

Tab 4

Project Approach

D. PROJECT APPROACH (TAB 4)

1. Facility Development

- a. The Emergency Shelter/Navigation Center would be built on the east side of Dinuba Boulevard across from Riverway Sports Park on a site of approximately three acres to be donated by Self-Help Enterprises (SHE). The property is bordered by Glendale Avenue on the north and Court Street on the east and is zoned Commercial Mixed Use, which permits an emergency shelter as a by-right use. The existing parcel is approximately 6 acres and SHE plans to develop rental housing on the southern half. It is located in Zone X, according to Flood Insurance Rate Map Panel 935E, which indicates the flood risk is considered low to moderate by the Federal Emergency Management Agency. No flood insurance is required.



The site is advantageous for many reasons, including access to transportation and proximity to services needed and locations frequented by those experiencing homelessness. The area surrounding it is undeveloped so perceived conflicts with existing uses would be avoided. The site would be developed such that only an attractive building façade would be visible from the Dinuba Boulevard side; parking and access would be on the eastern part of the property. This would avoid vehicle and pedestrian conflicts with traffic on Dinuba Boulevard, part of the State Route 63 highway. Opposite the facility on the north side of Glendale Avenue will be the rear of a tier of residential lots with a subdivision perimeter wall and landscaped buffer.

The Route 63 highway provides convenient access to downtown and the State Route 198 freeway. Three Visalia Transit bus routes (7, 8 and 16) circle the Orchard Walk shopping center and pass less than a block from the facility on Shannon Parkway. Service providers would make bus passes available to clients seeking services, and some operate their own transit vans. Bicycles are another transportation option.

The site is in close proximity to the St. John's Parkway, where many persons experiencing homelessness currently spend time. Encampments are located there and along the Modoc Trail less than a mile to the south. The Bethlehem Center is a little more than a mile down Route 63. Other providers of services to the homeless like Visalia Emergency Aid Council, Salvation Army, the CSET main office and the Samaritan Center are also nearby on or near Route 63. Measured directly, the Visalia Rescue Mission is less than two miles away, and the Visalia Transit Center is slightly more than two miles. These agencies among others provide the requisite continuum of housing and services made available to this project.

- b. The proposed site plan and building design are being coordinated by TC Hope and its members who have extensive experience with development of large public facilities.



