

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

Program Guidelines | August 2018



Community Development Block Grant (CDBG) Application Kit Forms and Instructions

Introduction

The Department of Community and Economic Development's vision for the commonwealth is to play a more strategic role in local government and municipal interaction by investing in our communities to provide assistance and support jobs that pay for all Pennsylvanians. The Department's 2018-19 priority is to revive Pennsylvania's economy by providing tax credits and targeted assistance to; distressed areas and low income populations with a strategic focus on community participation and collaborations among residents, nonprofits, and businesses.

Pennsylvania's renaissance will be driven by the need to increase community revitalization efforts, and this translates into the importance of programs such as the Community Development Block Grant program to provide support and opportunity for every neighborhood and community in the commonwealth. The Community Development Block Grant program will offer a proactive approach, with respect to its goals, which aim to offer additional resources in assisting neighborhoods with fiscal difficulties, averting adverse impacts on health, safety and the welfare of their residents helping to put communities back on the right track to good fiscal well-being.

All Applicants:

The original application must be submitted to the Department of Community and Economic Development, Center for Community Development Operations.

In addition, all applicants are to submit to the Center for Community Development Operations one copy of:

- General Application Description
- Budget Summary (**on two pages, not one, with no page numbers at top or bottom of page**)

Counties Applying for County Allocations as well as Entitlement Borough/Township Allocation(s):

In addition to the above, counties applying for multiple allocations are to submit an overall budget summary totaling the county and on behalf of allocations (**on two pages, not one, with no page numbers at top or bottom of page**). This overall budget summary is in addition to budget summaries for each allocation.

Direct any questions in preparing the Application to your designated Grant Manager.

CDBG Application Contents & Checklist

Please place the information in the application in the following order so that the DCED staff can review the information efficiently. Please organize the application as follows:

APPLICANT NAME:

- Cover Sheet indicating:**
 - PA CDBG Program
 - Name of Applicant
 - County
 - Date of submission
 - Completed Application Checklist

Section I

- Single Application** – *Completed online (copy)*
- General Application Description/Certifications** – *All blanks completed or marked N/A Extra copy included with submission*
- Resolution: Application Submission**
- Statement of Assurances** – *Signed and dated*
 - Citizen Participation Report
- Disclosure Report** – *All blanks completed or marked N/A*
- Fair Housing / MWBE Requirements / Section 3**
 - Submit Fair Housing Advertisement
 - Fair Housing Resolution
 - Actions taken to affirmatively further fair housing in accordance with your Fair Housing Analysis
 - M/WBE Plan must be officially adopted and in file for review
 - M/WBE identified participation goals, previous year achievements, actions if goals not met
 - Section 3 Plan adopted & in file for review
 - Four Factor Analysis with Certification or Language Access Plan (LAP)
 - 504 Officer Designation for Grantees with 15 or more employees
- DCED Land Use Implementation**
 - Letter from appropriate local and county planning agency certifying compliance *(if applicable) or marked N/A.*

Section II

- Management Plan/Local Staff Capacity**
 - Comprehensive description of how CDBG program will be managed and administered
 - All bullet points have been addressed
- Timeliness** – *All blanks completed or marked N/A*
- Completion of Risk Analysis Evaluation (RAE)**

Section III

- Three Year Community Development Plan** includes *(modified for competitiveness):*
 - Description of low and moderate income and minority persons based on Census data and/or surveys
 - Benefits to Minorities form done or marked N/A.
 - Assessment of community development needs relating to housing, public community facilities and improvements, public services and economic development
- Analysis of community development needs of Low Mod areas identified through ACS data
- Explanation of how the community development objectives address the identified needs with emphasis on benefit to low/moderate income persons. If Low Mod areas are identified with no funding, provide an explanation for this conclusion
- Short term (1 year) and long term (3 year) plan which identifies activities that are designed to meet the CD objectives
- Completed Three Year Activities Summary
- List the resources that were considered when developing the local and/or area wide plans
- A map or maps that depict:
 - Municipal **census** geography w/boundaries; includes identifying census tracts and block groups

- Location of low/mod income persons
- Incidence & concentration of minority within each Census Tract
- Location of each activity selected
- Identify the service area benefiting each submitted project. The individual projects with identified service areas may be separate maps attached to each activity description.

Section IV

- Activity Description(s)** – The Activity Description should include: 1) the need being met; 2) explanation of the need for CDBG funding; 3) proposed construction start and completion dates; 4) quantity and location of activity within the service area; 5) cost of the activity and breakout of unit/material costs; 6) how the activity meets a national objective; 7) purpose of the activity; and 8) beneficiaries, including total, Very Low Income (VLI) and Low Moderate Income (LMI), of the activities.
 - Map w/jurisdiction boundaries shown, project area shown as well as service area, and survey area corresponds to service area
 - Multi-year project? Yes or No
 - Project timetable included (*beginning with the application submission date, outline a reasonable timetable for project completion. Include all significant milestones, emphasizing those related to plans, permits, bids, contracts, financing, acquisition of property, construction, and completion*).
 - Project Budget that supports completion within 36 months of grant award
 - Have other funds been committed (*if applicable*)
 - Appropriate National Objective selected
 - Answered all questions related to the selected national objective
 - Current pictures of the proposed project or project area (*strongly recommended*)
 - Administrative Costs form

Appendix B - CDBG Public Service Activities
(*if applicable*)

Appendix C - Service Areas & Service Methodology (*if applicable*)

- Description of survey methodology
- Copy of sample survey form
- Map of survey area
- Survey Worksheet included (*if applicable*)
- Survey Results (K-2 form) included

Appendix D - Determining Service Areas
(*if applicable*)

Local Effort/User Fee Analysis
(*if applicable*)

Section V

LMI Principal Benefit Determination

Section VI

CDBG Budget Summary

- Admin no more than 18%
- Public Service no more than 15%

Section VII

Other Supporting Documents Included
Such as pictures, newspaper articles, test results, consent orders, other pertinent documents.
(*if applicable*)

Single Application

To apply for funding, the applicant must submit the electronic on-line DCED Single Application for Assistance located at dced.pa.gov/singleapp. If the program you are applying under requires multiple copies of the application, they may be sent via US Mail with the hard-copy of the signature page that accompanies the application. If addenda are required, it may be attached electronically to the application on the Addenda tab, or submitted via US Mail with the Signature page. Please reference the Single Application number on any documents sent with the signature page.

