

GAO

United States General Accounting Office

Report to the Chairman, Committee on
Governmental Affairs, U.S. Senate

August 1992

HOMELESSNESS

HUD Improperly Restricts Applicants for Supplemental Assistance Program



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RELEASE

**Resources, Community, and
Economic Development Division**

B-246126

August 13, 1992

**The Honorable John Glenn
Chairman, Committee on
Governmental Affairs
United States Senate**

Dear Mr. Chairman:

This report responds to your request that we assist your oversight of the management of assistance programs for the homeless by evaluating the implementation of the Supplemental Assistance for Facilities to Assist the Homeless (SAFAH) program (title IV, subtitle D of the Stewart B. McKinney Homeless Assistance Act). SAFAH was established in 1987 as a competitive grant program to (1) supplement funding provided under two other McKinney Act programs and (2) fund comprehensive, innovative programs that meet the immediate and long-term needs of homeless individuals and families. Since the SAFAH program was established, HUD has awarded 79 grants totaling \$37.5 million, making SAFAH HUD's smallest assistance program for the homeless.

As agreed with your staff, we are providing you with (1) an analysis of whether the Department of Housing and Urban Development's (HUD) selection process for awarding grants has complied with the legislation, (2) information on HUD's recent actions to improve the management of the program, (3) an analysis of whether grantees accomplished their objectives as stated in their SAFAH grant agreement, and (4) an analysis of whether the projects funded under the program are reaching the target populations stipulated by the McKinney Act.

Results in Brief

HUD's selection process for awarding the two rounds of grants for fiscal years 1987 and 1990 closely paralleled the law in allowing applications from all eligible recipients for all eligible activities;¹ however, in fiscal year 1991 HUD substantially changed the SAFAH grant selection process by restricting the use of funds and limiting the type of applicants that were eligible. For the fiscal year 1987 and 1990 funding rounds, states, metropolitan cities, urban counties and other governmental entities, tribes, and nonprofit organizations all competed for assistance awards. Funding was available for any program activity specified under the SAFAH legislation

¹HUD did not request funding or award any grants for the SAFAH program in fiscal years 1988 and 1989.

to benefit any homeless population. However, in fiscal year 1991 HUD narrowed the applicant pool to states alone. HUD also limited competition to projects providing coordinated and comprehensive supportive services (such as housing and rental assistance) to assist homeless families with children in moving from transitional to permanent housing.

We do not believe that the Secretary had the authority to restrict the applicant pool to states alone in its fiscal year 1991 decision. Under the SAFAH program statutes, an applicant is defined as a state, metropolitan city, urban county, governmental entity, tribe, or private nonprofit organization that is eligible to be a SAFAH recipient. We do not believe that this language, together with the legislative history, gives the Secretary the authority to expand or contract this statutory definition. We have no legal objections, however, to the other changes made by the Secretary for the fiscal year 1991 funding round.

During fiscal year 1991, HUD began taking steps to improve the management of the SAFAH program. These initiatives, if fully implemented, should result in more effective program management. Specifically, HUD has issued detailed monitoring guidance to regional and field offices, decentralized all financial payments to the field offices, provided initial guidance on grantee reporting requirements to the field and regional offices, and awarded a contract to the Urban Institute² to evaluate the program.

According to our analysis of grantee files, the 38 grantees who had spent the fiscal year 1987 SAFAH funds appear to have met the objectives stated in their grant agreements. As of April 1992, the remaining seven grantees that are still using SAFAH funds also appear to be accomplishing their objectives. Some of the fiscal year 1990 grantees had not started operations at the time of our review. We did not review the fiscal year 1991 grantees because the grants were not awarded until January 1992.

We found that the fiscal year 1987 grantees committed about 66 percent of all grant funds to the support of facilities designed primarily to benefit homeless elderly individuals or homeless families with children. Thus, in fiscal year 1987, the SAFAH grantees exceeded the McKinney Act requirement of spending at least 50 percent of the grant funds on the funding target stipulated by the act. According to a review of the grant applications, the fiscal year 1990 projects are also designed to reach the

²The Urban Institute is a nonprofit policy research and educational organization established in Washington, D.C., in 1968.

target populations. However, it is too early to determine whether they will meet or exceed the 50-percent funding target stipulation.

Background

The SAFAH program was authorized in 1987 by the Stewart B. McKinney Homeless Assistance Act to provide assistance for helping the homeless to states, metropolitan cities, urban counties and other governmental entities, and to tribes and nonprofit organizations. SAFAH is designed to provide (1) comprehensive assistance to particularly innovative programs that meet the immediate and long-term needs of the homeless and (2) supplemental assistance to Emergency Shelter Grant or Supportive Housing Demonstration projects³ when additional funds are required. The law specifies that, to the maximum extent practicable, the Secretary shall reserve not less than 50 percent of SAFAH funds for the support of facilities and services designed primarily to benefit either homeless families with children or homeless elderly individuals.

Comprehensive assistance funds can be used to purchase, lease, renovate, operate, or convert facilities to assist the homeless and to provide supportive services. These services include food, child care, assistance in obtaining permanent housing, outpatient health services, employment counseling, nutritional counseling, security arrangements necessary for the protection of residents, and other services deemed essential for maintaining independent living.

Assistance provided to augment the Emergency Shelter Grant or Supportive Housing Demonstration programs can be used to meet the special needs of homeless families with children, of elderly homeless individuals, and of the handicapped. These funds can also be used to provide supportive services and to facilitate the transfer and utilization of public buildings that will be used to assist homeless individuals and families.

Under the SAFAH program regulations, HUD publishes a Notice of Funding Availability (NOFA) in the Federal Register when SAFAH funds are made available. The NOFA provides the specific information and guidance applicable to that particular funding round.

³HUD's Emergency Shelter Grant program is designed primarily to help improve emergency shelters for the homeless. The Supportive Housing Demonstration program has two separate components—transitional housing to facilitate the movement of homeless individuals to independent living and permanent housing for handicapped homeless persons.

HUD has specified that the maximum amount an applicant for the SAFAH program may receive is \$1 million, which can be used over a multiyear period. Once the grant has been approved, it is subject to a grant agreement executed by HUD and the grantee. The grant agreement specifies the objectives that the grantee said it would accomplish when it applied for SAFAH funding. In addition, the grantee agrees to keep records and submit any reports that HUD requires.

Assistance under the SAFAH program may be provided to applicants who furnish satisfactory assurances that any property that has been purchased, leased, rehabilitated, or converted with SAFAH assistance will be operated as a facility to assist the homeless for not less than 10 years. HUD has a responsibility to ensure that this requirement is met by every applicable SAFAH grantee.

The SAFAH program is administered by HUD's Office of Special Needs Assistance Programs—an office under the Assistant Secretary for Community Planning and Development that HUD created in November 1989 to manage assistance programs for the homeless. Prior to 1989, the SAFAH program was managed by HUD's Office of Policy, Development, and Research. The program has been popular with applicants because unlike some other HUD programs, it requires no local funding match, does not require the applicant to acquire or operate a facility to receive funds, and encourages applicants to experiment with innovative approaches for meeting the needs of the homeless. For fiscal years 1987, 1990, and 1991, HUD funded 79 projects totaling \$37.5 million.

