

**DEPARTMENT OF HOUSING AND  
URBAN DEVELOPMENT**

**Office of the Assistant Secretary for  
Public and Indian Housing**

[Docket No. FR-3920-N-01]

**Notice of Funding Availability for  
Training and Technical Assistance for  
Public Housing Resident Patrols**

**AGENCY:** Office of the Assistant Secretary for Public and Indian Housing, HUD.

**ACTION:** Notice of Funding Availability (NOFA) for Training of Trainers and Technical Assistance for Public Housing Resident Patrols.

**SUMMARY:** This NOFA announces funding available up to \$500,000 for the development and implementation of technical assistance and training for resident patrols in public and Indian housing. The U.S. Department of Housing and Urban Development is seeking proposals for one or more Grant(s) to be executed through Cooperative Agreement(s) to develop and implement training, technical assistance (TA) and TA instruments. The purpose of this assistance is to provide state-of-the-art resident patrol training and TA to housing authority staff, residents, Resident Councils (RC), Resident Management Corporations (RMC), housing authority security staff, and local law enforcement personnel.

**DATES:** Proposals must be received at HUD Headquarters at the address below on or before 3 pm, Eastern Daylight Time, August 24, 1995. This application deadline is firm as to date and hour. In the interest of fairness to all competing applicants, the Department will treat as ineligible for consideration any application that is received after the deadline. Applicants should take this practice into account and make early submission of their materials to avoid any risk of loss of eligibility brought about by any unanticipated or delivery-related problems. Applications received after the deadline will not be considered.

**APPLICATION SUBMISSION:** There is no application kit for this grant application submission. All applications should be submitted with the required tabs and Federal forms. Copies of the forms are available from the contact listed below.

An original and two copies of the application must be sent to the Crime Prevention and Security Division, Office of Community Relations and Involvement, Public and Indian Housing, Department of Housing and Urban Development, Room 4116, 451

Seventh Street, SW, Washington, DC 20410. Facsimile ("FAX") applications are not acceptable.

**FOR FURTHER INFORMATION CONTACT:** Elizabeth A. Cocke, Crime Prevention and Security Division, Office of Community Relations and Involvement, Public and Indian Housing, Department of Housing and Urban Development, Room 4116, 451 Seventh Street, SW, Washington, DC 20410, telephone (202) 708-1197. A telecommunications device for hearing or speech impaired persons (TDD) is available at (202) 708-0850. (These are not toll-free telephone numbers.)

**SUPPLEMENTARY INFORMATION:**

**Paperwork Reduction Act Statement**

The information collection requirements contained in this NOFA have been submitted to the Office of Management and Budget (OMB) for review under the Paperwork Reduction Act of 1980 and have been assigned OMB control number 2577-0197.

**I. Purpose and Substantive Description**

(a) *Purpose.* The U.S. Department of Housing and Urban Development is seeking proposals for one or more Grant(s) to provide resident patrol training and technical assistance in public housing. The purpose of this training is to develop and provide state-of-the-art training and technical assistance to housing authority management and security staff, residents, Resident Councils (RC), Resident Management Corporations (RMC), and local law enforcement personnel in their development and implementation of volunteer resident patrols. Recipients of the TA and training should be better able to implement volunteer resident patrols in their authorities and developments.

(b) *Authority.* This Grant is authorized under Chapter 2, Subtitle C, Title V of the Anti-Drug Abuse Act of 1988 (42 U.S.C. 11901 *et seq.*), as amended by Section 581 of the National Affordable Housing Act of 1990 (NAHA), approved November 28, 1990, Pub. L. 101-625, and section 161 of the Housing and Community Development Act of 1992 (HCDA 1992) (Pub. L. 102-550, approved October 28, 1992).

The Departments of Veterans Affairs and Housing and Urban Development, and Independent Agencies Appropriations Act 1995, (approved September 28, 1994, Pub. L. 103-327), (95 App. Act) appropriated \$290 million for the Drug Elimination Program of which \$10 million, a portion of which is made available through this NOFA, will be used for funding drug

elimination technical assistance and training.

(c) *Award mounts.* This NOFA makes a total amount of \$500,000 available for one or more cost reimbursable grants.

