block Grant Regulations (CFR 45.96.1 - 45.96.74)
- Violence Against Women Act (VAWA) Requirements for HUD Programs:
[https://www.hudexchange.infor/resource/4718/federal-register-notice-proposed-rule-violence-against-women-act-2013-vawa-2013/](#)

X.CHF/ESG PROJECT PERFORMANCE MEASUREMENT

The resources available in the CHFP are designed to help prevent and reduce homelessness through supportive services, emergency assistance, and housing. To assess progress towards these goals, agencies who are awarded funds under this grant will be held to strict CoC System performance standards and outcomes. The Homeless Management Information System (HMIS) will be used to track these outcomes, so the capacity to collect and enter data into HMIS is very important for any prospective applicant. If an agency repeatedly fails to meet their performance objectives current and/or future funding may be jeopardized. Applicants awarded funds through the

CHFP that: 1) do not comply with the ESG/CHF Requirements; and 2) do not meet performance measures and outcomes through periodic monitoring and reporting mechanisms may be subject to termination of contract.

CHF Programs may be evaluated using the following measures:

1. Bed Utilization Rate meets system performance standard.
2. Average length of stay in project meets system performance standard.
3. Number of exits to positive destinations meets system performance standard.
4. Number of exits to negative destinations meets system performance standard.
5. Changes in income both earned and non-earned from program entry to exit meets system performance standard.
6. Number and Type of Units Secured

XI.RFP TERMS AND CONDITIONS

This RFP is issued subject to the following terms and conditions:

1. This RFP is a request for proposals but is not itself an offer and shall under no circumstances be construed as an offer.
2. CHFP expressly reserves the right to modify or withdraw this request at any time, whether before or after any qualifications have been submitted or received.
3. CHFP reserves the right to reject and not consider any or all respondents that do not meet the requirements of this RFP, including but not limited to incomplete qualifications and/or qualifications offering alternate or non-requested services.
4. CHFP reserves the right to reject any or all companies, to waive any informality in the RFP process, or to terminate the RFP process at any time, if deemed to be in its best interest.
5. In the event the party selected does not enter into the required agreement to carry out the purposes described in this request, CHFP may, in addition to any other rights or remedies available at law or in equity, commence negotiations with another person or entity.
6. In no event shall any obligations of any kind be enforceable against CHFP unless and until a written agreement is entered.
7. The applicant agrees to bear all costs and expenses of its response and there shall be no reimbursement for any costs and expenses relating to the preparation of responses of qualifications submitted hereunder or for any costs or expenses incurred during negotiations.
8. By submitting a response to this request, the applicant waives all rights to protest or seek any remedies whatsoever regarding any aspect of this request, the selection of another respondent or respondents with whom to negotiate, the rejection of any or all offers to negotiate, or a decision to terminate negotiations.
9. CHFP reserves the right not to award a contract pursuant to the RFP.
10. All items become the property of CHFP upon submission and will not be returned to the applicant.
11. CHFP reserves the right to split the award between multiple applicants and make the award on a category-by-category basis and/or remove categories from the award.
12. The applicant certifies that neither it nor its principals, contractors, or agents are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from utilizing federal funds by any federal or state department or agency.

XII.APPLICATION INSTRUCTIONS

Before beginning the application (s), please review this RFP and its attachment in their entirety. **A completed application package consists of four components:**

- A. Cover letter - The cover letter (**one per agency-can be word or PDF document**) shall consist of the following:
 - Name of non-profit agency or governmental unit submitting application
 - Street Address, City, State, Zip
 - A listing of all program proposals and the dollar amount of funding requested for each program/project
 - The name of the person authorized to sign contracts on behalf of the agencyThe cover letter must be signed by the Board Chair, and state that the Board authorizes submission of the program/project proposals for which the agency is seeking funding.
- B. Agency/organizational capacity assessment (**one per agency-with requested attachments- can be Word or PDF document**).
- C. Program/Project Proposal and certifications for each program for which you are requesting funding (**must be submitted in Word Format**).
- D. Budget form for each program/project (**Must be an excel document**).