ARCHIVED



GENERAL APPLICATION DESCRIPTION/CERTIFICATIONS COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

1. CDBG PROGRAM YEAR:
2. APPLICATION DEADLINE DATE:

3. APPLICANT'S NAME:	COUNTY:	ON BEHALF OF:
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4. DUNS NUMBER:	5. FEDERAL EMPLOYER IDENTIFICATION NUMBER:	6. CCR EXPIRATION DATE:
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7. APPLICANT STATUS - UNIT OF LOCAL GOVERNMENT (CHECK BOX): <input type="checkbox"/> Municipal <input type="checkbox"/> Joint Municipal <input type="checkbox"/> County Only <input type="checkbox"/> County "On Behalf Of"	7A. OTHER - SPECIFY: <input type="checkbox"/> Local Development District <input type="checkbox"/> Economic Development Organization <input type="checkbox"/> Community Development Financial Institution <input type="checkbox"/> Other: _____
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8. CHIEF ELECTED OFFICIAL OF APPLICANT: (NAME, TITLE, ADDRESS, ZIP CODE, TELEPHONE)	GRANT ADMINISTRATOR: (NAME, TITLE, ADDRESS, ZIP CODE, TELEPHONE, EMAIL)
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10. CDBG 20____ PROGRAM SUMMARY

11. ACTIVITIES. *Briefly describe activities to be undertaken and municipality(ies) or neighborhood(s) where located.*

12. FUNDING		
TYPE	AMOUNT	SOURCE
A. CDBG		
B. Other State		
C. Other Federal		
D. Local		
E. Other/Private		
F. Program Income (CDBG)		
G. Total Project Cost (A-F)		

GENERAL APPLICATION DESCRIPTION/CERTIFICATIONS | COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

13. LIST GRANT ADMINISTRATOR:	
14. METHOD OF PROCUREMENT (CHECK ONE): <input type="checkbox"/> RFP <input type="checkbox"/> Small Purchase <input type="checkbox"/> Local Funds <input type="checkbox"/> Not Yet Procured <input type="checkbox"/> N/A	
15. ARCHITECT/ENGINEER:	
16. METHOD OF PROCUREMENT (CHECK ONE): <input type="checkbox"/> RFQ <input type="checkbox"/> RFP <input type="checkbox"/> Local Funds <input type="checkbox"/> Not Yet Procured	17. CODE OF CONDUCT AND CONFLICT OF INTEREST: Adoption/Completion Date:
18. DRUG FREE WORK-PLACE POLICY (CHECK ONE): <input type="checkbox"/> On file <input type="checkbox"/> Attached <input type="checkbox"/> None	19. EXCESSIVE FORCE POLICY- ADOPTION DATE:
20. ANTI-DISPLACEMENT PLAN – ADOPTION DATE:	
21. MB/WBE PLAN – ADOPTION DATE:	22. SECTION 3 – ADOPTION DATE:
23. FAIR HOUSING ANALYSIS – COMPLETION DATE:	24. FAIR HOUSING ANNUAL ACTION UPDATES:
25. 504 PLAN – COMPLETION DATE:	26. 504 PLAN ANNUAL REVIEW DATE:
27. PROCUREMENT POLICY: <input type="checkbox"/> Yes <input type="checkbox"/> No	

28. DID THE COMMUNITY RECEIVE A CDBG PLANNING GRANT PERTAINING TO THIS PROJECT? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, what is the grant number for that plan?	
29. IN WHAT PA SENATE DISTRICT(S) IS THIS PROJECT?	30. STATE SENATOR(S) REPRESENTING THIS DISTRICT:
31. IN WHAT PA HOUSE OF REPRESENTATIVES DISTRICT(S) IS THIS PROJECT?	32. STATE REPRESENTATIVE(S) REPRESENTING THIS DISTRICT:
33. IN WHAT US CONGRESSIONAL DISTRICT IS THIS PROJECT?	

34. Certification of Community Development Plan (CDP) for Boroughs and Townships administering their own grants and for county grants.	
<p>For Counties:</p> <p>I hereby certify that all nonentitlement municipalities were provided with the notification specified in 2.a. of the Community Development Plan instructions and that the County of _____ has approved the CDP for nonentitlement municipalities.</p> <p>For Cities, Boroughs, and Townships:</p> <p>I hereby certify that _____ has approved the CDP. <small>(Name of Municipality)</small></p> <p>As Chief Elected Official of the grantee, I certify compliance with the Community Development Plan requirements.</p>	
_____ Signature of Chief Elected Official	_____ Date
_____ Name/Title of Chief Elected Official	_____ Municipality
	_____ County

GENERAL APPLICATION DESCRIPTION/CERTIFICATIONS | COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

35. Certification of Community Development Plan (CDP) for counties administering grants on behalf of one or more entitlement boroughs & townships.

For Counties with "On Behalf Of" Entitlements:

I hereby certify that the County of _____, which will administer the CDBG grant, has developed the CDP in cooperation with _____ and that said Municipality has approved the CDP or applicable portion of the CDP.
(Name of Municipality)

County:

Signature of Chief Elected Official

Date

Name/Title of Chief Elected Official

Municipality

County

"On Behalf Of" Entitlements:

Signature of Chief Elected Official

Date

Name/Title of Chief Elected Official

Municipality

County

(A copy of this form must be submitted for each grant applied for by the County on behalf of an Act 179 entitlement borough or township.)

36. Certification of Mandatory Tap in Fees:

As Chief Elected Official of a municipality in which CDBG funds will be used for the extension of water and/or sewer service, I hereby certify that said municipality will, prior to the execution of a construction contract for such improvements, adopt an ordinance mandating that all residences intended to benefit from the improvements, tap into the extended system.

I further certify that said municipality will enforce said ordinance to the extent permitted under local code.

Signature of Chief Elected Official

Date

Name/Title of Chief Elected Official

Municipality

County

In the case of County "On Behalf Of" applications, the County must submit a signed copy of the above certification for each municipality in which a water or sewer extension project is proposed. Also, this form must be submitted for any nonentitlement municipality in which funds allocated to the County will be used for a water or sewer extension project.



STATEMENT OF ASSURANCES

APPLICANT NAME:

The Grantee makes assurances that it will carry out its responsibilities under this Contract in compliance with the following statutes, regulations or guidelines:

(A) Legal Authority:

It possesses legal authority to apply for the grantee and to execute the proposed program and meets the general qualifications criteria of Act 179.

(B) Official Resolution:

Its governing body has duly adopted or passed as an official act, a resolution, motion or similar action authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.