HUD's Fiscal Year 1991 Selection Process Restricts Eligible Applicants

HUD's first two rounds of SAFAH funding closely paralleled the law, but in fiscal year 1991 HUD substantially changed the selection process by limiting the types of grant applicants that were eligible for the program and by restricting program activities and target populations. HUD's fiscal year 1991 funding round limited applicant eligibility to states only, thereby eliminating other types of previously eligible organizations, such as local governments and nonprofit agencies, from applying directly to HUD for SAFAH funds. HUD also limited eligible program activities to ones that provided supportive services for homeless families with children. HUD said that it made the changes because it wanted to more effectively use the small amount of SAFAH funding.

While we agree with the goal of using limited funds more effectively, we do not believe that HUD is authorized to restrict applications to states

alone. We have no legal objection to HUD's targeting the program activity to supportive services, since this activity is authorized under the statute. We also do not legally object to HUD's restricting the target population to homeless families with children, since this is a population designated by the Congress for special emphasis. Thus, as discussed below, we are primarily concerned with HUD's limiting the type of applicants eligible for the program.

HUD Changed Selection Process for Awarding Grants in Fiscal Year 1991

In fiscal years 1987 and 1990, HUD awarded grants in accordance with the full range of applicants, activities, and populations established in the law, but in fiscal year 1991 HUD changed the SAFAH grant selection process by narrowing the purpose and restricting the type of applicants that were eligible. HUD made these selection criteria known through a NOFA, which provided specific information and guidance for that particular SAFAH funding round.

HUD's fiscal year 1991 NOFA limited applicant eligibility to states, thus eliminating applications from entities such as cities, urban counties, Indian tribes, or nonprofit organizations. Funds could be used only to provide supportive services designed to enable homeless families with children to move from transitional to permanent housing. These criteria eliminated services to other homeless populations, such as the elderly and the handicapped, that do not belong to families with children.

HUD Says Program Change Is More Effective Use of SAFAH Funds

By limiting the type of applicants eligible for grants in fiscal year 1991, HUD attempted to use its funding for the SAFAH program more effectively by reducing the number of applications it had to review and grantees it had to monitor. In the NOFA HUD states that the primary reason it targeted the fiscal year 1991 funding round was that it wanted to effectively use the small amount of SAFAH funds available. Specifically, in fiscal years 1987 and 1990, HUD received approximately 635 applications and funded 64 projects that totaled \$25.8 million. Documentation provided by HUD's Office of Special Needs Assistance Programs showed that HUD's costs for administering the fiscal year 1990 SAFAH competition were approximately \$196,000—about two percent of the total amount of the grants awarded.⁴ By making states the only eligible type of applicant and allowing each state to submit only one application, HUD limited fiscal year 1991 grant applications to the 50 states, the District of Columbia, and the U.S. territorial possessions. In addition, HUD's Director of Special Needs

⁴Documentation for the fiscal year 1987 SAFAH funding round was not available.

Assistance Programs said that the changes to the fiscal year 1991 funding round were an attempt to get the states more involved in the effort for the homeless. Because states control many resources useful for assisting the homeless, the director said he wanted the states to take a more active role in alleviating homelessness.

HUD Exceeded Its Legal Authority by Restricting Applicants

HUD found the restriction in its fiscal year 1991 funding round to be a reasonable exercise of the Secretary's legislatively authorized discretion for administering the SAFAH program; however, we do not believe that HUD has the authority to exclude any class of eligible applicant. We requested HUD to comment on the legal basis for restricting SAFAH awards to only certain activities and applicants that were eligible for assistance under the statute. With respect to the narrowing of the applicant pool, HUD's Assistant General Counsel stated that the statutory definition of the term "applicant" uses the word "or"—i.e., under the definition section of the statute, "applicant" is defined as a state, metropolitan city, urban county, government entity, tribe, or private nonprofit organization eligible to be a SAFAH recipient. According to the Assistant General Counsel, since SAFAH is a discretionary grant program, none of the entities within the statutory definition of "applicant" has a right to receive a SAFAH award. Therefore, he contends that no funding rights are denied by the limitations imposed for the fiscal year 1991 funding round. (See app. I for HUD's legal opinion on this issue.)

We do not believe that the Secretary has the authority to restrict applications to states alone. The definition of applicant uses the unequivocal word "means," which suggests the defined term means neither more nor less than that the classes of entities specified in the definition are eligible to apply for SAFAH grants. The legislative history also supports this view. The fact that no "applicant" has a right to receive a SAFAH award, while undoubtedly true, provides no support for the claimed authority to restrict the class of entities that may submit grant applications. Nor does the use of the word "or" in the definition of applicant provide the Secretary authority to restrict applications to states alone. Accordingly, in our view the Secretary is not authorized to limit the eligibility to submit grant applications to states alone. (See app. II for GAO's legal opinion on this issue.)

HUD Implements Changes to Improve Management of the Program

HUD's Office of Special Needs Assistance Programs, under the Assistant Secretary for Community Planning and Development, has recently implemented the following initiatives, which, if fully implemented, should help improve program management:

- On April 18, 1991, the Assistant Secretary for Community Planning and Development issued a memorandum to HUD's regional and field offices that provided the first monitoring guidance for the SAFAH program. The guidance was prepared in response to requests for more direction in program management from regional and field offices, which assumed responsibility for the SAFAH program in November 1989. The memorandum also provided detailed instructions on topics such as conducting conferences on the SAFAH program, tracking program progress, and preparing and reviewing program reports.
- In November 1991, HUD decentralized all financial payments for fiscal year 1987 SAFAH grants to the field offices. Not only will this make the payment system for the fiscal year 1987 SAFAH grantees consistent with that of the fiscal year 1990 grantees, but it should also alleviate reimbursement delays experienced by some of the fiscal year 1987 SAFAH recipients.
- In January 1992, HUD issued a memorandum to all of HUD's regional and field offices that (1) discussed reporting requirements for fiscal year 1987 and 1990 grantees and (2) instituted a procedure for HUD to monitor whether projects are continuing to operate as facilities to assist the homeless. Essentially, the memorandum directs field offices to require that the fiscal year 1990 grantees provide HUD information necessary to monitor and evaluate their programs. For the first time, the memorandum also requires each fiscal year 1987 and 1990 SAFAH project that received funds for acquisition and/or rehabilitation to submit an annual certification stating that the project continues to operate as a facility to assist the homeless for the length of time prescribed in the grant agreement.

In addition, in response to a request to evaluate the SAFAH program from the Office of Management and Budget, HUD awarded a contract to the Urban Institute in September 1991. The Urban Institute evaluation will (1) develop descriptive data on the grantees, (2) report on project implementation, (3) identify projects that are uniquely comprehensive and innovative, (4) assess the impacts of SAFAH activities, and (5) gather grantee recommendations on the future of the SAFAH program. HUD and the Office of Management and Budget plan to use the study results in policy deliberations on the future role of SAFAH. The evaluation is scheduled to be completed in September 1992.