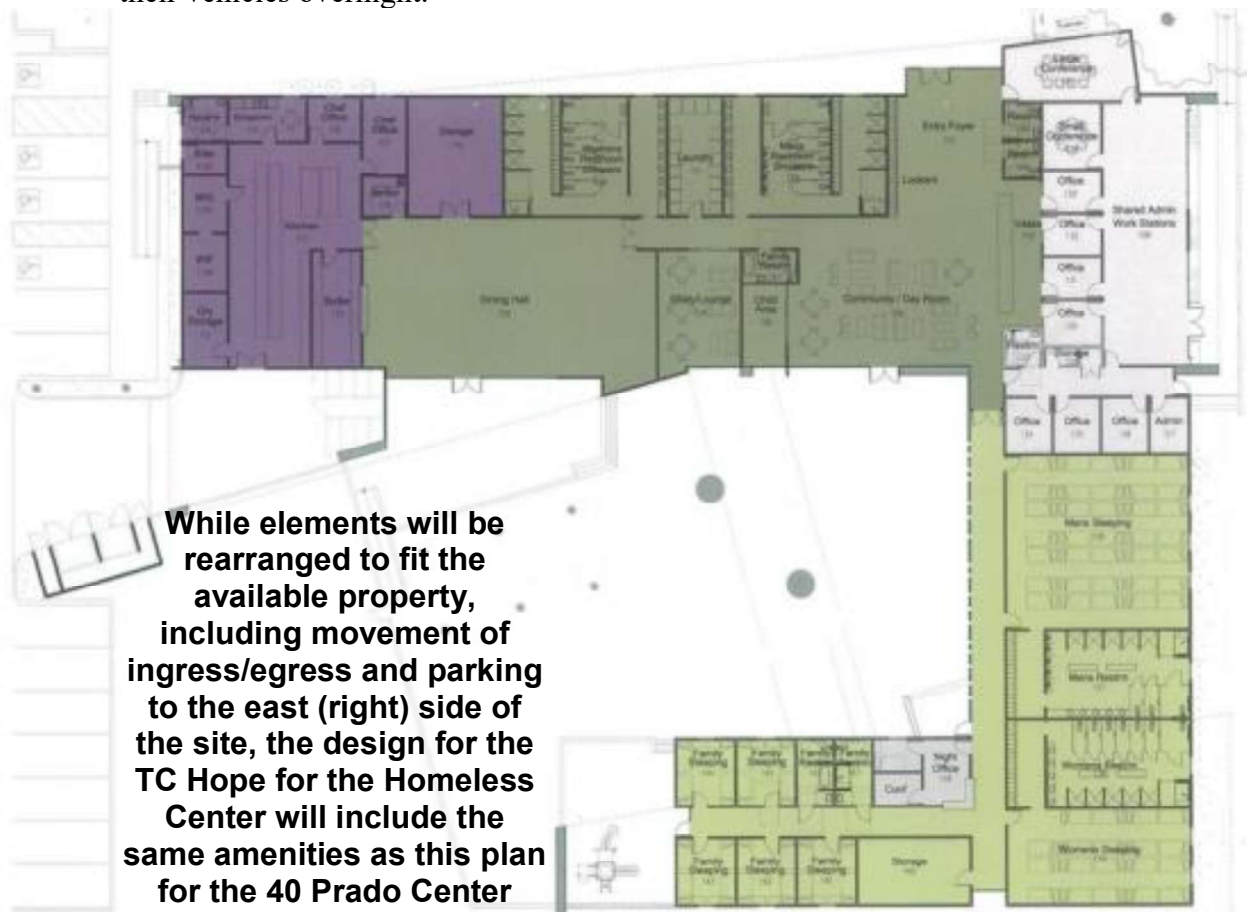
President Judee Berg is founder of the Samaritan Healthcare Center and the meal service at Bethlehem Center when it was known as Sister Ursula's Kitchen. Don Hutton chaired three building projects on the campus of Christ Lutheran Church and, most recently, led the development and construction of the Rotary Respite House, an outreach for Kaweah Delta Medical Center. Philip Hornburg is a retired attorney who co-founded the Visalia Rotary Community Foundation, which is involved in many public benefit development projects. Walter Deissler is a retired architect who was responsible for designing In-N-Out Burger restaurants nationwide. The other members, Rev. Brian Malison, Rie Reniers, Douglas Berg, Tom Peltzer and former Visalia Mayor Bob Link, bring to the table skills and experience in property development, project management, philanthropy, and delivery of social services. Serving as advisors for this project are Matt Ainley, Principal Civil Engineer for 4Creeks, and Harvey May, semi-retired local developer. A joint venture agreement between TC Hope and CSET is attached.



- c. The conceptual design for the TC Hope for the Homeless Center is very similar to the 40 Prado Homeless Services Center (pictured above) in San Luis Obispo that opened in October 2018. In addition to emergency shelter space, the proposed Center would have room for a warming and cooling center, recognizing the additional need for protection from extreme weather among the many homeless in Visalia who are unsheltered. During the mid-winter night of January 21-22, 2020, when the last Point in Time count was taken, 312 of the persons surveyed slept in unsheltered locations in Visalia, while only 94 had access to emergency shelter. A total of 540 homeless persons were identified in Visalia and 167 of them were considered chronically homeless. More than half of the 992 homeless counted in all of Tulare County were found in Visalia.