(C) Citizen Participation

It has established a citizen participation mechanism which:

- (1) Provides an opportunity for citizens to participate in the development of the application at minimum one public meeting, encourages the submission of views and proposals, particularly by residents of blighted neighborhoods and citizens of low and moderate income, and provides for timely responses to the proposals submitted.
- (2) Provides citizens with adequate information concerning the amount of funds available for proposed community development and housing activities, the range of activities that may be undertaken, and other important program requirements.
- (3) Provides citizens with an opportunity to submit comments concerning the community development performance of the applicant.
- (4) Provides for one or more public hearings on the proposed application before adoption of a resolution or similar action by the local governing body authorizing the filing of the application.
- (5) Adheres to the Department's CDBG Citizen Participation Plan and directives or guidance provided.
- (6) Provides for a timely written answer to written complaints and grievances, within 15 working days where practicable.
- (7) Identifies how the needs of non-English speaking residents, in the implementation of the Citizen Participation Plan, will be met in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.
- (8) Identify how the needs of physically disabled, including hearing and visually impaired persons, will be met, if necessary.
- (9) In the event the applicant or grantee wishes to request a modification to its original application or subsequent grant, the applicant or grantee will provide for public hearings to obtain the views of citizens on community development and housing needs and proposed revisions.

(D) Public Access to Records

a. Units of General Local Government and Non-Profit Organizations:

Recipients shall provide citizens reasonable access to records regarding the use of CDBG funds, consistent with applicable State and local laws regarding privacy and obligations of confidentiality. However, in accordance with 2 CFR 200.336 public access to records held by Federal, State, local governmental entities or non-profit organizations are not subject to the Federal Freedom of Information Act (5 U.S.C. 552) and unless required by Federal, State, or local law, grantees and sub-grantees are not required to permit public access to their records.

Both Units of General Local Government and Nonprofit Organizations are subject to requests for records made pursuant to the Pennsylvania Right-To-Know Law, 65 P.S. §§ 67.101-3104, when such requests relate to or arise out of the grant agreement into which the Units of General Local Government and Nonprofit Organizations have entered into with the Department of Community and Economic Development. The Pennsylvania Right-To-Know-Law provisions appear in Section (k) of Article V, Compliance with Applicable Statutes and Department Regulations, of the grant agreement.

(E) Program Priorities:

The program described in the application will continue to give maximum feasible priority to activities which will benefit low and moderate income families or aid in the prevention or elimination of slums or blight; the use of funds may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community where other financial resources are not available to meet such needs. It will ensure that not less than 70 percent of funds received as a result of this application will be used for activities that principally benefit persons of low and moderate income.

(F) Financial Requirements:

It will comply with the requirements and policies of 2 CRF Part 200: "Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards".

(G) Architectural Barriers:

It will comply with the Architectural Barriers Act of 1968, P.L. 90480, as amended (42 U.S.C. 4151 et. seq.). This requires that every building or facility (other than a privately owned residential structure) designed, constructed, or altered with funds provided under this Part to comply with the "American Standard Specifications for Making Buildings and Facilities Accessible to, and Usable by, the Physically Handicapped," Number A-117.1-R 1971, subject to the exceptions contained in 41 CFR 101-19.604. The applicant will be responsible for conducting inspections to ensure compliance with these specifications by the contractor

(H) Fair Housing and Civil Rights

- (1) Title VI of the Civil Rights Act of 1964, P.L. 88-352 (42 U.S.C. 2000d et. seq.) and the regulations issued pursuant thereto (24 CFR Part 1), which provides that no persons in the United States shall on the grounds of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives Federal financial assistance and will immediately take any measures necessary to effectuate this assurance. If any real property or structure thereon is provided with the aid of Federal financial assistance extended to the applicant, this assurance shall obligate the applicant or in the case of any transfer of such property, any transferee, for the period during which the real property or structure is used for a purpose for which the Federal financial assistance is extended, or for another purpose involving the provision of similar services or benefits.

Title VI, states that:

"No person in the United States shall, on the ground of race, color, or national origin be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Section 1.4b(2)(i) of the regulations issued pursuant to Title VI requires that:

"A recipient in determining the types of housing accommodations, facilities, services, financial aid, or other benefits which will be provided under any such program or activity, the class of persons to whom, or the situations in which, such housing, accommodation, facilities, services, financial aid, or other benefits will be provided under any such program or activity, or the class of persons to be afforded an opportunity to participate in any such program or activity, may not directly or through contractual or other arrangements, utilize criteria or methods of administration which have the effect of subjecting persons to discrimination because of their race, color, or national origin or have the effect of defeating or substantially impairing accomplishments of the objectives of the program or activity as respect to persons of a particular race, color, or national origin".

Title VI, Section 601 provides the **Limited English Proficiency (LEP)** Statutory Authority.

Executive Order 13166 (Issued in the Federal Register 65 FR 50121 on August 16, 2000) mandates improved access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency.

Grantees are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the grantee's programs and activities that have any federal financial assistance.

- (2) Title VIII of the Civil Rights Act of 1968, as amended by Fair Housing Amendments Act of 1988 (42 U.S.C. 3601-20) which states that no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale, rental, or advertising of dwellings, in the provision of brokerage services, or in the availability of residential real estate-related transactions; and requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing. Executive Order 11063 and the regulations contained in 24 CFR Part 107 requires that all action necessary and appropriate be taken to prevent discrimination because of race, color, religion (creed), sex, or national origin in the sale, rental, leasing, or other disposition of residential property and related facilities or in the use or occupancy thereof where such property or facilities are owned or operated by the Federal Government or provided with Federal assistance by HUD and in the lending practices with respect to residential property and related facilities of lending institutions insofar as such practices relate to loans insured, guaranteed or purchased by the Federal Government.
- (3) Section 109 of the Housing and Community Development Act of 1974, P.L. 93-383 (42 U.S.C. 5309) and the regulations issued pursuant thereto (24 CFR Part 570.602), which provide that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds provided under this Part.
- (4) Age Discrimination Act of 1975, P.L. 94-135 (42 U.S.C. 6101 et. Seq
- (5) Section 504 of the Rehabilitation Act of 1973, P.L. 95-602 (29 U.S.C. 794) and HUD implementing regulations at 24 CFR Part 8.
- (6) Executive Order 11246, Equal Opportunity in Federal Employment, September 24, 1965 (30 FR 12319), as amended by Executive Order 12086, October 5, 1978 (43 FR 46501), and the regulations issued pursuant thereto (24 CFR Part 130 and 41 CFR Chapter 60), which provides that no person shall be discriminated against on the basis of race, color, religion, sex or national origin in all phases of employment during the Performance of Federal or Federally assisted construction contracts. Contractors and subcontractors on Federal and Federally assisted construction contracts shall take affirmative action to ensure fair treatment in employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination, rates of pay or other forms of compensation and selection for training and apprenticeship.
- (7) Executive Order 11625, October 13, 1971 which prescribes additional arrangements for developing and coordinating a national program for Minority Business Enterprise (36 FR 19967). (2 CFR 200.321 Contracting with small and minority businesses, women's business enterprises and labor surplus area firms.)
- (8) Executive Order 12138, May 18, 1979 (44 FR 29637) which creates a National Women's Business Enterprise Policy. (2 CFR 200.321 Contracting with small and minority businesses, women's business enterprises and labor surplus area firms.)
- (9) Pennsylvania Human Relations Act of October 27, 1957, P.L. 744, (43 P.S. 951-963) which provides that no employee, applicant for employment, independent contractor, or any other person shall be discriminated against because of race, color, religious creed, ancestry, national origin, age, sex, or non-job related handicap or disability or the use of a guide or support animal because of blindness, deafness or physical handicap of any individual or independent contractor.