(d) *Objectives.* The Department's overall objectives in awarding this Grant are to build upon the initial TA and training grant awarded by the Department in 1994. Successful applicants for this grant award must design, develop and administer a variety of resident patrol TA and training instruments that will have functional use beyond the period of this grant, and that will assist public and Indian housing authority staff and residents, and local law enforcement officers. Specifically grantees must:

(1) Use and build on HUD's past successful Resident Patrol TA and training. A copy of the training curriculum for FY 1994 will be available for review at HUD's Community Relations and Involvement Clearinghouse, telephone 1-800-578-3472.

(2) Provide training and technical assistance using state-of-the-art techniques which can be easily transferable and replicable to assist housing authority staff and residents in understanding and implementing Resident Patrols. The media could include but is not limited to on-site visits, printed materials, "fact sheets", "how-to" technical material, training material and training meetings, videos, or other instruments.

(3) Design and develop a series of TA instruments for housing authority staff and residents on issues specific to Resident Patrol implementation. These include but are not limited to:

(i) Increasing the number of residents participating in volunteer resident patrols;

(ii) Increasing the number of successful patrols;

(iii) Improving the administration and active membership of existing patrols;

(iv) Improving coordinated administration by resident groups, housing authorities, and police departments, and

(v) Increasing the number of and quality of state-of-the-art TA and training instruments and media available to HA staff and residents interested in developing or improving their patrols.

(4) Design and develop an impact/process evaluation methodology for HA staff and residents to use in measuring their progress after implementing resident patrols.

(5) Successfully complete all tasks within a 24 month period and within budget.

(e) *Scope of work.*

(1) *General Requirements.*

(A) The grantee shall furnish all necessary personnel, materials, services, and equipment and shall otherwise do all things necessary for, or incidental to, the performance of the tasks set forth in this Statement of Work.

(B) The work to be performed under this Grant includes, but is not limited to: A brief report on the current status of the administration and effectiveness of current resident patrols in public housing, especially those formed and operating in the past twelve months; the development, dissemination and implementation of several tools for TA and training. In addition, the grantee shall attend one or more meetings at HUD Headquarters for the purpose of discussing HUD's comments pertaining to the grantee's services.

(2) *Specific Requirements.* The grantee shall perform the following tasks in accordance with the objectives and general scope of the Grant.

#### TASK 1—Orientation

Within the first week after the effective date of the Grant, the Project Director and other key personnel shall attend a meeting at HUD Headquarters in Washington, DC, for the purpose of establishing a common understanding and strategy with respect to the Grant objectives, the scope of work necessary to achieve the objectives, the time frame, methodology, and deliverables.

#### TASK 2—Management and Work Plan

The grantee shall develop a draft management and work plan that addresses all of the requirements contained in the approved Grant strategy and provide an updated and detailed work plan for the entire project. This draft plan shall be submitted to the HUD Government Technical Representative (GTR) for review and comment by the end of the second week of the Grant, setting forth the timing of all stages of the project, describing the training techniques, materials, and experiences of trainers for this project. The plan shall include a detailed allocation of Grant resources and a schedule for the accomplishment of the Grant work. HUD shall submit its comments and suggestions to the grantee within one week from receipt of the draft plan. A Final Management and Work Plan incorporating HUD's comments and suggestions shall be submitted by the end of the 5th week of the Grant.

#### TASK 3—Review of Resident Patrols and Other TA and Training Current in Public Housing

The grantee will review a variety of available documents, and work with previous grantees, HA staff, residents and law enforcement personnel to identify issues involving resident patrols and TA and training. The review should include housing authorities and resident councils with new resident patrols, Public Housing Drug Elimination Program (PHDEP) grantees with funds designated for training and implementing volunteer Resident Patrols, and former PHDEP grantees. The review should concentrate on learning from housing authority staff, residents and law enforcement personnel what they consider the most useful forms of resident patrol TA.

At a minimum the grantee should address the following issues:

- (1) Outlining and understanding the role of the participants;
- (2) Identifying available funding resources;
- (3) Recruiting, screening and organizing patrol members;
- (4) Curriculum and training of patrol members;
- (5) Written policies, practices and procedures;
- (6) The working relationships and necessary communications between patrols and local law enforcement agencies;
- (7) Patrol techniques; insurance and legal issues;
- (8) Department of patrol members;
- (9) Clothing and equipment needs;
- (10) Community relations;
- (11) How to train new members;
- (12) Group cohesion and group dynamics;
- (13) Action planning;
- (14) Team decision-making processes;
- (15) Conflict management;
- (16) Impact/process evaluation.