Grantees Appear to Be Meeting Their Objectives

The 38 SAFAH grantees that have spent their fiscal year 1987 funds appear to have met the objectives stated in their grant agreement, according to our analysis of the grantees' files. The remaining seven grantees are still ongoing and appear to be accomplishing their objectives. Actions carried out by the 38 grantees to meet their objectives include the following:

- The Southeastern Idaho Community Action Agency of Pocatello, Idaho, received a total of \$46,060 in SAFAH funding. The agency's objectives were to rehabilitate an 88-unit emergency shelter for the elderly and pay for the costs of child care and the salaries of two managers, a coordinator, and a clerk at a family shelter. According to the information contained in the agency's quarterly reports to HUD, the agency met these objectives by rehabilitating the emergency shelter and by hiring the staff to provide services at the family shelter.
- The Los Angeles Family Housing Corporation of Los Angeles, California, received a \$300,000 SAFAH grant to pay for two case managers and two service workers for children at a shelter where homeless families can stay for up to 60 days. According to our file review, the agency met these objectives. The file review also indicated that during a 3-month period the shelter served 47 families consisting of 192 individuals.
- Covenant House, Inc., of Charleston, West Virginia, received a total of \$26,250 in SAFAH funding to rehabilitate and expand its facility, which serves as a day shelter for homeless people. Our file review indicated that the agency used the funds solely for rehabilitation to expand the facility, and this increased the shelter's capacity from 65 to 90 persons.

We visited five SAFAH projects to obtain some on-site verification of the information obtained in the files about whether grantees were meeting their objectives. At all five projects we found that SAFAH funds had been used to accomplish the objectives in their grant agreements. Program officials at the five projects we visited indicated that the SAFAH funds had been instrumental in establishing their projects. They also said that without the SAFAH funds, the success of their projects may not have been possible. (App. III describes the fiscal year 1987 SAFAH grantees we visited.)

Because some of the fiscal year 1990 SAFAH grantees were not operating at the time of our review, we did not attempt to determine the status of the fiscal year 1990 SAFAH grantees. We also did not review the fiscal year 1991 grantees because grants were not awarded until January 1992. (App. IV describes the objectives of the fiscal year 1987 and 1990 SAFAH grantees and how the fiscal year 1987 grantees met their objectives.)

Target Population Is Being Served

As we found in our file review, the SAFAH projects funded in fiscal year 1987 exceeded the McKinney Act targets, which state that to the maximum extent possible the Secretary is to reserve not less than 50 percent of the funds available under the SAFAH program for support designed primarily to benefit homeless families with children or homeless elderly individuals. Approximately 66 percent of the fiscal year 1987 SAFAH funds were used to benefit the congressionally mandated target populations. (See app. IV for details on grantee spending on the target population.) We also found that according to the information in their SAFAH applications, the fiscal year 1990 projects are also designed to reach the target populations. However, it is too early to say whether the fiscal year 1990 grantees will meet or exceed the 50-percent funding target stipulated by the McKinney Act. By design, the fiscal year 1991 projects were targeted only to assisting homeless families with children.

Conclusions

In fiscal years 1987 and 1990, HUD awarded SAFAH grants in accordance with SAFAH legislative requirements. In its desire to more effectively use the small amount of funds available, HUD targeted the fiscal year 1991 funding round. This included restricting eligibility to apply only to states. Despite HUD's intentions to use the funds for the SAFAH program more effectively, in our view the Secretary did not have the authority to limit to states alone the eligibility to apply for SAFAH funds.

HUD's recent management initiatives, if implemented properly, should help ensure that the SAFAH program is managed more effectively and efficiently. Furthermore, as we found in our file review, the fiscal year 1987 SAFAH grantees are meeting their objectives as stated in their SAFAH applications, and the target populations stipulated by the Congress are being served.

Recommendation

We recommend, for future SAFAH awards, that the Secretary of HUD not eliminate any class of eligible applicants defined by the legislation unless legislative authority for doing so is obtained.

Agency Comments

As requested, we did not obtain official agency comments on this report. However, we did discuss its findings with HUD's Director of Special Needs Assistance Programs, with a Community Planner from HUD's Office of Research under the Assistant Secretary for Policy Development and Research, and with a representative from HUD's Office of General Counsel. They generally agreed with our review of the program, but disagreed with

our interpretation of the law. As HUD requested, we have included its letter to GAO describing its rationale for restricting applicants to states. (See app. I.)

To meet our objectives, we interviewed officials at HUD headquarters, one regional office, five field offices, and five SAFAH grantees. In selecting the grantees, we tried to obtain geographic distribution, large dollar amounts, and project diversity. The regional and field offices selected were those that have responsibility for the grantees selected. We also contacted the National Coalition for the Homeless to discuss the changes made in the fiscal year 1991 funding round and the Council of State Community Development Agencies to obtain its views on how the states plan to implement these changes. Finally, we reviewed HUD files to obtain information on the status of the grants and whether the projects are reaching the target population. We conducted our review from July 1991 to April 1992 in accordance with generally accepted auditing standards.

As agreed with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the date of this letter. At that time, we will send copies to the Secretary of Housing and Urban Development, and other interested parties. We will also make copies available to others upon request.

This work was performed under the direction of Judy England-Joseph, Director, Housing and Community Development Issues, who may be reached at (202) 275-5525 if you or your staff have any questions. Other major contributors to this report are listed in appendix V.

Sincerely yours,



J. Dexter Peach
Assistant Comptroller General

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Abbreviations

AHA	Archdiocesan Housing Authority
DHS	Department of Human Services
GAO	General Accounting Office
HUD	Department of Housing and Urban Development
NOFA	Notice of Funding Availability
SAFAH	Supplemental Assistance for Facilities to Assist the Homeless
SNAPs	Office of Special Needs Assistance Programs
VOA	Volunteers of America
WGCAAC	Washington-Green Community Action Corporation

HUD's Legal Opinion on Its Fiscal Year 1991 NOFA



OFFICE OF THE GENERAL COUNSEL

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-0500

NOV 1 1991

Mr. Martin Sloane
Assistant General Counsel
United States Accounting Office
Washington, D. C. 20548

Dear Mr. Sloane:

This responds to your letter of October 8, 1991, to General Counsel Frank Keating, asking us to address the Department's targeting of grant assistance under the Supplemental Assistance for Facilities to Assist the Homeless (SAFAH) program, as announced in the notice of funding availability (NOFA) published on August 30, 1991. You question the legal basis for restricting awards to only certain of the activities and applicants eligible for assistance under the statute, noting that the purpose of the SAFAH program is much broader than the focus of the NOFA.

As you know, the SAFAH program is authorized by Subtitle D of Title IV of the Stewart B. McKinney Homeless Assistance Act. Two of the three stated purposes in section 102(b) of the Act are to use resources in a more coordinated manner to meet critically urgent homeless needs, and to place special emphasis on assistance to the elderly, handicapped families with children, Native Americans and veterans. Both of these purposes are strongly supported under the funding strategy of the NOFA, by focusing on the capabilities of State recipients in coordinating the provision of available resources and delivery of services, and by targeting the assistance to families with children.

Section 432(a) of Title IV, Subtitle D, states that the Secretary is authorized to provide assistance for the activities there listed. Applicants are listed under the definition in section 431(1). Both listings are in the disjunctive and the funding authority of the Secretary under the program is not phrased in imperative terms. Since SAFAH is a discretionary assistance program, no funding rights are denied by the limitations imposed by the NOFA as would be the case, for example, in the CDBG entitlement program.

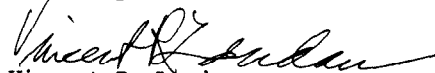
We believe that the rationale for the targeting described in the NOFA presents a reasonable exercise of the Secretary's discretion for administering the SAFAH program within his statutory authority. An additional explanation of the Department's funding objectives under the NOFA is contained in the enclosed memorandum of August 30 to our Field Offices. It should be noted that participation by local governments and nonprofit organizations through the State recipients is clearly anticipated. We should note also that there is precedent for selective competitions for discretionary grants under other HUD

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HUD's Legal Opinion on Its Fiscal Year 1991
NOFA

programs. For example, technical assistance grant competitions under section 107(b)(5) of the Housing and Community Development Act of 1974, as amended, have at times been limited to historically Black colleges and universities, work-study programs for economically disadvantaged and minority students, and CDBG entitlement grantees, depending on the funding objectives of the assistance to be provided.

