



CITY OF SOUTH BEND
COMMUNITY INVESTMENT

**EMERGENCY
SOLUTIONS GRANT
(ESG)**

RFP INFORMATION PACKET

PY2025 FUNDS

Issue Date: **August 12, 2024**

Due Date: **September 9, 2024**

PLEASE NOTE: The timeframe of any federal budget discussions, modifications, and/or approvals cannot be projected. The City of South Bend will proceed as usual with the RFP/application process for its HUD-funded programs. Please be aware that this is done with the understanding that FY 2025 funding is not confirmed. Recommendations are subject to change.



RFP TECHNICAL ASSISTANCE

Staff will provide limited technical assistance to agencies interested in responding to the RFP. Contact the Department of Community Investment at federalgrants@southbendin.gov.

PUBLIC ENGAGEMENT

Public hearings on the 2025 CDBG, HOME, and ESG RFPs, with the intention of developing the 2025 Action Plan, will be held on **Tuesday, August 27, 2024** at the following times and locations:

2:30 PM, Mishawaka Planning and Community Development
Mishawaka City Hall
100 Lincolnway West, Mishawaka

and

5:30 PM, 14th Floor Dept. of Community Investment Conference Room
County-City Building
227 West Jefferson Boulevard, South Bend

Both locations are ADA accessible.

Emergency Citizen Participation and Consultation Process

When a Declaration of an Emergency has been ordered by the President of the United States, or the Governor of Indiana, or the St. Joseph County Health Department, the City of South Bend will hold virtual public hearings through conference calls or an online video conference call platform. Access information for virtual meetings will be provided in the public hearing notice. The City will make a good faith effort to ensure that attendees of virtual public hearings will be able to comment and have questions answered in real-time. If real-time questions and responses are not feasible, citizens may submit questions via email to federalgrants@southbendin.gov and City staff will provide a response within two (2) business days.

ESG/HEARTH BACKGROUND

An Act to Prevent Mortgage Foreclosures and Enhance Mortgage Credit Availability was signed into law on May 20, 2009 (Public Law 111-22). This new law implemented a variety of measures directed toward keeping individuals and families from losing their homes. Division B of the law was the HEARTH Act (Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009) that consolidated and amended three separate homeless assistance programs carried out under title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371 et seq.) (McKinney-Vento Act). This consolidation into a single grant program was designed to improve administrative efficiency and enhance response coordination and effectiveness in addressing the needs of homeless persons.

The former Emergency Shelter Grant program was renamed the Emergency Solutions Grant program and revised to broaden existing emergency shelter and homelessness prevention activities and to add rapid re-housing activities. The HEARTH ACT also codifies in law and enhances the St. Joseph County - Region 2a Homeless Planning Council strategic process and, the coordinated response to addressing the needs of homelessness established administratively by HUD in 1995.

The ESG funds will be awarded to eligible community-based, nonprofit organizations providing emergency shelter, related services and rapid re-housing to the homeless, on a dollar-for-dollar match in the program component areas of: emergency shelter and rapid re-housing.

It continues to be a priority of the U.S. Department of Housing and Urban Development (HUD) and the City of South Bend to work with the Balance of State Continuum (BOS) and the St. Joseph County - Region 2a Homeless Planning Council (RPC) to assist homeless individuals and families as efficiently as possible to obtain a decent living environment. To that end HUD and the city supported the merger of the Region 2-A planning Council and with the BOS in late 2017.

The Department of Community Investment will continue to work with the BOS and RPC to align policies, procedures, and performance standards relative to ESGH funding to provide shelter, supportive services, and rapid re-housing for the homeless, as appropriate for South Bend.

ESG ACTIVITIES ELIGIBLE FOR CONSIDERATION

A. EMERGENCY SHELTER COMPONENT (24 CFR 576.102)

Eligible Program Participants: “unsheltered homeless people” meaning individuals and families who qualify as homeless under paragraph (1) (i) of the “homeless” definition under Section 576.2.

Eligible Costs Include: Essential services to homeless families and individual in emergency shelters, and operating services.