(I) Employment

It will comply with Section 3 of the Housing and Urban Development Act of 1968, P.L. 90-448, as amended (12 U.S.C. 1701 (u)) requiring that to the greatest extent feasible opportunities for training and employment be given to low and moderate income residents of the applicant's county and contracts for work in connection with the project be awarded to eligible business concerns which are located in, or owned in substantial part by, persons residing in the applicant's county.

(J) Displacement

It certifies that it has developed and adopted a residential anti-displacement and relocation assistance plan in accordance with Section 104 (d) of the Housing and Community Development Act of 1974.

(K) Acquisition/Relocation

It will comply with the Uniform Relocation Assistance Real Property Acquisition Policies Act of 1970, as amended by (42 U.S.C 4601) and the regulations at 42 CFR Part 24 which apply to the acquisition of real property by a State agency for an activity assisted with CDBG funds and to the displacement of any family, individual, business, nonprofit organization or farm that results from such acquisition; and

Will comply with Section 104(k) of the Housing and Community Development Act of 1974, as amended which requires that (i) reasonable relocation assistance be provided (at a minimum, the assistance shown in 24 CFR Part 570.606(c) shall be provided) to persons displaced as a result of the use of CDBG funds to acquire or substantially rehabilitate property and (ii) will develop, adopt and provide to persons to be displaced a written notice of the relocation assistance for which they are eligible; and

Will comply with the Eminent Domain Code Act of June 22, 1964, Special Session, P.L. 84, as amended, 26 P.S. 1-101 et. seq.

(L) Benefit Assessments for Public Improvements.

It will not attempt to recover any capital costs of public improvements assisted in whole or in part by CDBG funds or with amounts resulting from a guarantee under Section 108 of the 1974 Housing and Community Development Act by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvement, unless (i) CDBG funds are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under this title; or (ii) for purposes of assessing any amount against properties owned and occupied by persons of moderate income who, the grantee certified to the State, as the case may be, that it does not have sufficient CDBG funds to pay the assessments in behalf of all of the low and moderate income owner occupant persons.

(M) Hatch Act

It will comply with the provisions of the Hatch Act, P.L. 85-554 (5 U.S.C 1501 et seq.) which limits the political activity of employees.

(N) Labor Standards

It will comply with the labor standards set forth in Section 110 of the Housing and Community Development Act of 1974, as amended, and HUD's implementing regulations. The standards include, where applicable, the following:

- (1) The Davis-Bacon Act, P.L. 86-624, as amended (40 U.S.C. 276a-276a-5).
- (2) Contract Work Hours & Safety Standards Act, P.L. 87-581 (40 U.S.C. 327 et. seq.).
- (3) Copeland "Anti-kickback" Act (40 U.S.C. 276c).
- (4) DOL regulations at 29 CFR Parts 1, 3, 5, 6, and 7. These regulations implement the Davis-Bacon Act, the Contract Work Hours and Safety Standards Act and the Copeland Act.

(O) PA Prevailing Wage Act

It will comply with the PA Prevailing Wage Act of 1961, as amended (43 P.S. 165-1 through 165-17), when applicable.

(P) Environmental Clearance

Its chief executive officer or other appropriate officer/officers consents to assume the status of a "responsible federal official" under the National Environmental Policy Act of 1969 (NEPA) P.L. 91-190 (42 U.S.C. 4321 et. seq.). The applicant will assume responsibility for environmental review, decision-making and action under NEPA and HUD regulations at 24 CFR Part 58. The applicant further certifies that it has complied with and will comply with 24 CFR Part 58 and the statutes and authorities contained in 24 CFR Part 58.5 in the administration of its project.

General Responsibilities

Grantee is responsible for compliance with the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed in HUD's implementing regulations at 24 CFR Parts 50 and 58 and must comply with all requirements and actions for each activity that it carries out with federal funds, in accordance with the requirements imposed by this agreement and in accordance with Title 24 Part 58 of the Code of Federal Regulations. Grantee will provide information necessary for DCED to determine the environmental effects of each activity to be carried out with Federal funds. Grantee may not commit or obligate any Federal or non-federal funds to the project or any activity that is in any way binding without an Authority to use grant funds form in writing from DCED. A copy of the Environmental Review Record (ERR) shall be maintained by both the GRANTEE until at least three years after project closeout unless a longer period is required in writing as an amendment to the agreement by DCED.

Grantee is responsible for assuring that any SUBRECIPIENT to which it provides funds complies with the environmental review requirements.

Project Approvals Subject to Environmental Review Clearance:

No CDBG project funds will be advanced, and no costs can be incurred, until DCED has received sufficient information about the project as required under 24 CFR Part 58. The environmental review may result in a decision to proceed with, modify or cancel the project. Notwithstanding any provision of this Agreement, the parties hereto agree and acknowledge that this Agreement does not constitute a commitment of funds or site approval for a specific project, and that such commitment of funds or approval may occur only upon satisfactory completion of the environmental review and receipt by DCED of a Request for Release of Funds form from the grantee under 24 CFR Part 58 and a copy of the approved Authority to Use Grant Funds form.

Further, the Grantee will not permit any SUBRECIPIENT to undertake or commit any funds to physical or choice-limiting actions, including property acquisition, demolition, movement, rehabilitation, conversion, repair or construction prior to completion of the environmental clearance. Any violation of this provision may result in the denial of any funds under the agreement.