In summary, we do not believe that the imposition of limitations in this particular funding round of the SAFAH program subverts the intent of the program or violates the spirit or letter of the law.

Sincerely,



Vincent R. Landau
Assistant General Counsel
Block Grants Division

Appendix I
HUD's Legal Opinion on Its Fiscal Year 1991
NOFA



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-7000

OFFICE OF THE ASSISTANT SECRETARY
FOR COMMUNITY PLANNING AND DEVELOPMENT

AUG 30 1991

MEMORANDUM FOR: All Regional Administrators
All Regional CPD Directors
All Field Office Managers
All CPD Division Directors

Anna Kondratas
FROM: Anna Kondratas, Assistant Secretary for Community
Planning and Development, C

SUBJECT: NOFA for Supplemental Assistance for Facilities to
Assist the Homeless (SAFAH) Program

Attached is a copy of the Notice of Funding Availability (NOFA) for the Fiscal Year 1991 Supplemental Assistance for Facilities to Assist the Homeless (SAFAH) program, which was published in the Federal Register on August 30, 1991.

As you will note, this year's SAFAH program is markedly different from that of last year and has been structured as a demonstration in order to more effectively use the small amount of funds available (\$11.3 million) to support innovative approaches to meet the needs of homeless families with children as they seek to live independently by obtaining and remaining in permanent housing.

To achieve this goal, a number of important changes have been made to the program. First among these is that State governments are now the only eligible applicants and each State may submit just one application, although several projects within the State may be proposed. By providing States with the opportunity to play the key role in this year's competition, the limited SAFAH funds available will initially be channeled to a level of government able to coordinate the housing and additional supportive service resources needed to make the program successful. At the same time, those other applicants previously eligible under SAFAH (nonprofit organizations and units of local government) will also be able to participate in the program, since States may and probably will contract with these entities to operate projects within the State.

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2

Other significant changes include restricting the population to be served under the program to homeless families with children currently residing in transitional housing, limiting eligible activities to supportive services with a strong emphasis on coordination and case management, and requiring a rigorous evaluation component.

Given the demonstration nature of this year's program, there will be no field role in the application review process. However, field offices can play a key role in promoting the program and encouraging participation. Following selection, grants will be turned over to field offices to administer.

Potential State applicants should be referred directly to the Office of Special Needs Assistance Programs while units of local government and nonprofit organizations should be referred to their appropriate State officials. You will need to obtain the name of the State contact person in order to direct nonprofits to the appropriate source. Please also provide the name of the contact to the SNAPS office.

I am also asking that each field office inform its State or States as soon as possible by telephone and in writing of the SAFAH funds now available. In communicating with the State, you should point out that what we consider to be the critical components of programs we are seeking to fund are described in the Background section of the NOFA. You should also emphasize the fact that the tragedy of homelessness cannot be ended unless the homeless are empowered to secure and remain in permanent housing. This year's SAFAH program has the potential to be a very significant step in that direction.

I also want to take this opportunity to thank you, once again, for all the good work you are doing in implementing the Department's programs to assist the homeless.

Attachment

cc: Linda Z. Marston, SC

Legal Analysis: HUD's Authority Under the Supplemental Assistance for Facilities to Assist the Homeless Program (SAFAH) to Restrict the Applicant Pool to States Alone

Under the Supplemental Assistance for Facilities to Assist the Homeless Program (SAFAH), the term "applicant" is defined as follows:

"The term 'applicant' means a State, metropolitan city, urban county, government entity, tribe or private nonprofit organization that is eligible to be a recipient under this subtitle." 42 U.S.C. Sec. 11391 (1). (Emphasis added.)

The term "recipient" is defined to mean "any governmental or nonprofit entity that is approved by the Secretary as to financial responsibility." 42 U.S.C. Sec. 11391 (6). In turn, the eligibility provision specifies that, to be eligible to receive SAFAH assistance, "a State, metropolitan city, urban county, tribe, or private nonprofit organization shall submit an application to the Secretary in such form and containing such information as the Secretary shall prescribe." 42 U.S.C. Sec. 11392 (c).

Thus, the statute sets forth three conditions that any entity must satisfy for eligibility to submit an application for SAFAH grants. It must be among the classes of entities specified in the definition of "applicant;" it must be approved by HUD as to financial responsibility; and its application must be in the form and contain the information that HUD prescribes. Accordingly, under the terms of the statute, it would appear that each of the entities within the statutory definition of "applicant" may apply for SAFAH assistance, provided it is approved by HUD as to financial responsibility and submits an application in such form and containing such information as HUD prescribes. HUD would then make choices among the applicants on the basis of the merits of their proposals.

In its 1991 Notice of Funding Availability (Notice)¹ HUD confined eligibility to apply for SAFAH assistance for that year to states, alone, and declined to entertain applications from any of the other entities specified in the statute as "applicants." Thus, HUD refused to consider, on their merits, applications in fiscal year 1991, for example, from cities, urban counties, or Indian tribes.

The legal issue is whether, in light of the statutory definition of the term "applicant," HUD's authority to make grants under the SAFAH program impliedly authorizes it to permit only states to submit grant applications. We believe HUD does not have such authority.

¹56 Fed. Reg. 43526-43531 (August 30, 1991); see also 56 Fed. Reg. 48571 (September 25, 1991) (extending the deadline for submission of applications to November 14, 1991).

**Appendix II
Legal Analysis: HUD's Authority Under the
Supplemental Assistance for Facilities to
Assist the Homeless Program (SAFAH) to
Restrict the Applicant Pool to States Alone**

HUD's Views

As part of our review, we requested and received HUD's legal basis for narrowing the class of eligible applicants to states. In a letter from HUD's Assistant General Counsel, the Department asserted its authority to limit the applicant pool. By way of explanation, HUD's Assistant General Counsel observes that the statutory definition of the term "applicant" uses the disjunctive word "or,"² and that, since SAFAH is a discretionary grant program, none of the entities within the statutory definition of "applicant" has a right to receive a SAFAH award.³

The letter from HUD does not make reference to any section of the statute from which the authority to confine applications to states may be implied. Nor does it articulate a statutory scheme from which such authority may be derived. Rather, HUD's Assistant General Counsel points to one of the overall purposes of the McKinney Act, having to do with using resources in a more "coordinated manner." 42 U.S.C. Sec. 11301 (b) (2). He contends that this purpose is strongly supported by having states do the coordinating.

With respect to "those previously eligible under SAFAH," who were not permitted to apply for 1991 grants, HUD's Assistant General Counsel notes that "participation by local governments and nonprofit organizations through the State recipients is clearly anticipated." See also, 56, Fed. Reg. 43527; HUD memorandum to its field offices on the Notice (August 30, 1991). Apparently, HUD is concerned that the small amounts of SAFAH funds attract hundreds of applications of which only a small handful can be funded. For example, HUD received nearly 400 applications for the \$10.8 million available in the 1990 funding round. Only 20 applications could be funded.

