

Applies to all Organizations funded by MSHDA

Instructions: Review the MSHDA and/or HUD requirements listed below and respond by checking the appropriate boxes. These guidelines will be incorporated in any grant agreement executed pursuant to this grant. Failure to adhere to these guidelines may result in findings, disallowed costs, and/or withdrawal of ESG-CV funding. If you do not understand any of these provisions, contact your Homeless Assistance Specialist.

Non-Discrimination Requirements

Our CoC/LPB has developed and operates a coordinated entry process that permits recipients of Federal and state funds to comply with applicable civil rights and fair housing laws and requirements. Our CoC Program and ESG Program-funded projects comply with the nondiscrimination and equal opportunity provisions of Federal civil rights laws as specified at 24 CFR 5.105(a), including, but not limited to the following:

- Fair Housing Act prohibits discriminatory housing practices based on race, color, religion, sex, national origin, disability, or familial status;
- Section 504 of the Rehabilitation Act prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance;
- Title VI of the Civil Rights Act prohibits discrimination on the basis of race, color or national origin under any program or activity receiving Federal financial assistance; and
- Title II of the Americans with Disabilities Act prohibits public entities, which includes state and local governments, and special purpose districts, from discriminating against individuals with disabilities in all their services, programs, and activities, which include housing, and housing-related services such as housing search and referral assistance.
- Title III of the Americans with Disabilities Act prohibits private entities that own, lease, and operate places of public accommodation, which include shelters, social service establishments, and other public accommodations providing housing, from discriminating on the basis of disability.

In addition, HUD's Equal Access Rule at 24 CFR 5.105(a)(2) prohibits discriminatory eligibility determinations in HUD-assisted or HUD-insured housing programs based on actual or perceived sexual orientation, gender identity, or marital status, including any projects funded by the CoC Program, ESG Program, and HOPWA Program. The CoC Program interim rule also contains a fair housing provision at 24 CFR 578.93. For ESG, see 24 CFR 576.407(a) and (b), and for HOPWA, see 24 CFR 574.603.

Assurance of Equal Access to Program Benefits

The applicant will assure equal access to program benefits through effective outreach and assessment.

Assurance of Fair Selection of Participating Households

The applicant will assure that all eligible households will have fair and equal access to services and opportunities provided by the program.

Lead-Based Paint Requirements

The grantee is aware of and will abide by lead-based paint requirements that are applicable to Emergency Solutions Grant funding, as specified in program requirements.

Audit (Check one of the two)

The grantee is a local government or nonprofit expected to expend more than \$750,000 annually in combined federal funds during the fiscal years covered by the grant and will have an audit conducted by an eligible CPA firm or local government audit organization in accordance with OMB OMNI Circular, December 2014.

The grantee is a local government or nonprofit expected to expend less than \$750,000 annually in combined federal funds and is exempt from federal audit requirements for the fiscal years included in the grant period.

Audit (Check all that apply)

Records will be available for review or audit by appropriate officials of HUD, MSHDA, and/or the General Accounting Office (GAO).

The applicant recognizes that this provision does not limit the authority of federal agencies or MSHDA to conduct or arrange for an audit (e.g., financial audit, performance audit, evaluation, inspection, and review).

The grantee understands that costs of audits are not allowable.

The grantee has Gross Receipts of less than \$50,000 and is required to submit an IRS 990N.

Participation in Homeless Management Information System (Check one of the two)

The applicant understands that, as a recipient of Emergency Solutions Grant fund, our organization is obligated to maintain both client services activity records and performance outcome measures utilizing the Michigan Statewide Homeless Management Information System (MSHMIS) and the "ESG for Domestic Violence" ACCESS database system, in accord with standards published by MSHDA.

Not applicable if Fiduciary only.

By signing this Administrative Compliance Certification, I hereby certify, under penalty of perjury, that I have read, understand and will adhere to all the information, requirements and standards provided above as a prerequisite of Emergency Solutions Grant funding.

Organization Name

Authorized Official Name and Title

Authorized Official Signature

Date