The TC Hope for the Homeless Center would be of steel construction and have about 20,000 square feet of building space, single-story with an eave height of 18 feet. Fire sprinklers would be installed. Amenities would include sleeping quarters

accommodating 100 beds, restrooms with showers, kitchen and dining facilities, offices and meeting rooms, a laundry, bicycle storage and storage for personal items, a playground, pet shelter and parking. The area breakdown would be as follows: 2,240 square feet of general office space; 6,070 square feet of assembly area; 2,930 square feet of residence area; 1,414 square feet of storage; and the remainder in restrooms and showers. The facility would be flexibly designed to accommodate sleeping arrangements suitable for an ever-changing mix of clients, with consideration given to gender and to keeping families together. The assembly area can be configured to function as a warming and cooling center in extreme weather. The paved parking area will be sufficiently large to accommodate a safe parking program for those staying in their vehicles overnight.



- d. Facility development will take place from July 2021 – December 2022, with an anticipated opening date of January 2023. CSET’s administrative staff consisting of Mary Alice Escarsega-Fechner (Executive Director), Raquel Gomez-Collins (Division Director of Community Initiatives), Esta Willman (CFO) and Nicole Ferreira (Assistant Director of Finance) will have operations and budget oversight during the development phase. CSET is partnering with Self-Help Enterprises, the regional leader in the development of low-income housing, for development of this site. CSET’s finance team has many years of experience monitoring funds and ensuring they are spent accurately and timely. CSET operates over 50 different programs from various funding sources. The finance

department monitors all program expenditures and meets monthly with program staff to review progress.

- e. This facility will be designed to house up to 100 individuals at any given time. It will have rooms, dividers and modular furniture that can be configured to accommodate individuals, youth and families. Both spaces and staffing are scalable to adequately serve the number of clients housed in the Center at any one time. CSET's culture of cross-departmental assistance ensures that additional staff are available to assist in emergency situations as well as with special events and projects. For example, when referral-based programs were at a standstill during the COVID-19 pandemic, staff assigned to these programs immediately pivoted to assist with pandemic-response programs, ensuring hundreds of families and individuals gained access to supportive services as well as utility, rent, and mortgage assistance.
- f. The TC Hope for the Homeless Center will have no development aspects that deviate from Housing First principles. The goal will always be to stabilize housing situations so that clients can concentrate on alleviating the barriers that have prevented them from having housing stability.
- g. The proposed budget for development of the facility includes the following line items:
 - i. Acquisition – The site is currently owned by Self-Help Enterprises. It is approximately three acres and will be donated to CSET for this project. Minimal fees will be paid for the acquisition of the property.
 - ii. Design – The TC Hope team includes members of the community who have design and engineering experience. They are contributing their time to assist with the design of the shelter, which will be closely modeled after the 40 Prado facility located in San Luis Obispo.
 - iii. Construction/Rehabilitation – CSET will partner with Self-Help Enterprises for the construction and project management of the development phase of the project.
 - iv. Furniture, Appliances, and Equipment – Furniture, appliances and equipment will be needed for the startup phase of this project. These include: office furniture, computers, copiers, phones, internet equipment, cameras, monitors and lighting for security, beds and mattresses, bedding, storage bins, kitchen equipment (sinks, stoves, etc.), food service supplies, tables and chairs, TV's and charging stations, computer equipment for participant use, wheeled bins, lockers, patio tables, trash receptacles, animal kennels, laundry equipment and supplies and laundry carts.
 - v. Project Management (Staff/Consultants) – CSET will partner with Self-Help Enterprises for the construction and project management of the development phase of the project.