Flood Disaster Protection

In accordance with the requirements of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4001), the grantee shall assure that for activities located in an area identified by the Federal Emergency Management Agency (FEMA) as having special flood hazards, flood insurance under the National Flood Insurance Program is obtained and maintained as a condition of financial assistance for acquisition or construction purposes (including rehabilitation).

Historic Preservation

The grantee agrees to comply with the Historic Preservation requirements set forth in the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470) and the procedures set forth in 36 CFR Part 800, Advisory Council on Historic Preservation Procedures for Protection of Historic Properties, insofar as they apply to the performance of this agreement.

(Q) Violating Facilities List

It will ensure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of a program are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify HUD of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating that a facility to be used in the project is under consideration for the listing by the EPA.

(R) Conflict of Interest

It will establish safeguards to prohibit employees from using positions for a purpose that is or gives the appearance of being motivated by a desire for private gain for themselves or others, particularly those with whom they have family, business, or other ties. (2 CFR 200.112 Conflict of Interest)

(S) Lead Based Paint

It will comply with Title IV of the Lead Base Paint Poisoning Prevention Act, P.L. 91-695, as amended, (42 U.S.C. 4831) and the regulations issued pursuant thereto (24 CFR Part 35).

(T) Energy Conservation

It will comply with the Cost Effective Energy Conservation and Effectiveness Standards, ENERGY P.L. 95-557 (42 U.S.C. 1425(b)) and the regulations issued pursuant thereto (24 CFR Part 39).

(U) Flood Plain

It will comply with the Pennsylvania Flood Plain Management Act 166 (32 P.S. 697.101-679.601) and the regulations issued pursuant thereto (Title 16, Chapter 38)

(V) Steel Products

It will comply with the Pennsylvania Steel Products Procurement Act of March 3, 1978, (P.L. 6, No. 3, §1, 73 P.S. §1881 et. seq.).

(W) Separation Act

It will comply with the Separations Act of May 1, 1913, P.L. 155, 1, as amended, December 22, 1981, P.L. 546, No. 159, §1, 53 P.S. §1003, as applicable.

(X) Resource Conservation

It will comply with Section 6002 of the Resource Conservation and Recovery Act of 1976 (42 U.S.C. 6962) and

the regulations issued pursuant thereto (40 CFR Part 249) for the procurement of materials composed of the highest percentage of recovered material practicable.

(Y) Lobbying

No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal grant, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants and contracts under grants, loans and cooperative agreement) and that all sub-recipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure. (2 CFR 200.450 Lobbying)

(Z) Excessive Force

It has adopted and will enforce a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in nonviolent civil rights demonstrations and a policy of enforcing state and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

(AA) Drug Free Workplace

It has adopted and will enforce a policy creating a drug-free workplace in keeping with the spirit and intent of the Drug-Free Workplace Act of 1988.

(AB) Fire Protection and Safety Standards:

It will comply with the provisions of the Fire Administration Authorization Act of 1992 (P.L. 102-522)

Signature of Chief Elected Official

Date

Name/Title of Chief Elected Official

Municipality

County



CITIZEN PARTICIPATION REPORT

APPLICANT NAME: _____

CDBG INFORMATION TO THE PUBLIC	DATE
Notice of first public hearing:	
Date of first public hearing:	
First citizen comment period (enter date range):	
Notice of second public hearing:	
Date of second public hearing:	
Second citizen comment period (enter date range):	
Describe the methods used to solicit participation of low to moderate income persons:	
Denote any adverse comments/complaints received and describe resolution:	
<p>Immediately following this page, attach the documents below in the order listed:</p> <ul style="list-style-type: none"> • Hearing Ad/Proof of Publications • Sign-In Sheets • Hearing Minutes • Copy of response(s) to comments and/or complaints. <p><i>* Competitive applicants are required to conduct two public hearings.</i></p>	
I hereby certify, subject to the penalties of perjury, the above public hearings were conducted in accordance with all state and federal regulations.	
_____ Signature, Chief Elected Official	_____ Date
_____ Typed Name and Title:	
* Note: Counties and counties applying on behalf of entitlement municipalities may have to attach additional sheets for this information.	

Instructions for Completion of Disclosure Report

All applicants for CDBG grants must complete and submit, with their applications, Parts I and II of the Disclosure Report. At the completion of Part II of the report, some applicants will find that they must complete Parts III, IV, V and VI.

Part I requires the applicant's name, address, phone and Federal Employer Identification number; indication as to whether this is an initial report or an update (all applicants will check the initial report box); the fiscal year CDBG funds subject to the disclosure; a check as to whether the disclosure is related to an entitlement or competitive application; the amount of CDBG funds being requested; the amount of any CDBG program income that will be used with the CDBG grant; and, the total amount (CDBG grant and program income).

Part II asks two questions. If the answer to both questions is "no," the applicant must provide the certification at the end of Part II, but is not required to complete the remainder of the report. If the answer to either questions is "yes" the applicant must complete the remainder of the report.

Part III requires information on any other Federal, State and/or local assistance that is to be used in conjunction with the CDBG project.

Part IV requires the identification of interested parties. Interested parties are persons and entities with a reportable financial interest in the project. If an entity is being disclosed, the disclosure in Part IV must include an identification of each officer, director, principal stockholder or other official of the entity. All consultants, developers or contractors involved in the application for CDBG assistance, or in the planning, development or implementation of the project, must be identified as an interested party. Also, any other person or entity that has a pecuniary interest in the project that exceeds \$50,000 or 10 percent of the CDBG assistance, whichever is lower, must be listed as an interested party. Pecuniary interest means any financial involvement in the project, including (but not limited to) situations in which a person or entity has an equity interest in the project, shares in any profit or resale or any distribution of surplus cash or other assets of the project or receives compensation for any goods or services provided in connection with the project. (The following are not considered interested parties: local CDBG administrative staff, recipients of housing rehab assistance, and rehab contractors as long as the rehab agreement is between the property owner and the contractor).

It is realized that at the time of application, applicants may not be aware of all interested parties since contracts and agreements for goods and services are not generally awarded until after notice of grant award. Subsequent to grant award, as projects are being implemented, funds will be committed to interested parties which will necessitate the submission of an updated Disclosure Report. However, if an applicant identifies under Part III of the Disclosure Report, other governmental assistance that is to be used in conjunction with projects funded with CDBG and, if these other funds have been committed to interested parties, then these interested parties must be identified in Part IV.

