

# **APPENDIX A**

## **Public Comment Statement**

## **Public Notices and Participation Information**

## Sheila Dravis

**From:** Piacentini, Suzanne [suzanne.piacentini@hud.gov]  
**Sent:** Wednesday, March 20, 2019 10:36 AM  
**To:** Guttman, Lori; Kabel, Alanna C; Adam Sendroff; Andi Gray; Chavon Hamilton; 'Chris Bandecchi'; Dale Kroop; David St. Hilaire; Dawn Leger; Diane Toolan; Donald LoRusso; Florence Villano (Florence@ct-housing.org); Gary Evans; Ginne Rae Clay; Heather Guerette; Joan Barere; Joseph Samolis; Julie Nash; Justin Malley; Kathy Crees; Kenneth Malinowski; Laura Watson; Margaret Malinowski; Barnhart, Mark; Mark Bisaccia; Matthew Sarcione; Michael Santoro; Miguel Angel Rivera (rivera.miguel@ct.gov); Nancy Allen; Paul O'Sullivan; Ron Gizzi; Sabrina Church; Sara Ross; Scott Shanley; Sheila Dravis; Tami Strauss; Tara Petrocelli; Theresa Lerner; Tiane Curtis; Timothy Sheehan; Tina Lubus; Tom Bombria; Tyler Fairbairn  
**Cc:** HAR CPD All Staff  
**Subject:** RE: CDBG Program Update Vol. 19-02

*For full Report  
Go to - HUD Proposed 2020 Budget  
Link at bottom of email*

Good morning everyone, a question was raised on the recently announced budget for the federal fiscal 2020 which begins Oct. 1, 2019.

We wanted everyone to understand that the recently announced budget for FY2020 is the President's proposed budget. The budget the president sends to Congress is just a starting point, a way for the administration to spell out its spending priorities for the coming year. Congress then will review and respond to the president's budget proposal and generally do make changes. I would recommend that you pay attention to the news as well as the industry groups which cover the areas of the budget you're interested in following as HUD will not be making any further official comments on the proposal. Please let us know if you have specific questions - Suzanne

*9  
2020  
Budget*

**SUZANNE PIACENTINI**  
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**HUD HARTFORD**  
20 Church St  
10<sup>th</sup> Floor  
Hartford, CT 06103



**From:** Guttman, Lori <LGUTTMAN@fairfieldct.org>  
**Sent:** Wednesday, March 20, 2019 9:03 AM  
**To:** Kabel, Alanna C <Alanna.C.Kabel@hud.gov>; Adam Sendroff <asendroff@hamden.com>; Andi Gray <a.gray@danbury-ct.gov>; Chavon Hamilton <chamilton@easthartfordct.gov>; 'Chris Bandecchi' <cbandecchi@townofstratford.com>; Dale Kroop <DKroop@hamden.com>; David St. Hilaire <d.sthilaire@danbury-ct.gov>; Dawn Leger <dawnleger@bristolct.gov>; Diane Toolan <dtoolan@waterburyct.org>; Donald LoRusso <dlorusso@waterburyct.org>; Florence Villano (Florence@ct-housing.org) <Florence@ct-housing.org>; Gary Evans <gary.evans@newbritainct.gov>; Ginne Rae Clay <ginne-rae.clay@bridgeportct.gov>; Heather Guerette <hguerette@manchesterct.gov>; Joan Barere <Joan.Barere@hartford.gov>; Joseph Samolis <joseph.samolis@middletownct.gov>; Julie Nash <jnash@ci.milford.ct.us>; Justin Malley <Justinmalley@bristolct.gov>; Kathy Crees <kcrees@cityofnorwich.org>; Kenneth Malinowski <kmalinowski@newbritainCT.gov>; Laura Watson <laura.watson@ct.gov>; Margaret Malinowski <mmalinowski@newbritainCT.gov>; Barnhart, Mark <MBarnhart@fairfieldct.org>; Mark Bisaccia <markb@westhaven-ct.gov>; Matthew Sarcione

<msarcione@meridenct.gov>; Michael Santoro <Michael.Santoro@ct.gov>; Miguel Angel Rivera (rivera.miguel@ct.gov) <rivera.miguel@ct.gov>; Nancy Allen <nallen@waterburyct.org>; Paul O'Sullivan <posullivan@easthartfordct.gov>; Ron Gizzi <rgizzi@newhavenct.gov>; Sabrina Church <schurch@norwalkct.org>; Sara Ross <Sross@easthartfordct.gov>; Scott Shanley <sshanely@manchesterct.gov>; Sheila Dravis <sdravis@ci.milford.ct.us>; Tami Strauss <ts Strauss@norwalkct.org>; Tara Petrocelli <tpetrocelli@stamfordct.gov>; Theresa Lerner <theresa.lerner@westhartfordct.gov>; Tiane Curtis <tc Curtis@cityofnorwich.org>; Timothy Sheehan <TSheehan@norwalkct.org>; Tina Lubus <tlubus@waterburyct.org>; Tom Bombria <Tbombria@ci.new-london.ct.us>; Tyler Fairbairn <tyler.fairbairn@greenwichct.org>  
Cc: Piacentini, Suzanne <suzanne.piacentini@hud.gov>; HAR CPD All Staff <HARCPDAllStaff@hud.gov>  
Subject: RE: CDBG Program Update Vol. 19-02

Good morning,

From a quick glance at HUD's Proposed 2020 Budget, there does not seem to be any funds allocated to CDBG and HOME???

*Lori Ellyn Guttman*

*Grants Coordinator & Programs Manager*

*Notary Public*

*Town Of Fairfield*

*Community & Economic Development*

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*Fairfield, CT 06824*

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*[www.fairfieldct.org](http://www.fairfieldct.org)*

*Shop Local! Like us on Facebook at [www.facebook.com/shopfairfield](http://www.facebook.com/shopfairfield)*

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**From:** Kabel, Alanna C [<mailto:Alanna.C.Kabel@hud.gov>]

**Sent:** Wednesday, March 20, 2019 8:57 AM

**To:** Adam Sendroff; Andi Gray; Chavon Hamilton; 'Chris Bandecchi'; Dale Kroop; David St. Hilaire; Dawn Leger; Diane Toolan; Donald LoRusso; Florence Villano ([Florence@ct-housing.org](mailto:Florence@ct-housing.org)); Gary Evans; Ginne Rae Clay; Heather Guerette; Joan Barere; Joseph Samolis; Julie Nash; Justin Malley; Kathy Crees; Kenneth Malinowski; Laura Watson; Guttman, Lori; Margaret Malinowski; Barnhart, Mark; Mark Bisaccia; Matthew Sarcione; Michael Santoro; Miguel Angel Rivera ([rivera.miguel@ct.gov](mailto:rivera.miguel@ct.gov)); Nancy Allen; Paul O'Sullivan; Ron Gizzi; Sabrina Church; Sara Ross; Scott Shanley; Sheila Dravis; Tami Strauss; Tara Petrocelli; Theresa Lerner; Tiane Curtis; Timothy Sheehan; Tina Lubus; Tom Bombria; Tyler Fairbairn

**Cc:** Piacentini, Suzanne; HAR CPD All Staff

**Subject:** CDBG Program Update Vol. 19-02

Happy Spring, everyone!

Attached please find *CDBG Program Update Volume 19-02*. Please review it and contact your CPD Representative or me if you have any questions.

Sincerely,

Alanna Kabel

Alanna Cavanagh Kabel  
CPD Director – Hartford  
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# CDBG Program Update

## All Grantees

### HUD Issues CPD Urban County Notice

HUD has issued CPD-19-04, effective March 8, 2019: Instructions for Urban County Qualification for Participation in the Community Development Block Grant (CDBG) Program for Fiscal Years (FYs) 2020-2022. This Notice establishes requirements, procedures and deadlines to be followed in the urban county qualification process for FYs 2020-2022. Information concerning specific considerations and responsibilities for urban counties is also provided. HUD Field Offices and urban counties are expected to adhere to the deadlines in this Notice. Field Offices are to share this Notice with all their Urban Counties and their State CDBG program agency (where applicable). The Notice is posted online at: <https://www.hud.gov/sites/dfiles/OCHCO/documents/19-04cpdn.pdf>

### CPD Funding Matrix and Dashboard Reports Posted

The CPD Funding Matrix and Dashboard Reports, as of March 1, 2019 have been posted to HUD Exchange.

**CPD Notice 19-01, Submission of FY Action Plans** – the version initially posted on HUDClips was missing a page. That has been corrected and the complete document is posted at:  
<https://www.hud.gov/sites/dfiles/OCHCO/documents/19-01cpdn.pdf>

### **Low/Moderate Income Area Benefit Data**

HUD issued CPD Notice 19-02, “Low- and Moderate-Income Summary Data Updates” on February 14. This Notice announces the publication of new Low- and Moderate-Income Summary Data (LMISD) based on the 2011-2015 American Community Survey estimates. The effective date of the new data is April 1, 2019. The Notice describes policies for transitioning from the prior data to the new data.

The Notice also provides revised guidance on confidence levels and margin of error for local income surveys. These changes are designed to significantly reduce sample sizes and make local income surveys easier and more affordable.

HUD published the new Low- and Moderate-Income Summary Data Online. The downloadable data files are now only available as a single, nationwide file. The state-by-state files are no longer being provided for the new data. Additionally, there is a new LMISD Map Application with

improved functionality. It allows for multiple geographies to be selected, and data to be exported as a csv file. This simplifies the process of calculating the percentage of LMI persons across multiple geographies, see the “USAGE” section of the landing page for more details.

### **CDBG-DR Grantees**

Below is a link to our most recent published Federal Register Notice that provides a number of grantee-specific waivers and alternative requirements and clarifies provisions of previous Notices related to the extension of expenditure time frames for certain activities, the definition of substantial Action Plan amendments, and the applicability of certain Uniform Relocation Act requirements.

<https://www.govinfo.gov/content/pkg/FR-2019-02-28/pdf/2019-03530.pdf>

### **Section 108 Loan Guarantee Program**

HUD will hold a public offering for the Section 108 loan guarantee program on Thursday, March 28. At the offering, underwriters selected by HUD will purchase trust certificates backed by a pool of Section 108 notes guaranteed by HUD. The underwriters will then sell those certificates to investors. The public offering provides Section 108 borrowers the opportunity to refinance their existing permanent notes or convert their variable rate notes to permanent, fixed rates. Section 108 borrowers that participate in the offering achieve cost savings and predictability in their interest payments for the remainder of their loan terms. Approximately 155 notes (including multiple notes by some borrowers), totaling approximately \$300,000,000, will participate in the offering.

**HUD's Proposed 2020 Budget:**

<https://www.hud.gov/sites/dfiles/CFO/documents/HUD2020BudgetinBrief03072019Final.pdf>

**HUD awards \$10.6 million to help Low-Income Public Housing residents secure higher paying jobs:** [https://www.hud.gov/press/press\\_releases\\_media\\_advisories/HUD No 19 012](https://www.hud.gov/press/press_releases_media_advisories/HUD_No_19_012)

**Office of Block Grant Assistance Personnel News**

Margaret Price has joined OBGA as a Community Planning and Development Specialist with the Disaster Recover Special Issues Division. She previously worked as a Project Manager with the State of Maryland, Department of Housing and Community Development in the Neighborhood Revitalization Department where she worked with both the CDBG and CDBG-DR grantees. Prior to working with the State of Maryland, she worked as a Compliance Analyst with the State of Louisiana, Office of Economic Development and monitored the business recovery grant and loan program. Margaret is a native of New Orleans, La and a mother of two.

## Sheila Dravis

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**From:** Vicki Watson [vwatson@ncdaonline.org]  
**Sent:** Monday, March 18, 2019 4:51 PM  
**To:** Sheila Dravis  
**Subject:** FY20 CDBG/HOME Funding; Congressional Letters; National Community Development Week Webinar  
**Attachments:** HUD Budget Chart.pdf; house cdbg dear colleague letter 2019.pdf

Members,

The President released his full FY20 budget request today. The proposal cuts the Department of Housing and Urban Development by \$9.6 billion (18% from FY19). The budget zeros out funding for CDBG, HOME, Public Housing Capital Fund, Section 108, and Choice Neighborhoods. It calls for the elimination of the National Housing Trust which is funded through a fee on Fannie Mae and Freddie Mac. Besides eliminating these crucial programs, it also cuts the Public Housing Operating Fund by 38% and underfunds project-based and tenant-based rental assistance.

NCDA and other organizations representing the CDBG Coalition met with members of the House and Senate Transportation, Housing and Urban Development (THUD) subcommittees last week and will continue our meetings this week. We are seeking \$3.8 billion for CDBG (\$500 million increase) and \$1.5 billion for HOME (\$250 million increase) in FY20. While the offices we met with are supportive of CDBG and HOME, the subcommittee members are faced with the daunting task of marking up their FY20 spending bills without a negotiated increase in the budget caps (which limits federal spending). The budget cap negotiations are not expected to take place until later this summer, well after the spending bills have been marked-up. This means that NCDA (and other national organizations) and its members will have to advocate fervently for CDBG and HOME to try to protect program funding. In that regard, letters are circulating in the House and Senate to garner Congressional support for increased funding for the programs in FY20. The House CDBG letter is being led by Representatives Jim McGovern (D-MA), Maxine Waters (D-CA), Gregory Meeks (D-NY), Michael Turner (R-OH), and Mike Kelly (R-PA). The House HOME letter is being led by Rep. Marcia Fudge (D-OH). The Senate CDBG letter is being led by Senators Tammy Baldwin (D-WI), Dianne Feinstein (D-CA), and Chris Coons (D-DE). The Senate HOME letter has not started circulating yet.

Please contact your Congressional Members and ask them to sign-on to these letters by the following deadlines.

House CDBG Dear Colleague Letter Deadline is **March 29**

House HOME Dear Colleague Letter Deadline is **April 1**

Senate CDBG Dear Colleague Letter is **April 4**.

Please go to the following links to contact your Congressional Members (via phone or e-mail).

### House

<https://www.house.gov/representatives/find-your-representative>

### Senate

<https://www.senate.gov/senators/index.htm>

### National Community Development Week Webinar

As a reminder, the U.S. Conference of Mayors, National Association of Counties, NCDA, and the Council of State Community Development Agencies will host a webinar on March 25, 2019 at 2 pm ET on National Community Development Week. Please go to the following link to register.

<https://register.gotowebinar.com/register/1263527274261888525>

Thanks,  
Vicki



National Community Development Association

Vicki Watson

Executive Director

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## **NCD A Washington Report**

### **March 1, 2019**

#### **Status of Appropriations**

##### **FY19 Appropriations Completed**

The FY19 appropriations process was completed earlier this month when Congress lumped the remaining spending bills for HUD and other federal agencies without approved funding into one large omnibus bill (H.J. Res. 21 – Consolidated Appropriations Act of 2019). The President signed the measure, averting a partial government shutdown. The measure provides \$44.2 billion for HUD, a 4% increase from FY18 and \$12 billion more than the Administration's request.

##### **Highlights:**

- \$3.3 billion for CDBG – maintaining the increase provided to the program in FY18. The Administration's FY19 budget proposal eliminated funding for CDBG.
- \$300 million for Section 108 – level funding from FY18. The Administration's FY19 budget proposal eliminated funding for Section 108.
- \$1.250 billion for HOME – a decrease of \$112 million from FY18. Like CDBG, the Administration's FY19 budget proposal eliminated funding for HOME.
- The measure includes language that extends HOME's 24-month commitment deadline suspension through 2021 and makes CHDOs eligible for the suspension, too. NCD A and other groups advocated for these provisions.
- \$2.6 billion for HUD's homeless assistance programs, \$123 million increase from FY18. At least \$280 million (\$10 million increase) must be allocated to the Emergency Solutions Grant Program. Provides \$50 million for rapid re-housing projects and services for victims of domestic violence, dating violence, and stalking. Provides \$7 million for the national homeless data analysis project. Provides \$80 million for projects in up to 25 communities (including 8 rural communities) to demonstrate how a comprehensive approach to serving homeless youth can reduce homelessness.
- \$150 million for Choice Neighborhoods. The Administration's FY19 budget eliminated funding for this program. At least \$75 million must be made available to public housing agencies. Up to \$5 million will be made available for comprehensive local implementation plans.
- Fully funds all tenant- and project-based rental assistance

- \$25 million for a new voucher mobility demonstration aimed at helping low-income families move to higher-income neighborhoods.
- \$250 million for Treasury's CDFI Fund – level funding from FY18

#### FY20 Appropriations

The annual budget and appropriation process start with the release of the President's annual budget request to Congress. This normally takes place the first Monday in February; however, the Administration will release its FY20 budget proposal in two phases: March 11 – President's budget message, top priorities, and summary tables released; March 18 – line-item budget document released. This delay will further confine an already tight budget and appropriations schedule.

#### *Budget Control Act*

The 2011 Budget Control Act (BCA) put in place annual spending limits (or caps) on discretionary programs (including HUD's programs) that limit the amount of federal funding available for appropriations. In past years, Congressional appropriators and the White House reached agreement on lifting the spending caps and will need to do so for FY20 spending, otherwise the programs will face stark cuts. Congress has not yet started negotiations on the budget caps.

#### *Send a Funding Request to Your Congressional Members*

Once the President's budget has been released, the House and Senate Transportation, Housing and Urban Development (THUD) subcommittees will hold hearings with HUD Secretary Ben Carson and begin marking up the FY20 spending bills in March/April. It is crucial that you reach out to your Congressional Members to request that they prioritize funding for CDBG and HOME in the FY20 THUD spending bill. NCDCA and the CDBG Coalition are seeking \$3.8 billion for CDBG in FY20, an increase of \$500 million from FY19. The HOME Coalition is seeking \$1.5 billion for HOME in FY20, an increase of \$250 million from FY19. Make sure to include these levels in your funding request. Given the tight spending limits and the unknown level that the THUD subcommittees will receive, it is imperative that we make a hard push for increased funding for CDBG and HOME early. Sending a request to your Congressional Members will ensure that CDBG and HOME funding is made a priority in the House and Senate THUD spending bills.

The best way to do this is to send an e-mail to your Congressional Member. Please go to the following links to access your Congressional Members web page. The e-mail link is usually located at the very bottom of the page under Contact or E-mail. Please use the following message.