The grantee should also work with HAs and other interested parties to identify TA, training, and TA instruments from a variety of media, especially those which can continue to be of use after the end of the grant. The grantee will confer with several Clearinghouses which disseminate TA material, as well as other training organizations for public housing staff and residents, and law enforcement, to identify popular, useful and cost-effective media for TA and training. This could include on-site visits, printed materials, "fact sheets", "how-to" technical material, training material and training meetings, videos, or other instruments.

#### TASK 4—Revision of TA and Training Plan

HUD and the grantee will work to incorporate into the original plan any new issues, or TA and training techniques identified during the review and develop a revised action plan for the grant. The revised plan will be made available to the GTR for comment and approval, and will incorporate HUD's comments and suggestions. The grantee must submit any revised budget, plan and timetable by Week 12 of the Grant. The GTR will work with the grantee to approve a revised budget, plan and timetable no later than Week 14 of the Grant.

#### TASK 5—Choosing HAs for Targeting TA and Training

The grantee shall define the target audience, including any specific HAs, for all TA, training and related TA instruments. All TA, training and TA instruments must address issues in a comprehensive manner, including issues raised by HA staff, residents, local law enforcement and other parties involved in the training, development and implementation of Resident Patrols. Additionally, any HA participating in the TA or training must establish a team including three to five members representing housing authority staff, residents and law enforcement. HA teams participating in the TA and training should demonstrate their commitment and ability to use the TA or training at their own developments.

#### TASK 6—Develop and Administer Resident Patrol Training Workshops, TA, and TA Instruments

From the plan revised in Task 4, and approved by the GTR, the grantee will begin and complete the administration and implementation of the TA, training and TA instruments identified as most effective for the issues and problems identified. This will be provided to the HA teams specified in Task 5.

Training, TA and the use of TA instruments will be provided to the HA teams from selected housing authorities using the TA, training and TA instruments identified in the plan. For any training, the grantee will submit a list of proposed training sites, and HUD and the grantee will choose the final list of training sites. Attendees will be responsible for their own travel, lodging and per diem costs. The grantee will be responsible for all costs associated with facilities, training materials, and training staff costs of travel, lodging and per diem at non-governmental rates. All provision of TA and training must begin no later than week 22.

For any training, the grantee will provide printed materials, or if required, curriculum, instructor manual, participant manual, student materials, and state-of-the-art videos and other supporting student aids for each of the elements addressed above.

As part of each training or TA, the attendees shall have developed a specific plan of action for using the TA, training or TA instrument in their public housing community.

#### TASK 7—Analysis, Evaluation and Reporting

The grantee will develop an evaluation instrument for each of the TA and training instruments developed. This will be used to assess the effectiveness of each of the instruments. The draft evaluation form for each instrument shall be provided to the GTR for review and comments. The GTR's comments will be provided to the grantee and incorporated into the final product(s).

(f) *Eligibility.* Organizations that can demonstrate experience with successful implementation and continuation of resident patrols, working with public and Indian housing authorities and resident groups, and in resident training programs are eligible to apply.

(g) *Application submission requirements.* (1) Applicants must submit a completed Application for Federal Assistance (Standard Form 424). The SF-424 is the face sheet for the application. Applicants must also submit a Standard Form 424A (Budget Information), including a program narrative, a detailed budget with budget narrative with supporting cost analysis and legal and accounting services.

(2) Application format requirements. The application must be no longer than 25 pages, excluding attachments (e.g. resumes, certifications, etc.). All materials must be typewritten, single-spaced, with type no smaller than 10 cpi, on 8.5" by 11" paper, with at least 1" margins on all sides and printed on one side only. Each application must include the items listed in the following format:

(a) Cover letter.

(b) Tab 1—Standard Form 424, Application for Federal Assistance.

(c) Tab 2—Standard Form 424A, Budget Information with attached program narrative. Applicants must provide a budget with detailed justification for all costs, including the basis for computation of these costs. The program budget must be complete, reasonable, and cost-effective in relation to the proposed program. This explanation must include the applicant's financial capability, i.e., the

fiscal controls and accounting procedures which assure that Federal funds will be accounted for properly. Applicants must demonstrate that they have the financial capability to effectively implement a project of this size and scope.