Appendix A – HUD Programs Subject to Disclosure

This Appendix contains a list of all the HUD Programs that are subject to the disclosure requirements of the HUD Reform Act (42 U.S.C. §3545). All applicants for CDBG assistance must review this list to determine if they are receiving, or expect to receive, assistance from other covered programs besides CDBG. Applicants must consider HUD funds that are received either directly from HUD or through the State. The State administered CDBG Program is listed at item 3(v).

It is the total amount of funds received from all the below sources that the applicant uses to answer the second question of Part II of the Disclosure Report.

- (1) Section 312 Rehabilitation Loans under 24 CFR part 510, except loans for single family properties.
- (2) Applications for grant amounts for a specific project or activity under the Rental Rehabilitation Grant Program under 24 CFR part 511 made to:
 - (i) A State grantee under Subpart F.
 - (ii) A unit of general local government or a consortium of units of general local government or a consortium of units of general local government receiving funds from a State or directly from HUD whether or not by formula under Subparts D, F, and G.
 - (iii) HUD, for technical assistance under 511.3.

(Excludes formula distributions to States, units of general local government, or consortia of units of general local government under Subparts D and G, within year reallocations under Subpart D, and the HUD-administered Small Cities Program under Subpart F.)

- (3) Applications for grant amounts for a specific project or activity under Title I of the Housing and Community Development Act of 1974 made to:
 - (i) HUD, for a Special Purpose Grant under Section 105 of the Department of Housing and Urban Development Reform Act of 1989 for technical assistance, the Work Study Program of Historically Black colleges.
 - (ii) HUD, for a loan guarantee under 24 CFR part 470, Subpart M.
 - (iii) HUD, for a grant to an Indian tribe under Title I of the Housing and Community Development Act of 1974.
 - (iv) HUD, for a grant under the HUD-administered Small Cities Program under 24 CFR part 570, Subpart F.
 - (v) A State or unit of general local government under 24 CFR part 570.
- (4) Applications for grant amounts for a specific project or activity under the Emergency Shelter Grants Program under 24 CFR part 576 made to a State or to unit of general local government, including a Territory.

(Excludes formula distributions to States and units of general local government (including Territories); reallocations to States, units of general local government (including Territories) non-profit organizations; and applications to an entity other than HUD or a State or unit of general local government.)

- (5) Transitional Housing under 24 CFR part 577.
- (6) Permanent Housing for Handicapped Homeless Persons under CFR part 578.

- (7) Section 8 Housing Assistance Payments (only project-based housing under the Existing Housing and Moderate Rehabilitation program for Single Room Occupancy Dwellings for the Homeless under Subpart H).
- (8) Section 8 Housing Assistance Payments for Housing for the Elderly or Handicapped under 24 CFR part 885.
- (9) Loans for Housing for the Elderly or Handicapped under Section 202 of the Housing Act of 1959 (including operating assistance for Housing for the Handicapped under Section 162 of the Housing and Community Development Act of 1987 and Seed Money Loans under Section 106(b) of the Housing and Urban Development Act of 1968).
- (10) Section 8 Housing Assistance Payments-Special Allocations-under 24 CFR part 886.
- (11) Flexible Subsidy under 24 CFR part 219-both Operating Assistance under Subpart B and Capital Improvement Loans under Subpart C.
- (12) Low-Rent Housing Opportunities under 24 CFR part 904.
- (13) Indian Housing under 24 CFR part 905.
- (14) Public Housing Development under 24 CFR part 941.
- (15) Comprehensive Improvement Assistance under 24 CFR part 968.
- (16) Resident Management under 24 CFR part 964, Subpart C.
- (17) Neighborhood Development Demonstration under Section 123 of the Housing and Urban-Rural Recovery Act of 1983.
- (18) Nehemiah Grants under 24 CFR part 280.
- (19) Research and Technology Grants under Title V of the Housing and Urban Development Act of 1970.
- (20) Congregate Services under the Congregate Housing Services Act of 1978.
- (21) Counseling under Section 106 of the Housing and Urban Development Act of 1968.
- (22) Fair Housing Initiatives under 24 CFR part 125.
- (23) Public Housing Drug Elimination Grants under Section 5129 of the Anti-Drug Abuse Act of 1988.
- (24) Fair Housing Assistance under 24 CFR part 111.
- (25) Public Housing Early Childhood Development Grants under Section 222 of the Housing and Urban-Rural Recovery Act of 1983.
- (26) Mortgage Insurance under 24 CFR Subtitle B, Chapter II (only multifamily and nonresidential).
- (27) Supplemental Assistance for Facilities to Assist the Homeless under 24 CFR part 579.
- (28) Shelter Plus Care Assistance under Section 837 of the Cranston-Gonzalez National Affordable Housing Act.
- (29) Planning and Implementation Grants for HOPE for Public and Indian Housing Homeownership under Title IV, Subtitle A, of the Cranston-Gonzalez National Affordable Housing Act.
- (30) Planning and Implementation Grants for HOPE for Homeownership of Multifamily Units under Title IV, Subtitle B, of the Cranston-Gonzalez National Affordable Housing Act.
- (31) HOPE for Elderly Independence Demonstration under Section 803 of the Cranston-Gonzalez National Affordable Housing Act.



DISCLOSURE REPORT

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

PART I - APPLICANT INFORMATION

1. APPLICANT/GRANTEE NAME:	
2. ADDRESS:	
3. PHONE NUMBER:	4. FEDERAL ID NUMBER:
5. REPORT: Indicate whether this is: <input type="checkbox"/> Initial Report <input type="checkbox"/> Update Report	
6. PROJECT TO BE ASSISTED:	
6A. FISCAL YEAR:	6B. <input type="checkbox"/> Entitlement Grant(s) <input type="checkbox"/> Competitive Grant
	6C. Amount Requested/Received: _____
	6D. Program Income to be used with C Above: _____
	6E. TOTAL of C and D: _____

PART II - THRESHOLD DETERMINATIONS

1. Is the amount at 6E. (above) more than \$200,000? <input type="checkbox"/> Yes <input type="checkbox"/> No
2. Have you received or applied for other HUD assistance (through programs listed in Appendix A of the instructions) which when added to 6E (above) amounts to more than \$200,000? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
If the answer to either 1. or 2. of Part II is " YES ", then you must complete the remainder of this report. If the answer to both 1. and 2. of Part II is " NO ", then you are not required to complete the remainder of this report, but you must sign the following certification.