<https://www.senate.gov>

<https://www.house.gov/representatives/find-your-representative>

#### Sample E-Mail Message

Topic line: FY20 CDBG/HOME Funding

Message: As your constituent, I am writing to ask you to support \$3.8 billion for the Community Development Block Grant (CDBG) Program and \$1.5 billion for the HOME Investment Partnerships (HOME) Program in your FY 2020 request letter to the Appropriations Committee and the Subcommittee on Transportation, HUD and Independent Agencies. Both programs provide important resources to my community and more funding is needed to improve and provide affordable housing, improve local infrastructure, and provide services to the elderly, youth and other vulnerable populations.

#### **House Financial Services Committee Hearing on Homelessness**

The House Financial Services Committee held a hearing on February 13 on "Homeless in America." Committee Chair Maxine Waters (D-CA) will reintroduce her bill from 2016 that provides more than \$13 billion over five years to federal homelessness programs.

### **Bi-Partisan Voucher Mobility Bill Enacted**

A bi-partisan voucher mobility bill previously introduced by Representatives Emanuel Cleaver (D-MO) and Sean Duffy (R-WI) (Housing Choice Voucher Mobility Demonstration Act of 2019) was included in the FY19 omnibus spending measure and signed by the President. The measure provides \$25 million for a demonstration program that would encourage Section 8 voucher holders to move from lower-income areas to "higher opportunity areas" with access to better schools, transportation and other services. HUD must now work on the program regulations.

## **HUD NEWS**

### **Commitment of HOME Funds**

HUD's Office of Affordable Housing Programs released information this week reiterating how Participating Jurisdictions (PJs) must commit funds in their HOME Investment Trust Fund local accounts. The information is based on the HOME Program Commitment Requirement Interim Final Rule, published on December 2, 2016.

1. PJs must record the amount of funds deposited into their HOME local account in IDIS in intervals not to exceed 30 days.
2. IDIS will automatically assign each local account receipt to the PJ's current program year.
3. HOME regulations provide PJs with three options to commit local account funds:
  - a. Commit local account funds from the current program year to existing projects identified in the current Annual Action Plan (AAP);
  - b. Accumulate the local funds received during the current program year and including the total uncommitted amount in the following year's AAP; or
  - c. Any combination thereof
4. Beginning with FY 2016 HOME allocations, IDIS will no longer permit a PJ to fund activities with its current Treasury account funds until after all local account funds earned in the prior program year have been fully committed. This does not apply to CHDO reservation funds, however. PJs may commit CHDO reservation funds at any point in time prior to the expenditure deadline.
5. If an activity is funded with both HOME Treasury account funds and local account funds, IDIS will require the local account funds to be fully disbursed before the Treasury account funds can be drawn down.

### **HUD Releases Notice on Submitting Consolidated Plans and Action Plans for FY 2019**

Notice CPD-19-01 provides information to grantees on submitting their FY 2019 Consolidated Plans and Action Plans to HUD. Most importantly, grantees are advised not to submit their plans until they have received notification from HUD of their FY 2019 allocations. As with past notices, this notice contains waivers for CDBG and HOME grantees to incur pre-award costs in certain circumstances prior to the submission of their plans. This year's notice provides interim guidance for grantees wishing to incorporate assistance for designated Opportunity Zones into their Consolidated Plan process.

### **LMI Summary Data Notice**

The LMI Summary Data (LMISD) notice, CPD Notice 19-02, was released earlier this month. The data is used to qualify Low/Moderate-Income area benefit activities in CDBG. Highlights of the notice include the following:

- The new LMISD will go into effect on *April 1, 2019*. The data can be used to qualify *all new* area-benefit activities as of April 1, 2019.
- The new LMISD is based on the American Community Survey (ACS) 2011-2015 5-year estimates (2015 ACS). It replaces the prior LMISD based on the ACS 2005-2010 data (2010

ACS). The notice provides a transition policy for circumstances where prior 2010 ACS LMISD may continue to be used.

- The notice explains how to use the LMISD to demonstrate compliance for LMA activities.
- The notice announces the publication of margin of error data for all geographies in the LMISD, including all census places and block groups, and provides instructions for use.
- HUD will set a 5-year publication schedule for other geographic data used for reporting race/ethnicity, disability, and age of beneficiaries, as well as poverty data used to qualify certain activities for assistance.
- The notice provides instructions for reporting LMA activities in IDIS.
- The LMISD 2011-2015 [page](#) provides detailed data sets that may be used for qualifying area benefit activities.
- The Low/Moderate area [page](#) explains everything a grantee needs to know about qualifying area benefit activities and which data set to use.

#### **HUD Releases CDBG IDIS FAQs**

Earlier this month, HUD released a set of CDBG IDIS [FAQs](#) that provides guidance on the following topics.

- Change in activity's matrix code
- Set-up a CDBG project
- Remove a duplicate CDBG project
- Revise CDBG vouchers drawn from the wrong grant year
- Determine the activity to enter on the Program Income (PI) receipt
- Make adjustments on the PR26 CDBG Financial Summary Report
- Verify expenditures from the PR26 CDBG Financial Summary Report

You can submit further IDIS questions [here](#).

#### **NCDA NEWS**

##### **National Community Development Week**

National Community Development Week will be held on April 22-26, 2019. This year's theme is "CDBG and HOME Make Communities Better Places to Live and Work." Please use #CDWeek2019 in your social media outreach. Please use the attached Tool Kit to plan, implement and market your National Community Development Week events and activities.

National Community Development Week is designed to focus local as well as national attention on the CDBG and HOME programs. It provides an ideal opportunity to educate members of Congress and your

community on CDBG and HOME and the importance of both programs to the community. We are seeking increased funding for CDBG (\$3.8 billion) and HOME (\$1.5 billion) in FY 2020 and your participation in National Community Development Week helps our efforts to increase program funding. National Community Development Week will occur during a critical time when Congress is making decisions about spending levels, so ensure you're a part of the conversation by hosting a National Community Development Week activity and inviting your Congressional Members (or their staff) to participate. The following video created by NCDA provides you with important information and advice for reaching out to your Congressional Members in the coming year, particularly to invite them to participate in National Community Development Week and to schedule meetings in their district office to share information on your CDBG and HOME programs to push for increased funding in FY20.

<https://www.dropbox.com/s/pkmfgtu3tyarpe7/NewCongressNCDA.mp4?dl=0>

#### **CDBG Coalition**

The CDBG Coalition is seeking \$3.8 billion for CDBG in FY20, an increase of \$500 million. The Coalition launched a national CDBG support letter that will be sent to Congressional leaders. We need grantees to sign-on to the letter by **March 8**. Please go to the following link to add your agency to the letter. Please invite your program subrecipients and other local partners to sign-on to the letter, too.

<https://data.ncdaonline.org/cdbgletter.asp>

The House and Senate CDBG Dear Colleague letters will be ready in the next week or so and we will need you to reach out to your Congressional Members to urge them to sign on to the letters.

The Coalition launched a CDBG Needs Survey to help in our efforts to increase program funding this year. The survey closes today, so please take a few minutes to complete it.

#### **CDBG Needs Survey**

<https://www.surveymonkey.com/r/QLMCMRR>

The Coalition will start meeting with THUD subcommittee members on March 11. We are seeking CDBG and HOME projects to share with the THUD members. If your Congressional Member serves on the House or Senate THUD subcommittee (see attached list), please send a project example to [vwatson@ncdaonline.org](mailto:vwatson@ncdaonline.org) by **March 8**. Please include the following information: amount of CDBG and or HOME funds, other project funding, population served, type of project, impact of the project on the beneficiaries and the community, project photo, other information you deem important.

#### **NCDA 50<sup>th</sup> Anniversary**

NCDA invites you to help us celebrate our 50<sup>th</sup> anniversary by attending the 50<sup>th</sup> NCDA Annual Conference in Jacksonville, FL. The conference will be held at the Omni Hotel on June 19-22. Conference registration is now open. **Early conference registration ends on April 1**. The registration fee is \$550 for members and \$650 for non-members. The fee will increase after April 1 to \$650/members and \$750/non-members, so please register early. Please note, registration cancellations received after June 1, 2019 will be charged 50% of the registration fee.

50<sup>th</sup> Annual Conference Registration Link

<https://ncdaonline.regfox.com/jacksonville-2019-50th-anniversary-ncda-annual-conference>

NCDA has reserved a block of rooms at the rate of \$91.00 per night plus tax through **June 1**. Please go [here](#) to make your hotel reservation or call 1-800-843-6664.

The draft conference agenda is attached. If you are interested in participating as a speaker or moderator, please contact [vwatson@ncdaonline.org](mailto:vwatson@ncdaonline.org). Please contact Steve Gartrell at [sgartrell@ncdaonline.org](mailto:sgartrell@ncdaonline.org) with any questions concerning conference registration or the hotel.

**Upcoming NCDA Training**

NCDA is pleased to offer the following training in the coming months. Please go to the following link to obtain course information and to register: <https://ncdaonline.org/training>

HOME Basics

March 4-6

Anaheim, CA

CDBG Advanced

March 19-21

Columbus, OH

CDBG-DR (Disaster Recovery)

March 28-29

Jacksonville, NC

CDBG Basics

April 9-11

Santa Rosa/Sonoma County, CA

Managing CDBG Subrecipients

May 21-23

Boise, ID

Advanced HOME/Underwriting (coming soon)

July 17-19

Columbus, GA

Managing CDBG Subrecipients (coming soon)

August 6-8

Santa Rosa/Sonoma County, CA

Advanced HOME/Underwriting (coming soon)

September 18-20

Fort Worth, TX

Please contact Rita Pribyl at [rpribyl@ncdaonline.org](mailto:rpribyl@ncdaonline.org) with any questions regarding the above training courses or if you are interested in hosting a training course in your community.

**Department of Housing and Urban Development  
Budget Chart**

<b><i>Program</i></b>	<b><i>FY18 Omnibus Spending Measure</i></b>	<b><i>President's FY19 Budget Proposal</i></b>	<b><i>FY19 Omnibus Spending Measure</i></b>
CDBG Formula Grants	\$3.3 billion	\$0	\$3.3 billion
HOME Formula Grants	\$1.362 billion	\$0	\$1.25 billion
Homeless Assistance Grants	\$2.513 billion	\$2.383 billion	\$2.636 billion
Section 108	\$300 million	\$0	\$300 million
Choice Neighborhoods	\$150 million	\$0	\$150 million
HOPWA	\$375 million	\$330 million	\$393 million
Lead Based Paint Hazard Reduction	\$230 million	\$145 million	\$279 million
Elderly Housing (Section 202)	\$678 million	\$563 million	\$678 million
Housing for Persons with Disabilities (811)	\$229.6 million	\$132 million	\$184 million
Housing Counseling	\$55 million	\$45 million	\$50 million
Housing Choice Vouchers	\$22.015 billion	\$20.550 billion	\$20.3 billion
Project-Based Section 8	\$11.515 billion	\$11.147 billion	\$11.347 billion
Public Housing Operating Fund	\$4.550 billion	\$2.975 billion	\$4.653 billion
Public Housing Capital Fund	\$2.750 billion	\$0	\$2.775 billion



OFFICE OF COMMUNITY PLANNING  
AND DEVELOPMENT

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

**Special Attention of:**  
All CPD Division Directors  
HUD Field Offices  
HUD Regional Offices  
All CDBG Grantees  
All HOME Participating Jurisdictions  
All HTF Grantees  
All ESG -Grantees  
All HOPWA - Grantees

**NOTICE: CPD-19-01**

Issued: February 13, 2019  
Expires: September 30, 2019

Cross Reference: 24 CFR Part 91

**Subject: Guidance on Submitting Consolidated Plans and Annual Action Plans  
for Fiscal Year (FY) 2019**

**Purpose:**

The purpose of this Notice is to instruct all Community Development Block Grant (CDBG), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) grantees on the timing of submission of FY 2019 Consolidated Plans and Action Plans. Grantees should not submit their Plans until after Congress passes HUD's FY 2019 appropriations, and the actual grant amounts have been determined. This Notice provides instructions to grantees/participating jurisdictions under each of these programs regarding costs incurred prior to execution of a grant agreement. This Notice further informs Entitlement CDBG grantees and HOME participating jurisdictions of waivers being made available to certain grantees/participating jurisdictions to assist in the implementation of the pre-award costs instructions. These procedures apply equally to grantees' 3- to 5-year Consolidated Plans as well as to annual Action Plans (either as a stand-alone document or as a component of the overall Consolidated Plan submission).

**Notes regarding applicability:**

This Notice uses the term "grantee" generically, to also include HOME participating jurisdictions, except where the term appears in discussions explicitly limited to one of the other covered funding programs. Provisions of this Notice covering the Entitlement CDBG program also apply to Insular Areas grantees and CDBG nonentitlement county grantees in Hawaii, as the Entitlement CDBG program regulations also apply to their CDBG funds.

**Background:**

Pursuant to 24 CFR 91.15(a)(1), each jurisdiction should submit its Consolidated Plan to HUD at least 45 days before the start of its program year. The earliest date on which HUD will accept a Consolidated Plan or Action Plan submission is November 15, 2018; and the latest



submission deadline is August 16, 2019. However, in most years, HUD does not receive its annual funding appropriation until several months into the federal fiscal year (rarely earlier than December, and sometimes as late as April). Once a fiscal year's appropriation is enacted, HUD needs time to compute grantees' allocation amounts for the programs covered by the Consolidated Plan.

According to 24 CFR 91.500(a), a Plan will be deemed approved 45 days after HUD receives the Plan, unless HUD notifies the jurisdiction before that date that the Plan is disapproved. In past years, HUD typically did not disapprove a Plan solely because it was based on estimated allocation amounts. As a result, a Plan submitted by a grantee before its allocation amounts are announced typically received automatic approval, even though the Plan did not list the grantee's actual allocation amounts.

This practice resulted in significant additional work for both HUD and grantees. After the actual allocation amounts were announced, a grantee had to submit a revised, re-signed SF-424 form listing the actual allocation amounts for each of its grants. In many cases, the grantee had to make additional changes to amend its Plan to reflect its actual allocation amounts. This may have constituted a substantial amendment under 24 CFR 91.505, which is subject to the grantee's citizen participation plan process. For FY 2019, HUD will not execute a grant agreement with a grantee until HUD has received a Plan (or an amended Plan) which incorporates the actual allocation amounts a grantee is to receive for FY 2019.

#### **Revised Procedures for Submission of FY 2019 Consolidated Plans and Action Plans by Grantees with Early Program Year Start Dates:**

HUD is issuing the following revised procedures to govern the submission and review of Consolidated Plans and Action Plans for FY 2019 funding prior to computation of FY 2019 allocation amounts. These procedures will apply to any grantee whose normal Consolidated Plan/Action Plan submission deadline (45 days before the start of the program year) falls either before, or less than 60 days after, the date HUD announces FY 2019 allocation amounts for CDBG, ESG, HOME and HOPWA funding. (See Section II. for a discussion of the timing of Housing Trust Fund allocations.)

Congress has not completed the appropriations process for HUD's FY2019 appropriation. At this time, HUD cannot predict when its FY-2019 appropriations bill will be enacted and when it will be able to announce FY 2019 allocation amounts. Thus, HUD cannot say how many grantees – or which program year start dates – will be subject to these revised procedures. Similarly, HUD cannot provide estimated FY 2019 allocation amounts for grantees to use for planning purposes in developing annual Action Plans.

**Note:** These procedures will not apply to grantees whose normal Consolidated Plan/Action Plan submission deadline is more than 60 days after HUD announcement of FY 2019 allocation amounts; those grantees should have sufficient time to revise their Plans to match actual allocation amounts prior to the due date for their Plan.

**I. Revised Submission Dates for FY 2019 Consolidated Plans/Action Plans for CDBG, ESG, HOME, HOPWA**

Grantees are advised not to submit their Consolidated Plan/Action Plan until after the FY 2019 allocations have been announced. Grantees due to submit a new 3- to 5-year Consolidated Plan in FY 2019 should refrain from submitting the overall Consolidated Plan as well as the FY 2019 Action Plan contained within the overall document. HUD cannot complete its review of the overall Consolidated Plan components independent of the current year's Action Plan component. Once HUD informs grantees of their FY 2019 funding allocation amounts, each grantee should, prior to submission, ensure that the actual FY 2019 allocation amounts are reflected in the form SF-424, in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). It may be necessary for a grantee to revise its Action Plan before submission to HUD.

An affected grantee may delay submission of its Consolidated Plan or Action Plan to HUD until 60 days after the date allocations are announced, or until August 16, 2019 (whichever comes first). This delay will give a grantee time to revise its Action Plan to incorporate actual allocation amounts, and to conduct any additional citizen participation, if necessary.

For example, if HUD were to announce the FY 2019 allocation amounts to grantees on April 26, 2019:

- For grantees with January 1 – June 1 program year start dates, their normal plan submission date would have been before the date that HUD announced allocation amounts. These grantees would be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- For grantees with July 1 and August 1 program year start dates, their normal Plan submission date would be less than 60 days after HUD's announcement of allocation amounts. These grantees would also be able to postpone submission of their Consolidated Plan/Action Plan until June 25, 2019.
- Grantees with September 1 and October 1 program year start dates would have more than 60 days between the date of announcement of allocations and the normal submission deadline for their Consolidated Plan/Action Plan. These grantees would be expected to submit their Plan on time.

However, in no case may a Consolidated Plan/Action Plan be submitted to HUD later than August 16, 2019. Failure to submit an Action Plan for FY 2019 by August 16, 2019, will result in the automatic loss of FY 2019 CDBG funds to the grantee. This requirement is established by statute, and HUD cannot waive the August 16 submission deadline. Funding under other CPD formula programs are not subject to this deadline but, since virtually all CPD formula grantees receive CDBG funding, the CDBG submission requirement effectively establishes the deadline for submission of Action Plans.

The regulations, at 24 CFR 91.15(a)(1), state that "...each jurisdiction should submit its Consolidated Plan at least 45 days before the start of its program year." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Action Plans. This provision does not prohibit a grantee from submitting a Plan in the eCon Planning Suite after that time. It is not necessary for an affected grantee to request an exception to its normal Action Plan submission date under 24 CFR 91.15(a)(1), nor is it necessary for a field office to grant an exception to the Action Plan submission deadlines, under 24 CFR 91.20, in order to implement the procedures in this Notice.

## **II. Submission Process for the Housing Trust Fund (HTF) Program**

HTF is an affordable housing production program to increase and preserve the supply of decent, safe, and sanitary affordable housing for extremely low-income and very low-income families. See 24 CFR part 93. HTF is a formula grant program for states.