Analysis

The definition section of the statute does not purport to authorize HUD to play any role in determining the classes of entities that may be "applicants" for SAFAH grants. For example, under the language of the statute, only

²The definition serves to identify those entities that are either eligible or entitled to apply for SAFAH assistance, provided they satisfy the other statutory requirements for eligibility. Use of the disjunctive "or" in the definition section does not address whether the identified entities are entitled to or are merely eligible to have proper applications entertained by HUD. Further, use in the definition of the disjunctive word "or," rather than the conjunctive word "and," avoids a possible ambiguity in the meaning of the statutory term. If the conjunctive "and" had been used, the statute might be misinterpreted as requiring all of the named entities to combine for submission of a single grant application.

³The fact that no "applicant" has a right to receive a SAFAH grant award, while undoubtedly true, is also beside the point. That HUD has authority to select among eligible applicants for grant awards provides no support for its claimed authority to restrict the class of entities that may submit grant applications.

Appendix II
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those entities that are named in the definition may become applicants, and HUD has no authority to consider applications from entities not named. Moreover, we believe that the legislative history of the statute, together with the language Congress employs in the definition section, and the language Congress chooses not to employ, evidence a congressional intention to further limit HUD.

The legislative history strongly suggests that Congress intended that the classes of entities named in the definition are entitled to be applicants, and did not intend that HUD confine eligibility to submit grant applications to states, alone. This suggestion is contained in the Conference Report. In expressing concern over one of the entities defined as an "applicant" under the SAFAH program, the Report took "special account of the needs of homeless Native Americans . . . (2) by making an Indian tribe an eligible recipient in the . . . Supplemental Assistance [SAFAH] program." H. Conf. Rep. No. 174, 100th Cong., 1st. Sess. 66 (1987) (Emphasis added).

Thus, the way in which Congress tried to accommodate the needs of homeless Native Americans was to include Indian tribes, along with such other entities as cities, counties, and states, in the definition of "applicant." By this means, an Indian tribe, as well as each of the other named entities, may be "an eligible recipient" and may compete for SAFAH grants. This strongly suggests that Congress did not intend that HUD, through its notices, could render Indian tribes, or any of the other "eligible recipients," ineligible to apply for SAFAH grants, while restricting such eligibility to states alone.⁴

The prospect that each entity identified in the definition of "applicant" might be entitled to apply for grant funds does not, of course, suggest that HUD lacks authority to determine which applicants are selected for award. See, 42 U.S.C. Sub Sec. 11392(b) (1) and (d). Indeed, the statute provides HUD explicit, albeit limited, authority to exclude certain applicants. It may exclude prospective applicants according to its judgment of the applicants' financial responsibility, and it may exclude those whose applications do not conform to the form and informational content prescribed by HUD. 42 U.S.C. Sec. 11932 (c).

However, under the language of the definition section itself, the determination of the classes of entities that are to be "applicants" appears to have been established within the statute, itself. That section states that

⁴Nor is there any assurance that an Indian tribe, even if it were to submit an outstanding proposal, would receive a contract from a state. Indeed, the state in which the tribe was located might not even apply for funds.

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the term applicant “means a State, metropolitan city, urban county, governmental entity, tribe, or private nonprofit organization. . .” (Emphasis added.) The statute does not use an open-ended term such as “includes,” which might be read to imply HUD authority to expand the list of named classes of entities beyond those specified in the statute. Nor does it use the more restricted term “is limited to,” which might be read to imply HUD authority to contract that list. Rather, the statute uses the unequivocal word “means,” which suggests that the defined term means neither more nor less than those classes of entities specified in the definition.

Conclusion

For the foregoing reasons, we have concluded that, while the statute provides HUD with certain limited authority in determining who may be an “applicant,” HUD lacks authority to confine eligibility to apply for SAFAH grants to states alone. Indeed, the statute does not authorize HUD to play any role in making the threshold determination of which otherwise qualified entities may submit applications. HUD may neither expand nor contract the list of entities that qualify as “applicants” under the statute. The language that Congress employs—and the language Congress does not employ—in the definition section, as well as the legislative history, support the conclusion that this determination is dictated by the statute.

Description of SAFAH Grantees Visited

Washington-Green Community Action Corporation

The Washington-Green Community Action Corporation (WGCAC) is a private nonprofit corporation located in Washington, Pennsylvania. WGCAC was awarded a SAFAH grant of \$260,443 to assist in rehabilitating two transitional housing properties and to provide comprehensive services for five years. The grant was to serve 12 families with children as well as 6 individuals at once and to provide needed services to allow those families and individuals to move into permanent housing.

WGCAC originally submitted the application to the Department of Housing and Urban Development (HUD) under the Transitional Housing Demonstration Program. Because the application was submitted after the transitional housing deadline, HUD suggested that WGCAC revise the application and submit the package under the SAFAH program. Because of the program change, HUD disallowed the rehabilitation monies and approved the SAFAH grant for comprehensive services only. As a result, WGCAC started its renovations and then asked HUD headquarters if the agency could reallocate a portion of the operating funds to pay for the renovation. After the program was decentralized to the field offices, HUD's Pittsburgh field office visited WGCAC on June 29, 1990, agreed that the reallocation was necessary; and submitted a recommendation to HUD headquarters. HUD headquarters gave the field office the authority to approve the amendment, which it did on May 1, 1991.

According to a quarterly progress report submitted by WGCAC, 10 families had been served in both properties from July 1, 1990, through June 30, 1991. During our visit in September 1991, four families were occupying the property located in Washington, Pennsylvania. We did not visit the other facility. As of April 1992, \$257,000 had been disbursed from the total grant amount.

Volunteers of America - Louisville, Kentucky

The Volunteers of America (VOA) of Louisville, Kentucky, received a \$562,600 grant for 5 years to provide comprehensive support services to families with children in a 16-apartment transitional housing project. VOA later increased the size of some of the apartments and decreased the number of available units from 16 to 13 apartments. Specifically, the grant included salaries and fringe benefits for two full-time and one part-time counselors, and it provides equipment and supplies for recreational programs, child care, health services, transportation, and building security services. The grant allowed VOA to expand its transitional housing services in Louisville. The rehabilitation costs were funded equally by a HUD

**Emergency Shelter Grant and Community Development Block Grant,
matching funds from the city of Louisville.**

The project is located on the campus of Holy Cross School. The VOA sub-leased part of the campus and converted the school building into 10 3-bedroom and 2 2-bedroom transitional housing units and a manager's apartment. In February 1991, the VOA staff asked HUD to allow VOA to reallocate SAFAH monies to provide services to homeless families in other transitional housing facilities. HUD headquarters approved the change in September 1991, primarily because the activities covered by the SAFAH monies did not change.

Our visit to the project in September 1991 showed that the transitional housing apartments were being adequately maintained and fully occupied. The shelter's child care facility, located in a separate building, was airy and bright, and it provided a nurturing environment for the children. As of April 1992, \$349,789 had been disbursed from the total grant.

**The Department of Human
Services - City of St. Louis,
Missouri**

The Department of Human Services (DHS) is responsible for coordinating the needs of the homeless population for the city of St. Louis. DHS, together with some nonprofit organizations, received a SAFAH grant in the amount of \$620,995. The grant was awarded to supplement existing services focusing on crisis intervention and transition to permanent housing. Specifically, the funds support programs to provide preshelter outreach services, provide relocation assistance and supportive services, rehabilitate a gym to provide seven additional transitional housing bedrooms to families with children, and furnish rental assistance to 500 families to ease entry into permanent housing.