CERTIFICATION

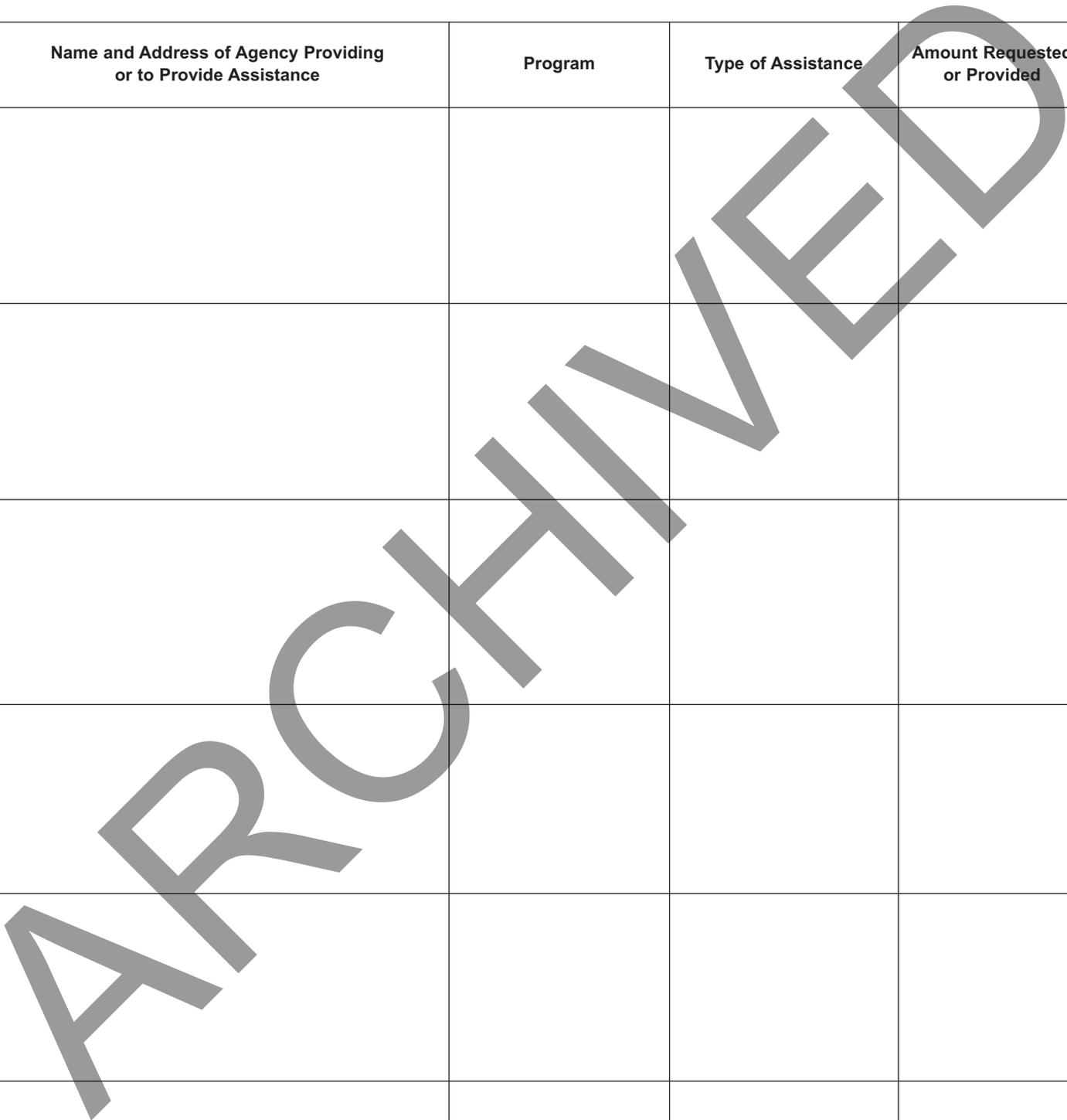
I hereby certify that this information is true.

Signature of Chief Elected Official	Date
Name/Title of Chief Elected Official	Municipality
	County

PART III OTHER GOVERNMENT ASSISTANCE PROVIDED/APPLIED FOR

1. Provide the requested information for any other Federal, State and/or local government assistance, on hand or applied for, that will be used in conjunction with the CDBG grant. (See Appendix A of the instructions).

Name and Address of Agency Providing or to Provide Assistance	Program	Type of Assistance	Amount Requested or Provided



Instructions for Compliance with Fair Housing and Civil Rights Requirements in the Application Process

I. Fair Housing

A. Entitlement Grantee

1. Fair Housing Advertisement:

Entitlement applicants must submit with their applications a copy of a published advertisement re-designating a Fair Housing Officer within their municipality. This advertisement must also inform residents of their rights under the Fair Housing law and that cases of suspicious discrimination are to be reported to the Fair Housing Officer. Communities that cannot identify a person qualified to serve as a Fair Housing Officer must publish an advertisement that provides an alternative agency, who will take discrimination complaints.

If a community designates a Fair Housing Officer, that officer will be *responsible* for the following:

a. Forwarding all complaints of housing discrimination to:

Pennsylvania Human Relations
Commission
Pittsburgh Regional Office
301 Fifth Avenue
Suite 390, Piatt Place
Pittsburgh, PA 15222
(412) 565-5395
(412) 565-5711 TTY users only

AND

U.S. Department of Housing
and Urban Development
FHEO/Regional III Office Mid-Atlantic Office
100 Penn Square East, 12th Floor
Philadelphia, PA 19107
(215) 861-7643
Fax: (215) 656-3449
TTY: (800) 927-9275

OR

Pennsylvania Human Relations
Commission
Philadelphia Regional Office
110 North 8th Street, Suite 501
Philadelphia, PA 19107
(215) 560-2496
(215) 560-3599 TTY users only

OR

U.S. Department of Housing
and Urban Development
PITTSBURGH FHEO FIELD OFFICE
Moorhead Federal Building
1000 Liberty Avenue
Pittsburgh, PA 15222
(412) 644-5449 or (412) 644-6353
Fax: (412) 644-6516
TTY: (800) 927-9275

OR

Pennsylvania Human Relations
Commission
Harrisburg Regional Office
333 Market Street, 8th Floor
Harrisburg, PA 17101-2210
(717) 787-9780
(717) 787-7279 TTY users

- b. Maintaining a record of all complaints filed, dates forwarded to appropriate agencies, and evidence of resolution. This record will be part of the grantees annual reporting to the Department for compliance and will be reviewed during monitoring.
2. Adoption of a Fair Housing Resolution by the Applicant/Grantee
Entitlement applicants must have a fair housing resolution adopted annually affirming its dedication to further Fair Housing Practices within its jurisdiction. This notice identifies typical discriminatory acts, informs residents of their rights under the fair housing law and that cases of suspected discrimination are to be reported to the Fair Housing Officer. This Notice must be posted at prominent locations throughout the municipality and a record of the postings must be kept on file for monitoring.
3. All Entitlement applicants must annually undertake and report on actions to affirmatively further fair housing in accordance with the Fair Housing Guidance located in the Federal Resource Library: dced.pa.gov/download/fair-housing-tip-sheet/59662

B. Competitive Applicants

1. Competitive applicants are not required to address the Fair Housing requirements at the application stage. Those competitive applicants that are selected for funding will be instructed to fulfill these requirements subsequent to notification of grant award.