The HTF regulation at 24 CFR 93.100 requires each state to include its HTF allocation plan in its annual Action Plan as described at 24 CFR 91.320(k)(5). The HTF allocation plan describes the method for the distribution of funds, and establishes the application requirements and criteria for selecting applications. The rule also requires a local jurisdiction that receives a subgrant of HTF funds from the state to include a HTF allocation plan (24 CFR 91.220(l)(5)) in its annual Action Plan, but due to the timing of the publication of HTF allocations, the local jurisdiction may need to amend its annual Action Plan to include HTF.

The timing of the HTF allocations is different from other CPD formula programs (CDBG, HOME, HOPWA, and ESG) because the source of funding is the mandatory assessments on Fannie Mae and Freddie Mac rather than Federal appropriations. The earliest HUD expects to publish the HTF allocations is April 2019. If HTF allocations are not published before a state submits its Consolidated Plan/Action Plan, a state may submit its Consolidated Plan/Action Plan for the other CPD formula programs, then submit its HTF allocation plan as a substantial amendment to its annual Action Plan, after the HTF allocations are published.

## **III. HUD Review of Action Plans**

HUD will review a Consolidated Plan/Action Plan in accordance with 24 CFR 91.500(b). The 45-day review period will begin whenever the eCon Planning Suite submission or original executed SF-424, certifications and applicable assurances (SF 424B and SF 424D, as applicable) are received by the field office, whichever is later. HUD will disapprove as substantially incomplete any Consolidated Plan or Action Plan covering FY 2019 funding that does not reflect actual CDBG, HOME, ESG and HOPWA allocation amounts on the form SF-424(s), in the description of resources and objectives, and in the description of activities to be undertaken (or, for states, the method of distribution). The HTF allocation must be included if the HTF allocations are published before the state submits its Consolidated Plan or Action Plan. (See Section II.) A grantee whose Action Plan is disapproved for this reason is advised to not resubmit a revised Plan until HUD has announced the actual FY 2019 allocation amounts, and until the grantee has incorporated the actual allocation amounts into its Plan.

24 CFR 91.500(b) states HUD may disapprove a Plan or a portion of a Plan if it is inconsistent with the purpose of the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703), if it is substantially incomplete, or, in the case of a CDBG certification under §91.225(a) and (b) or §91.325(a) and (b), if it is not satisfactory to the Secretary in accordance with §570.304, §570.429(g), or §570.485(c). The following are examples provided in §91.500(b) of substantially incomplete Plans:

- (1) A Plan developed without the required citizen participation or the required consultation;
- (2) A Plan that fails to satisfy all the required elements in 24 CFR Part 91, as reflected in the eCon Planning Suite. This includes when the grantee has not provided a final statement of community development objectives and the projected use of funds;
- (3) A Plan for which a certification is rejected by HUD as inaccurate, after HUD has inspected the evidence and provided due notice and opportunity for comment; and
- (4) A Plan without a description of the manner in which the unit of general local government or state will provide financial or other assistance to a public housing agency if the public housing agency is designated by HUD as "troubled".

24 CFR 91.500(d) states that "(t)he jurisdiction may revise or resubmit a Plan within 45 days after the first notification of disapproval." HUD has determined that it is not necessary to waive this provision in order to implement the procedures in this Notice for FY 2019 Consolidated Plans/Action Plans. This provision does not prohibit a grantee from re-submitting a Plan after that time period.

24 CFR 91.105(c), 91.115(c) and 91.505 require a grantee to comply with citizen participation requirements when it undertakes a substantial amendment to an approved Plan. A Plan that has been disapproved by HUD is, by definition, not an approved Plan. When a grantee's Plan is disapproved by HUD, the Consolidated Plan regulations do not necessarily require a grantee to undertake further citizen participation on the changes the grantee makes before re-submitting it. (A major exception to this, however, would be if the reason for disapproval involved the grantee's failure to fulfill citizen participation requirements to begin with.) However, as noted in this Notice, there are circumstances in which a grantee may need to make major revisions to a disapproved Plan, which could trigger further citizen participation efforts. A grantee with a disapproved Plan should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its Plan, prior to re-submission of the revised Plan.

#### **IV. Development of Proposed Action Plans and Citizen Participation During the Interim**

A grantee has several options regarding fulfilling its citizen participation obligations while waiting for HUD to announce FY 2019 allocation amounts:

- a. A grantee may conduct citizen participation on its draft Plan (with estimated funding amounts) according to its normal timetable and citizen participation procedures. (Grantees

are cautioned, though, that they should not submit their Plan until allocation amounts are known.) A grantee doing so should make clear that the funding levels shown are estimated amounts. In addition, the grantee should include "contingency provision" language in its Action Plan which explains how it will adjust its proposed Plan to match its actual allocation amounts, once actual amounts become known. By including such contingency language, a grantee can avoid the need to make significant revisions to its Plan (beyond incorporating the final allocation amounts into the Plan and the SF-424 form). The grantee may also avoid the potential need to conduct additional citizen participation on a Plan that has to be significantly revised in order to reflect actual allocation amounts.

Examples of contingency provisions include:

- A Plan could state that all proposed activities' budgets will be proportionally increased or decreased from the estimated funding levels to match actual allocation amounts.
- A grantee could express its budget in terms of percentages of the allocation to be budgeted to each planned activity, along with the grantee's current estimate of how many dollars that equates to for each activity. [For example, regardless of what the final allocation amounts are, the United Interfaith Street Outreach Program will receive 22% (currently estimated to be approximately \$38,000) of the grantee's total ESG allocation, and the Tenant-Based Rental Assistance activity will receive 10% (currently estimated to be about \$68,750) of the HOME allocation.]
- A Plan could state that any increase or decrease in funding to match actual allocation amounts will be applied to one or more specific activities (e.g., any increase or decrease relative to the grantee's estimated allocation amount will be applied to the single-family housing rehabilitation grant program).
- A Plan could list its proposed activities in priority order and indicate that the East Side Sidewalk Replacement activity listed in the plan is a "backup" activity that will be funded only if sufficient CDBG funding exists; or conversely, if the grantee's actual allocation is less than estimated, the East Side Sidewalk Replacement activity will not be funded in FY 2019.
- A Plan could state that, should the actual allocation amount exceed the grantee's estimate, the grantee will increase the Uptown Sewer Separation activity budget and will extend the service area block-by-block along the 600-900 blocks of Cherry Street, based on the amount of additional funding available.

A grantee may include these or other comparable provisions singly or in any combination to meet its needs. A grantee may adopt a different contingency approach for each of the programs covered by this Notice (CDBG, ESG, HOME, HOPWA and HTF).

- b. Alternatively, a grantee may prepare a proposed Action Plan according to its normal timetable, but wait until actual allocation amounts are known before undertaking citizen participation actions. Once allocation amounts are announced by HUD, the grantee

will need to update relevant sections of its Plan (such as the listings of resources and objectives, and the description of activities or the state's method of distribution) to reflect actual allocation amounts before conducting citizen participation. All grantees intending to incur pre-award costs under the programs covered by this Notice should be aware that this option will not be available to them, as citizen participation requirements must be met before pre-award costs are incurred. (See Section V. below.)

HUD has developed these procedures to minimize disruption to grantees and to minimize duplication of effort by grantees. A grantee that does not follow either option a. or b. above (i.e., the grantee undertakes citizen participation according to its normal timetable, based solely on estimated funding levels, and the Plan does not contain any contingency language on how the final Plan will be adjusted to match actual allocation amounts) runs the risk of increasing its own work obligations and costs. The grantee will still be required to update its Plan to incorporate actual allocation amounts before submission to HUD. The grantee may need to undertake additional publication and citizen participation processes, depending on the difference between its actual allocation amounts and the estimated amounts in its proposed Action Plan, and how the grantee plans to adjust its proposed activities in order to match its actual allocation amounts. Local policies and procedures may also require the grantee to obtain re-approval of the revised Plan from its legislative body or authorizing officials.

A Plan that has not yet been submitted to HUD is also not an approved Plan, and is not subject to the citizen participation requirements of a substantial amendment. However, a grantee that delays its Plan submission should review its citizen participation plan and local policies to determine whether it will need to conduct further citizen participation as a result of the changes it makes to incorporate actual allocation amounts into its Plan, prior to its submission.

## **V. Pre-Award Costs**

### **A. General Provisions Applicable to All Consolidated Plan Programs**

Special attention must be paid to situations in which a grantee wishes to incur costs prior to grant award. For example, under certain programs, a grantee may want to execute annual renewals of agreements with social service providers in order to prevent interruption of social services. The annual performance cycle of these agreements might normally begin after the grantee's official program year start date but, under this Notice the grantee cannot even submit its Action Plan until after the date that the agreements need to be executed. Thus, the timing instructions in this Notice may cause some program costs to be classified as pre-award costs where they would otherwise not have been.

The government-wide Uniform Administrative Requirements, Cost Principles and Audit Requirements regulation, at 2 CFR Part 200, contains language concerning agency approval of pre-award costs. The language at 2 CFR 200.458 applies to any program that does not have its own separate provisions concerning authorization of pre-award costs:

**§ 200.458. Pre-award costs.** Pre-award costs are those incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.

The ESG, HOPWA and HTF program regulations do not contain program-specific language establishing pre-award cost requirements for those programs; the CDBG and HOME program regulations do contain pre-award cost requirements unique to those programs. (However, the HOME requirements apply only to certain types of pre-award costs.) The following guidance applies to all five programs. Additionally, guidance unique to each separate program is provided below.

The Part 91 Consolidated Plan regulations make distinctions between a “proposed Plan” and “a Plan”. Most notably, 24 CFR 91.105(b) and 91.115(b) describe the citizen participation requirements for a grantee’s proposed Plan. For purposes of this Notice regarding pre-award costs, HUD considers a grantee’s Plan to have moved from being “a proposed Plan” to being “a Plan” once a grantee has completed the publication, public hearing and public comment requirements at 24 CFR 91.105(b)(2), (3) and (4) or 91.115(b)(2), (3) and (4), and has developed its written summary of comments received pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5).

To minimize additional workload on grantees and HUD field offices, this Notice establishes the following procedures implementing the 2 CFR 200.458 requirements cited above. This Notice provides HUD approval to incur pre-award costs if and when the grantee completes the following documentation in its local files:

1. The grantee documents that the costs incurred prior to grant award are necessary for efficient and timely performance of the activity in question.
2. The grantee documents that the costs are for eligible activities under the regulations for the applicable funding program;
3. The grantee documents that the grantee has complied with all other requirements for pre-award costs under the regulations for the applicable funding program or as described below;
4. The activity for which costs will be incurred is included in a Consolidated Plan/Action Plan;
5. The grantee documents completion of its citizen participation process by including in its files a written, dated summary of citizen participation comments received on its Plan, pursuant to 24 CFR 91.105(b)(5) or 91.115(b)(5) as applicable.

If the grantee’s files contain all other necessary documentation supporting the costs (described below for each program), the date of HUD approval for pre-award costs is the date of the written summary of citizen participation comments, or the grantee’s program year start date, whichever is later.

Note: Pre-award costs are incurred at the grantee's own risk because reimbursement is contingent upon the availability of appropriated funds for FY 2019 in addition to the applicable provisions listed in this section.

**B. Additional Provisions: Entitlement CDBG Program**

The Entitlement CDBG program regulations specify, at 24 CFR 570.200(h), the situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 570.200(h) defines the effective date of a grantee's agreement as the grantee's program year start date or the date that the Consolidated Plan/Action Plan is received by HUD (whichever is later). Under the provisions of this Notice, a grantee's Action Plan may not be submitted to (and thus received by) HUD until several months after the grantee's program year start date. This may negatively affect grantees' ability to incur pre-award costs.
2. Therefore, HUD has issued a waiver of 24 CFR 570.200(h) to the extent necessary to implement the following requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the grantee's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any Entitlement CDBG grantee seeking to incur pre-award costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected community applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. Grantees' authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.
3. 24 CFR 570.200(h)(1)(i) requires that the activity for which the costs are being incurred must be included in a Consolidated Plan/Action Plan prior to the costs being incurred; grantee compliance with steps 4 and 5 under the general pre-award cost provisions above will meet that requirement. However, grantees must also comply with §570.200(h)(1)(ii), which further specifies that the Plan must advise citizens of the extent to which the pre-award costs will affect future grants. CDBG grantees intending to incur pre-award costs are cautioned that option b. described in Section IV above is not likely to be a feasible alternative for them. HUD advises any Entitlement CDBG grantee intending to incur pre-award costs to follow the process described in Section IV. a. above; in doing so, the grantee will need to ensure that it has met the citizen participation and notification requirements above.
4. Pursuant to § 570.200(h)(1)(iii) and § 570.604, the costs and corresponding activities must comply with the environmental review requirements at 24 CFR Part 58.



### C. Additional Provisions: HOME Program

The HOME regulations specify situations under which a grantee may incur costs prior to the effective date of its grant agreement. The provisions of this Notice will affect how grantees comply with the pre-award cost reimbursement requirements.

1. 24 CFR 92.212(b) defines the effective date for incurring administrative and planning costs to be charged to the HOME allocation as the beginning of the participating jurisdiction's consolidated program year or the date that the Consolidated Plan is received by HUD (whichever is later). Under the provisions of this Notice, a participating jurisdiction's Action Plan may not be submitted to (and thus received by) HUD until several months after the PJ's program year start date. This may negatively affect a participating jurisdiction's ability to incur planning and administrative pre-award costs. Therefore, HUD has issued a waiver of 24 CFR 92.212(b) to the extent necessary to implement an alternative requirement: the effective date of a grantee's FY 2019 grant agreement will be considered to be the earlier of the participating jurisdiction's program year start date or the date that the Consolidated Plan/Action Plan (with actual allocation amounts) is received by HUD.
2. Attachment A contains the HUD memorandum authorizing this waiver. This waiver is applicable to any HOME participating jurisdiction seeking to incur pre-award administrative and planning costs, whose Action Plan submission is delayed past the normal submission date because of delayed enactment of FY 2019 appropriations for the Department. An affected participating jurisdiction applying this waiver shall document in writing the conditions giving rise to the need to use this waiver, and maintain the documentation for HUD's review. A participating jurisdiction's authority to make use of this waiver is only in effect until August 16, 2019, as that is the last date that a grantee may submit its FY 2019 Action Plan.

### D. Additional Provisions: ESG Program

An ESG grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

1. The costs and corresponding activities must comply with the ESG Program regulations at 24 CFR Part 576.
2. The costs and corresponding activities must comply with environmental review requirements. The "Moving Ahead for Progress in the 21st Century Act" (MAP-21), (Public Law 112-141) made several changes to HUD's homeless assistance programs, including authorization to permit recipients and other responsible entities to assume HUD environmental review responsibilities in accordance with 24 CFR Part 58. Initially, for FY 2012 ESG funds, ESG projects were subject to the environmental review procedures under 24 CFR Part 50, which assigns HUD all environmental review responsibilities due to the HEARTH Act's repeal of Section 443 of the McKinney-Vento Homeless Assistance Act. Now, recipients or other Responsible Entities assume environmental review responsibilities

under 24 CFR Part 58.

**E. Additional Provisions: HOPWA Program**

A HOPWA grantee is permitted to incur pre-award costs against its FY 2019 grant, provided that the grantee has met the general conditions described in Section V.A., above, plus the following conditions:

1. The costs are incurred for eligible activities undertaken in accordance with HOPWA program regulations at 24 CFR Part 574.
2. The costs and corresponding activities must comply with environmental review requirements at 24 CFR 574.510.

**F. Additional Provisions: HTF Program**

HUD is authorizing HTF grantees to incur pre-award costs permitted under 2 CFR 200.458 for planning activities and preparation of the HTF allocation plan. Eligible pre-award costs may include the cost of public hearings, consultations, and publication of public notices, as well as developing program guidelines. Pre-award costs may not exceed 5% of the minimum allocation amount of \$3 million. This is one half of the grant amount that the state may use for administration and planning in accordance with 24 CFR 93.202, based on receiving a minimum grant amount. The costs and corresponding activities must comply with the environmental review requirements at 24 CFR 93.301(f).

**VI. Opportunity Zones**

Created by the 2017 Tax Cut and Jobs Act, the Opportunity Zone program is designed to stimulate private investment in designated, low-income census tracts nationwide. Since the passage of the law, Opportunity Zones (OZ) have been designated in all 50 states, the District of Columbia, Puerto Rico, and in Insular Areas.

Census tracts were eligible for designation as Opportunity Zones if they satisfied the definition of a "low-income community" (LIC) per § 45D(e) of the Internal Revenue Code. States were limited in the number of tracts they could designate as Opportunity Zones since the number of designated census tracts could not exceed 25 percent of the total number of tracts in the State that met the LIC definition.

The term "low-income community" means any census tract where: (a) the poverty rate for such tract is at least 20 percent, or (b)(i) in the case of a tract not located within a metropolitan area, the median family income for such tract does not exceed 80 percent of statewide median family income, or (b)(ii) in the case of a tract located within a metropolitan area, the median family income for such tract does not exceed 80 percent of the greater of statewide median family income or the metropolitan area median family income. For grantees who are familiar with using New Market Tax Credits (NMTC) as a source for community development finance, these eligibility criteria are the same as the requirements necessary to qualify for NMTC. It is worth noting that some non-LIC

tracts were also eligible for OZ designation if certain additional criteria were met.

This program incentivizes individuals and companies to invest equity in real estate projects or in businesses in these communities. It does so by enabling them to temporarily defer and reduce their tax liability on investments in privately- or publicly-managed Opportunity Funds. These Opportunity Funds must invest funds in real estate projects or businesses located in designated Opportunity Zones. Moreover, if investors leave their investments in these funds long-term, the profits they make on their Opportunity Fund investments will not be taxed.

HUD encourages Community Planning and Development (CPD) program grantees to consider the use of CDBG, HOME, ESG, HOPWA, and HTF funds for eligible activities in Opportunity Zones when developing their Consolidated Plans. CPD will be publishing further guidance in the near future which will provide additional information related to how program funds can be deployed to leverage Opportunity Zone financing.

In the interim, when considering strategies to facilitate the use of CDBG and Section 108 guaranteed loan funds in Opportunity Zones, CPD encourages grantees to explore whether these zones would also qualify as Neighborhood Revitalization Strategy Areas (NRSAs) under CPD Notice 16-16. Compliance with certain CDBG requirements can be streamlined through the designation of NRSA's that may make it more feasible for grantees and their partners to leverage CDBG and Section 108 funds more quickly in Opportunity Zones.