2. Facility Operation

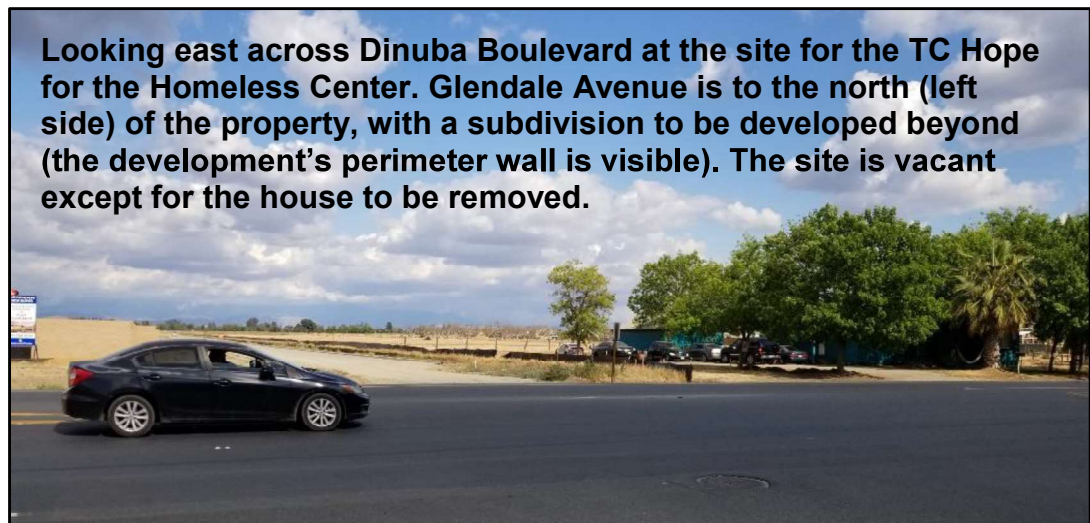
- a. The number of positions to be funded through CSET and the percent of each position's time dedicated to the facility and its services annually:

TC HOPE FOR THE HOMELESS CENTER Position Title (CSET Job Description)	Full Time Equivalent (FTE)
Program Director (<i>Division Director</i>)	0.1
Program Manager (<i>Assistant Director</i>)	0.1
Accountant (<i>Accountant</i>)	0.25
Shelter Coordinator (<i>Senior Program Coordinator</i>)	1.0
Shelter Advocates - supervisors (<i>Program Coordinators</i>)	4.2
Shelter Workers (<i>Program Specialists</i>)	6.2
Food Services Manager (<i>Program Coordinator</i>)	1.4
Homeless Services Food Prep Assistants (<i>Program Specialists</i>)	3.9
Custodians (<i>Senior Program Specialists</i>)	2.4
TOTAL FULL TIME EQUIVALENTS	19.55

- b. Facility development will take place from July 1, 2021 to June 2023. CSET's administrative staff, consisting of Mary Alice Escarsega-Fechner (Executive Director), Raquel Gomez-Collins (Division Director of Community Initiatives), Esta Willman (CFO) and Nicole Ferreira (Assistant Director of Finance), will have operations and budget oversight during the development phase. Four months before project development is complete, daily operations supervisory staff (Shelter Coordinator and Food Services Manager) will be hired and begin prepping and hiring staff for a shelter open date of January 2023. Shelter staff will be in place 60 days before the shelter opens for training and preparation.
- c. CSET's plan to operate the facility and programs specifically addresses:
- i. HMIS and nightly intake procedures
- Staff members will research and determine if clients are in HMIS. If they are not clients will be asked to allow CSET staff to enroll them.
 - For "first-time visitors," intake interviews will be conducted with client information gathered on Intake Forms.
 - Interviews may be conducted by trained volunteers, as well as TC Hope staff members when Kings/Tulare Homeless Alliance staff are not available.
 - Every effort will be made to update HMIS with all intake interview information on the night of the client's first arrival. At the very minimum, some demographic information will be entered into HMIS that night.
 - KTHA staff will be responsible for:

- ✓ Determining the HMIS status of clients
 - ✓ HMIS data entry
 - ✓ Recording the emergency shelter service for the night.
- All intake interview paperwork must be reviewed by the senior staff member and signed. This allows for missing information to be obtained while the client is still on site.
 - All TC Hope shelter staff members will be given more detailed instructions and “client flow” information at the formal HMIS training.

It may be discovered at intake that clients have the capability and the resources to quickly attain housing on their own, or with minimal assistance, allowing them to achieve stability while conserving shelter resources for other clients. These clients will receive diversion services which may include referral to other programs which provide rapid rehousing or mediation of landlord conflicts.