Applicants must submit a detailed budget using the forms provided by the CHF. The budget should be based on anticipated actual costs. It should specify how funds will be spent, why these costs are justified and necessary to conduct the project and that the costs are reasonable and appropriate for the level of effort proposed.

XIII.APPLICATION SUBMISSION

Submit one electronic copy of the entire application package via e-mail at pheamo.witcher@doa.ri.gov. Do not include any materials not requested in this RFP. Applicants must submit the completed application package by no later than Friday, February 25th at 4:00 PM (EST) to:

Consolidated Homeless Partnership c/o:
Pheamo R. Witcher
Assistant Administrator Community and Planning Services
Office of Housing and Community Development
Pheamo.witcher@doa.ri.gov

XIV.PROPOSAL SELECTION & PROJECT APPROVAL PROCESS

The proposal selection and project approval process shall consist of a two-step process as described below:

Step 1: The CHFP Partnership staff will conduct a threshold review of all applications, before forwarding them to the CHF/CoC Review Committee. The threshold review will determine the following:

- Application Completeness
- Applicant Eligibility
- Applicant Agrees to Comply with CHF/HOPWA Requirements

Applications found to be technically or substantially non-responsive at any point in the evaluation process will be rejected and not receive further consideration.

Step 2: All applications that meet the threshold criteria listed above will be forwarded to the CHF/CoC Evaluation Committee. The review committee will thoroughly review and evaluate the applications against rating criteria, such as, but not limited to the following:

- Applicant's Proposed Service Plan (100 points)
 - Demonstrated Need for Project.
 - Scope of Services.
 - Applicant's plan to connect participants with mainstream benefits and employment services.
 - Applicant's staffing plan.
 - Applicant's plan to successfully transition individuals and families out of homelessness and into permanent housing.
 - Applicant's proposed outcomes and project impact, if applicable; and
 - Applicant's budget request is reasonable in comparison to similar projects, appropriate match funds are provided, administrative costs are consistent with CHF policies and procedures and do not exceed limitations.

XV. CHF/ESG ADMINISTRATIVE & FINANCIAL REQUIREMENTS

All agencies that receive awards under the CHFP will be required to:

- Participate in periodic onsite monitoring visits (Programmatic and Fiscal).
- Send applicable staff to periodic workshops and training provided by and/or supported by the CHF and the CoC, as deemed appropriate.
- Routinely request payment and provide appropriate backup documentation showing expenditures.
- Submit required quarterly reports.
- Adhere to all regulations and policies set forth by the federal government and the CHFP Policies and Procedures Manual.
- Establish and maintain effective internal control over federal funds that provides reasonable assurance that the Sub-Recipient is managing federal funds in compliance with Federal statutes, regulations, and the terms and conditions of the federal funding.
- Comply with Federal statutes, regulations, and the terms and conditions of federal funds.
- Take prompt action when instances of noncompliance are identified including noncompliance identified in audit findings.
- Take reasonable measures to safeguard protected personally identifiable information and other information that OHCD or HUD designates as sensitive or the Sub-Recipient considers sensitive consistent with applicable Federal, state, local, and tribal laws regarding privacy and obligations of confidentiality.
- Sub-recipients must ensure access to financial records, supporting documents, statistical records, and all other records related to the CHFP award for a period of four (4) years from the date of submission of the final expenditure report or closeout of the grant, whichever is occurs later. HUD, Inspectors General, the Comptroller General of the United States, and OHCD, or any of their authorized representatives or sub-

contractors, must have the right of access to any documents, papers, or other records of the applicant to the CHFP award.

- Sub-recipients must execute Rental Assistance Payment Contracts with the tenants and landlords and ensure HP Lease Addendum (that contains HUD-prohibited lease provisions and VAWA language) is executed by the tenants and landlords.
- A Sub-Recipient must comply with rent reasonableness requirements, property inspection requirements and Lead-based paint requirements.
- A Sub-Recipient will be required to complete a Consolidated Annual Performance and Evaluation Report (CAPER). The CAPER report provides annual performance reporting on client output and outcomes that enables an assessment of HOPWA grantee performance in achieving the housing stability outcome measures.
- Sub-Recipients must use a financial software system for accounting purposes that is functioning and operated in accordance with generally accepted accounting principles or has designated an entity that will maintain such an accounting system.