Missouri Balance of State Continuum of Care

APPLICATION INSTRUCTIONS for

Domestic Violence Coordinated Entry Supportive Services Only Award



Missouri Balance of State Continuum of Care
CPSEMO, Lead Agency
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ISSUE DATE: June 1, 2023
APPLICATION DEADLINE: June 30, 2023

OVERVIEW

The Continuum of Care (CoC) Program is authorized by subtitle C of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S. C. 11381-11389). The CoC is designed to address the critical problem of homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. The CoC Governance Board (Board) designates a Lead Agency and Collaborative Applicant to manage the required HUD processes on its behalf to ensure the maximum amount of funds are received by the CoC planning area and that the CoC is in compliance with all applicable HUD rules and regulations. The Lead Agency serves as the CoC staff and performs all tasks at the direction of the Board.

The Missouri Balance of State Continuum of Care (MO BoS CoC) was formally housed under the Missouri Governor's Committee to End Homelessness (GCEH). In 2017, this body left the GCEH to form its own Continuum of Care, known as MO BoS CoC.

The MO BoS CoC is a membership body made up of multiple agencies and individuals with a focus on ending homelessness. Membership includes governmental departments, for-profit organizations, not-for-profit organizations, community action agencies, community partners, and individuals. For more information, please visit http://www.moboscoc.org

ABOUT DOMESTIC VIOLENCE COORDINATED ENTRY SUPPORTIVE SERVICES ONLY AWARDS

The MO BoS CoC is accepting applications from Missouri-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.

*** When the term domestic violence (DV) or DV service provider is mentioned throughout this document, it is abbreviated to the definition by HUD, "Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or life-threatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

KEY PRIORITIES of the CoC

- Meet the community needs for persons fleeing domestic violence, sexual assault, stalking or other dangerous or life-threatening conditions including trafficking where needs relate to coordinated entry, housing navigation, case management, and outreach.
- Increase the access to the Coordinated Entry System (CES) for persons fleeing domestic violence, sexual assault, stalking, and other dangerous or

life-threatening conditions, that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary night time residence (including human trafficking).
- Develop system capacity to better serve individuals through collaboration, training, and ongoing support from the Continuum of Care

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 (HUD) through an annual competitive award process. MO BoS CoC is awarded a Domestic Violence Coordinated Entry award through the Domestic Violence Bonus. CoC funds must be used to serve those experiencing homelessness as defined by HUD.[1]

FUNDING SUMMARY

Through this award opportunity, MO BoS CoC will award up to ten awards (one per region) of no more than $27,000 each in CoC funding to not-for-profit organizations that provide homeless services in the MO BoS CoC. An agency may only submit one application; however, the organization may be listed as a partner on other applications. The grant will have a seventeen-month (17) term and is tentatively scheduled to begin on August 1, 2023 and end on December 31, 2024.
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 MO BoS CoC, through its Lead Agency, CPSEMO, requesting reimbursement for charge by the 20th of the preceding 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 homelessness **and** be fleeing or attempting to flee domestic violence, dating violence, stalking, and/or human trafficking.

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[1] See Appendix E for HUD Homeless Category Definitions
[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.

All awardees must be willing to work with MO BoS CoC, through its Lead Agency, CPSEMO, 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.

One award will be given for each region. An applicant agency may apply for more than one region with the expectation that said agency will travel and provide services to each region awarded funding. **All regions must be on one application.**

With this funding, MO BoS CoC 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.

***If a region has no applicant that meets eligibility and service requirements, the Board of Directors and Lead Agency reserve the right to recruit an applicant from that region and/or request another awarded applicant serve that region.

APPLICANT ELIGIBILITY

In order to be eligible, an applicant must be a 501(c)3 not-for-profit corporation in good standing with the Missouri 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 MO BoS 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 MO BoS CoC, with no active Performance Improvement Plan.
MO BoS CoC 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 MO BoS CoC, if they are a member agency;
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 Missouri;

9. Be otherwise qualified and eligible to receive an award under applicable laws and regulations, including not be suspended or debarred;
10. Use either HMIS or a non-HMIS comparable database for this project; and
11. Submit all required reports to the Lead Agency in a timely manner.

***Applicants that are Victim Service Providers (VSP) will be required to use the MO BoS CoC selected non-HMIS comparable database, DVIM, for this project. No other comparable database will be allowed.

***Applicants that are not VSPs will be required to use the MO BoS CoC HMIS system. For this project only, HMIS will be set up to automatically lock down every file entered for this project. There will be no personally identifying information available to any other service provider in HMIS.

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
g. Project must provide $1,030 cash match at the beginning of year one of the grant period and $2,475 cash match at the beginning of year two of the grant period.

To strengthen applications, applicants are encouraged to build all of these initiatives into their project, if possible:

1. Connect DV survivors to services within their region, including working with DV providers that are not actively participating in the CES.
2. Attend regional meetings and advocate on behalf of survivors.
3. Attend case conferencing and advocate on behalf of survivors.
4. Perform housing assessments and place participants on the non-HMIS portal for prioritization.
5. Design a program that allows for equal and no barrier access to the CES in the region.