## **VII. Applicability of This Notice to Future Years**

This Notice applies only to Consolidated Plans/Action Plans submitted for FY 2019 funding on or before August 16, 2019, or 60 days after HUD announcement of the FY 2019 allocation amounts for CDBG, ESG, HOME, and HOPWA funding (whichever is earlier). HUD anticipates revising the Consolidated Plan regulations (and other related regulations) to explicitly include, as a basis for disapproval of a Plan, that a Plan does not contain and reflect a grantee's actual allocation amount. For further information on potential rulemaking in this area, see HUD's June 3, 2015, Federal Register Notice (80 FR 31538). That document solicited public comments on possible amendments to the Consolidated Plan regulations and the CDBG Entitlement regulations to effect such a change. See in particular Sections II.B.1., II.B.2 and II.B.7 of the Notice, pages 31544 and 31546. (Please note, however, that the public comment period for that Federal Register Notice has closed.)

### **For further information:**

Grantees with questions concerning this Notice should direct their inquiries to their local HUD Field Office Community Planning and Development Division. Field Offices should direct their questions to the following Headquarters program offices as applicable:

Office of Block Grant Assistance at (202) 708-1577 for the Entitlement CDBG program or (202) 708-1322 for the State CDBG program

Office of Affordable Housing Programs at (202) 708-2684

Office of Special Needs Assistance Programs at (202) 708-4300

Office of HIV/AIDS Housing at (202) 708-1934 or at [hopwa@hud.gov](mailto:hopwa@hud.gov)



**HUD Contingency Plan  
for Possible Lapse in Appropriations  
2018**

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## 1. General Guidance and Legal Decisions

The Constitution, statutory provisions, court opinions, and Department of Justice (DOJ) opinions provide the legal framework for how funding gaps and shutdowns have occurred in recent decades. Additionally, the Office of Management and Budget (OMB) provides agency guidance in OMB Circular A-11, Section 124.

The Constitution provides, “No Money shall be drawn from the Treasury, but in Consequence of Appropriations made by Law.” The Antideficiency Act prohibits all officers and employees of the federal government from entering into obligations in advance of appropriations and prohibits employing federal personnel except in emergencies, unless otherwise authorized by law. 31 U.S.C. sections 1341 *et seq.*

The Attorney General issued two opinions in the early 1980s that the language and legislative history of the Antideficiency Act unambiguously prohibit agency officials from incurring obligations in the absence of appropriations ("Applicability of the Antideficiency Act Upon a Lapse in an Agency's Appropriations" (1980) and "Authority for the Continuance of Government Functions During a Temporary Lapse in Appropriations" (1981)). The Office of Legal Counsel of the Department of Justice issued an opinion dated August 16, 1995, that reaffirms and updates the 1981 opinion.<sup>1</sup>

When the Congress fails to act on program supplementals and the result is partial funding interruptions, special procedures beyond those outlined in this section may be warranted. In such cases, agencies must consult OMB. In the absence of appropriations:

- Federal officers may not incur any obligations that cannot lawfully be funded from prior appropriations unless such obligations are otherwise authorized by law. Federal officers may incur obligations as necessary for orderly termination of an agency's functions, but funds may not be disbursed.<sup>2</sup>

In 1995, the Department of Justice Office of Legal Counsel provided a legal opinion that identifies the types of activities that can take place during a shutdown. This includes (1) activities to address cases of threat to human life or property where the threat can be reasonably said to be near at hand and demanding of immediate response; (2) government functions funded with multi-year appropriations or indefinite appropriations; (3) express authorizations for agencies to enter into contracts or to borrow funds to accomplish their missions (without appropriations); (4) obligations necessary to discharge of the President's constitutional duties and powers; and (5) the orderly termination of functions that may not continue during a period of lapsed appropriations.<sup>3</sup>

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<sup>1</sup> OMB Circular A-11, Section 124;  
<http://www.whitehouse.gov/sites/default/files/omb/assets/a11currentyear/s124.pdf>

<sup>2</sup> OMB Circular.

<sup>3</sup> See Department of Justice Office of Legal Counsel Memorandum Re: “Government Operations in the Event of a Lapse in Appropriations” from Assistant Attorney General Walter Dellinger to Alice Rivlin, Director, Office of Management and Budget, dated August 16, 1995.

## 2. Guidance for Program Operations

### a) Definition of Excepted

In the event of a government shutdown due to a lapse in appropriations, most Federal employees are required to stop work because no funds would be available to pay staff and the government is prohibited from accepting voluntary services. A limited number of employees are “excepted” from this general rule based on the functional activity they perform.<sup>4</sup> This list should include:

1. Employees who are necessary to address emergency situations where the failure to perform those functions would result in an imminent threat to the safety of human life or the protection of property.
2. Employees who perform functions that are funded through fees or under multi-year (as opposed to annual) appropriations.
3. Employees who perform functions that are related to express authorizations to contract or borrow without an appropriation.
4. Employees necessary to meet the obligations necessary to the discharge of the President’s constitutional duties and powers. This is understood to be employees necessary to interpret statutes, such as the Antideficiency Act, to avoid significant constitutional issues.
5. Employees who are required for the orderly termination of agency functions.

In addition, Presidential appointees, who are confirmed by the Senate, are not subject to the furlough. However, Schedule C, non-career SES, and career SES have no special status in the case of a shutdown. They must be deemed “excepted” or “not excepted” based upon the duties they perform.

### b) Compliance with OMB Circular A-11

HUD will avoid initiating new activities unless the activities fall under one of the exceptions. As set forth specifically within this document, the Secretary has determined the activities that are essential to operate HUD during a lapse in appropriations. HUD estimates that a half-day (four hours) would be needed to complete the shutdown.

For the duration of the shutdown period, the automatic apportionment issued by OMB will serve as the obligational authority for necessary HUD operations in the absence of appropriations. Under this Bulletin, OMB apportioned amounts necessary for obligations required in order to carry out the Department’s Contingency Plan which was required by OMB Circular A-11, section 124. The automatic apportionment provides authority to obligate such funds but does not provide any authority to liquidate such funds. No allotments will be issued with respect to such automatic apportionment during the shutdown, since such Contingency Plan will limit and control activity and associated funding during the shutdown. The automatic apportionment does not affect previously approved apportionments (e.g., apportionments of carryover or other multi-year funding). Therefore, HUD will operate, but only consistent with such Contingency Plan, under such previously approved apportionments and allotments (issued by OCEO) for those other funding sources and follow normal funds



National Finance Center records indicate that HUD has 7,497 employees on board as of November 10, 2018. The following chart demonstrates the approximate number of employees, by funding stream, and those who are excepted or exempt:

Funding Streams	Number of Employees (National Finance Center Records)	Approximate Number of Excepted and Exempt Full-time Employees as projected	Approximate Maximum Number of Recalled/ Intermittent Employees on any given day
<b>Annual Appropriations</b>			
<b><u>Administrative Offices &amp; Management</u></b>			
Executive Office	72	15	5
Field Policy and Management	321	45	65
Chief Human Capital Officer	134	15	25
Chief Financial Officer	180	12	40
Chief Information Officer	191	16	15
Chief Procurement Officer	107	8	40
Administration	232	32	35
General Counsel	537	24	75
Departmental Equal Employment Opportunity	19	0	0
Strategic Planning and Management	27	1	1
<b><u>Program Offices</u></b>			
Housing	2,386	103	300
Public and Indian Housing	1,276	15	37
Fair Housing and Equal Opportunity	454	9	5
Policy Development and Research	134	5	6
Lead Hazard Control and Healthy Homes	47	2	2
Community Planning and Development	680	15	36
Office of Inspector General	552	11	275
Ginnie Mae	148	15	21
<b>TOTAL</b>	<b>7,497</b>	<b>343</b>	<b>983</b>

The reasons for the retention of excepted employees are set forth in this document by program office. Additionally, during lapse in appropriations, HUD anticipates that a modest

number of employees, up to 983, would be called in on an intermittent basis to work solely on excepted activities.

**c) Excepted Activities by Office**

**i. Office of Public and Indian Housing (PIH)**

PIH will address emergency situations where the failure to perform those functions would result in an imminent threat to the safety of human life or the protection of property. In addition, PIH will:

- Keep open the line of credit control system for the purposes of disbursing funds for public housing (operating subsidies and capital funds) that were appropriated in prior years or necessary to support an exempted activity. Funds that have already been obligated in the system and which can be drawn down without further action or review by HUD employees may also be accessed.
- Keep open the line of credit control system for section 8 tenant-based rental assistance, noting that funds are only available for payments through December. Obligated HAP funds (HUD-held reserves) are available for draw. Essential personnel at FMC in Kansas City will be available to assist.
- Manage property where HUD is the Administrative Receiver.

Public housing agencies and other grantees continue operating in the event of a federal government lapse in appropriations and there are existing IT systems that will be available to public housing agencies so that they can draw down obligated funding from prior years which can be drawn down without further action or review by HUD employees. The systems below are considered to be excepted activities that are necessary to protect property and records:

- Enterprise Income Verification
- Inventory Management System
- Voucher Management System
- Financial Assessment Sub-System
- Physical Assessment Sub-System
- Integrated Assessment Sub-System
- Management Assessment Sub-System
- Technical Assistance Center
- Customer Assessment Sub-System

**ii. Office of Community Planning and Development (CPD)**

CPD will:

- Continue to disburse CDBG, HOME, HOPWA, Homeless Assistance Grants funds and other block grant funds where prior year funds have been obligated..
- Continue Disaster Recovery Assistance Programs funded through multi-year appropriations.
- Continue to maintain the CACI contract for the systems (e.g., IDIS, DRGR, eSNAPs) that support excepted activities.

Note: CPD grantees submit consolidated plans that are deemed approved if not disapproved within 45 days of submission. These are rolling submissions that are due 45 days prior to submission of the start of their program years. CPD grantees select the start dates of their program years. A long term shut down could result in the automatic approval of consolidated plans. The review of the consolidated plans does not fall under an excepted activity. Technical assistance providers may continue to carry out activities on previously approved work plans.

**iii. Fair Housing and Equal Opportunity (FHEO)**

With respect to systems, the CIO/CFO LOCCS system is necessary for maintaining excepted functions (the distribution of FY2015 and FY2016 funding to grantees) in FHEO. System unavailability would result in the inability of FHEO grantees to receive payment and continue operations in the investigation of their complaints. FHEO needs to provide access to LOCCS to its grantees. FHEO will recall necessary personnel if an emergency arises where the Department must pursue prompt judicial action or obtain restraining orders in a civil rights matter. FHEO will also recall staff that are necessary to respond to a request from the Department of Justice to assist in litigation that has not been stayed. A limited number of FHEO Information Technology personnel are necessary to monitor HEMS and provide system maintenance and fix any system delays/crashes.

**iv. Office of Housing (Housing)**

Work during a lapse in appropriations includes the performance of functions that are funded through multi-year appropriations or where the failure to perform those functions would result in an imminent threat to the safety of human life or the protection of property. These activities are associated with FHA's portfolio of insured mortgages – multifamily, healthcare, and single family, as well as commitments entered into for project-based rental assistance. All excepted staff will be performing functions associated with multi-year or no-year credit reform financing ("x-year") appropriations, and are necessary to administer transactions for which a commitment has been made; administering the portfolio of FHA insured loans (collecting premiums, paying claims); or fulfilling obligations associated with Housing's project-based rental assistance programs. In addition, "excepted" employees will be performing functions related to the protection of government property.

# CHAPTER 2: ACTIVITY SELECTION AND IMPLEMENTATION



## CHAPTER PURPOSE & CONTENTS

This chapter provides an overview of the framework within which grantees must make decisions concerning activities and organizations to fund under their CDBG programs. This chapter also discusses the various types of organizations that grantees may choose to work with as well as how the selection process might be implemented.

SECTION	TOPIC	PAGE
2.1	The Planning Framework	2-1
2.2	Methods of Administering Programs	2-7
2.3	Project and Partner Selection	2-15

### 2.1 The Planning Framework

- ✓ Within the framework established by the CDBG rules, grantees need to make strategic choices about how they administer their local programs. This chapter highlights the planning framework under which the grantee will make these choices.

Key Topics in This Section	✓ The Consolidated Plan
Regulatory/Statutory Citations	Section 104 §91, §570.302
Other Reference Materials on This Topic	✓ Consolidated Plan Guidelines • <a href="http://www.onecpd.info">http://www.onecpd.info</a>

- ✓ To begin the process of implementing CDBG activities, grantees must understand community needs, interests, and objectives in order to make effective choices about how to administer their CDBG programs.
- ✓ Based on this analysis of the community, grantees can then make decisions about:
  - What types of activities will be funded?
  - Who will implement these activities?
  - How will activities/organizations be selected?
- ✓ The remainder of this chapter highlights these key program administration questions and the framework within which these key decisions are made. The first step in this process is the creation of a Consolidated Plan.



### **2.1.1 Consolidated Plan Components**

- ✓ Completing the Consolidated Plan (and annual Action Plans) will help grantees determine what activities and organizations to fund in the coming year.
  - The Consolidated Plan is a plan of three to five years in length, which describes community needs, resources, priorities, and proposed activities to be undertaken under certain HUD programs, including CDBG, Home Investment Partnerships (HOME), Emergency Shelter Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA).
  - Each year, grantees must submit an update to HUD, referred to as an Action Plan. The Action Plan describes the specific planned uses for HUD programs, including CDBG, as well as certain other program requirements.
  - Finally, the grantee must also assess the effectiveness of their analysis of impediments (AI) to fair housing choice and update as necessary. An AI is a comprehensive review of an Entitlement jurisdiction's laws, regulations, and administrative policies procedures and practices; an assessment of how those laws, etc. affect the location, availability and accessibility of housing; an assessment of the conditions, both public and private affecting fair housing choice for all protected classes; and an assessment of the availability of affordable, accessible housing in a range of unit sizes. The AI is covered further in Chapter 19: Fair Housing, Accessibility and Equal Employment.
- ✓ To meet the minimum requirements set forth by HUD, the Consolidated Plan must include five main components:
  - A description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan and a description of the process undertaken to develop the plan;
  - A housing and homeless needs assessment;
  - A housing market analysis;
  - A strategic plan (three to five years in length); and
  - A one-year Action Plan.
- ✓ See Exhibit 2-1 for specific information on what each of these components must include.



### **Exhibit 2-1: Contents of a Consolidated Plan**

A description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan and a description of the process undertaken to develop the plan.

A housing and homeless needs assessment:

- ✓ Number and type of families in need of housing assistance;
- ✓ Disproportionate needs of minority groups, if applicable;
- ✓ Nature and extent of homelessness;
- ✓ Number of persons requiring supportive housing;
- ✓ Size and characteristics of population with HIV/AIDS; and
- ✓ Number of housing units occupied with LMI families with lead-based paint hazards.

A housing market analysis which contains:

- ✓ Supply, demand, cost and condition of housing;
- ✓ Housing stock available to persons with special needs;
- ✓ Description of areas of minority and low-income concentrations;
- ✓ Number, physical condition and rehabilitation needs of public housing units;
- ✓ Housing authority's strategy for improving management and operations of public housing and for improving the living environment of families residing in public housing; and
- ✓ Identification of public housing developments participating in an approved PHA Plan (as per 24 CFR 91.201(b)(1)), including a reference to those being funded with other funds covered by the Consolidated Plan.

A strategic plan that includes the following:

- ✓ General housing, homeless and special needs priorities and geographic investment among priority needs;
- ✓ Identification of any obstacles to meeting underserved needs;
- ✓ Description of how funds made available will be used to address priority needs;
- ✓ Proposed accomplishments over a specific time period;
- ✓ Non-housing community development plan;
- ✓ Neighborhood revitalization strategy (optional);
- ✓ Strategy to remove or improve barriers to affordable housing;
- ✓ Actions to evaluate and reduce lead-based paint hazards;
- ✓ Anti-poverty strategy;
- ✓ A description of the institutional structure;
- ✓ A description of activities to enhance coordination between public and private housing providers; and
- ✓ Public housing resident initiatives.



An action plan which contains:

- ✓ Application form (SF 424);
- ✓ An Executive Summary which includes:
  - Objectives and outcomes for the upcoming year;
  - Self-evaluation of past performance;
  - Citizen participation and consultation process;
  - Public comments, views, and responses;
- ✓ A description of Federal and other resources expected to be available;
- ✓ A description of leveraging of sources and how match obligations will be met;
- ✓ Annual objectives expected to be achieved;
- ✓ A description of the activities to be undertaken, including:
  - Number and type of families that will benefit;
  - Priority needs addressed;
  - Program income anticipated;
  - Proposed accomplishments;
  - Target completion dates;
- ✓ Outcome measures for proposed activities;
- ✓ A description of the geographic distribution of investment;
- ✓ A description of planned homeless and other special needs activities;
- ✓ A description of other actions proposed to:
  - Address obstacles to address underserved needs;
  - Foster and maintain affordable housing;
  - Remove barriers to affordable housing;
  - Evaluate and reduce lead-based paint hazards;
  - Reduce the number of families in poverty;
  - Develop the community's institutional structure;
  - Enhance coordination between public and private housing providers, social service agencies; and
  - Foster public housing improvements and resident initiatives.
- ✓ Appropriate reference to annual revisions made in the PHA plan by the housing authority;
- ✓ If the housing authority is designated as a "troubled" housing authority, the plan to assist the agency in addressing its problems;
- ✓ General certifications;
- ✓ A description of proposed alternate forms of investment not specifically listed as eligible in the HOME regulations;
- ✓ If undertaking homebuyer activities, a description of proposed resale and/or recapture guidelines; and
- ✓ Program-specific certifications.

### 2.1.2 eCon Planning Suite

- ✓ In May 2012, HUD introduced the eCon Planning Suite, a collection of new online tools to help grantees create market-driven, leveraged housing and community development plans. These three tools are designed to help grantees with the needs analysis and strategic decision making:
  - IDIS Template for Consolidated Plan, Annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER).
  - CPD Maps, an online data mapping tool for place-based planning.