The DHS subgranted with three different nonprofit service providers to implement the SAFAH grant. During our visit, the DHS told us that the SAFAH administrative funding had run out in August 1989, and the person hired to monitor the subgrantees had left. DHS also indicated that the progress reports that they are required to submit to HUD were less detailed as a result.

The Regional Homeless Coordinator from Kansas City visited the transitional housing portion of the project on February 20, 1991, and noted that the subgrantees was meeting its goals and objectives. The St. Louis field office visited the same transitional housing project and noted that the original purpose had changed from serving families with children to

servicing families headed by women with drug abuse problems and their children. The field office asked that DHS amend the agreement with the subgrantee to reflect this change.

Our visit in October 1991 revealed that DHS had reallocated their rental assistance to the other subgrantee due to staff turnover, and this delayed the completion of program activities. DHS appeared to be meeting its goals and objectives. As of March 19, 1992, all monies had been disbursed from the total grant amount.

**Archdiocesan Housing
Authority - Seattle,
Washington**

The Archdiocesan Housing Authority (AHA), a secular nonprofit organization affiliated with Catholic Charities of the Archdiocese of Seattle, received a \$938,091 SAFAH grant to acquire and substantially rehabilitate the Westlake Hotel, and to provide food, counseling, and security services to elderly men. The 5-year SAFAH grant will allow AHA to pay the salaries of two resource counselors, a food coordinator, and desk security, in order to permanently house 53 elderly men. The SAFAH grant increased AHA's ability to leverage other funds for the project, which cost approximately \$3 million.

A quarterly progress report stated that the hotel opened in October 1988 and was providing services to the clients. HUD's Seattle field office visited the project twice—in April 1990 and April 1991—and reported each time that AHA was meeting its goals and objectives and complimented AHA on a well-managed project.

Our visit to the project in November 1991 revealed that 52 elderly men were in residence, services were being provided, and security was in place. The hotel was spotless, bright and appeared to be well-managed. As of April 1992, \$705,671 had been disbursed.

**Metropolitan Dade County
- Miami, Florida**

HUD awarded a \$345,145 SAFAH grant to Metropolitan Dade County, located in Miami, Florida to provide comprehensive services to serve women with children in an emergency shelter. Metro-Dade subcontracted with Miami Mission Association, a nonprofit organization, to hire staff to provide rental assistance, job placement training, and provide the necessary equipment and materials to educate and train clients to re-enter society. The shelter had been rehabilitated earlier through HUD's Emergency Shelter Grant Program.

HUD's Jacksonville field office visited Metro-Dade for the Emergency Shelter Grant, but did not visit the project for the SAFAH grant. By the time the field office assumed responsibility for the SAFAH grant, Metro-Dade had only \$16,000 remaining to draw down, and the field office said that it assumed the project was monitored by Headquarters.

Since it is Metro-Dade's policy not to let their subcontractors draw down money when the contract has expired, the subcontractor, Miami Mission, requested two time extensions to spend the money. Metro-Dade sent the request directly to HUD headquarters for approval.

Metro-Dade certified to HUD's Jacksonville field office that Miami Mission's final report dated November 30, 1990, which stated that over 23,800 women and children had been served, was correct and complete and all funds had been expended in accordance with the grant agreement. The field office formally closed the grant out in September 1991. During our visit to Miami Mission in November 1991 there were staff available to assist the clients and classes in progress.

SAFAH Grants for Fiscal Years 1987 and 1990

Table IV.1: SAFAH Grants for Fiscal Year 1987

Grantee	Dollar amount	Grant approval date	Objective
City of Birmingham, Ala.	\$167,476	2/24/88	Renovate administrative building; hire 6 staff members to provide services
Nosotros, Inc., Tucson, Ariz.	403,350	2/9/88	Acquire 12-unit apartment complex to be used as emergency/ transitional housing for families with children; purchase furnishings
Black River, Pochontas, Ark.	14,583	2/12/88	Moderate rehabilitation of 2 shelter units; provide supportive services to families/individual
Alameda County, Hayward, Calif.	586,564	3/1/88	Provide transitional housing shelter and permanent sober housing
Tri-Valley, Livermore, Calif.	26,051	2/23/88	Hire employment counselor and provide job readiness training
Ford Street Project, Ukiak, Calif.	422,741	2/23/88	Rehabilitate existing emergency shelter to include 4 transitional apartments; provide supportive services
LA Family Housing Corp., Los Angeles, Calif.	300,000	2/24/88	Hire 4 staff members to provide case management and child care services to families
City of Santa Monica, Calif.	179,437	2/12/88	Rehabilitate facility to serve as an advocacy center; provide supportive services
Warren Village, Inc., Denver, Colo.	321,064	2/9/88	Rehabilitate day care facility; expand transitional housing apartment; hire 4 staff for services
Harrington Homes, Denver, Colo.	150,000	2/27/89	Acquire and rehabilitate 5 homes for transitional housing shelter; provide services
City of Hartford, Conn.	63,366	2/12/88	Hire 2 housing counselors to help clients obtain permanent housing
Women in Distress, Ft. Lauderdale, Fla.	124,250	3/3/88	Renovate emergency shelter - add 20 clients; hire a counselor
Metro Dade County, Miami, Fla.	345,145	2/23/88	Hire staff; provide: childcare; rental assistance; employment training, stipends, and clothing allowance
YWCA of Jacksonville, Fla.	46,904	6/22/88	Hire instructor and 2 assistants to operate cultural program for 30 school-age children

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Progress report	Status^a	Population served	Dollars to target population	Percentage to target population
12/14/90 HUD monitoring - all funds audited; funds spent; grant terms satisfied	Closed out 4/19/91; met objectives	General population ^b	0	0
2/21/89 final report: project completed and operating 4/1/88; final audited statements 6/30/88	Disbursed, met objectives	Families with children	\$403,350	100
10-12/89 final report completed renovation; served 90 people	Disbursed, met objectives	Families with children individual (child care) ^b	0	0
7/1/ - 9/30/89 transitional housing program operational; 49 families and individuals in permanent housing	Operating; meeting objectives	Families with children and handicapped (alcohol problems)	351,938	60
4/1/ - 6/30/89 final report: hired employee counselor; 13 women entered program and 3 got jobs	Disbursed, met objectives	Women with children	26,051	100
4/1/ - 6/30/89 renovation started 3/22/89 - 20 families ready to move in to the 4 units by 8/15/89	Operating; meeting objectives	Families with children (child care)	422,741	100
4/1/ - 6/30/91 47 families served; case management and child care services provided	Disbursed, met objectives	Families with children (child care)	300,000	100
7/1/ - 9/30/89 facility operating 1/89; served 108 clients; 600 clients placed in temporary/permanent housing	Disbursed, met objectives	General population (child care)	143,352	80
1/1/ - 8/31/89 final report: apartments completed and occupied; 268 families served	Disbursed, met objectives	Single parents with children (child care)	321,064	100
8/15/91 annual report number of clients served; description of services provided; analysis of actual costs vs. budget	Disbursed, met objectives	Families with children	150,000	100
2 counselors started work on 9/26/88; 10/1/ - 12/31/89 final report: served 430 clients; placed 19 in permanent housing	Closed out, met objectives	General population ^b	0	0
10/1/ - 11/30/89 final report: rehabilitation work completed; new clients in place; hired counselor	Closed out, met objectives	Women with children	124,250	100
7/1/ - 8/31/90 final report: hired staff; provided services to 23,800 women and children; 10/10/91 - Jacksonville JAX field office closed out grant	Closed out, met objectives	Women with children (child care)	345,145	100
3/1/ - 5/31/89 final report; served 23 children; hired staff	Closed out, met objectives	Families with children (child care)	46,904	100