(d) Tab 3—Organizational Qualifications. Applicants must fully describe their organizational structure and staff size, and demonstrate that they are sufficient to effectively implement a project of this size and scope. Applicants should outline a list of housing authorities where similar activities were conducted, the dates and numbers of persons involved, any current points of contact, and the results of any evaluations of the work.

(e) Tab 4—Staff Qualifications. Applicants must fully describe the capabilities and work experience of the proposed director, and all key staff. Applicants must fully describe their knowledge and experience with the proposed activities, preferably in public housing. Applicants should have successful experience in working with persons with disabilities and with persons from diverse ethnic and racial backgrounds. Applicants must include a staffing plan to fulfill the requirements of the statement of work, including staff titles, related work and educational background, experience, and skills of the director and the staff; and the time each will be required to contribute to the project. Applicants must provide a short list of names and current phone numbers of individuals or firms for which the proposed project director has previously accomplished work.

(f) Tab 5—Project Experience. Applicants must fully describe prior experience in designing and delivering TA, training and TA instruments. Applicants must demonstrate that their organization, staff size, and prior experience is sufficient to effectively implement a project of this size and scope. Applicants should outline a list of housing authorities or other sites where similar training was offered, the dates of the training, numbers of persons trained, any current points of contact, and the results of any evaluations of the training and TA.

(g) Tab 6—Implementation Plan. Applicants must submit a plan outlining the major activities of each task and describe how available resources will be allocated. The plan must include an annotated organizational chart depicting the roles and responsibilities of key organizational and functional components and a list of key personnel responsible for managing and implementing the major elements of the program. There must be a time-task plan

which clearly identifies the major milestones and products, organizational responsibility, and schedule for the completion of activities and products. The plan must discuss how the proposed activities reflect a knowledge of the subject and the target populations (including persons from diverse ethnic/racial backgrounds and persons with disabilities), and how the applicant plans to take into account any minor or major changes in the timetable that might result from the review of the issues outlined in Task 3 above.

(h) Tab 7—Representations, certifications, and other statements of offerors or quoters.

(i) HUD Form 2880—Applicant Disclosure Report.

(ii) SF-LLL Disclosure of Lobbying Activities.

(iii) Certification Regarding Drug-Free Workplace Requirements.

(iv) Prior to award execution, a successful applicant must submit a certification that it will comply with:

(A) Section 3 of the Housing and Community Development Act of 1968, Economic Opportunities for Low and Very-Low Income Persons (12 U.S.C. 1701u), and with implementing regulations at 24 CFR part 135. Section 3 requires, that to the greatest extent feasible, opportunities for training and employment arising in connection with housing rehabilitation, construction or other public construction projects be given to lower income residents within the metropolitan area (or nonmetropolitan county) and for contracts for work to be performed in connection with the housing rehabilitation, construction or other public construction project be awarded to eligible businesses that provide economic opportunities for low and very-low income persons residing within the metropolitan area (or nonmetropolitan county) in which the assistance is expended;

(B) Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d–2000d–4) (Nondiscrimination in Federally Assisted Programs) and implementing regulations issued at 24 CFR part 1; and

(C) The prohibitions against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101–07) and implementing regulations at 24 CFR part 146, and the prohibitions against discrimination against persons with disabilities under section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8.

(h) *Selection criteria.* The Department will review and rate proposals according to the extent to which they meet the following criteria, and will

make an award to the applicant that best meets all of the below criteria and receives the highest score out of a possible 100 points divided according to the criteria listed below:

(1) Corporate/Organizational Management Qualifications (20 points).

(i) Organizational Structure (10 points). Applicants must concisely describe how their organizational structure, staff size, financial reporting capacity and internal controls will maximize successful implementation of the tasks described in this notice.

(ii) Administrative Experience (10 points). Applicants must demonstrate their experience in the successful administration of programs of a similar budget and staff size. (10 points)

(2) Staff Qualifications (20 points).