Eligible emergency and homeless shelters shall conform to the following*:

- Provide common kitchen and dining room areas adequate for the number of residents serviced;
- Provide bathroom with lavatory, toilet, and showers adequate for the number of residents serviced;
- Comply with all requirements of the City of South Bend’s zoning ordinance at all times, as well as any other applicable provisions of the ordinance, including obtaining any other permits or licenses, such as building permits or a business license, required before establishing, expanding, or maintaining the use.

* Please refer to Emergency Shelter Standards for ESG Funding for more details.

B. RAPID RE-HOUSING COMPONENT (24 CFR 576.104)

Eligible Program Participants: Those who meet the criteria under paragraph (1) of the homeless definition in Section 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

Eligible Costs Include: The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in Section 576.105, the short- and medium-term rental assistance requirements in Section 576.106, and the written standards and procedures established under Section 576.400.

ESG ACTIVITIES INELIGIBLE FOR CONSIDERATION

Emergency Solutions Grant funds may not be used for activities other than those listed above.

For example: Acquisition or construction of an emergency shelter for the homeless; rehabilitation services performed by the staff of a grantee or recipient such as preparation of work specifications, loan processing or inspections; or mortgage assistance are not eligible activities.

ESG Program Regulations and the Homeless Emergency Assistance and Rapid Rehousing Transition to Housing Act of 2009 (HEARTH Act) can be found at <https://www.hudexchange.info/programs/esg/>

ESG GENERAL REQUIREMENTS

If the proposed project is funded, the following requirements will apply:

- Recognize and follow 24 CFR PART 576 - the Code of Federal Regulations for the EMERGENCY SOLUTIONS GRANT PROGRAM (including but not limited to: Definitions of Homeless and At Risk of Homeless; Program Components and Eligible Activities, etc.) AND the Emergency Solutions Grant portion of the Housing and Community Development Plan, as well as any plan amendments.
- Term of Agreement - Agreements awarded in response to this RFP will be for a term of:
 - Emergency Shelter - 12 months, January - December 2024
 - Rapid Re-housing - 18 months from contract execution date
- Active participation in the Balance of State Continuum and the St. Joseph County - Region 2a Homeless Planning Council
- Active participation in the Coordinated Entry process/implementation that includes the BOS and RPC approval of the use of the VI-SPDAT as the screening tool and, following the approved prioritization policy as it relates to placement services for the homeless.
- Active participation in the Homeless Management Information System (HMIS). The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and sub-recipients. HMIS will be used to generate reports for the City to use to verify compliance.
- Victim service providers cannot participate in HMIS, and Legal Services Organizations may choose to not participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.
- Each recipient must maintain complete client files including, but not limited to, eligibility, demographic characteristics, and income of persons assisted.
- Identify the participation of homeless or formerly homeless individuals on its board of directors or other policy-making entity.

- Assure that homeless individuals will be involved, to the maximum extent feasible through employment, volunteer services, or otherwise, in providing services that are assisted under ESG.
- Must fulfill 1:1 (dollar for dollar) match requirements. (see Proof of Matching Funds page)
- Compliance with local, state, and federal requirements in regard to procurement of architect/professional services.
- Compliance with Conflict of Interest requirements. A copy of the organization's approved code/standard of conduct will be required to be submitted.
- 2 CFR Part 200 Single Audit: As an entitlement community administering federal funds, the City of South Bend is responsible for ensuring subgrantees comply with 2 CFR Part 200 requirements. All agencies receiving ESG funding will be required to have an independent audit completed annually to qualify for and receive ongoing funding. The Office of Management and Budget requires subrecipients that expend \$750,000 or more in federal funds in one fiscal year to conduct a Single Audit pursuant to the Single Audit Act. Subrecipients that do not qualify for a Single Audit must submit a CPA Audited Financial Statement, or at a minimum a Certified Annual Financial Statement (CFA). Audited Financial Statements and CFAs will only be accepted from those non-profits that can document they did not qualify for a Single Audit. Subrecipients are responsible for ensuring that their independent auditors conduct the proper type of audit.
- Minority and Women's Business Enterprise Outreach: The subgrantee must comply with the requirements of Executive Orders 11625, 12432, and 12138, concerning Minority and Women's Business Enterprise, and the policy of the City of South Bend which further supports and encourages the participation of minority and women owned businesses in the benefits of the ESG program, by:
 1. Contacting all minority businesses that offer services needed by the organization in carrying out the ESG program and offering copies of any ads outlining information on where, when and how to submit bids or proposals for such work; **and**
 2. Keeping records on contacts made to minority and women business enterprises and retaining any correspondence (letters, proposals, bids, etc.) received from

such businesses for any contracts let through the ESG program and relaying this information to Department of Community Investment staff at least semi-annually.