(continued)

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Grantee	Dollar amount	Grant approval date	Objective
Our House, Inc., Decatur, Ga.	182,035	2/9/88	Convert existing facility for 30-child day-care; hire staff to provide daycare/aftercare and health services
City of Atlanta, Ga.	158,232	3/15/88	Renovate school into transitional housing shelter; hire 2 staff directors
Southeastern Idaho, Pocatello, Idaho	46,060	2/23/88	Rehabilitate 88-unit emergency shelter for elderly; hire 2 managers, a coordinator, and clerk; provide childcare for families
Travelers and Immigrants Aid, Chicago, Ill.	353,884	2/9/88	Hire staff to provide services to 45 young adults/year at transitional housing project
A Safe Place, Waukegan, Ill.	50,000	6/27/88	Hire part-time advocate and counselor (1/2 salary) for child intervention program
Catholic Charities, Chicago, Ill.	344,253	2/24/88	Expand staff and services at 4 transitional housing shelters
Volunteers of America, Louisville, Ky.	562,600	3/18/88	Hire staff and provide services for transitional housing project
Dove, Inc., Quincy, Mass.	60,000	2/12/88	Hire housing/legal advocate and child care coordinator and advocate to expand services at existing shelter
City of Boston, Mass.	1,000,000	2/24/88	Provide shelter funding to numerous agencies and programs including rehabilitation and supportive services
St. Peter's Episcopal Church, Detroit, Mich.	376,238	7/7/88	Hire 2 staff to setup outreach program; provide supportive services
Women Shelter, Inc. Rochester, Minn.	22,673	6/27/88	Increase living affordability; increase supportive services
City of Kansas City, Mo.	214,065	2/23/88	Provide day care, recreational programs, and transportation for children; hire 3 case managers for parents

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Progress report	Status^a	Population served	Dollars to target population	Percentage to target population
4/1/ - 6/30/89 final report; 35 parents working because of day care; 56 children served; 154 medical exams	Disbursed, met objectives	Families with children (child care)	182,035	100
2/2/90 final report; Renovation completed; HUD regional office said operating and meeting objectives	Disbursed, met objectives	Families with children	158,232	100
4/1/ - 6/30/89 renovation completed; 1/1 - 3/31/89 final report staff hired; child-care provided	Disbursed, met objectives	Families with children (child care) elderly	46,060	100
8/23/91 HUD monitoring report: services being provided	Disbursed, met objectives	Young adults (18-21) ^b	0	0
4/1/ - 6/30/89 hired staff; classes averaged 6 families/week	Disbursed, met objectives	Families with children	50,000	100
7/1/ - 9/30/89 final report: 52 families received services; intake staff received requests for 835 clients; mental health services provided	Closed out, met objectives	Families with children (child care)	344,253	100
10/1/ - 12/31/90; 16 families served, 3 families got permanent housing; 10 adults were employed; 8/19/91 HUD monitoring report: meeting goals and objectives	Operating, meeting objectives	Families with children (child care)	562,600	100
1/1/ - 3/31/89- hired staff; 18 clients got permanent housing; child care advocate upgraded; 44 children got served	Disbursed, met objectives	Families with children (child care)	60,000	100
12/19/90 HUD monitoring report - all funded activities completed except 1	Disbursed, met objectives	Families with children elderly, handicapped (child care)	544,743	54.5
4/1-30/89 final report: 10 women admitted - 2 from outreach program; 46 ex-residents received services	Disbursed, met objectives	Teenage girls (child care) ^b	0	0
7/1/ - 9/30/88 - rents reduced; child care provided; meals provided	Closed out, met objectives	Women with children (child care)	22,673	100
7/1/ - 9/30/89 final report: 1 of 3 case managers resigned; serving families with children; 795 children served during grant period	Closed out, met objectives	Families With children (child care)	214,065	100

(continued)

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1988**

Grantee	Dollar amount	Grant approval date	Objective
City of St. Louis, Mo.	620,995	3/15/88	Rehabilitate gym for 7 transitional housing bedrooms; provide outreach services; hire 8 counselors to help clients obtain permanent housing; provide rental assistance
Family Self Help Center, Joplin, Mo.	437,705	2/9/88	Renovate facility; provide services to 10 additional families and children and expand daycare services
United Way-Nevada, Reno, Nev.	332,541	2/9/88	Hire staff to provide services to families with children - childcare vouchers, revolving loan fund, transportation, crisis hot line, and mental health
Human Resources Administration, City of New York, N.Y.	996,707	3/22/88	Staff drop-in center; provide meals
City of Newark, N.J.	881,329	2/24/88	Rehabilitate transitional housing projects; expand existing emergency shelters; provide staff and services
RECAP/ROI, Middletown, N.Y.	505,000	2/24/88	Acquire/rehabilitate 14 room hotel or transitional housing
The Sharing Community Inc., Yonkers, N.Y.	317,000	2/9/88	Hire staff to provide supportive services - childcare, security, and meals
Clackamas County, Oregon City, OR	58,590	2/24/88	Hire 3 staff to provide comprehensive assistance services
PA. Dept. Public Welfare, Harrisburg, Pa.	734,804	4/8/88	Acquire/rehabilitate 3 shelters; renovate/rehabilitate 4 shelters; provide operating funds for 5 shelters; provide housing assistance for 6 county families
Washington-Greene Community Action Corp., Washington, Pa.	260,443	3/22/88	Acquire/rehabilitate 2 transitional housing projects hire staff and provide services
Resource Center for Women, Aberdeen, S. Dak.	113,190	2/9/88	Various moderate rehabilitation projects; staff; rental assistance; child care provider
WO/Men's Resource & Rape Assistance Program, Jackson, Tenn.	74,100	2/12/88	Acquire emergency shelter for women and children of domestic violence; provide services including child care, rental assistance, hot line
Metro Health Dept., Nashville, Tenn.	391,696	2/23/88	Acquire/rehabilitate facility; hire staff and provide support services