When clients are referred, they will be informed if beds are available or if they will be put on a wait list. The referring agency will fill out the referral form and e-mail/fax/scan it to the shelter contact person. Referred clients will be able to stay at the shelter for the specified period. A percentage of beds will be reserved (filled by referrals). If a referred client does not show up by 7:00 p.m. on a given day, the bed that was to be occupied is declared “open” and will be filled by staff contacting the individuals on the wait list. Clients who do not show for two consecutive days lose their reserved beds and are placed at the end of the waitlist.

- ii. Case management summary: When a client is checked in and receives a personal “immediate needs kit” a VI-SPDAT entry is completed by the KTHA Navigator. It will be submitted to the agency that can best serve the client based on eligibility and risk factors. Shelter case managers will contact the client to complete an intake. At intake, a staff member will assess the client’s needs and offer available services provided by CSET and its partner agencies and organizations. CSET often

serves individuals who seek a specific service but get connected to multiple programs because other needs emerge as their service plan develops. The service plan is a tool that the case manager and the client will use to develop a commitment and action plan to serve the client's needs and goals for housing.

When case managers determine what the client's needs are they will begin assessing eligibility for programs. If clients have disabilities and report that they are not receiving assistance, case managers will initiate referrals to Tulare County HHSA, which may determine that they qualify for the Housing Disability Assistance Program. If clients have children and receive or are eligible for CalWORKS, referrals will be initiated for the Housing Support Program.

CSET Housing and Family Resource Center case managers are trained in the Whole Family Approach and are skilled in holistic interviewing that employs strategies that help to reduce anxiety and repetitive trauma to participants. CSET staff are committed to a holistic approach in pursuing the well-being of clients, especially underserved populations. These services include making connections to health, rental assistance, payments for application fees, housing deposits, furnishings, appliances, supplies, housing inspections, and utility assistance. Case managers ensure that clients are the decision makers in their service plans. They are provided with tools for resources that will be ongoing depending on funding availability. CSET staff work with clients and providers regarding exit and transition strategies.

When referrals are appropriate, CSET staff also assist in applying for Mainstream Voucher Program (MVP) or Section 8 housing vouchers, assisting clients with completing and sending applications and back-up documents. Section 8 is administered by the Housing Authority of Tulare County, while MVP applications are screened by the Homeless Alliance before processing by the Housing Authority. Staff follow up with e-mail messages and telephone calls to check on approval status.

- iii. CSET is able to connect clients directly to employment development services as the operator of the Employment Connection one-stop centers in Visalia and two other locations. CSET also operates the ECO (Environmental Cleanup Opportunities) program on behalf of the City of Visalia, employing persons experiencing homelessness to perform litter control while gaining job readiness skills and job search services, with the opportunity for work experience with the City's Public Works department.

Data shows that the majority of persons experiencing homelessness qualify for disability benefits. The 2019 Point in Time report indicates that while 75% of the homeless population is disabled, only 18% receives SSI/SSDI benefits. Tulare County eligibility workers perform outreach on every client that visits County offices and screen for potential eligibility. If potentially eligible for disability insurance benefits (claiming to be disabled and homeless), clients are referred to

HHSA’s in-house SSI Advocacy Unit, which is responsible for the HDAP program. HDAP disability advocacy and case management services are currently delivered by HHSA with Housing Navigation services provided by CSET. Outreach and engagement from both Tulare County caseworkers and CSET staff, along with robust communication between agencies, are responsible for our success in maintaining contact with homeless clients, which is critical to providing disability benefit advocacy services and housing supports. All agencies conduct reverse referrals as it is a best practice in ensuring clients receive the services that they need to succeed.

- iv. Housing First is a philosophy that values flexibility, individualized supports, client choice, and autonomy. CSET staff will do all they can to accommodate clients and their needs upon arrival. Relevant questions are asked at intake to better understand clients’ needs.