- New data sets describing a broad spectrum of community, economic, and market conditions.
- ✓ The IDIS Template for the Consolidated Plan provides a number of benefits to grantees.
  - A uniform, web-based format helps ensure that the Consolidated Plan includes all the required elements per the regulations. The template also includes a Quality Check that grantees can use to review the plan for missing information and discrepancies before submitting the final version to HUD.
  - With the incorporation of the Consolidated Plan and Annual Action Plan into IDIS Online, all of the key reporting elements of the grants management cycle are integrated into one system. This will help ensure cohesiveness between the goals described in the Consolidated Plan and Action Plan and the outcomes tracked in IDIS and reported in the Consolidated Annual Performance and Evaluation Report (CAPER); making the Consolidated Plan a useful management tool.
  - Many of the data tables within the Consolidated Plan Template are pre-populated with the latest housing and economic data. The data is provided to help grantees develop their funding priorities in the Strategic Plan and to save time in searching for and compiling the data.
  - The Consolidated Plan Template is integrated with the CPD Maps tool. The maps and data sets available in CPD Maps can help grantees assess market conditions and present the information in a compelling fashion. CPD Maps is publicly available so that community stakeholders will also have access to the same data sets. The Consolidated Plan Template allows grantees to easily insert maps and data tables from CPD Maps throughout the document.
- ✓ CPD Maps is an online GIS mapping tool designed to provide easy access and analysis of data sets pertinent to the Consolidated Plan. Use of this tool is not required. However, CPD Maps is designed to increase a grantee's understanding of how needs and market conditions are distributed geographically throughout its jurisdiction and to assist with needs- and market-based decision-making.
- ✓ Underlying both the IDIS Template for the Consolidated Plan and CPD Maps are expanded data sets that grantees can use as a basis for planning. In addition to the Comprehensive Housing Affordability Strategy (CHAS) data, HUD is providing 5-year American Community Survey data from the U.S. Census, public housing data, and additional data sets describing business and employment characteristics.

For more details on the e-Con Planning Suite, please visit

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/about/conplan](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/about/conplan)

### 2.1.3 Citizen Participation

- ✓ The Consolidated Plan regulations stipulate that grantees meet certain minimal citizen participation requirements. In fact, each grantee is required to prepare a Citizen Participation Plan that details the community's procedures for involving the public in its program planning and implementation. The complete requirements can be found in 24 CFR 91.105.
- ✓ At a minimum, the Citizen Participation Plan must ensure that the following requirements are met:





- The grantee must hold at least two public hearings a year to obtain citizens' views and to respond to proposals and questions. They should be conducted at a minimum of two different stages of the program year;
  - One of the public hearings should be held during the development of the plan. This can count as one of the two required public hearings;
  - The proposed Consolidated Plan must be published. At a minimum, the grantee is required to publish a summary of the proposed plan in one or more newspapers of general circulation, and make copies available in libraries, government offices, and public places;
  - There must be a 30-day period for citizen review and comment prior to submitting the plan to HUD; and
  - Public comments must be given consideration. The plan should include a summary of comments received and reasons the comments/suggestions were not incorporated.
- ✓ In addition, grantees must consult with other public and private agencies that provide assisted housing, health services, social services, child welfare agencies (regarding lead paint), adjacent units of local government (for non-housing community development needs), and local housing authorities.
- ✓ Meeting or exceeding the minimum citizen participation requirements may help grantees to:
- Better inform the public about community needs and the resources available to address needs;
  - Learn about "hidden" community needs and issues;
  - Allow citizens and organizations to bring forward ideas on how to address community needs; and
  - Generate involvement in and commitment to proposed solutions.
- ✓ In developing the Consolidated Plan and making choices about the types of programs to be undertaken, grantees need to think about the range of possible CDBG activities and about how these activities compare to the needs of the community.

### **2.1.4 Plan Review and Approval**

- ✓ A grantee's Consolidated Plan must be submitted to its respective field office for review and approval at least 45 days before the start of the grantee's program year. HUD will not accept a submission earlier than November 15 or later than August 16 of the Federal fiscal year for which the grant funds are appropriated.
- ✓ HUD will review the consolidated plan upon receipt. The grantee should consider the Plan approved after 45 days unless HUD notifies the grantee before that date that it is disapproved.
- Within 15 days of a disapproval notice, HUD must provide the grantee with written reasons for disapproval and corrective actions.
  - The grantee then has 45 days to resubmit its corrected Consolidated Plan.
- ✓ HUD will disapprove a plan if:
- Any portion of the Plan is inconsistent with the Cranston-Gonzalez National Affordable Housing Act (42 U.S.C. 12703); or
  - It is "substantially incomplete," meaning:



- The Plan was developed without the required citizen participation or the required consultation;
  - The Plan does not include all the elements listed in 24 CFR 91.200 through 91.225; or
  - The Plan contains an inaccurate certification.
- ✓ There are times when grantees must amend their Consolidated Plans after they have been approved. A grantee must amend its Plan:
- To make a change in its allocation priorities or a change in its method of distributing funds;
  - To carry out a new activity using funds covered under the consolidated plan; or
  - To change the purpose, scope, location or beneficiaries of an activity.
- ✓ The citizen participation plan must specify what program changes constitute a substantial amendment to the Consolidated Plan, and what procedure will be followed to amend the plan. While all amendments must be made public, it is substantial amendments that are subject to a citizen participation process, in accordance with the grantee's citizen participation plan. Such plan must provide a period of not less than 30 days to receive public comments on substantial amendments before they are implemented.
- ✓ Grantees may submit a copy of each amendment to HUD as it occurs, or at the end of its program year.

### 2.1.5 Reporting on the Consolidated Plan

- ✓ Grantees are required to submit a Consolidated Annual Performance and Evaluation Report (CAPER) 90 days after the end of the grantee's program year. The CAPER must include the following:
- A description of the resources made available;
  - The investment of available resources;
  - The geographic distribution and location of investments;
  - The families and persons assisted including their racial and ethnic status; and
  - Actions taken to affirmatively further fair housing
- ✓ The CAPER must also include detailed information on progress towards addressing priorities, goals, and objectives outlined in a grantee's Consolidated Plan.
- ✓ Refer to Chapter 13 of this manual for further details on the CAPER.

## 2.2 Methods of Administering Programs

- ✓ Grantees have many options for how they can administer their CDBG programs. This section highlights the range of possible options.

Key Topics in This Section	<ul style="list-style-type: none"><li>✓ Grantee responsibilities</li><li>✓ Subrecipients</li><li>✓ Community Based Development Organizations (CBDOs)</li></ul>
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	<ul style="list-style-type: none"> <li>✓ Community Development Financial Institutions (CDFIs)</li> <li>✓ Faith Based Organizations</li> <li>✓ Contractors</li> </ul>
Regulatory/Statutory Citations	<p>Section 105(a)(15) §570.3, §570.200(j), §570.204, §570.503</p>
Other Reference Materials on This Topic	<p>OneCPD website resource library on <a href="http://www.onecpd.info">http://www.onecpd.info</a>:</p> <ul style="list-style-type: none"> <li>✓ Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight</li> <li>✓ Guidance to Faith-Based and Community Organizations on Partnering with the Federal Government</li> <li>✓ CPD Notice 04-10: Notice of Guidelines for Ensuring Equal Treatment of Faith-based Organizations</li> </ul>

### 2.2.1 Overview

- ✓ The CDBG Program does not dictate which kinds of activities or organizations grantees work with to implement their programs. Instead, grantees must make choices about who will administer and carryout CDBG activities. These choices are made as part of the planning process. Options for carrying-out eligible activities include use of:
  - Grantee staff;
  - Subrecipients;
  - Community Based Development Organizations (CBDOs);
  - Community Development Financial Institutions (CDFIs);
  - Faith Based Organizations;
  - Developers,
  - Contractors.

### 2.2.2 Grantee Staff Administration of Programs

- ✓ Some communities' CDBG programs are run with few staff and a large number of subrecipients while others are administered primarily by grantee staff and few subrecipient organizations. Factors which tend to affect the degree to which grantee staff are relied upon more heavily for all CDBG functions include:
  - Size of the community and of the entitlement grant amount;
  - Types of programs undertaken;
  - Local politics;
  - Capacity of in-house staff; and
  - Capacity and availability of subrecipient organizations.
- ✓ Before undertaking any CDBG-funded activity, grantees should consider the following issues:



- Is there political will to carry the program/project through the development, approval, and implementation phases?
  - Does the required staffing experience currently exist?
  - Is there sufficient time to take on new or expanded work?
  - Are there adequate and appropriate administrative resources (e.g., legal, financial, etc.)?
  - Are there subrecipients with the capability to assist with the program/project?
  - Will consultants be needed?
  - Are there sufficient funds to carry out the program/project and/or to invest the level of effort necessary for its implementation?
- ✓ Staffing for CDBG programs and activities generally requires:
- Conducting a skills inventory of staff members;
  - Developing a list of required skills;
  - Assessing where gaps exist between existing staff skills and required skills; and
  - Undertaking the appropriate training, capacity building, and staff expansion necessary to administer the programs/activities.
- ✓ Based upon the grantee's analysis of staffing capacities and upon programmatic needs, the grantee must determine whether and/or to what extent it will work with subrecipients, CBDOs, contractors, and CDFIs.

### 2.2.3 Subrecipients

- ✓ A subrecipient is a public or private non-profit agency or organization receiving CDBG funds from a grantee or another subrecipient to undertake eligible activities.
- Entities, including public and private for-profit organizations, providing assistance to microenterprises are considered subrecipients.
  - Contractors are *not* considered subrecipients.
  - CBDOs are not considered subrecipients *unless* the grantee specifically designates these organizations as such.
  - Institutions of higher learning may be subrecipients if carrying out CDBG-eligible activities.
- ✓ The grantee is responsible for ensuring that CDBG funds are used in accordance with all program requirements. The use of designated subrecipients (or public agencies or contractors) does not relieve the grantee of this responsibility. The grantee is also responsible for determining the adequacy of performance under subrecipient agreements (and procurement contracts) and for taking appropriate action when performance problems arise.
- ✓ Before disbursing funds to any organization that is carrying out CDBG activities on behalf of the grantee as a subrecipient, a written agreement must be executed. The CDBG regulations stipulate that certain requirements be included in all written agreements with subrecipients. These requirements are listed in the section below.
- ✓ Written agreements must remain in effect for the length of time that the subrecipient has control over any CDBG funds, including program income. However, it is good practice to



update subrecipient agreements annually to ensure the agreements are current with regulations and requirements. This process also allows an opportunity to revisit and clarify problem areas or issues.

### 2.2.4 Subrecipient Agreements

- ✓ For subrecipients, compliance with applicable requirements is covered through a Subrecipient Agreement. The following general requirements are applicable:
  - All CDBG requirements are applicable to subrecipients.
  - Procurement by the subrecipient must follow a written code of conduct and established procurement procedures that provide open and free competition in accordance with OMB Circular A-110.
  - Uniform administrative requirements in 24 CFR Part 85 and OMB Circular A-87 and A-133 must be met by subrecipients that are governmental entities (including public agencies).
- ✓ The grantee may allow the subrecipient to retain program income for use for specified eligible activities, provided a subrecipient agreement remains in effect during any period the subrecipient has control over the program income. The agreement must specify the activities that will be undertaken with the program income. Program income is subject to all CDBG requirements. At a minimum, the written agreement with the subrecipient shall include provisions concerning the following items:
  - Statement of work - The agreement shall include a description of the work to be performed, a schedule for completing the work, and a budget. These items shall be in sufficient detail to provide a sound basis for the grantee to effectively monitor performance under the agreement.
  - Records and reports - The grantee shall specify in the agreement the particular records the subrecipient must maintain and the particular reports the subrecipient must submit in order to assist the grantee in meeting its recordkeeping and reporting requirements.
  - Program income - The agreement shall include the disposition of any program income received as a result of the CDBG project in compliance with all CDBG requirements. The agreement shall also specify that, at the end of the program year, the grantee may require remittance of all or part of any program income balances held by the subrecipient. For more information on the remittance of excess program income, please see chapter 11 of this manual.
  - Uniform administrative requirements - The agreement shall require the subrecipient to comply with applicable uniform administrative requirements, (OMB Circular A-110, implemented at 24 CFR Part 84; A-122 or A-21, as applicable; and A-133).
  - Other program requirements - The agreement shall require the subrecipient to carry out each activity in compliance with all Federal and State laws and regulations except that:
    - The subrecipient does not assume the grantee's environmental responsibilities; and
    - The subrecipient does not assume the grantee's responsibility for initiating the review process under the provisions of 24 CFR Part 52, Intergovernmental Coordination Regulations.



- Conditions for religious organizations - Where applicable, the conditions prescribed by HUD for the use of CDBG funds by religious organizations shall be included in the agreement.
- Suspension and termination - The agreement shall specify that, in accordance with 24 CFR 85.43, suspension or termination may occur if the subrecipient materially fails to comply with any terms of the agreement, and that the agreement may be terminated for convenience in accordance with 24 CFR 85.44.
- Reversion of assets - The agreement shall specify that upon its expiration, the subrecipient shall transfer to the grantee any CDBG funds on hand at the time of expiration and any accounts receivable attributable to the use of CDBG funds. It shall also include provisions designed to ensure that any real property under the subrecipient's control that was acquired or improved in whole or in part with CDBG funds in excess of \$25,000 is either:
  - Used to meet one of the three National Objectives of the CDBG program until five years after expiration of the agreement, or for such longer period of time as determined to be appropriate by the grantee; or
  - Disposed of in a manner that results in the grantee being reimbursed in the amount of the current fair market value of the property less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, or improvement to, the property. (Reimbursement is not required after the five years referenced above.)

### 2.2.5 Community Based Development Organizations

- ✓ CDBG funds may also be provided to Community Based Development Organizations (CBDOs) to carry out certain activities in connection with neighborhood revitalization, community economic development or energy conservation projects.
  - A neighborhood revitalization project must include activities of sufficient size and scope to have an impact on the decline of a particular neighborhood.
    - The neighborhood must be designated in a local comprehensive plan or other local planning document or ordinance.
    - For communities with populations of less than 25,000, the entire community can be considered a neighborhood.
  - A community economic development project must include activities that will increase economic opportunity, principally for LMI persons, or that retain or create jobs.
    - Projects that address a lack of affordable housing accessible to existing or planned jobs are considered eligible under a community economic development project.
  - Energy conservation projects must include activities that address energy conservation, principally for LMI persons in the community.
- ✓ In order to qualify as a CBDO, an organization must have the following characteristics:
  - Is organized under state or local law to engage in community development activities in a specific geographic area within the community;



- Has as its primary purpose the improvement of the physical, social, economic environment of its service area by addressing one or more critical problems in the area, with particular attention to the needs of LMI persons;
  - If a for profit organization, the profits to shareholders or members must be incidental to its operations;
  - The governing body's membership consists of 51 percent LMI residents of its service area or owners or officers of entities located in the service area or representatives of LMI organizations in the service area;
  - Is not an agency or instrumentality of the grantee, and no more than one-third of the board is elected or appointed public officials or employees of the grantee; and
  - The governing body is nominated by the general membership of the organization.
- ✓ Certain types of Community Housing Development Organizations (CHDOs) designated by the grantee under the HOME Program may qualify as a CBDO.
- NOTE: CHDOs only automatically qualify as CBDOs if that CHDO serves a single neighborhood.
- ✓ CBDOs that do not meet the above requirements may be determined to qualify if HUD determines that the organization is sufficiently similar in purpose, function, and scope to the above criteria.
- ✓ CBDOs are not automatically designated as subrecipients: the grantee may elect whether or not to consider the CBDO as a subrecipient.
- ✓ Note that the assets of a CBDO do not revert back to the grantee (as is required with subrecipient organizations) and that CBDOs are free to contract for goods and services.
- For CBDO assets paid for by the grantee *under CDBG*, the grantee may elect to require reversion of assets. It is good practice for the grantee to develop policies about the types of CDBG-funded assets that will be subject to reversion from CBDOs.
  - If the grantee elects to designate the CBDO as a subrecipient, all of the rules regarding subrecipients will also apply to that CBDO, including the requirement for reversion of assets.

### **2.2.6 Community Development Financial Institutions**

- ✓ A community development financial institution (CDFI) is a community-based lending institution. The CDBG regulation changes that took effect in 1995 included certain flexibilities for activities carried out by CDFIs.
- ✓ As defined in the Community Development Banking and Financial Institutions Act of 1994, CDFIs have the following characteristics:
- Primary mission of promoting community development;
  - Serve an investment area or targeted population;
  - Have as its predominant business the provision of loans or development investments and provides development services in conjunction with such loans and investments;
  - Maintains accountability to residents of its investment area or targeted population through representation on its governing board or some other means; and



- Is not an agency or instrumentality of the government (Federal, state or local).
- ✓ CDFIs are not considered subrecipients or contractors. A CBDO may qualify as a CDFI.
- ✓ Types of organizations that may meet these criteria include community development banks; community development loan funds; microenterprise loan funds; and venture capital organizations.
- ✓ The Community Development Banking and Financial Institutions Act of 1994 also created a CDFI Fund to promote economic revitalization and community development through investment in and assistance to CDFIs.
  - The CDFI Fund is managed by the Department of Treasury and provides assistance to qualified organizations.
  - CDFIs then provide funds to other organizations in accordance with their missions.
- ✓ Activities carried out by CDFIs receive special consideration under CDBG regulations regardless of whether or not the CDFI is actually receiving assistance from the CDFI Fund.
  - For a CDFI whose charter limits its investment area to a primarily residential area with 51 percent LMI persons:
    - Job creation/retention activities may be qualified as meeting area benefit requirements;
    - Scattered site housing activities may be considered to be a single structure for the purposes of applying the LMI housing national objective criteria; and
    - Economic development activities may be exempt from the aggregate public benefit standards.
- ✓ For any CDFI, regardless of its investment area, job creation/retention national objective requirements may be met by aggregating the jobs created/retained by all businesses for which CDBG assistance was obligated during the program year.

### **2.2.7 Faith Based Organizations**

- ✓ Effective October 30, 2003, HUD issued a new final rule to remove barriers to the participation of faith-based organizations in eight of HUD's Community Planning and Development programs, including the CDBG program.
- ✓ The amended CDBG regulations establish the following policies (§570.200(j)):
  - Faith-based organizations are eligible for CDBG funding on an equal footing with any other organization. There is no Federal requirement that an organization incorporate or operate as a nonprofit to obtain tax-exempt status under section 501(c)(3) in order to receive CDBG funds.
  - Organizations may not use direct CDBG funds to support inherently religious activities such as worship or religious instruction. If an organization does conduct such activities, the activities must be offered separately than activities funded by the CDBG program, in time or location.
  - Faith-based organizations retain their independence from Federal, state, and local governments, including their exemption from the federal prohibition on employment discrimination on the basis of religion for employees not involved in CDBG funded activities (§570.607).