- Inclusive Staffing Practices: Where possible and practical, subgrantees must advance inclusive hiring practices for delivery of housing and other community-related projects. Building wealth and inclusive economic opportunities in low-income communities is considered fundamental in the provision of CPD-funded housing and services projects. This is to be achieved through hiring, training, and providing opportunities for growth.
- Equal Access Rule: Subgrantees must comply with the requirements of 24 CFR § 5.106, Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs (CPD). All individuals – regardless of sexual orientation or gender identity – must have equal access to CPD-funded programs, shelters, other buildings and facilities, benefits, services, and accommodations. Additional information and resources may be found through the following links:
 1. Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity: <https://tinyurl.com/FR-2012-2343>
 2. Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development: <https://tinyurl.com/FR-2012-22589>
 3. Equal Access for Transgender People: Supporting Inclusive Housing and Shelters: <https://tinyurl.com/InclusiveHousingandShelters>
 4. Equal Access Expectations: Training Scenarios for Use with Project Staff: <https://tinyurl.com/EqualAccessTrainings>
 5. Equal Access Agency Assessment Tool: <https://tinyurl.com/EqualAccessAssessmentTool>

FAITH-BASED ORGANIZATIONS

BACKGROUND/GENERAL GUIDANCE/APPLICABILITY

On December 12, 2002, Executive Order 13279 was issued, requiring federal departments to treat all organizations fairly and without regard to religion in federal programs. It is HUD policy that, within the framework of constitutional church-state guidelines, faith-based organizations should be able to compete on an equal footing with other organizations for federal funding. Accordingly, organizations that are faith-based are eligible, on the same basis as any other organization, to participate in HUD's programs and activities.

The new rule revises HUD regulations to remove barriers to the participation of faith-based organizations in the HOME, CDBG, HOPE 3, HOPWA, Emergency Solutions Grants, St. Joseph County - Region 2a Homeless Regional Planning Council, Supportive Housing, and Youthbuild Programs. In doing so, the preamble to the rule stresses that all program participants should complete on equal footing and be subject to the same requirements. In its implementation, HUD and grantees in the formula programs – HOME, CDBG, ESG and HOPWA, should be conscious that requirements for documentation, reporting, monitoring and use should be applied to all entities across the board. If a formula grant recipient has procedures in place, these procedures should be applied to all sub-recipients without regard to their religious or secular status.

As with any regulatory change, the new rule requires clarification on several fronts in order to ensure a uniform and accurate implementation in the affected programs. This is to provide guidance on certain aspects of the September 30, 2003, final rule. The guidance contained in this notice applies to all eight of the Community Planning and Development programs, as it determines necessary, and as it receives questions and requests for clarification on the new regulatory requirements.

On September 30, 2003, (68 FR 56396), HUD issued a final rule requiring equal treatment of faith-based organizations for eight HUD programs administered by its Community Planning and Development (CPD) Division. In addition, HUD published a final rule on July 9, 2004 (69 FR 41712) requiring, among other things, that states under the ESG program provide equal treatment of faith-based organizations. Copies of the rules can be assessed online at: <http://archives.hud.gov/initiatives/fbci/Faith-Based.pdf>

EMERGENCY SHELTER

STANDARDS FOR ESG FUNDING

Adopted December 2019

Administration & Organizational Requirements:

1. The shelter shall not require clients to participate in religious services or other forms of religious expression.
2. The shelter shall not discriminate on the basis of race, religion, or national origin. Shelters serving families shall also not discriminate on the basis of the sex or age of the children or the size of the family, except where limited by facility.
3. The shelter's Board of Directors shall consist of voluntary (unpaid) members, with the possible exception of the agency's CEO or Director.¹
4. The shelter's Board of Directors shall meet at least on a quarterly basis and set overall policy for the shelter.
5. The shelter shall have a secure storage space for confidential documents relating to clients and personnel.
6. The shelter shall develop and implement procedures to ensure the confidentiality of records pertaining to any individuals provided family violence prevention or treatment services.
7. The shelter shall have a policy manual which includes the shelter's purpose, population, served, program description, non-discrimination policy and confidentiality statement.²
8. The shelter shall provide for an evaluation of the effectiveness of the services offered, at least annually. This evaluation should include client input that could take the form of a client exit survey or house meetings. It may also include board evaluation of programs/services, staff evaluation of programs/services, or an assessment completed by other shelter providers (e.g., coalition of providers).

¹ Please note, if a shelter is part of a parent organization (e.g., the Salvation Army, etc.), it is not required to have a separate Board of Directors for the shelter.

² Please note, shelter programs that are part of a parent organization are not required to have a policy manual separate from the parent organization's policies if those policies include policies relevant to the shelter's operation as well as rights and responsibilities of the clients being served.

Personnel Requirements:

1. The shelter shall have a table of organization of all paid staff working in the shelter. There shall be written position descriptions for each position type, which includes job responsibilities and qualifications.
2. The shelter shall have written policies for the selection of all paid personnel in conformance with the EEO (Equal Employment Opportunity) guidelines.
3. The shelter shall have adequate, trained, on-site staff coverage during all hours the shelter is open to residents, unless individual secured units are provided. "Trained, on-site staff" is defined as persons having training in the areas listed below as items 4 and 5 in the Personnel Requirements section and items 3 and 4 in the Health Requirements section.
4. All shelter staff (including, direct service, finance, maintenance, volunteers, etc.) shall receive training in at least the following:
 - a. emergency evacuation procedures;
 - b. agency operation procedures.
5. All relevant direct service staff ³ shall receive additional training in at least the following:
 - a. non-violent crisis intervention techniques;
 - b. referral procedures to relevant community resources; and
 - c. first aid procedures.

Facility Requirements:

1. The shelter shall comply with applicable local fire, environmental, health, and safety standards and regulations.
2. The shelter shall be clean and in good repair.
3. Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior must be free of pollutants at a level that might threaten or harm the health of residents.
4. The shelter shall have reasonable access to transportation services (this could consist of being within walking distance to public transportation or coordinating transportation with another agency). But the shelter is not required to provide clients with transportation services.

³ Please note, "relevant direct service staff" is defined as those staff members, such as case workers and shelter managers, who have daily, direct contact with clients, and who may be assisting them in resolving their crisis of homelessness. All direct service staff should have updated training in non-violent crisis intervention techniques and first aid procedures every *two years*. A specific number of training hours is not required. The adequacy of the "training" will be evaluated by review of direct service staff resumes, records that document continuing education in the areas listed in item 5, and performance appraisals for these areas.

5. The shelter shall provide a bed or crib for each guest except in extenuating “overflow” conditions. The shelter shall make provision for clean linens for each client. There shall be procedures to provide for the sanitizing of all linens and sleeping surfaces.
6. The shelter shall provide sufficient showers/baths, wash basins, and toilets, which are in proper condition for personal hygiene. These should be adequate for the number of people served.
7. The shelter shall provide private space to meet with clients. Private space is any space relatively free from regular interruptions and noise and provides clients with the assurance that the conversation will not be overheard by others in the shelter.
8. The shelter shall have laundry facilities available to clients or a system available for like services.
9. The shelter shall have a fire safety plan, which includes at least the following:
 - a. posted evacuation plan;
 - b. fire drills that are conducted at least quarterly;
 - c. fire detection systems that conform to local building and fire codes;
 - d. adequate fire exits; and
 - e. adequate emergency lighting.
10. The shelter shall have adequate provision of the following services:
 - a. pest control services;
 - b. removal of garbage;
 - c. proper ventilation;
 - d. proper ventilation and heating/cooling systems; and
 - e. removal of garbage and other debris, ice, snow, and other hazards to keep clear all entrances, exits, steps, and walkways.
11. The shelter shall provide adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. Sufficient electrical sources shall be provided to permit the use of essential electrical appliances while assuring safety from fire.