(i) Project Director (10 points). Applicants should provide a project director with the experience and capacity to manage the budget and staff of the proposed grant, showing evidence of the ability to successfully complete proposed activities on-time and within budget. The project director must also have demonstrated experience in working with the public housing and law enforcement communities.

(ii) Project Staff (10 points). Applicants should provide staff with the experience and capacity to quickly and efficiently organize and implement the TA and training. Staff must have demonstrable experience in working with public housing staff and residents (including persons from diverse ethnic/racial backgrounds and persons with disabilities), especially in the implementation of resident patrols. The applicant must demonstrate how such staff experience will result in the ability to understand and resolve any issues (including those issues identified through the completion of Task 3) arising from the implementation of tenant patrols in public housing.

(3) Project Experience (20 points).

(i) Applicants must be able to demonstrate maximum knowledge and experience in developing and implementing needs assessments with public housing staff and residents, and law enforcement, showing previous success in matching identified needs to the type of TA and training provided (10 points).

(ii) Applicants must demonstrate experience with and understanding of the target population and of resident patrols. (10 points).

(4) Quality of the Plan (40 points).

(i) Applicants must propose tasks, timetable and staff assignments for the proposed activities that reflect an understanding of the current needs of public housing communities in the

development of resident patrols, and that will minimize revisions to the budget, plan and timetable outlined in Task 2. The activities proposed by the grantee must evidence an understanding of the diversity of public housing staff and residents. (20 points).

(ii) Applicants must propose TA, training and TA instruments that demonstrate maximum understanding of the current needs of public housing communities in the development of resident patrols, and which are cost-effective and state-of-the-art (20 points).

(i) *Review process.* Applications submitted in response to this competitive announcement will be reviewed by a panel of HUD representatives, which will make recommendations to the Assistant Secretary for Public and Indian Housing, Department of Housing and Urban Development. The panel will assign numerical values based on the weighted selection criteria. In the case of a numerical tie, preference will be given to the applicant with the highest numerical score for the Quality of the Plan. The final award will be made by the Assistant Secretary for Public and Indian Housing, Department of Housing and Urban Development. Letters will be sent to all applicants notifying them that their proposal has been selected or the reason(s) it was not selected. HUD will then negotiate specific terms of the award with the selected applicant.

(j) *Administrative requirements.*

(1) *Award Period.* The Grant(s) will be cost-reimbursable and awarded for a 12 to 24 month base period. HUD has the option to extend the Agreement for an additional year(s), subject to the grantee's performance, and the availability of funding.

(2) *Cooperative Agreement.* After the application has been approved and the grant awarded, HUD and the applicant shall enter into a Cooperative Agreement (Form HUD-1044) setting forth the amount of the Cooperative Agreement and its applicable terms, conditions, financial controls, payment mechanism/schedule, and special conditions.

(k) *Other matters.*

*Environmental Impact.* A Finding of No Significant Impact (FONSI) with respect to the environment has been made in accordance with the Department's regulations at 24 CFR part 50 which implement section 102(2)(C) of the National Environmental Policy Act of 1969 (42 U.S.C. 4332). Since the FY 1995 NOFA is substantially identical to the FY 1994 NOFA, the FY 1994 FONSI is appropriately applicable to the FY 1995 NOFA. This FONSI is available for public inspection between 7:30 a.m.

and 5:30 p.m. weekdays at the Office of the Rules Docket Clerk, Room 10276, Department of Housing and Urban Development, 451 Seventh Street, SW., Washington, DC 20410.

*Federalism Impact.* The General Counsel, as the Designated Official under section 6(a) of Executive Order 12612, *Federalism*, has determined that the policies contained in this NOFA will not have substantial direct effects on States or their political subdivisions, or the relationship between the Federal government and the States, or on the distribution of power and responsibilities among the various levels of government and, therefore, the provisions of this rule do not have "federalism implications" within the meaning of the Order. The NOFA makes funds available to help housing authorities organize and train tenant patrols. As such, it would help housing authorities combat serious drug-related crime problems in their developments, thereby strengthening their role as instrumentalities of the States.

*Family Impact.* The General Counsel, as the Designated Official for Executive Order 12606, *The Family*, has determined that the provisions of this NOFA have the potential for a positive, although indirect, impact on family formation, maintenance and general well-being within the meaning of the Order. As such, this NOFA is intended to improve the quality of life of public and Indian housing development residents, including families, by reducing the incidence of drug-related crime.