- Faith-based organizations, like all organizations implementing HUD-funded programs, must serve all eligible beneficiaries without regard to religion. The CDBG statute and regulations prohibit any person from being denied the benefits of, or being subjected to discrimination, on the basis of religion under any activity funded in whole or in part with CDBG funds.
- Faith-based organizations, like all organizations, may receive CDBG funds to acquire, construct, or rehabilitate buildings and other real property as long as the funds only pay the costs attributable to CDBG activities.
- The final rule applies to state or local funds if a state or local government chooses to commingle its own funds with CDBG funds.

### 2.2.8 Developers

- ✓ A nonprofit or for-profit entity may be considered a developer when the organization is being paid by CDBG funds for the purposes of acquisition and/or rehabilitation for homebuyer or rental housing under 24 CFR 570.202(b)(1).
- ✓ A developer does not have to be competitively procured by the grantee; however, costs must be eligible and reasonable for the development being undertaken and a written agreement must be executed between the grantee and the developer outlining all applicable requirements.

### 2.2.9 Contractors

- ✓ A contractor can be either a for-profit or a nonprofit entity that is paid CDBG funds by the grantee (or subrecipient/CBDO) in return for specific services, where payment is made to the contractor as compensation for such services.
- ✓ A contractor is different than a CBDO and/or subrecipient in the following ways:
  - A contractor must be procured competitively according to the OMB rules; and
  - Most of the uniform administrative requirements do not apply to contractors (once the procurement process is complete).
- ✓ Typically, grantees use a contractor when:
  - The project is a discrete activity and does not involve program management or administration;
  - There will be a specific activity under contract with a clearly defined beginning and end date; and
    - The specific activity undertaken by a contractor may be a physical project (like a multi-family rehabilitation) or a social service activity (like running a day care center.)
- ✓ See Chapter 14 in the manual for additional information on procurement.

## 2.3 Project and Partner Selection

- ✓ There are several common ways that grantees may choose their partners. The section below highlights some possible processes for selecting partners.

Key Topics in This Section	✓ Application processes
----------------------------	-------------------------



Regulatory/Statutory Citations	Not applicable
Other Reference Materials on This Topic	Guidebooks for Grantees and Subrecipients in the CDBG Program

- ✓ There are a variety of approaches that grantees use to select activities and organizations for funding under local CDBG programs within the framework of the Consolidated Plan. Note, however, that **contractors** must be selected in accordance with the procurement requirements of 24 CFR Part 85. See Chapter 14 for information on procurement.
- ✓ Communities take many different approaches toward activity selection, including:
  - Some communities take a “wait and see” approach: evaluating each activity on a case-by-case basis as it is proposed.
  - Other communities take a more proactive approach: seeking out and choosing only those projects clearly falling within the scope of a concrete series of objectives and plans.
  - Many communities are somewhere in between these two: on the lookout for interesting opportunities, but working from a basic program design framework.
- ✓ There are four basic models upon which the selection process can be based; however, different variations of these approaches may be necessary or appropriate to meet community needs. These models are discussed below.

### 2.3.1 Formal Application Process

- ✓ Requires the submission of a formal application or proposal from the potential partner organizations, and is typically undertaken once a year in conjunction with the grantee’s planning and budgeting process.
- ✓ Under the formal application process, applications are evaluated based on explicit selection criteria.
- ✓ This process works best in communities with:
  - Numerous or complex activities;
  - Numerous potential applicants with varying degrees of experience; or
  - Politics or other community issues require standardized, consistent treatment of all requests for funding.
- ✓ Advantages to a formal application process are that:
  - It requires the subrecipients to provide all the information needed (e.g., details on the proposed activity and on the organization’s experience and capacity); and
  - It helps to ensure consistency throughout the evaluation process.
- ✓ Disadvantages to a formal proposal approach are that:
 

This type of process tends to favor more experienced subrecipients (i.e., those familiar with the application process);

  - Staff time to ensure consistency, from the preparation of application packages to the review and evaluation of submissions, may be substantial; and
  - This approach may limit new activities or new subrecipients to only one chance per year.



### **2.3.2 Limited Application Process**

- ✓ This approach is similar to the formal application process, but the application is not as detailed and grantees provide more follow-up and “hands on” involvement in the process.
- ✓ Grantees may review the applications and narrow the number of applications under consideration before requesting additional detailed information from the subrecipient.
- ✓ This approach may be useful for grantees interested in encouraging the participation of potential subrecipients not familiar with the program or the application process, or when the grantee’s program is not complex.
- ✓ Some of the advantages of the limited application approach include the fact that it is more open and may attract new organizations or new ideas to the program. On the other hand, this approach shifts the responsibility for determining capacity and experience to the grantee. This, in turn, may require more grantee staff time. In addition, this process may not ensure the consistency and fairness that is more evident in the formal application process.

### **2.3.3 Solicitation of Applications from Qualified Organizations**

- ✓ Grantees identify potential qualified applicants through an informal process or through a general Request For Qualifications (RFQ).
- ✓ From the identified group, grantees identify organizations to carry out specific activities and approach the organization about their interest in doing so.
- ✓ This approach is proactive and is more focused on qualified organizations. Because of this, it may result in less grantee staff time.
- ✓ However, this approach is much more “closed door” than the previous two and can result in criticism of the grantee’s selection process. In addition, by focusing on the known, qualified organizations, lesser known, but possibly equally capable organizations may be overlooked.

### **2.3.4 “Open Door” Or Unsolicited Application Process**

- ✓ This is a “laissez faire” approach to selecting activities and partner organizations. It either encourages or allows consideration of requests for funding at any time during the program year, and may or may not include an actual application.
- ✓ In reality, unsolicited applications may occur regardless of the type of approach in place in the community. However, if there is another process in place (e.g., formal application), the unsolicited application should be required to meet the requirements of the process already in place. This may mean that the application is held until the next application process is conducted, or the application is evaluated based on the criteria used during the regular application process.
- ✓ If the grantee uses the “Open Door” or “Unsolicited Application” process as its only means for accepting applications, it must ensure that all applications are treated consistently and that the same types of information are received and reviewed by the grantee.
- ✓ One of the advantages of this type of process is that it is open and may allow opportunities for grantees to more quickly respond to community needs.
- ✓ The primary disadvantage of this approach is that it is unplanned. Applications may come in at any time and require crucial staff time and effort to respond.



- ✓ Another disadvantage to this approach is timing. By not conducting the process at a specific time of year, grantees may commit funds to projects before qualified applications are received. This process tends to result in budget changes and program amendments throughout the year.

### **2.3.5 Mixed Approach**

- ✓ As mentioned previously, the reality in many communities may be that one application process only is not feasible or does not work given local politics and community needs. In these cases, a variation of any of the above approaches or a mix of the four approaches may be more appropriate.
- ✓ Grantees should use caution, however, when mixing very different types of application processes and strive to maintain accountability to applicants and consistent treatment of requests for funds regardless of the process used.

### **2.3.6 The Application Package**

- ✓ The specific elements of a grantee's application package will vary based on the type of application process used as well as the grantee's preferred level of information requested on the applicant organization and project/activity.
- ✓ In order for an application package to be effective, it should:
  - Provide a clear explanation of the grantee's CDBG program in order for prospective subrecipients to understand what they are applying for, how their proposed project fits into the overall program and what their responsibilities will be;
  - Provide detailed information regarding eligible activities and national objectives to eliminate the possibility of applications for ineligible activities;
  - Not be so complicated that organizations are discouraged from applying; and
  - Require enough information about the organization to permit the grantee to make informed reasonable decisions about the subrecipient's ability to carry out the proposed activity.

### **2.3.7 General Contents of an Application Package**

- ✓ The general contents of an application package fall into two categories:
  1. Information provided to applicants; and
  2. Information required from the applicants when their applications are submitted.

#### **Information Provided to Applicants**

- ✓ In order to provide a clear picture to prospective subrecipients of the CDBG program as a whole and the grantee's program in particular, the application package may contain the following elements:
  - Summary of funding available (total and, if applicable, by activity type);
  - Summary of the grantee's funding priorities (if applicable);
  - Current income limits for the program;
  - Summary of eligible activities;



- Summary of national objectives;
- Description of the policies and criteria used to determine funding allocations;
- Schedule for determining funding allocations;
- Summary of rules and requirements applicable to CDBG subrecipients;
- Name and telephone number of a contact person for questions; and
- Application deadline and location where applications are to be submitted.

### Information Required from Applicants

- ✓ Types of information required from applicants often includes:
  - Project summary:
    - Need/problem to be addressed;
    - Project location;
    - Population/area to be served;
    - Description of work;
    - Proposed budget (including staff and other sources of funding);
    - Proposed schedule of work;
  - Agency information:
    - Background and mission;
    - Non-profit determination;
    - Articles of information/by-laws;
    - Personnel; and
    - Financial information (funding sources, financial statements, audits, etc.).
- ✓ The amount of information required from applicants under a grantee's CDBG program will vary depending upon the type of application process used.
  - For example, if a grantee uses the formal application process, this process typically requires applicants to provide all the information needed (e.g., details on the proposed activity and on the organization's experience and capacity).
  - On the other hand, if using a limited application or open door process, the amount of information required from applicants is typically less. In this case, the grantee either makes decisions based on a lesser amount of information, or it requests the detailed information later in the process.

### 2.3.8 Evaluating Applications

- ✓ Grantees should establish criteria for selecting its partners and assessing risk. The criteria should be used to determine whether a prospective subrecipient has the necessary systems in place to carry out the proposed project/activity *and* to comply with applicable rules and regulations.



- ✓ At a minimum, the criteria should include:
  - Eligibility of the activity under CDBG;
  - Compliance with a CDBG national objective;
  - Consistency with the priorities and specific objectives established in the Consolidated Plan;
  - Prior experience with CDBG and/or other grant programs;
  - Prior experience in the community;
  - Prior experience in the type of project/activity being proposed;
  - Organization's administrative and financial capacity to carry out the proposed activity; and
  - Appropriateness of the design of the proposed project or program delivery approach.
- ✓ In addition to general selection criteria, some grantees perform a risk analysis. This process provides for a way to assess potential risks associated with proposed projects. The analysis can also be used to guide the allocation of training, technical assistance and monitoring resources once activities are funded.

## Sheila Dravis

---

**From:** Sheila Dravis  
**Sent:** Tuesday, March 19, 2019 9:15 AM  
**To:** David Sulkis; Diana Nytko; Gary Johnson (gjohnson@unitedwayofmilford.org); Joel Baldwin (janjoel2001@yahoo.com); Jorge Santiago (jsantiago@milfordbank.com); Julie Nash  
**Subject:** FY19-20 CDBG Application Binders, Public Hearing and HPC Membership  
**Attachments:** Milford Housing Partnership Membership Structure 2019.pdf

Good morning all,

The CDBG application binders will be available to pick up after 1pm Thursday March 21, 8:30- 12:30 on Friday March 22, and 8:30-5pm Monday-Wednesday March 25-27.

The public hearing begins at 6pm Wednesday March 27.

I provided the Mayor with the attached member structure to fill the committee vacancies. Your input and recommendations to the Mayor are welcome, please review the member structure to find vacancies area.

Please feel free to contact me with any questions. Thank you all for your involvement in the process, it's invaluable.

*Best Regards, Sheila*

*CDBG Administrator & Fair Housing Officer*

*City of Milford, Department of Economic & Development*

*70 W. River Street, Milford CT 06460*

*ph: 203-783-3230*



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*"A Small City With A Big Heart"*

DEPARTMENT OF  
ECONOMIC & COMMUNITY DEVELOPMENT

January 28, 2019

To All Interested Parties:

With this letter, the City of Milford is announcing the start of its 2019-20 Notice of Funding Availability (NOFA) and planning process for the Program Year 45 Community Development Block Grant (CDBG) Consolidated Annual Action Plan. The Program Year begins October 1, 2019 and ends September 30, 2020.

Included in the packet are the following program and grant application information to guide your organization through the process, eligibility and post award requirements.

1. Public Notice of NOFA & Public Hearing
2. 2019-20 CDBG Schedule
3. 2019-20 CDBG Program Guideline
4. 2019-20 CDBG Application form
5. 2019-20 CDBG Reporting Forms (Activity Budget, Activity Report, Request for Reimbursement)
6. HUD Household Certification form
7. 2018 HUD Income Guidelines

The application is due date by 5:00 p.m. on Friday, March 15, 2019 to the Department of Economic and Community Development, Parsons Government Complex, 70 West River Street, 2<sup>nd</sup> floor, Milford, CT 06460. Applications received by fax or email will not be considered. The 2019-20 CDBG application and forms will be made available on the EDC webpage of the City's website

<http://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-program>.

The Department of Economic and Community Development will hold a public hearing on Wednesday, March 27, 2019 at 6:00 pm, in Conference Room B, Parsons Government Complex, 70 West River Street, 2<sup>nd</sup> floor, Milford, CT. The ECD staff and Housing Partnership Committee will hear public comment and it is an important opportunity for applicants to present and discuss their funding proposals.

Please feel free to contact me with any questions.

Best Regards,

*Sheila Dravis*

Sheila Dravis, CDBG Administrator

[sdravis@ci.milford.ct.us](mailto:sdravis@ci.milford.ct.us)

enclosures

70 West River Street, Milford, CT 06460-3317  
Tel (203) 783-3230 - Fax (203) 878-7394



**CITY OF MILFORD**  
**Community Development Block Grant (CDBG)**  
**NOFA, Public Hearing & Amendment**

With this Notice of Funding Availability (NOFA), the City of Milford, Department of Economic and Community Development (ECD) requests public participation in preparing its Program Year 45 Community Development Block Grant (CDBG) Consolidated Annual Action Plan. The Annual Action Plan process is designed to assess Milford's housing and community needs and create a framework to assist in improving public facilities, housing, and public services that support households of low to moderate income in the community.

The U.S. Department of Housing and Urban Development (HUD) has not announced the 2019-20 Entitlement Grant award. The City of Milford will proceed with its public planning process based on an estimate award of \$515,000, similar to its 2018-19 grant award. HUD announces the Entitlement Grant awards Milford will adjust any funding allocations based on the percentage in which the actual award increases or decreases from the estimated award amount.

The ECD invites non-profit organizations and local agencies to submit a 2019-20 CDBG funding application and is available to discuss grant proposals, program and HUD requirements. The CDBG application and program guideline, forms and a public participation schedule are available on the EDC webpage of the City's website <http://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-program>. The CDBG application is due on or before March 15 2019 at 5:00 p.m. in the Department of Economic and Community Development, Parsons Government Complex, 70 W. River Street, 2<sup>nd</sup> floor, Milford, CT.

The Department of Economic and Community Development will hold a public hearing on Wednesday, March 27, 2019 at 6:00 pm, in Conference Room B, Parsons Government Complex, 70 West River Street, 2<sup>nd</sup> floor, Milford, CT. The ECD staff and Housing Partnership Committee will hear public comment and applicant proposals, this comment is included in the Plan. The 2019-20 Annual Action Plan and proposed budget will be available for review during 30-day public comment period prior to the Board of Alderman review in July and its submittal to HUD on or before August 16, 2020.

An substantial amendment will reprogram the funds from the following Action Plan years to 2015 Waste Water Pump Station project funded to install and elevate new generator equipment: 2015-16 \$25,000, 2017 \$77,533 and 2018 \$77,533. The project upgrade will ensure it remains running when the area experiences flooding and will be completed Spring 2019.

Given reasonable notice, an individual with a disability may request assistance to participate in the public hearing by contacting the ECD at (203)783-3230.

# CDBG Schedule

## PROGRAM YEAR 45

### October 1, 2019 - September 30, 2020

<u>DATE</u>	<u>ACTIVITY</u>
January 25, 2019	Mail 2019-2020 NOFA Memo & CDBG Application
January 31 - February 15, 2019	15-Day Public Notice of NOFA, Public Hearing Date & Amendment
<i>March 15, 2019, Friday</i>	<i>CDBG PY45 Application Due: 5 p.m. Friday, March 15, 2019</i>
March 27, 2019, Wednesday <b>6:00 pm Conf Room B</b>	1 <sup>st</sup> Public Hearing – Public comment on community & housing needs, and hear application proposals and HUD updates.
March - April	ECD & Housing Partnership – Review Application & Propose Budget
April - May	Submit proposed budget to Mayor and prepare PY45 Annual Action eCon Plan
May 16 – June 17, 2019	30-day Public Notice of PY45 Action Plan & proposed budget
June 18, 2019	Submit PY45 Action Plan to Mayor/Attorney – Agenda & Resolution
July 1, 2019	Board of Aldermen Meeting – Present PY45 Action Plan & budget
July - August	IDIS Entry of PY45 eConPlan & Environmental Record Review (ERR)
August 1, 2019	15-day Public Notice ERR/Request for Release of Funds (RROF)
August 2, 2019	HUD 1.5 Expenditure to Grant Ratio Deadline
August 16, 2019	PY45 Action Plan Due to HUD Hartford Office (45 day before new PY)
<i>September 1, 2019</i>	<i>Due Subrecipient Final PY44 Reimbursements &amp; Reports to Reconcile, Report and Prepare CAPER for completion prior to 9/30/19</i>
October 1, 2019	Program Year 45 Begins
November 28 - December 13, 2019	15-day Public Notice PY44 CAPER Accomplishments & Public Hearing
December 4, 2019 Wednesday <b>5:30 pm Conf Room B</b>	2 <sup>nd</sup> Public Hearing – Discuss community goals & housing objectives SubRecipient questions, PY44 CAPER Accomplishments, and HUD updates.
December 30, 2019	PY44 CAPER Due 90 days in Hartford (90 days from 9/30/19)

**\*\* All CDBG Applications, Notices, Reports posted to City website on ECD webpage**

CITY OF MILFORD  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
2019-20 Application Program Guide  
Program Year 45

**Application Instructions:**

- Submit a single unbound CDBG application request with attachments and supplemental program material.
- The CDBG application and forms are available on the EDC webpage of the City's website <http://www.ci.milford.ct.us/economic-and-community-development/pages/community-development-block-grant-cdbg-program>
- ***Complete applications are due by Friday, March 15, 2019 at 5:00 pm.***  
Incomplete applications or applications submitted on modified form(s) will deem the funding request incomplete.
- Applications received by fax or email will not be considered.  
*Deliver or Mail Applications To:*  
Sheila Dravis, CDBG Administrator  
Department of Economic and Community Development  
70 West River Street, 2<sup>nd</sup> floor  
Milford, CT 06460

**Application Attachments:**

Please submit the following documents with the application.

