Request for Local Nonprofit to Assume HUD Rapid Rehousing Grant
Issued by: Resilience: Advocates for Ending Violence
HUD Grant ID: MI0494L5F192409
Award Amount: $175,698
Grant Term: July 1, 2025 – June 30, 2026

Resilience was awarded FY2024 Continuum of Care (CoC) funding from HUD to continue a Rapid Rehousing program serving survivors of domestic violence in Ottawa County. While we strongly support housing as a key part of safety, we are unable to accept this year’s award due to legal conflicts between HUD’s required certifications and the state and federal confidentiality laws we must follow as a domestic and sexual violence agency. Rather than risk compliance issues or compromise survivor privacy, we’ve chosen not to enter into a new HUD contract this year.

We will continue to serve our current HUD-funded clients using private donations and alternate funding. These participants will remain with Resilience and will not transfer to a new agency. The organization that assumes the HUD grant would be responsible for enrolling and serving new participants.

HUD allows the funds to remain in the community if another eligible organization agrees to assume the project. We are seeking a local nonprofit that can take over as the lead agency for this award, and we are open to continuing in a supportive role focused on trauma-informed safety planning.

**About the Project**

* Population Served: Domestic violence survivors who are homeless or fleeing dangerous situations
* Model: Scattered-site Rapid Rehousing
* Capacity: Approximately 8 units
* Funding Breakdown:
	+ $174,600 – Rental Assistance
	+ $1,097 – Supportive Services
	+ $1 – Admin

Resilience’s original application was for 303,000 for 15 units. Our HUD representative has indicated to us the $1 in administration was placed there to open the line item, and that a line-item amendment request may be submitted after accepting the award.

**What You Need to Know About Data Collection**

If you are not a Domestic Violence agency, HUD still allows you to serve this population, but there are strict rules about data handling. HUD recognizes that survivor safety overrides standard documentation, and confidentiality protections under the Violence Against Women Act (VAWA) take priority:

* You cannot enter personally identifying information (PII) about survivors into HMIS or other shared systems
* Only aggregate, non-identifying data (like total served, age ranges, service types) should be reported
* Options for compliance:
1. HUD allows paper records or encrypted spreadsheets as a short-term option. HUD allows non-HMIS storage for very short periods only as a stopgap until a proper comparable system is in place. This would require:
* Physical files in a locked cabinet *and/or*
* Encrypted digital storage with strict access controls
* Detailed policies and procedures for safeguarding the data
1. An HUD HMIS Comparable database that:
* Is not connected to HMIS
* Does not allow other providers or CoC partners access
* Has VAWA-compliant privacy and security control

You do not need to hold or document details of someone’s domestic violence story to accept the grant. We’d like to confirm with HUD, but we believe referrals from Resilience may be sufficient.

**Steps to Assume the Grant**

HUD allows an awarded project to be transferred to another eligible organization. To do so, the following steps must be completed:

1. Confirm Eligibility: Your organization must be a 501(c)(3) or other HUD-eligible entity, registered in SAM.gov with an active Unique Entity Identifier (UEI).
2. Be in e-snaps: Create or update your agency’s applicant profile in HUD’s e-snaps system.
3. Notify the CoC Lead Agency: The Ottawa County CoC (Good Samaritan Ministries) must support the transfer and coordinate communications with HUD.
4. Request Transfer Approval from HUD:
The CoC or original recipient (Resilience) will submit a formal transfer request to HUD via the “Ask A Question” (AAQ) portal or through the local HUD Field Office. This request must:
	* Identify the new recipient
	* Confirm that the project scope will remain the same
	* Include confirmation that the new agency meets eligibility requirements
5. Submit a New Project Application (if requested): HUD may ask the new agency to submit a replacement project application in e-snaps referencing the original grant.

Resilience and the Lakeshore Housing Alliance are also seeking technical assistance from the National Network to End Domestic Violence and MCAH for further guidance on how to ensure a transfer process would align with HUD regulations and survivor confidentiality standards.

**Interested?**

If your organization is interested in assuming this project, please reach out as soon as possible. Time is limited, and HUD approval must be secured before the funds can be reassigned.

Thank you for the work you do every day to prevent and end homelessness in our community. We want to see these resources stay local, where they’re needed most. Thank you for considering this opportunity to ensure survivors in Ottawa County don’t lose access to housing and support.