Operational Requirements:

1. In addition to sleeping arrangements, the shelter shall provide the following basic needs:
 - a. humane care which preserves individual dignity;
 - b. a clean environment;
 - c. reasonable security; and
 - d. referrals to other agencies.
2. The shelter shall have written policies for the intake of clients and criteria for admitting people to the shelter.

3. The shelter shall maintain an attendance list which includes, at least, the name and sex of each person residing in the shelter.
4. The shelter shall post and read, or otherwise make known, the rules, regulations, and procedures of the shelter.
5. The shelter shall post and read, or otherwise make known, the rights and responsibilities of shelter clients that shall include a grievance procedure for addressing potential violations of their rights.
6. The shelter shall report child abuse and endangerment as required by law.
7. The shelter shall only require clients to perform duties directly related to daily living activities within the shelter.
8. The shelter shall provide access to a public or private telephone for use by shelter clients to make and receive calls. This should include one of the following:
 - a. access to a phone in staff areas;
 - b. installation of private or pay phone for client use (with funds to use if the client lacks necessary income); or
 - c. coordinated services with another agency.
9. The shelter shall maintain records to document services provided to each client.
10. The shelter shall provide accommodations for shelter clients to store personal belongings. This can be defined as any place (a client's room, a closet, a locker, etc.) that provides reasonable security from theft or damage. "Personal belongings" include items such as clothing, personal hygiene products, radio, clock that can be consolidated into limited storage space.
11. The shelter shall provide a safe, secure environment and have policies to regulate access.
12. The shelter shall have a policy regarding the control of weapons.
13. The shelter shall encourage the involvement of clients in the decision-making processes of the shelter. This can be accomplished in a variety of ways, including: having resident advisory councils to give input into the operations of the shelter, having homeless or formerly homeless people on the board, or having homeless or formerly homeless people trained and hired as staff, etc.
14. The shelter shall allow current clients to use the shelter as a legal residence for the purpose of voter registration and the receipt of public benefits.
15. The shelter shall maintain a daily log to record at a minimum all unusual or significant incidents.
16. The shelter shall have written policies for consensual and nonconsensual searches.

Health Requirements:

1. At all times, the shelter shall have available first aid equipment and supplies in case of a medical emergency.

2. All staff on duty shall have access to a telephone. Emergency telephone numbers shall be posted conspicuously near the telephone.
3. The shelter shall assure that at least one staff person on duty is trained in emergency first aid procedures.
4. The shelter shall have a procedure for making referrals to appropriate medical providers.
5. The shelter shall have a written policy regarding the possession and use of controlled substances as well as prescription and over the counter medication.
6. The shelter shall have a written policy regarding the control of infectious diseases, such as HIV, tuberculosis, etc.
7. The shelter shall provide a locked space for the storage of medication. If a client can secure their prescription medication in her/his locked room that another client does not have access to and shelter policies allow for this, then this standard is void. If a client cannot secure their prescription medication, then the shelter should provide a means to secure the medication via a locked office, cabinet, etc.

Food Services Requirements:

1. Shelters providing food services shall make adequate provisions for the sanitary storage and preparation of foods.
2. Shelters providing food for infants, young children, and pregnant mothers shall make provisions to meet their nutritional needs.
3. Shelters shall provide, or arrange, food services to clients or make known nearby available services.

Fiscal Management Requirements:

1. There shall be an accounting system that is maintained in accordance with Generally Accepted Accounting Principles (GAAP).
2. The shelter shall have a record of accountability for client's funds or valuables the shelter is holding.
3. The shelter shall receive an annual independent audit or audit review.
4. The shelter shall have internal fiscal control procedures which are reviewed and approved by the Board of Trustees.