HOW TO APPLY

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

1. Project Description Narrative (no more than 5 pages)
2. Completed application (Appendix A)
3. Print Screen of current SAM.gov registration – must include UEI
4. Print Screen of Secretary of State registration
5. Homeless Representation on Board Form (Appendix B)
6. IRS 501(c)3 Determination Letter
7. Letter(s) of support from Regional CE Lead, DV provider, or both
8. Match commitment letter

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

PROJECT DESCRIPTION NARRATIVE (5 PAGES MAXIMUM)

Please respond to each question in the order it is listed in this application instruction. Please be thorough and explain how you will implement this project in your region. Lengthy answers are not required but please provide enough information that reviewers understand your answers.

1. Agency History

Please provide a short paragraph that describes your agency. Include when your agency started, your agency mission statement, and current services. ***Mission Statement is required.**

2. CE Participation

Briefly describe if your agency participates in Coordinated Entry in your region. If so, please describe your involvement. If not, please describe how and when your agency will begin participating.

3. HMIS and Non-HMIS System

Please state your commitment to only utilize the MO BoS CoC HMIS or non-HMIS comparable database system that has been selected by MO BoS CoC for this project, DV CE SSO. For VSPs, the project will use DVIM, which will be monitored by Institute for Community Alliances (ICA). ICA is the HMIS provider for MO BoS CoC and they will be providing technical assistance throughout this grant period.

Your agency may continue to utilize either HMIS or your comparable database for your other agency projects**. All persons served with DV CE SSO funds must be entered into HMIS or DVIM.** No other comparable database will be accepted due to annual reporting with HUD. For this project only, HMIS will be set up to automatically lock down every file entered for this project. There will be no personally identifying information available to any other service provider in HMIS.

4. Demographics of DV services in Your Region

Please state how many DV providers are in your region and how many currently participate in the CES in your region. How many DV survivors are in your region?

How was this number calculated? What is the estimated number of DV survivors to be served by this project?

5. Needs of Survivors in Your Region

What needs do you see with regard to DV survivors accessing the CES in your region?

6. Goals and Objectives

Please state at least two (2) goals with two (2) measurable objectives for each goal that this project will work to achieve in your region.

7. Project Description

Please describe, in no particular order, your project, including, but not limited to:

- How your agency will involve DV survivors and DV providers in the project design and implementation of this project.
- How this project will strengthen relationships and communication between DV and non-DV entities with respect to coordinated entry.
- How this project will ensure that this funding only serves eligible populations.
- What type of services will be provided.
- What is the average wait-time for DV survivors in your region to get access to housing and how this project will reduce that time.
- When will the project begin serving DV survivors.

8. Budget

Please detail how the grant funds will be spent to support the project. Please note that a maximum of $27,000 will be granted for each funding cycle:

- August 1, 2023 – December 31, 2023
- January 1, 2024 – December 2024

MO BoS CoC recognizes that funds are often needed for start-up and training costs. These will be allowed as one-time expenses in the first year.

9. Partnership

At a minimum, this grant requires 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.

Please describe how your project will involve these partners.

***Please note that 5 pages of narrative is not required. Adequate space is allowed for projects that may apply for multiple regions. **If you are applying for multiple regions, please complete sections 4, 5, 6, 7, and 9 for each region.**

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 http://www.sos.mo.gov. The applicant can log in or select "Search for a Business". Type in the applicant agency name and a screen will come up that states the current status of the business. Please scan this form in a pdf.

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 MO BoS CoC 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:

a. Name of agency
b. Location of agency (BoS Region)
c. Type of agency (Regional CE Lead, homeless service provider, DV service provider)
d. How the agency was involved in the application
e. How the agency will be involved in implementing the project

Applying for one region:

- If the applicant agency is a DV service provider with DV as a primary focus of their mission, a letter from the Regional CE Lead is all that is required.
- If the applicant agency does not have DV as a primary focus of their mission, they must have a letter of support from a DV service provider and a letter of support from the Regional CE Lead.
- If the applicant agency is the Regional CE Lead, a letter from a DV service provider is all that is required.
- If the applicant agency is both a DV service provider with DV as a primary focus of their mission and the Regional CE Lead, they must have a letter of support from someone in their regional leadership team.

Applying for more than one region:

- If the applicant agency is a DV service provider with DV as a primary focus of their mission, a letter from each Regional CE Lead will be required.
- If the applicant agency does not have DV as a primary focus of their mission, they must have a letter of support from a DV service provider and a letter of support from each Regional CE Lead.
- If the applicant agency is the Regional CE Lead, a letter from a DV service provider and a letter from each of the other Regional CE Leads is required.

- If the applicant agency is both a DV service provider with DV as a primary focus of their mission and the Regional CE Lead, they must have a letter of support from someone in each region's leadership team.

MATCH COMMITMENT LETTER

Cash Match

***Applicants will be required to provide a 25% match, or $6,750, for each awarded grant period. Awarded applicant must pay $1,030 cash match at the beginning of year one of the grant period and $2,475 cash match at the beginning of year two of the grant period to the Lead Agency, CPSEMO. The balance of the match may be cash or in-kind and accumulated throughout the length of the grant period. These funds will be used to support the non-HMIS comparable database, DVIM.