#### **Section 102 HUD Reform Act— Documentation and Public Access Requirements; Applicant/Recipient Disclosures**

*Documentation and public access.* HUD will ensure that documentation and other information regarding each application submitted pursuant to this NOFA are sufficient to indicate the basis upon which assistance was provided or denied. This material, including any letters of support, will be made available for public inspection for a five-year period beginning not less than 30 days after the award of the assistance. Material will be made available in accordance with the Freedom of Information Act (5 U.S.C. 552) and HUD's implementing regulations at 24 CFR part 15. In addition, HUD will include the recipients of assistance pursuant to this NOFA in its **Federal Register** notice of all recipients of HUD assistance awarded on a competitive basis. (See 24 CFR 12.14(a) and 12.16(b), and the notice published in the **Federal Register** on January 16, 1992 (57 FR

1942), for further information on these requirements.)

**Disclosures.** HUD will make available to the public for five years all applicant disclosure reports (HUD Form 2880) submitted in connection with this NOFA. Update reports (also Form 2880) will be made available along with the applicant disclosure reports, but in no case for a period less than three years. All reports—both applicant disclosures and updates—will be made available in accordance with the Freedom of Information Act (5 U.S.C. 552) and HUD's implementing regulations at 24 CFR part 15, subpart C, and the notice published in the **Federal Register** on January 16, 1992 (57 FR 1942).

### Section 103 HUD Reform Act

HUD's regulation implementing section 103 of the Department of Housing and Urban Development Reform Act of 1989 was published May 13, 1991 (56 FR 22088) and became effective on June 12, 1991. That regulation, codified as 24 CFR part 4, applies to the funding competition announced today. The requirements of the rule continue to apply until the announcement of the selection of successful applicants.

HUD employees involved in the review of applications and in the making of funding decisions are limited by part 4 from providing advance information to any person (other than an authorized employee of HUD) concerning funding decisions, or from otherwise giving any applicant an unfair

competitive advantage. Persons who apply for assistance in this competition should confine their inquiries to the subject areas permitted under 24 CFR part 4.

Applicants who have questions should contact the HUD Office of Ethics (202) 708-3815. (This is not a toll-free number.) The Office of Ethics can provide information of a general nature to HUD employees, as well.

### Section 112 HUD Reform Act

Section 13 of the Department of Housing and Urban Development Act contains two provisions dealing with efforts to influence HUD's decisions with respect to financial assistance. The first imposes disclosure requirements on those who are typically involved in these efforts—those who pay others to influence the award of assistance or the taking of a management action by the Department *and* those who are paid to provide the influence. The second restricts the payment of fees to those who are paid to influence the award of HUD assistance, if the fees are tied to the number of housing units received or are based on the amount of assistance received, or if they are contingent upon the receipt of assistance. Section 13 was implemented by final rule published in the **Federal Register** on May 17, 1991 (56 FR 22912). If readers are involved in any efforts to influence the Department in these ways, they are urged to read the final rule, particularly the examples contained in Appendix A of the rule.

### Prohibition Against Lobbying Activities

The use of funds awarded under this Cooperative Agreement is subject to the disclosure requirements and prohibitions of section 319 of the Department of Interior and Related Agencies Appropriations Act for Fiscal Year 1990 (31 U.S.C. 1352) (The "Byrd Amendment") and the implementing regulations at 24 CFR part 87. These authorities prohibit recipients of federal contracts, grants, or loans from using appropriated funds for lobbying the Executive or Legislative branches of the federal government in connection with a specific contract, grant, or loan. The prohibition also covers the awarding of contracts, grants, cooperative agreements, or loans unless the recipient has made an acceptable certification regarding lobbying.

Under 24 CFR part 87, applicants, recipients, and subrecipients of assistance exceeding \$100,000 must certify that no federal funds have been or will be spent on lobbying activities in connection with the assistance.

**Authority:** Sec. 5127, Public Housing Drug Elimination Act of 1988 (42 U.S.C. 11901 et. seq.); sec. 7(d), Department of Housing and Urban Development Act (42 U.S.C. 3535(d)).

Dated: July 7, 1995.

#### Joseph Shuldiner,

*Assistant Secretary for Public and Indian Housing.*

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