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Progress report	Status^a	Population served	Dollars to target population	Percentage to target population
7/1/ - 9/30/89; transitional housing project is scheduled to start 10/89; 4/1/ - 6/30/90 - 674 received rent assistance grants; 4,981 families called to use the outreach services; 9/18/91 HUD monitoring report: field office visited transitional housing project - target population revised to serve women with drug-abuse problems and their children	Disbursed, met objectives	General population ^b	0	0
4/1/ - 6/30/90; all activities completed; services provided to 21 women and children	Disbursed, met objectives	Women with children (child care)	437,705	100
1/3/89 services provided: transportation, crisis hot line, revolving loan, childcare; staff working	Disbursed, met objectives	Families with children (child care)	332,541	100
10/1/ - 12/31/91 staff positions filled; out-reach team engaging an average of 10 clients/day, meals provided	Operating; meeting objectives	General population ^b	0	0
7/1/ - 9/30/90 rehabilitation and emergency shelter work completed; hired the staff	Disbursed, met objectives	Families with children individuals (child care) ^b	0	0
9/12/89 project completed 7/1/89; 15 family (full) occupancy	Disbursed, met objectives	Women with children	505,000	100
10/1/ - 12/31/89 staff hired; services provided; 230 meals served;	Disbursed, met objectives	Families with children (child care)	317,000	100
7- 9/88 hired staff; 11/14/89 final report: 55 families left the shelter	Closed out, met objectives	Families with children	58,590	100
8/31/90 final report; 6 of 7 projects got acquisition/ rehabilitation funds	Disbursed, met objectives	Families with children	734,804	100
6/29/90 HUD monitoring report: moderate rehabilitation work completed; 4/1- 6/30/91 18 families served and services provided	Operating; meeting objectives	Families with children/ individuals (child care)	195,332	75
1/1/ - 4/1/91 moderate rehabilitation on-going; rental assistance to 6 families; child care to 6 families; 27 women/29 children served	Operating; meeting objectives	Women with children (child care)	113,190	100
1 - 3/89 rehabilitation was completed; increased capacity from 4 to 5 families; 2 families assisted with rent; 168 crisis calls	Disbursed, met objectives	Women with children (child care)	74,100	100
8/1/ - 10/30/89 facility fully utilized; hired 4 staff to provide services	Disbursed, met objectives	General population (child care)	101,841	26

(continued)

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Grantee	Dollar amount	Grant approval date	Objective
Center for Battered Women, Austin, Tex.	500,000	2/24/88	Substantial rehabilitation to existing emergency shelter to increase capacity from 25 to 50 beds
State of Vermont, Montpelier, Vt.	232,804	2/12/88	Rehabilitate 2 properties; hire staff and provide services for 5 other projects
City of Alexandria, Va.	754,677	2/9/88	Acquire land to build homeless shelter
Archdiocesan Housing, Seattle, Wash.	938,091	2/24/88	Acquire/rehabilitate a hotel into 53-bed SRO; hire staff to provide food, counseling, and security services.
Covenant House, Inc. Charleston, W.Va.	26,250	6/22/88	Rehabilitate a day shelter to increase space
Community Relations, Milwaukee, Wis.	283,334	6/22/88	Services to assist homeless living in shelter obtain permanent housing
	\$ 14,980,227		

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Progress report	Status^a	Population served	Dollars to target population	Percentage to target population
10/27/89 status report: completed project on 10/17/89; serving 1,325 women/children per year	Disbursed, met objectives	Women with children	500,000	100
10/1/89 - 2/9/90 final report: rehabilitation, staff and services were reported for the 5 properties	Disbursed, met objectives	Families with children elderly (child care)	232,804	100
5/9/90 final report: Acquired land; 1/89 shelter completed; have 55 families with 95 helped children	Disbursed, met objectives	Families with children/ single individuals	458,618	60.77
4/1/ - 6/30/91- SRO opened 10/88, staff hired and services provided; 4/90 and 4/91 HUD monitoring report: meeting goals & objectives	Operating; meeting objectives	Elderly men	938,091	100
5/11/89 - rehabilitation complete	Disbursed, met objectives	General population ^b	0	0
7/1/ - 9/30/90 final report: 462 families and 39 elderly/handicapped received assistance locating permanent housing; 28 families received security deposit assistance	Disbursed, met objectives	Families elderly, handicapped	0	0
			\$ 9,819,072	

^aObjectives appear to have been met as stated in the grant agreements.

^bApplication does not separate dollars/percentages of target population.

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Table IV.2: SAFAH Grants for Fiscal Year 1990

Grantee	Dollar Amount	Objective	Population served	Dollars to target population	Percentage to target Population
Daystar House, Inc., Cullman, Ala.	\$46,644	Hire day care coordinator; contract out for: day care; medical exams; and transportation services	Women and children (child care)	\$46,644	100
Berkeley-Oakland Supportive Services, Berkeley, Calif.	472,275	Hire staff to expand services: case management; substance abuse counseling; parent/child program	Families with children	472,275	100
Catholic Charities, San Francisco, Calif.	746,656	Moderate rehabilitation of existing facility; provide childcare, job counseling, and housing assistance services	Families with children (child care)	746,656	100
Community of Hope, Washington, D.C.	147,000	Rehabilitate 26-unit apartment building for transitional housing; provide health, counseling, employment, and childcare services	Families with children (child care)	147,000	100
Coalition for Homeless Inc., Washington, D.C.	905,163	Moderate rehabilitation to 2 buildings; provide day care services to elderly and comprehensive services to families	Families with children; elderly men (child care)	905,163	100
Green Door, Inc., Washington, D.C.	360,000	Renovate existing transitional housing building; provide new and expanded services	Families with children; elderly (child care)	360,000	100
Associated Catholic Charities, Washington, D.C.	398,789	Renovate house for transitional housing and provide clients with case management, substance abuse counseling, and child care	Women with children (child care)	398,789	100
YWCA Lewiston-Clarkston, Lewiston, Idaho	301,063	Renovate the YWCA building; hire staff to expand services to provide child care services, counseling, health care, etc.	Families with children (child care)	301,063	100
Public Action to Deliver Shelter Inc., Aurora, Ill.	816,690	Substantial rehabilitation to transitional housing building; provide employment and job training, child care, and life enhancement skills services	General population* (child care)	0	0
Hawkeye Program, Cedar Rapids, Iowa	1,000,000	Lease facility; provide supportive services	Women with children (child care)	1,000,000	100
Shreveport SRO, Inc., Shreveport, La.	979,148	To access a network and intake/tracking system; provide day care, job training, and educational services	General population* (child care)	0	0
Elizabeth Stone House, Roxbury, Mass.	259,000	Hire staff to expand transitional housing services to include women substance abusers and children	Women with children	259,000	100

(continued)

**Appendix IV
SAFAH Grants for Fiscal Years 1987 and
1990**

Grantee	Dollar Amount	Objective	Population served	Dollars to target population	Percentage to target Population
County of Wayne, Detroit, Mich.	1,000,000	To hire staff and provide operating and supportive services to include case management, outreach, and medical services	Families with children	1,000,000	100
Family Self Help Center, Joplin, Mo.	404,210	Substantial rehabilitation on existing shelter; provide assessment counseling, education programs, health care, transportation, and day care services	Pregnant and parenting teens (child care)	404,210	100
Warren-Hamilton Housing, Corp., Indian Lake, N.Y.	368,014	Acquire/ rehabilitate 7-unit apartment complex for transitional housing; provide life skills, counseling services	Families with children	368,014	100
Greystone Family Inn, Yonkers, N.Y.	730,210	Provide childcare job training, employment, and counseling services	Families with children (child care)	730,210	100
WSOS Community Action, Fremont, Ohio	196,500	Acquire/ rehabilitate 5 homes to be used, then sold to families; provide case management, out patient health care, and limited child care	Families with children (child care)	196,500	100
Lane County Eugene, Oreg.	468,763	Moderate rehabilitate/ construction on family shelter housing; provide case management, health care, employment, child care, etc. services	Families with children (child care)	468,763	100
State of Rhode Island, Providence, R.I.	724,000	Rehabilitate existing property for homeless; hire coordinator	General population ^a	0	0
Volunteers of America, Knoxville, Tenn.	524,848	Substantial rehabilitation to an existing shelter; hire staff to provide case management, counseling, and child enrichment services	Families with children; single women ^a (child care)	0	0
\$	10,848,973		\$	7,804,287	

^aApplication does not separate dollars/percentages of target population.

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