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, if the in-kind match is coming from outside the applicant agency.

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

OTHER REQUIREMENTS

If funded, MO BoS CoC requires the following of applicant agencies:

- To be informed about the VAWA requirements for DV survivors and housing.
- To be informed about the MO BoS CoC VAWA Emergency Transfer Policy.
- To attend the Victim Services Committee meetings
- To provide match updates, if requested, to the Lead Agency, CPSEMO
- To respond to any requests for information or evaluations of progress, if requested, to the Lead Agency, CPSEMO
- To provide a $1,030 cash match at the beginning of year one of the grant period and $2,475 cash match at the beginning of year two of the grant period to the Lead Agency, CPSEMO.
- All awarded subrecipients will be expected to have HMIS or DVIM training completed and be operational in HMIS or DVIM by August 31, 2023.

APPLICATION REVIEW, EVALUATION, & SELECTION

Evaluation of all applications will be completed by MO BoS CoC through its Rank and Review Panel. Applicants will be scored based on Applicants submitting all required documents, strength of responses, 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 MO BoS CoC.

Please note: MO BoS CoC will also take into consideration the Applicant's past performance under CoC, ESG, HOPWA, Cares Act, and other MO BoS CoC 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

June 1, 2023 Application Instructions released to the general public.

June 15, 2023 Applicant Q&A Session (Google Meet)

SSO-CE/DV Applicant Q&A Session
Thursday, June 15 · 2:00 – 2:45pm
Time zone: America/Chicago
Google Meet joining info
Video call link: https://meet.google.com/ipn-righ-jdr

Or dial: (US) +1 779-456-6563 PIN: 270 436 024#
More phone numbers: https://tel.meet/ipn-righ-jdr?pin=9423780534111

June 30, 2023	Applicant must submit proposal by 11:59 p.m. CST in PDF format
July 10-14, 2023	Rank and Review Panel meets.
July 20, 2023	Board Approval of subgrantees.
August 1, 2023	Grant start date

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 collaborativeapplicant@moboscoc.org.

The deadline for submission is Friday, June 30, 2023 at 11:59 pm Central Standard Time.

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.

Appendix A

Section 1: Project Applicant Information

Name of Organization:	
Physical Address:	
Address 2:	
City, State, Zip code:	
MO BoS CoC Region:	
Organization Type:	☐ Non-profit 501 (c) (3)
UEI Number (SAM.gov):	
Employer or Tax Identification Number:	
What best describes the applicant agency:	☐ CE Lead ☐ DV Provider ☐ Service Provider
Has the subrecipient ever received a federal grant, either directly from an agency or through a State/local agency?	☐ YES ☐ NO
Dollar Amount Requested (up to $27,000 per region)	
Contact Information for Executive Officer:	
Name:	
Title:	
Phone:	
Email:	
Contact Information for person completing this application, if different:	
Name:	
Title:	
Email:	
Contact Information for person responsible for managing project, if different:	
Name:	
Title:	
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 MO BoS CoC 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

- 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

*Agency Eligibility**

- Is the agency registration current in SAM?) ☐YES ☐NO
- Is the agency registration current with Missouri's Secretary of State?
  ☐YES ☐NO
- 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 trafficking[5]

☐YES ☐NO (note that projects indicating "no" are not eligible to apply)

- Project commits to using the Housing First model[6]

☐YES ☐NO (note that projects indicating "no" are not eligible to apply)

*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 : 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 a 12-month time period. MO BoS CoC recognizes that this budget is likely to change over the course of project implementation; the applicant may work with MO BoS CoC 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 4 : 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. By signing below, I understand my agency will have to carry the expenses for a 30-60 day time period.

_____

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

_____

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

_____

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

_____

Appendix B

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

Agency Name: Grant Number(s):

Address: Phone :
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 MO BoS CoC 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 Missouri Balance of State Continuum of Care includes 101 counties in the state. These counties are categorized into 10 individual regions.

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 quality 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.

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 MO BoS CoC 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

The Lead Agency of the MO BoS CoC, as elected by the Board of Directors is Community Partnership of Southeast Missouri (CPSEMO). This agency acts as the Collaborative Applicant to manage the required HUD processes on its behalf to ensure the maximum amount of funds are received by the CoC planning area and that the CoC is in compliance with all applicable HUD rules and regulations. The Lead Agency serves as the CoC staff and performs all tasks at the direction of the Board.

Service Provider

Refers to any homeless services provider in the MO BoS CoC.

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: (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); or (iii) Is exiting an institution where (s)he has 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
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: (i) 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 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: (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; and (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: (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; and (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 Missouri 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 MO BoS CoC 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. MO BoS CoC will determine whether a conflict of interest exists and whether an apparent conflict of interest may reflect negatively on MO BoS CoC, should MO BoS CoC select Applicant. Further, MO BoS CoC 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 MO BoS CoC 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 MO BoS CoC.

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 MO BoS CoC 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 MO BoS CoC 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.