- ☐ CDBG Activity Budget - *List all project related funding & resources on the form.*
- ☐ Organizational current operating budget.
- ☐ Most recent Annual Financial Statement Report.
- ☐ Most recent A-133 Single Federal Audit if \$750,000 or more in Federal funds was received in 2017/2018. *OR, a statement that a A-133 Single Federal Audit is not necessary since less than \$750,000 or \$0 in Federal funds were received in 2017-18.*
- ☐ Organizational Mission Statement, By-laws, and Board of Directors.
- ☐ Copy of IRS 501(c)(3) Tax Exemption Letter.
- ☐ Program service information and newsletter, if applicable.
- ☐ Client testimony, if possible.
- ☐ Project scope of work and cost estimate from a vendor

**Program Compliance**

Prior to applying for CDBG funding the applicant should be relatively sure the household income of its participants are at, or below, the HUD low and moderate income guidelines OR delineate the service area. With this data the Sub-recipient of a CDBG award submits an Activity Report with quarterly accomplishment, participant demographics and income (unless a presumed benefit category).

Direct Benefit Eligibility

The Applicant will use the Household Certification Form provided to document the participant demographics and household income for Activity reporting and recordkeeping purposes as required by HUD.

### Area Benefit Eligibility

To document the program/project is located in a low and moderate income area as determined by Census Bureau for Milford or its service area, via a list of participant addresses used to verify the participants live in a L/M area. The data is recorded for the project file as required by HUD. Assistance from the CDBG office through the City of Milford is available.

### **Funding Criteria**

Grants to assist an non-profit or agency provide a service or improve a public facility project are determined on the activity budget or a project cost estimate, available funding, benefit to the community, the financial need and capacity of the organization and the other funding requests and priorities in the funding cycle.

Public Service Activities – Highly competitive review due to number of applicants and funding level capped at 15% of the annual block grant, plus 15% of the Program Income from the previous year. A proposed public service grant request ideally encompasses a service improvement or new service. Funds *cannot* be used to cover a decrease of City or State funding. This prohibition *does not apply* to activities formally funded privately or through other Federal sources.

Housing Activities - A high priority locally and HUD. Funding consist of but is not limited to, assisting non-profit and private residential to acquire property to create affordable units, to make residential and public housing repairs and improvements.

\*Public Facility Projects – The complexity and overall cost to complete a public facility improvement is high and involves Davis Bacon Rules and Prevailing Wage Rates. An award amount is based on the general factors noted above, the estimate provided by the Sub-recipient, an 3-10% project contingency inconsideration of prevailing wage rates and overages, cost to hire a qualified project manager (\$1,000 max/reimbursed to Sub-recipient), and CDBG delivery costs related to coordinating the procurement process on behalf of the Sub-recipient. The actual bid cost will determine whether the project is feasible.

Planning & Administration – Capped a 20% of the annual block grant, plus 20% of the Program Income received in the current year, is used to support the Planning & Administration costs related to the management of the CDBG program. CDBG administrative delivery costs related to coordinating the procurement process can be included in a project budget to complete a public facility project.

### **Application Eligibility**

An activity must be meet a HUD National Objective, local objectives and be an eligible CDBG activity.

### **National Objectives**

Eligible activities funded under the CDBG program must meet at least one of three broad HUD national objectives to benefit low to moderate (L/M) income persons or area.

#### 1. Persons/Households

##### **Area**

CDBG projects benefiting person's living in L/M census tracts or a service area. Street improvements, water & sewer lines, neighborhood facilities, and economic development and improvements.

<b>Persons</b>	<p>Person's participating in CDBG supported public services and facility improvements</p> <p>Person's in the "<u>Presumed Benefit</u>" <u>Income Category</u> include abused children, battered spouse, elderly persons (defined by HUD as 62 years of age and above), homeless persons, severely disabled adults, illiterate adults, migrant farm workers, persons with AIDS.</p>
<b>Housing</b>	CDBG funds to benefit or create supportive housing, affordable or public housing unit(s); residential property acquisition and repair, and homeownership.
<b>Jobs</b>	Create or retain L/M jobs thru economic development, micro-enterprise business assistance and job training.

2. Preventing or eliminating slums or blight  
Improvements might include clearance of derelict properties, converting a lot to a park or playground, façade improvements, removal of toxic materials.
3. Urgent Needs  
Urgent assistance to meet a particular serious and immediate threat to health or welfare of the community whereby other financial resources are not available. Immediate needs from a catastrophe such as a flood or hurricane.

#### **Eligible Activities**

***Acquisition of Real Property*** – for housing or any public purpose that meets a low and moderate income benefit.

***Disposition of Real Property*** – reasonable costs incurred through sale, lease, donation, or temporary management of such CDBG acquired property. Proceeds from such disposition of real property shall be program income subject to regulation 570.504.

***Public Facilities and Improvements*** – acquisition, construction, ADA compliance or repair of eligible facilities by a public or private, non-profit entity. The facility must be shown to serve an income eligible population and be open to the public during normal operating hours.

***Clearance Activities*** – building demolition, environmental remediation and relocation of structures.

***Public Services*** – (capped at 15% of grant) including rental & mortgage assistance, job training, fair housing, child care, senior services, homeless services, health care and substance counseling, housing counseling, and recreation or educational programs

***Interim Assistance-*** improvements or repairs needed prior to the implementation of a comprehensive improvement plan or to address an emergency situation that threatens public health or safety.

***Relocation*** – for short-term relocation of individuals, families or businesses necessary to perform rehabilitation work or long term relocation where displacement occurs.

***Loss of Rental Income*** – where private property owners are holding space vacant as part of a relocation plan.

***Privately-Owned Utilities*** – acquire, construct, reconstruct, rehabilitate or install distribution lines and related facilities for privately owned utilities.

***Rehabilitation of Structures*** – residential or commercial rehabilitation and related costs such as code enforcement, energy conservation, handicap accessibility and encapsulation of hazardous material, if required. General interior repairs may be considered but the scope of work completed is at the discretion of the CDBG Administrator and budget. **New construction or expansion of housing units is not eligible.**

***Handicapped Accessibility*** - the removal of material and architectural barriers that restrict the accessibility or mobility of elderly or disabled persons.

***Code Enforcement*** – salaries and overhead costs directly related to the enforcement of state and/or local codes in designated, deteriorated areas where such enforcement, together with public or private improvements, rehabilitation, or services to be provided, may be expected to arrest the decline of the area.

***Special Economic Development Activities*** – creating business incubators, business expansion loans, providing technical assistance to struggling business enterprises, or training as part of a welfare to work program.

***Micro Enterprise Assistance*** – technical assistance to a new or existing micro enterprise or general support to owners or persons developing micro enterprises.

***Special Activities by Community Based Development Organizations*** – a CBDO is an organization specifically designated by the city of Milford to carry out specific activities that can not be adequately addressed by the grantee. These activities might include Neighborhood Revitalization, Community Economic Development or Energy Conservation.

***Homeownership Assistance*** – down payment assistance, interest rate subsidies and closing cost assistance.

***Planning & Capacity Building*** – Comprehensive Plans, project plans, capital improvement plans, Analysis of Impediments to Fair Housing Choice, environmental and historic preservation studies (may be subject to the 20% administrative cap depending on the specific activity).

***Program Administration Costs*** - (capped at 20% of grant) staff and costs related to administration of the CDBG Program.

***Other Activities:***

***Payment of non-Federal Share*** – to supplement other federally funded activities where CDBG funds are permitted. The activity must be eligible under other CDBG criteria.

***Urban Renewal Completion*** – completion of projects funded under Title 1 of the Housing Act of 1949.

***Technical Assistance*** – funds can be used to increase the capacity of public or non-profit entities to carry out eligible neighborhood revitalization or economic development activities.

***Assistance to Institutions of Higher Education*** – educational institutions engaged in CDBG eligible activities are eligible to receive funds.

***Housing Services*** – administrative and program delivery service costs related to the administration of the HOME program.

***Reconstruction*** – unlike rehabilitation involves the rebuilding of a structure on the same site in substantially the same manner. Reconstruction is not considered “new construction” which is prohibited.

***In Rem*** – specifically authorizes activities necessary to make essential repairs and the payment of operating expenses needed to maintain the habitability of housing units acquired through tax foreclosure.

## **Ineligible Activities**

***Furnishings and personal property*** ( 570.207 Ineligible activities (iii)) The purchase of equipment, fixtures, motor vehicles, furnishings, or other personal property not an integral structural fixture is generally ineligible. CDBG funds may be used, however, to purchase or to pay depreciation or use allowances (in accordance with OMB Circular A-21, A-87 or A-122, as applicable) for such items when necessary for use by a recipient or its subrecipients in the administration of activities assisted with CDBG funds *Reference: §570.207(b)(1)(iii)*, or when eligible as fire fighting equipment, or when such items constitute all or part of a public service pursuant to § 570.201(e)

***Operating & Maintenance Expenses*** – any expense associated with repairing, operating or maintenance of a public facility, improvements, and services is ineligible. This includes the maintenance and repair of public streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, parking areas and other public facilities and improvements. Payment of salaries for staff, utility costs, and similar expenses necessary for the operation of public works facilities is prohibited.

***New Housing Construction*** – new construction to create or expand existing dwellings is generally prohibited. New construction housing is only eligible in conjunction with Housing Development Grant funding or as part of a relocation plan.

***Maintenance of buildings or portions thereof, used for the general conduct of government*** – however, the removal of architectural barriers or the acquisition of land is eligible.

***General Government Expenses*** – the conducting normal government business.

***Political Activities*** – such as political forums or voter registration.

## ***HUD Consolidated Strategic Goals and Objectives***

The overall goal of the Community Development Block Grant Program is to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low- and moderate-income persons.

(i) Decent housing includes assisting homeless persons to obtain appropriate housing and assisting persons at risk of becoming homeless; retention of the affordable housing stock; and increasing the availability of permanent housing in standard condition and affordable cost to low-income and moderate-income families, particularly to members of disadvantaged minorities, without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability. Decent housing also includes increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs, including persons with HIV/AIDS and their families, to live with dignity and independence; and providing housing affordable to low-income persons accessible to job opportunities.

(ii) A suitable living environment includes improving the safety and livability of neighborhoods; increasing access to quality public and private facilities and services; reducing the isolation of income groups within a community or geographical area through the spatial de-concentration of housing opportunities for persons of lower income and the revitalization of deteriorating or deteriorated neighborhoods; restoring and preserving properties of special historic, architectural, or aesthetic value; and conservation of energy resources.

(iii) Expanded economic opportunities includes job creation and retention; establishment, stabilization and expansion of small businesses (including micro-businesses); the provision of the public services concerned with employment; the provision of jobs involved in carrying out activities under programs

covered by this plan to low-income persons living in areas affected by those programs and activities; availability of mortgage financing for low-income persons at reasonable rates using nondiscriminatory lending practices; access to capital and credit for development activities that promote the long-term economic and social viability of the community; and empowerment and self-sufficiency opportunities to low-income persons to reduce generational poverty in federally assisted and public housing.

#### Housing Objectives

- Increase the energy efficiency and ADA accessibility of residential property.
- Reduce costs for households paying 30% or more income for housing.
- Improve living conditions for renters in owner occupied multi-family property.
- Increase the opportunities for homeownership.

#### Homeless Housing

- Address the needs of the homeless and at-risk households with counseling and meal services.
- Provide emergency shelter on a temporary basis for those in need.

#### Community Development & Economic Development

- Improve public facilities in support of neighborhood revitalization
- Improve accessibility in the community through ADA compliant improvements.
- Support public service agencies that serve the community.
- Expand economic opportunities principally to the benefit of income eligible persons.
- Promote clean and efficient use of energy in public facilities.

### **Outcomes Measurement**

HUD's Office of Planning and Development, in response to a Federal Management Agenda, requests recipients integrate a Performance Measurement System Components as part of the Consolidated Planning process. The intent is to make planning and evaluation activities more "results oriented" and thus more useful to communities in assessing their progress.

The five components are defined as follows:

- **Goals:** the proposed solutions to problems or needs identified by the community.
- **Inputs:** the resources dedicated to or consumed by the program such as money, staff, equipment and supplies.
- **Activities:** what the program does with the inputs to fulfill its mission. Activities include the strategies, techniques, and types of treatment that comprise the program's production process or service methodology.
- **Outputs:** the direct products of a program's activities. They are usually measured in terms of the volume of work accomplished, such as the number of low income households served, number of loan applications processed, number of units constructed or rehabilitated, linear feet of curbs and gutters installed, or number of jobs created or retained.
- **Outcomes:** the benefits that result from the program. Outcomes typically relate to a change in conditions, status, attitudes, skills, knowledge, or behavior. Common outcomes could include improved quality of life for program participants, improved quality of local housing stock, or revitalization of a neighborhood.

Under the performance measurement section of the CDBG application, describe the component(s) that best characterize the activity being considered for funding. The component(s) should be carefully



considered, as they will form the basis for evaluating the actual performance of the sub recipient activity. Organizations receiving financial assistance will be subject to on-site monitoring visits.

### **Other Federal Requirements**

#### Circular A-133 Single Federal Audit

HUD requires that sub-recipients meet OMB Circular A-133 *Audits of States, Local Governments, and Non-Profit Organization*. If your organization expends \$750,000, or more, in Federal grant awards during its most recent fiscal year, please acknowledge that the City of Milford will be provided a copy of the federal single audit report if the Applicant receives a CDBG award.

#### Increased Activity Accomplishment Oversight

On October 31, 2011, the Inspector General for the U.S. Department of Housing and Urban Development issued an audit that found that the CDBG program needed to increase its use of Integrated Disbursement & Information System (IDIS) to improve oversight of CDBG activities. The IDIS system now notifies HUD and flags activities that have not had funds expended in nine months and/or where no activity accomplishment report has been entered but funds had been expended. Once an activity is flagged the CDBG staff must submit a plan explaining the delay and how the issue remediated to Hartford Field Office for approval. It is important that sub-recipients are aware that an activity/project not completed in a timely manner is justification for HUD to recapture any expended activity grant funds.

#### System for Award Management (SAM.gov)

The Office of Management and Budget (OMB) has established new uniform administrative Federal award terms that require the Community Development Block Grant (CDBG) grantees, grant sub-recipients, vendors, contractors and subcontractors to obtain a Dun and Bradstreet Data Universal (DUNS) number and register their company in the System for Award Management at SAM.gov. If awarded CDBG funding, a sub-recipient must verify it has completed this process prior to receiving a CDBG grant agreement with the City of Milford. A guide to registration to SAM.gov is attached for your review.

CITY OF MILFORD  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM  
2019-2020 Application for Funding  
Program Year 45

1. **Applicant Information**

Organization Name \_\_\_\_\_

Address \_\_\_\_\_

Phone \_\_\_\_\_

Email: \_\_\_\_\_

Applicants Name & Title \_\_\_\_\_

Director of Organization (if different) \_\_\_\_\_

Phone \_\_\_\_\_

Email \_\_\_\_\_

Federal Tax ID (EIN) \_\_\_\_\_ DUNS Number \_\_\_\_\_

Registered in System for Awards Management (SAM) Yes or No? \_\_\_\_\_

SAM Cage Code? \_\_\_\_\_

2. **Program/Project Information**

Program/project Name \_\_\_\_\_

Program/project Address \_\_\_\_\_

Total program/project estimate cost: \$ \_\_\_\_\_ (attach estimate)

Total amount CDBG funds requesting: \$ \_\_\_\_\_

Total funds dedicated to program/project by Applicant: \$ \_\_\_\_\_

Provide a detailed description and intent of the activity proposed for funding.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How was the activity identified as a community need?

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

How many participants are expected to benefit directly if activity funding is allocated? \_\_\_\_\_

How many participants are assisted by the organization in total? \_\_\_\_\_

How will market proposed activity be marketed to the community?

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3. **Application Eligibility**

Describe how the activity will benefit the participant, household, service area and community?

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**Which CDBG Activity eligibility category does the program/project fit? (Check One)**

☐ Public Service   ☐ Public Facility   ☐ Public Housing   ☐ Housing  
☐ Homelessness   ☐ Mental Health   ☐ Acquisition   ☐ Infrastructure   ☐ Economic/Business Development  
☐ Planning   ☐ Other, Specify \_\_\_\_\_

**To meet a CDBG National objective, at least 70% of the program participant(s) must meet the HUD income guidelines. Which Low and Moderate Income CDBG National Objective does the program/project meet? L/M Income Person(s) \_\_\_\_\_ (CDBG program services and facility improvements) (Check One)**

Person's in the "Presumed Benefit" L/M Income Category

☐ abused children , ☐ battered spouses,   ☐ elderly persons(defined by HUD as 62 + years),   ☐ homelessness  
☐ severely disabled adults , ☐ illiterate adults,   ☐ immigrant farm workers,   ☐ person(s)with AIDS.

☐ L/M Household Income Area (or Service Area)

☐ Job Creation -Employment of L/M Income Persons.

☐ Prevent or eliminate slum and blight - Improvements might include clearance of derelict properties, converting a lot to a park or playground, façade improvements, removal of toxic materials.

☐ Urgent Need - Urgent assistance to meet a particular serious and immediate threat to health or welfare of the community whereby other financial resources are not available. Immediate needs from a catastrophe such as a flood or hurricane.

**Program Compliance**

The Household Certification form is required for public service and some facility activity participants to fill out so the organization can accurately document demographic and income data of person(s) participating in the CDBG funded programs for recordkeeping and reporting on the CDBG Activity Report (forms attached).

Please describe the organizations current participant admittance process.

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**Direct Benefit Program/Project:** In (A), please enter the approximate number of persons the Organization expects will directly benefit from program activity and (B), the number of low and moderate income person(s) of the total who will benefit. *If the program/project meets a low/mod income presumed benefit clientele national objective this calculation is not required. Contact the CDBG Administrator for assistance.*

(A)	(B)
Total Person(s) Assisted	Total Low and Moderate Income Person(s) Assisted
(A) ____	(B) ____

**Calculate:** Divide (B) by (A) and enter the percentage of low and moderate income persons the expected to serve. \_\_\_\_%.