The shelter will include storage space for visitors. The shelter will provide lockers to ensure the customer’s personal belongings are safely stored. Pet kennels will be provided to assure that a guest’s best friend has a safe place and food to eat, whether registered as a service animal or not. Bicycle racks will be available.

CSET or the referral agency will work closely with a client who receives a housing voucher. If housing staff locates a suitable unit, the client will be encouraged to inspect and approve it and consider all details about it before putting in a rental application. CSET provides to the client an affordability calculation based on estimated Social Security benefits (or other benefits) to ensure that the housing cost ratio is in line with what is considered affordable. CSET also evaluates accessibility of the unit while working with a client who possesses physical disabilities, especially if it is an upstairs unit that requires climbing stairs, or a distance to reach a bus stop if the client has to see a doctor for treatment and relies on public transportation.



CSET has adopted the “Housing First” model and will ensure that clients experiencing homelessness are treated with respect and dignity, care and without preconditions or service participation requirements. Case managers work to

develop trusting relationships to assist clients in rebuilding their lives one milestone at a time. Rapid placement and stabilization in permanent housing are primary goals. Clients are accommodated regardless of their sobriety or use of substances, completion of treatment or participation in services. CSET works to place clients in housing that meets their needs and will be affordable after their program assistance is terminated. Depending on the program the client is eligible for, a case manager will continue to work with clients to address and overcome the barriers that caused them to become homeless. Clients who are Anthem customers are eligible to receive additional assistance from Anthem.

- v. Placement into housing starts with utilization of the Vulnerability Index-Service Prioritization Decision Assistance Tool (VI-SPDAT), Prevention/Re-Housing (PR) VI-SPDAT, and the Transition Age Youth (TAY) VI-SPDAT to measure vulnerability and housing needs based on the highest priority. Utilizing the VI-SPDAT for prioritization has been vital to target the limited and intensive permanent supportive housing resources to the people with the longest histories of homelessness and the most extensive needs due to these individuals having the highest barriers to obtaining and maintaining permanent housing. These tools are utilized by the local Continuum of Care via HMIS and allows agencies partnering with the CoC to refer individuals from the Coordinated Entry System (CES) to the most appropriate program to meet their needs. All homeless partnering agencies and programs utilize HMIS, allowing for inter-agency collaboration in regard to tracking client data and to ensure all homeless individuals throughout the County are being captured. It is critically important for homeless service providers to be able to share information about each homeless individual being served.

For clients who are unable to find a housing placement independently, CSET staff provide coaching and assistance in researching housing opportunities. CSET maintains strong relationships with local landlords who are understanding and willing to give a “second chance” to people who have suffered homelessness. Identifying a good fit for both the client and the landlord is critical.

To enhance housing stability, CSET offers clients life skills workshops which address financial management; referrals for supportive services or other safety net services; and assistance in pursuing housing and or energy subsidies. CSET teaches clients how to be good tenants and how to maintain their units, helping them to understand their lease agreements and recognize their responsibilities as stakeholders. Once clients are settled into housing, they are provided with a Resource Directory that they will use to find support during times of need.

- vi. The shelter will provide small conference rooms where clients can participate in private virtual meetings using Google hangouts, Zoom, FaceTime and other tools used for legal assistance, tele-health appointments, interviews for potential job opportunities or training, etc.

CSET developed considerable infrastructure and expertise in its teleconferencing capabilities during the COVID-19 pandemic. CSET never closed its doors and continued to deliver services to customers despite such obstacles as infection prevention precautions, social distancing requirements and shelter-in-place orders. Other online resources that are incorporated in the proposed Center are: OneSpan cybersecurity for case management and timesheet approvals; virtual appointments and coaching; and increased use of phone calls, texting and email to reach clients.