Reviewed by Homeless Regional Planning Council 12/12/19

PRIORITIES

The purpose of the Emergency Solutions Grant (ESG) Program is to:

- Broaden existing emergency shelter and homelessness prevention activities;
- Emphasize Rapid Re-Housing;
- Help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness;
- Enhance alignment of ESG regulations with the Balance of State Continuum as well as other HUD programs – including CDBG and HOME; and,
- Support more coordinated and effective data collection, performance measurement, and program evaluation.

ESG SPECIFIC OBJECTIVES

To help nonprofit organizations provide assistance to homeless individuals and families through grant awards for:

- The payment of certain operating and social service expenses in connection with emergency shelter and essential services for the homeless; and,
- Housing relocation and stabilization services and, short and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing.

PROPOSED ACTIVITIES AND OVERALL BUDGET

The St. Joseph County 2020-2024 HCD Plan states the St. Joseph County - Region 2a Homeless Planning Council has established and works towards the following objectives: (1) continue to support the work of existing shelters to address those individuals that cannot immediately be assisted; (2) Increase the percentage of homeless persons staying in permanent housing over 6 months; (3) Increase the percentage of homeless persons moving from transitional housing to permanent housing. Towards that end, the RPC and the City agreed that the maximum allowed for shelter operations is 60% of the total available be allocated for the payment of certain operating and social service expenses in connection with emergency shelter for the homeless; the balance is to be split between administrative costs (5% maximum of total allocation) and 35% to rapid re-housing activities. This proposal was based the critical need of shelter operations' funding in the community. The emphasis on rapid re-housing should continue to support the efforts of the Mayor's Working Group on Homelessness.

PROOF OF MATCHING FUNDS

Pursuant to 24 CFR 576.201, each grantee must supplement its ESG grant amount with an equal or greater amount of match funds from sources other than ESG funds. These match funds must be provided after the date of the grant award. Matching funds used for this ESG project may not be used to match any other projects or grant. Applicants must submit a letter of commitment signed by a person authorized by the entity to make such a commitment of resources. This letter should identify the resource(s) to be provided, a minimum dollar value to be provided, and for what purpose the resource(s) will be used. Applicants must realize that any resources committed in an application and considered in the evaluation of that application must be provided in the event that the project is selected for funding.

The value of any donated material or building: The fair market value of a building may be used as match only if the building was donated for the activities in the ESG application and is not currently being used for these activities. When using the fair market value of a donated building as match, submit documentation from an appraiser, or realtor as to the value of the property, and information relating to the circumstances of the donation, including when the building was donated and for what purpose, current use of building, and how long the building has been used for its current purpose.

The fair market rental or lease value of a building currently occupied by an applicant, based on 12-month occupancy: Submit a letter from the appraisal district, an appraiser, or realtor that specifies location of building, square footage, value per square foot, and total lease or rent value.

Staff salaries: When using any staff salary as match, include the position/title, annual salary, the percentage of time dedicated to ESG activities, and the dollar amount of their salary that will be used as match.

The time and services contributed by volunteers to carry out the emergency shelter program is determined at the rate of \$10 per hour. [Note: Volunteers providing professional services such as medical or legal services are valued at the reasonable and customary rate in the community.]

EVALUATION CRITERIA

The City of South Bend has the final decision-making authority on the selection of proposals to be funded, the City may award funds outside this criteria at its discretion. Proposals will be evaluated, and preference given to those which address the following:

- Active involvement in the St. Joseph County – Region 2a Homeless Planning Council (RPC) and follows approved policies as adopted by the RPC.
- Allow for the most efficient and cost-effective use of ESG Program funds so that the greatest number of homeless individuals and families will be assisted.
- Demonstrate a commitment and capacity to implement the project in terms of time, effort, staff and other resources, etc.
- Include a realistic, detailed financial package that documents the ability of the applicant entity to match the ESG funds and demonstrates the ability to leverage financing from other sources. (Expenditures should be explained).
- Describe the nature and extent of the (documented) unmet homeless need within the applicant’s jurisdiction and detail the extent to which the proposed activities address this need.
- Prove the ability of the applicant entity to carry out the proposed activities within the specified time frame.
- Demonstrate effectiveness in serving the homeless, including the ability to establish, maintain, and/or improve the self-sufficiency of homeless individuals.
- Current or previously funded agencies – timely reimbursement requests/draw request.