**Area Benefit Program/Project:** This data will be used to determine whether the Service Area of program/project meet the criteria for an eligible low and moderate income area designated project.

#### Census Data

Census Data is used to help establish the program/project Service Area, please enter the census track(s) and block group(s) and the number of people served in each. List the individual block groups unless all the block group in a census tract are part of the Service Area. *Contact the CDBG Administrator for assistance.*

		(A)	(B)
Census Track # 1501-1512	Block Group #	Total Persons in Census Track and/or Block Group	# of Low /Moderate Income Persons in
Total		(A)	(B)

**Calculate:** Divide (B) by (A) and enter the percentage of low and moderate income persons the project expects to serve \_\_\_\_%.

#### Service Area Boundary

To determine the service area boundary of the program/project please attach an address list of the program/project participant(s). The addresses will allow us to produce a GIS map to depict the service area and help substantiate the project/program meets a L/M national objective.

#### Survey Method

A survey can be used if the organization can show that the Census information does not reflect current relative income levels in the area, or that the service area does not coincide sufficiently with the census boundaries. A special survey of residents in the area may be allowed to ascertain the percentage of low-and moderate income persons but first the *survey itself requires HUD approval prior to use.*

## 4. Activity / Project Management

Does the Organization have the financial resources to cover the balance of the activity budget should the actual CDBG award be less than the proposed funding request? Yes \_\_\_\_ No \_\_\_\_ (Use CDBG Activity Budget form to list all funding sources.)

If no, how will the Organization finance the balance of funds needed to manage the activity?

Will less CDBG funding limit the organization from effectively managing the activity?

Please state the anticipated activity start date? \_\_\_\_ Completion date? \_\_\_\_

Provide a contact name(s) in the organization who is responsible for coordinating the program/project?

\_\_\_\_\_  
\*Beginning in Program Year 45, the organization will be required to hire a qualified construction/project manager to oversee and complete its public facility improvement project. If CDBG funds are awarded, up to \$1,000 of the award will be allocated toward the cost of a project manager. The CDBG staff will manage the procurement process and guidance on CDBG requirements to complete project. Does the organization accept responsibility this requirement and ensure the project will be completed in a timely manner? Yes\_\_ No \_\_

Please provide the name and contact information of the construction/project manager, if or when known.

\_\_\_\_\_  
\_\_\_\_\_

**5. Accounting Compliance**

Has the Organization received \$750,000 in federal funds during in most the previous or current fiscal year?

Yes \_\_ No \_\_

**6. Outcomes Measurement**

There are five performance components to the outcomes measurement model. Please explain how the proposed project relates to each component. Please refer to the application instructions for guidance with outcomes measurement.

Goal: \_\_\_\_\_

\_\_\_\_\_

Inputs: \_\_\_\_\_

\_\_\_\_\_

Activities: \_\_\_\_\_

\_\_\_\_\_

Outputs: \_\_\_\_\_

\_\_\_\_\_

Outcomes: \_\_\_\_\_

\_\_\_\_\_

**7. Instructions & Application Attachments**

Please review the Application & Program Guide for instructions and list of documents required to complete the application.

\_\_\_\_\_  
**Signature of Organization**

\_\_\_\_\_  
**Date**

\_\_\_\_\_  
**Printed Name**

# Activity Budget

City of Milford

Community Development Block Grant

Program Year 45     October 1, 2019 - September 30, 2020

Agency Name: \_\_\_\_\_

Activity: \_\_\_\_\_

Period Covered: \_\_\_\_\_

## ACTIVITY FUNDING SOURCES

*Please specify all financial sources including CDBG contribution*

Line Item	Total Activity Cost	CDBG Award	Organization Budget	Public/Private Grant	Other or In-Kind
<b>Public Service Program</b>					
Salary	\$ -	\$ -	\$ -	\$ -	\$ -
Fringe Benefit (FICA)	\$ -	\$ -	\$ -	\$ -	\$ -
Insurance	\$ -	\$ -	\$ -	\$ -	\$ -
Travel	\$ -	\$ -	\$ -	\$ -	\$ -
Supplies	\$ -	\$ -	\$ -	\$ -	\$ -
Other Approved Expense (state:)	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Public Facilities Project</b>					
Contractor Project Estimate					
Project Manager Contract Estimate	\$ -	\$ -	\$ -	\$ -	\$ -
Other Approved Expense	\$ -	\$ -	\$ -	\$ -	\$ -
	\$ -	\$ -	\$ -	\$ -	\$ -
<b>TOTAL:</b>	\$ -	\$ -	\$ -	\$ -	\$ -

Activity Funding Detail     Organization Budget: \_\_\_\_\_

Public/ Private Grant: \_\_\_\_\_

Other / In-Kind Funding: \_\_\_\_\_

# Activity Report

City of Milford

Community Development Block Grant Program

Program Year 45 October 1, 2019 - September 30, 2020

<b>Agency Name:</b>				
<b>Activity:</b>				
<b>Date:</b>				
<b>Period Covered:</b>		<b>From:</b>	<b>To:</b>	
<b>Report Activity Accomplishment for the period</b>				
<b>Activity Statistics</b>				<b>Sub-Total</b>
<b>White</b>		<b>Hispanic White:</b>		0
<b>Black/ African American</b>		<b>Hispanic Black:</b>		0
<b>Black/African American &amp; White</b>				0
<b>Hispanic</b>				0
<b>American Indian/Alaskan Native</b>				0
<b>American Indian/Alaskan Native &amp; White</b>				
<b>American Indian/Alaskan Native &amp; Black/African American</b>				0
<b>Asian</b>				0
<b>Asian White / Pacific Islander</b>				0
<b>Native Hawaiian &amp; Other Pacific Islander</b>				0
<b>Other Multi-Racial</b>				0
		<b>Total Statistic:</b>		0

<b>Number of Female Headed Households</b>	<b>#</b>
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<b>Extremely Low Income (under 30% of Median)</b>	
<b>Low Income (under 50% of Median)</b>	
<b>Moderate Income (under 80% of Median)</b>	
<b>Non-Low Moderate Income</b>	
<b>Total Income:</b>	<b>0</b>

*Total Income = Total Statistic*

<b>Number of Handicapped Individuals:</b>	<b>#</b>
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I certify that the information being reported is correct and accurate to the best of our ability.

Name of person completing this form: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

# REQUEST FOR PAYMENT

City of Milford

Community Development Block Grant Program

Program Year 45 October 1, 2019 - September 30, 2020

<b>Agency Name:</b>		
<b>Activity:</b>		
<b>Date:</b>		
<b>Period Covered:</b>	<b>From:</b>	<b>To:</b>

EXPENSE ITEM	AMOUNT REQUESTED	AMOUNT APPROVED
Program Staff Wage	\$0.00	
Program Staff FICA (social security/medicare)	\$0.00	
Program Material	\$0.00	
Program Service	\$0.00	
Contractor Project Estimate	\$0.00	
Project Manager Contract Estimate	\$0.00	
Other Approved Expense	\$0.00	
<b>Total</b>	<b>\$0.00</b>	

## SUBMITTED BY:

Signature: \_\_\_\_\_

Name & Title: \_\_\_\_\_

Date: \_\_\_\_\_

\*\*\*\*\*

## APPROVED BY:

Signature: \_\_\_\_\_

Name & Title: \_\_\_\_\_

Date: \_\_\_\_\_



## Household Certification Form

Participant Name: _____	[ ] Male [ ] Female
Address _____	
Number of Person(s) in the Household: [ ]	Number of Children under the Age of 18: [ ]
Female Headed Household Yes _____ No _____	
Number of Persons 62 years of Age or Older: [ ]	Household with Disabled Person: [ ]
U. S. Citizen? Yes _____ No _____	
Student Status:	
Name _____	F/T__ or P/T__ Student Age: _____
Name _____	F/T__ or P/T__ Student Age: _____

**Please Provide Household Race/Ethnicity (Check one per household).**

- |  |   |
|--|---|
| <input type="checkbox"/> White<br><input type="checkbox"/> Black<br><input type="checkbox"/> Asian/Pacific Islander<br><input type="checkbox"/> American Indian/Alaskan Native<br><input type="checkbox"/> Asian White<br><input type="checkbox"/> Black/African American & White<br><input type="checkbox"/> Other Multi-Racial | <input type="checkbox"/> Hispanic<br><input type="checkbox"/> Hispanic, White<br><input type="checkbox"/> Hispanic, Black<br><input type="checkbox"/> American Indian/Alaskan Native & Black/African American<br><input type="checkbox"/> Asian/Pacific Islander<br><input type="checkbox"/> Native Hawaiian/Other Pacific Islander |
|--|---|

**Household Income**

The program participant checks the income level that meets, but does not exceed, the total household adjusted gross income (AGI). A household income includes persons related, and unrelated, over the age of 18 and living in the home for 6 months or more. The program manager may request additional income documentation when required.

Total Household Income (Check one box)	Household Income Level (AGI) 4/1/18
	\$50,350
	\$57,550
	\$64,750
	\$71,900
	\$77,700
	\$83,450
	\$89,200
	\$94,950

**CERTIFICATION:**

I/We hereby certify that the information on this form is complete and correct to the best of my knowledge.

Participant Signature \_\_\_\_\_ Date \_\_\_\_\_

Participant Signature \_\_\_\_\_ Date \_\_\_\_\_

This information is required to receive Federal funds to assist this organization to continue to offer this program or activity. The information on this form is confidential and will not be shared with an agency other than the Grantor, the Department of Community Development, which regulates use of Community Development Block Grant funds for the City of Milford. This information is used to determine program eligibility and the statistical information of the participant to ensure that CDBG funds assist low and moderate-income individuals and families.



## FY 2018 INCOME LIMITS DOCUMENTATION SYSTEM

[HUD.gov](#) [HUD User Home](#) [Data Sets](#) [Fair Market Rents](#) [Section 8 Income Limits](#) [MTSP Income Limits](#) [HUD LIHTC Database](#)

### FY 2018 Income Limits Summary

Selecting any of the buttons labeled "Explanation" will display detailed calculation steps for each of the various parameters.

FY 2018 Income Limit Area	Median Family Income Explanation	FY 2018 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
<b>Milford-Ansonia-Seymour, CT HUD Metro FMR Area</b>	\$93,200	Very Low (50%) Income Limits (\$) Explanation	33,900	38,750	43,600	<b>48,400</b>	52,300	56,150	60,050	63,900
		Extremely Low Income Limits (\$)* Explanation	20,350	23,250	26,150	<b>29,050</b>	31,400	33,740	38,060	42,380
		Low (80%) Income Limits (\$) Explanation	50,350	57,550	64,750	<b>71,900</b>	77,700	83,450	89,200	94,950

**NOTE:** Milford town is part of the **Milford-Ansonia-Seymour, CT HUD Metro FMR Area**, so all information presented here applies to all of the **Milford-Ansonia-Seymour, CT HUD Metro FMR Area**. HUD generally uses the Office of Management and Budget (OMB) area definitions in the calculation of income limit program parameters. However, to ensure that program parameters do not vary significantly due to area definition changes, HUD has used custom geographic definitions for the **Milford-Ansonia-Seymour, CT HUD Metro FMR Area**.

The **Milford-Ansonia-Seymour, CT HUD Metro FMR Area** contains the following areas:

**NEW HAVEN COUNTY, CT TOWNS OF** Ansonia town, CT; Beacon Falls town, CT; Derby town, CT; Milford town, CT; Oxford town, CT; Seymour town, CT; and Seymour town, CT.

## Request for Taxpayer Identification Number and Certification

Give Form to the  
requester. Do not  
send to the IRS.

Print or type  
See Specific Instructions on page 2.

1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.

2 Business name/disregarded entity name, if different from above

3 Check appropriate box for federal tax classification; check only **one** of the following seven boxes:

- ☐ Individual/sole proprietor or single-member LLC      ☐ C Corporation      ☐ S Corporation      ☐ Partnership      ☐ Trust/estate
- ☐ Limited liability company. Enter the tax classification (C=C corporation, S=S corporation, P=partnership) ▶ \_\_\_\_\_
- Note.** For a single-member LLC that is disregarded, do not check LLC; check the appropriate box in the line above for the tax classification of the single-member owner.
- ☐ Other (see instructions) ▶ \_\_\_\_\_

4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):

Exempt payee code (if any) \_\_\_\_\_

Exemption from FATCA reporting code (if any) \_\_\_\_\_

(Applies to accounts maintained outside the U.S.)

5 Address (number, street, and apt. or suite no.)

Requester's name and address (optional)

6 City, state, and ZIP code

7 List account number(s) here (optional)

### Part I Taxpayer Identification Number (TIN)

Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the Part I instructions on page 3. For other entities, it is your employer identification number (EIN). If you do not have a number, see *How to get a TIN* on page 3.

**Note.** If the account is in more than one name, see the instructions for line 1 and the chart on page 4 for guidelines on whose number to enter.

Social security number

				-				-				
--	--	--	--	---	--	--	--	---	--	--	--	--

or

Employer identification number

				-								
--	--	--	--	---	--	--	--	--	--	--	--	--

### Part II Certification

Under penalties of perjury, I certify that:

1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and
3. I am a U.S. citizen or other U.S. person (defined below); and
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.

**Certification instructions.** You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions on page 3.

Sign  
Here

Signature of  
U.S. person ▶

Date ▶

### General Instructions

Section references are to the Internal Revenue Code unless otherwise noted.

**Future developments.** Information about developments affecting Form W-9 (such as legislation enacted after we release it) is at [www.irs.gov/fw9](http://www.irs.gov/fw9).

### Purpose of Form

An individual or entity (Form W-9 requester) who is required to file an information return with the IRS must obtain your correct taxpayer identification number (TIN) which may be your social security number (SSN), individual taxpayer identification number (ITIN), adoption taxpayer identification number (ATIN), or employer identification number (EIN), to report on an information return the amount paid to you, or other amount reportable on an information return. Examples of information returns include, but are not limited to, the following:

- Form 1099-INT (interest earned or paid)
- Form 1099-DIV (dividends, including those from stocks or mutual funds)
- Form 1099-MISC (various types of income, prizes, awards, or gross proceeds)
- Form 1099-B (stock or mutual fund sales and certain other transactions by brokers)
- Form 1099-S (proceeds from real estate transactions)
- Form 1099-K (merchant card and third party network transactions)

- Form 1098 (home mortgage interest), 1098-E (student loan interest), 1098-T (tuition)

- Form 1099-C (canceled debt)

- Form 1099-A (acquisition or abandonment of secured property)

Use Form W-9 only if you are a U.S. person (including a resident alien), to provide your correct TIN.

If you do not return Form W-9 to the requester with a TIN, you might be subject to backup withholding. See *What is backup withholding?* on page 2.

By signing the filled-out form, you:

1. Certify that the TIN you are giving is correct (or you are waiting for a number to be issued),
2. Certify that you are not subject to backup withholding, or
3. Claim exemption from backup withholding if you are a U.S. exempt payee. If applicable, you are also certifying that as a U.S. person, your allocable share of any partnership income from a U.S. trade or business is not subject to the withholding tax on foreign partners' share of effectively connected income, and
4. Certify that FATCA code(s) entered on this form (if any) indicating that you are exempt from the FATCA reporting, is correct. See *What is FATCA reporting?* on page 2 for further information.

## City of Milford

70 West River Street, Milford, CT 06460  
Phone 203 783-3230, FAX 203 878-7394  
Website [www.ci.milford.ct.us](http://www.ci.milford.ct.us)

# Memo

To: Applicants, Subrecipients, Vendors, and Contractors

From: Sheila Dravis, Administrator  
Community Development Block Grant (CDBG)  
Department of Economic and Community Development

Date: January 2019

Re: Federal Award Requirement - System for Award Management (SAM).

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On October 1, 2010, following the requirements of the Federal Funding Accountability and Transparency Act of 2009 and the American Reinvestment and Recovery Act of 2009, the Office of Management and Budget (OMB) established new uniform administrative Federal award terms that require all organizations that conduct business with the U.S. Federal government to obtain a Dun and Bradstreet Data Universal (DUNS) number and register in the System for Award Management (SAM).

If your organization does not have a DUNS number please begin the process to obtain one and provide me with your DUNS number so that it can be used to verify your registration in SAM. To obtain/search/update a DUNS number go to <http://fedgov.dnb.com/webform> **D&B D-U-N-S Number for US Government Contractors or Grantees**. For technical difficulties contact [govt@dnb.com](mailto:govt@dnb.com) or (866) 705-5711. There is no charge for assistance through DNB.

When you have obtained a DUNS number use the same information provided in DUNS to create a SAM registration via <http://www.sam.gov/> as a new user. To renew or activate an inactive SAM or CCR registration follow the instructions on the user guides provided on the SAM.gov. For technical difficulties, go to Help and contact the SAM helpdesk at <http://www.fsd.gov> or (866) 606-8220. There is no charge for assistance by the Federal Service Desk (SAM Helpdesk).

Thank you for your assistance, completing this process will avoid a delay in receiving CDBG activity or project funding.

Mr. Ted Suhr President  
Agency on Aging of S. Central CT  
117 Washington Ave  
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North Haven, CT 06473

Mrs. Roberta Cook CEO  
BHCare Inc.  
127 Washington Avenue  
North Haven, CT 06401

Mr. John Dixon President, CEO  
Bridges Health Care, Inc  
949 Bridgeport Avenue  
Milford, CT 06460

Ms. Diane Rosenthal Director of  
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Career Resources  
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Bridgeport, CT 06604

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Milford, CT 06464

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City of Milford, Mayor Office  
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Manager  
City of Milford, Open Space  
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Corporation for Independent Living  
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Hartford, CT 06106

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Beth El Center  
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Milford, CT 06460

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Boys & Girls Club of Milford  
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Milford, CT 06460

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Capital For Change  
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City of Milford, Mayor Office  
110 River Street  
Inter-Office  
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Milford, CT 06460

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Milford, CT 06460

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Milford Marine Institute/Gulf Pond  
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Milford Redevelopment & Housing  
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Milford Transit District  
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Milford, CT 06460

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MTAC  
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Milford, CT 06460

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R.E.A.C.H. OUT Project, Inc.  
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Milford, CT 06460

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Inter-Office  
Milford, CT 06460

Mrs. Peggy Pisano Director Victim  
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Property Manager  
River Park Apartments  
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Milford, CT 06460

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Storehouse Food Pantry  
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Mr. Raymond Vitali Aldermen,  
Chairman  
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Milford, CT 06460