- vii. Clients will be connected to other community resources if they are unable to attain a safe exit from the program before reaching the maximum length of stay, which will be determined during 4-month start-up period leading to facility opening. Working with local partners (shelters) and leveraging other programs that the client is eligible for, case managers will help establish transition plans. Some of the participants need to save money in order to afford their rent and often stay at local shelters until they are able to move on to a unit that they can afford or that meets their needs. For example, 18 former ECO participants have gained unsubsidized employment, including a few who are now employed by CSET. CSET's HSP program staff also work with the Tulare Lighthouse Rescue Mission when transitioning families with children. These accommodations ensure that the participants have a safe place where they can continue to work on their Service Plan goals until affordable housing is secured.
- d. CSET is experienced in setting specific, measurable, reasonable, relevant and time-oriented program goals. While program goals will be influenced by future funder requirements and partnerships, CSET envisions a strong navigator role in which clients will gain access to a continuum of services that meet individual needs.

Ability to set and meet outcomes for high-need individuals is demonstrated by performance of CSET's ECO program: 40 of 42 participants completed a Level 1 transitional job; 12 of 20 participants completed a Level 2 transitional job with 8 more to begin soon; 100% of supportive services were expended (\$4,500 providing 47 services); and 18 of 24 participants are now employed, with several more in the hiring process. In addition, many participants will be co-enrolled in other programs that meet their needs or interests. For example, 3 ECO participants were co-enrolled in a Bitwise program through which they received website development training in WordPress. These individuals have now been offered paid internships, starting at \$17/hour, with the Bitwise company.

Reflecting a strong navigator role, annual goals for the proposed project may include the following, in addition to the Pool for Homeless Initiatives Locally (PHIL) performance measures:

- Days of operation: 365
- Shelter beds occupied: up to 100

- Individuals who rotate through the shelter annually: 500
 - Referrals made to partner services: 250-300
 - Individuals co-enrolled in at least one additional CSET program or supportive service: 150
 - Individuals who gain paid work experience: 25
 - Shelter meals served: 54,750 (based on 75 clients receiving 2 meals/day)
 - Safe Parking Program users: maximum of 5 per night
 - Day visitors during warming/cooling center hours: 50
 - Exits to stable housing: 225
 - Volunteers and interns supporting Center services and activities: 20
- e. CSET’s Compliance Department ensures that contractual obligations are fulfilled, including RFP requirements and regulations from programs such as CDBG, PLHA and SAH. Financial obligations are also monitored by the Finance Department, and operational data is reviewed regularly by CSET’s management team and the Board of Directors.
- f. CSET is pursuing installation of a commercial kitchen in the TC Hope for the Homeless Center not only to facilitate preparation of client meals, but to allow for the possibility of preparing meals for outside use. This could provide an opportunity for work experience for clients while generating income to benefit the Center. The Center could prepare food for use by CSET’s Senior Services, which delivers 20 frozen meals per month to approximately 1,400 clients. Meals could be provided to other agencies on a fee for service basis.

3. Leveraging

The navigation center will rely heavily on the leveraging of other programs, volunteers and intern support function. Pledges include:

Partner Organization	Pledge Amount	Status of Funds
Kings/Tulare Homeless Alliance	\$32,665	Pledged – not yet received
Family Health Care Network	\$10,000	Pledged – not yet received
The Source LGBT+ Center	\$100,000	Pledged – not yet received
Visalia Rotary Community Foundation	\$250,000	Pledged – not yet received

Other forms of support and the estimated value, if available:

Name of Program	Support Provided	Estimated value
Emergency Food and Shelter Program	EFSP funds must be used to supplement feeding, sheltering (including transitional sheltering) and rent/mortgage and utility assistance	\$50,000
Senior Nutrition	The senior nutrition program provides nutrition services to individuals 60+ that promote physical, psychological and social well-being and reduce isolation through programs coordinated with nutrition related support services.	\$410,233
Community Services Block Grant (CSBG)	The Community Services Block Grant (CSBG) provides funds to alleviate the causes and conditions of poverty in communities.	\$300,000
Substance Abuse Mental Health Service Act (SAMHSA)	Programs primarily target people experiencing homelessness who have been underserved, or who have not received any behavioral health services. Most of these programs support people who experience chronic homelessness.	\$110,653
Anthem Blue Cross Medi-Cal Members	Assess the members' housing needs, identify and connect the member to available resources, provide support through the process including elimination of any housing barriers	\$46,986
CSET's Workforce Development Dept.	Work experience opportunities for support of the kitchen, as well as job readiness skills development and job search resources leading to unsubsidized employment. These resources are available through a range of CSET programs for young people and adults, including Welfare to Work, Supported Employment & Volunteer Program, Workforce Innovation & Opportunity Act (WIOA), and Title V (Senior Community Service & Employment Program).	\$670,558
Sequoia Community Corps	Work experience opportunities for support of the kitchen.	TBD

Volunteer and Intern support will vary based on the enrollment and needs of the shelter. It is estimated that 6.3 FTE volunteers would be needed to assist with food service and other entry level shelter tasks such as assisting clients with laundry and cleaning. This rate was based on the California Minimum Wage for 2023 of \$15.00/hour: \$15.00 x 2,080 hours x 6.30 FTE = \$196,560. Interns will be utilized to assist the Homeless Navigators with various tasks, including intake and referral to other services. The rate was based on the Bureau of Labor Statistics median wage of \$21.067/hour: \$21.067 x 2,080 hours x 5.60 FTE = \$245,392.

4. Barriers, Exclusions

CSET is unaware of any barriers to program access, coordination of services, or of any other type. The only exclusion criterion that will be used by the program is determination that someone seeking services is a hazard to self or others, which would lead to that individual being excluded for health and safety reasons and referred to the appropriate mental health or public safety authorities.

5. Program Administrative Costs versus Activity Delivery Costs

CSET is familiar with the difference between “Program Administration Costs (PAC)” and “Activity Delivery Costs (ADC),” recognizing that the City will charge PACs to the CDBG grant for City staff time and overhead performing planning and general administration of the CDBG Program. CSET will invoice for Activity Delivery Costs (ADCs) incurred for implementing and carrying out eligible CDBG activities. ADCs include costs for staff directly carrying out the activity (authorized under 24 CFR 570.202), in addition to equipment and supplies that are necessary for successful completion of the activity. CSET acknowledges that ADCs must be allocable to a CDBG-assisted activity or an activity that is CDBG-eligible, meet a national objective, and meet all other CDBG program requirements. Staff time allocable to the ADCs represent the actual time spent on implementing and completing the eligible activity, and not overall administration.

CSET is familiar with and will conform to the following notices:

- a. SD-2015-01- Transition to 2 CFR Part 200; Issued Feb 26, 2015
 - i. Related to Uniform Administrative Requirements for Grants and other Agreements with Non-Profit Organizations (2 CFR Part 200, replacement of A-110); Cost Principles for Non-Profit Organizations (2 CFR part 200, replacement of A-122, and Audits of Non-Profit Organizations A-133):
 - ii. <https://www.hud.gov/sites/documents/15-01SDN.PDF>
- b. CPD Notice 16-04; Additional Transition and Implementation Guidance for recipients of CDBG funds for 2 CFR 2 Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
 - i. This includes reference to Uniform Requirements at 2 CFR 2400, which amended 24 CFR Parts 84 and 85, which had implemented A-102 and A-110 for HUD Programs
 - ii. <https://www.hudexchange.info/resource/4990/notice-cpd-16-04-additional-transition-and-implementation-guidance-for-recipients-of-community-planning-and-development-cpd-funds-for-2-cfr-part-200-uniform-administrative-requirements-cost-principles-and-audit-requirements-for-federal-award/>
- c. CPD 13-07; Allocating Staff costs between Program Administration Costs versus Activity Delivery Costs in CDBG:
 - i. <https://www.hudexchange.info/resources/documents/Notice-CPD-13-07-Allocating-Staff-Costs-Program-Administration-Delivery-Costs-CDBG.pdf>