II. Section 504

A. Entitlement Grantee with more than Fifteen 15 Employees

1. Section 504 Officer:
Entitlement applicants with over fifteen (15) employees must re-designate a Section 504 Officer annually within their municipality. This designation must be made in writing and at a public meeting. A copy of this notice must be submitted with this application.

The Officer's duties include:

- a. Compile and maintain a Self - Evaluation of the grantee's facilities, hiring practices, and citizen participation, as well as each activity funded with the CDBG grant, to assure that there has been no discrimination in the providing of services based on race, color, national origin, sex, disability, religion, familial status, age, or ancestry. From this self-evaluation, the municipality will develop a Transitional Plan to provide a timetable and responsible entity to bring the municipality into compliance. The Section 504 Officer will oversee that the municipality follows the Transition Plan and brings the municipality into compliance. Please refer to the Federal Resource Library on DCED's website dced.pa.gov/library Federal Resource Library\CDBG\Required Plans\Template for Plans.
- b. The municipality will develop and maintain a grievance procedure that must also be adopted publically, incorporating due process standards and allowing for prompt local resolution of any complaints of discrimination based on disability. Existing grievance procedures can often be adapted to satisfy this requirement. Any individual or authorized representative who believes that they have been denied opportunities or treated differently due to their race, color, national origin, sex, disability, religion, familial status, age or ancestry may file a complaint with the Section 504 Officer. The Officer must act on the complaint and maintain the records of the process for monitoring.

B. Competitive Applicants

Competitive applicants are not required to address the Section 504 requirements at the application stage. Those competitive applicants that are selected for funding will be instructed to fulfill these requirements subsequent to notification of grant award.

III. Minority/Women Business Enterprise (MBE/WBE) Plan

It is required that all grantees receiving federal funds from DCED must promote the opportunity for full participation by minority and women's business enterprises ("MBEs" and "WBEs") in all housing and community development programs receiving funds from the Pennsylvania Department of Community and Economic Development. This includes all forms of procurement and contracting. Grantees are required to maintain sufficient documentation to verify that this requirement has been met.

- A. All **entitlement** applicants are reminded that they are to adopt and provide a good faith, comprehensive and continuing endeavor to their MBE/WBE Outreach Plan. One portion of the plan establishes minority owned business enterprise (MBE), and women owned business enterprise (WBE), minimum participation levels (MPLs) to be used as a guide in determining bidders' compliance with Federal MBE and WBE requirements.

As part of the application process, the applicant, on grantee letterhead, must indicate:

1. the minimum participation level as established in their plan
 2. the previous calendar year's achievement of the MBE and WBE goals with the actual percentage of total contract awards that went to each category. (ie: 2016 application = 2015 achievement percentage)
 3. actions to be taken by the applicant to achieve these goals in the current year if not achieved
- B. Competitive applicants that are awarded competitive grants will be required to adopt and follow an MBE/WBE Outreach Plan subsequent to notification of grant award, including minimum participation levels.

NOTE: Applicants for Competitive CDBG Funding – Non-entitlement municipalities are encouraged to seek assistance in applying for funds through the County administrators.

Limited English Proficiency Guidance

for CDBG Applicants

In Compliance with:

- Section 601 of Title VI the Civil Rights Act of 1964 (LEP Statutory Authority) “No person in the United States shall, on the grounds of race, color, or national origin, be excluded from *participation in, be denied the benefits of, or be subjected to discrimination* under any program or activity receiving Federal financial assistance.”

And

- Executive Order 13166 (Issued in the Federal Register 65 FR 50121 on August 16, 2000) Mandates improved access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency.

Grantees are required to make reasonable efforts to provide language assistance to ensure meaningful access for LEP persons to the contractor’s programs and activities that has any federal financial assistance.

DCED is providing this guide to its grantees of federal financial assistance to aid in the analysis of determining if the beneficiaries of the proposed projects have limited English proficiency. Please use the following template to document your analysis of your program or activity and to determine if the certification can be signed by the grantee as not having an affected population or if a Language Access Plan is required. *DCED will provide additional guidance if necessary.*



**CERTIFICATION OF COMPLETION OF A
FOUR-FACTOR ANALYSIS
FOR LIMITED ENGLISH PROFICIENCY PERSONS**

and

**CERTIFICATION OF THE ACTIVITIES TO BE INCLUDED
IN THE LANGUAGE ACCESS PLAN**

**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)
(Includes CDBG Competitive, CDBG-DR, and NSP)**

For:

GRANTEE NAME: _____

PROGRAM and FISCAL YEAR: _____

CONTACT PERSON (Name, Telephone Number & E-mail) _____

Purpose:

In compliance with Section 601 of Title VI the Civil Rights Act of 1964 (LEP Statutory Authority) and Executive Order 13166, _____ (*Grantee*) has conducted the following Four Factor Analysis for Limited English Proficiency (LEP) persons for the federally funded program listed above.

History:

Title VI of the Civil Rights Act of 1964, is the federal law which protects individuals from discrimination on the basis of their race, color, or national origin in programs that receive federal financial assistance. In certain situations, failure to ensure that persons who have limited English proficiency can effectively participate in, or benefit from, federally assisted programs may violate Title VI's prohibition against national origin discrimination. Persons who, as a result of national origin, do not speak English as their primary language and who have limited ability to speak, read, write, or understand English may be entitled to language assistance under Title VI in order to receive a particular service, benefit, or encounter.

Executive Order 13166 (Issued in the Federal Register 65 FR 50121 on August 16, 2000) mandates improved access to federally assisted programs and activities for individuals who, as a result of national origin, are limited in their English proficiency. The order also requires a Language Access Plan for the program or activity if a qualifying population is determined. To determine if there is an affected population of beneficiaries having limited English proficiency, all grantees receiving federal financial assistance must conduct the four-factor analysis as outlined below.

Grantee Four-Factor Analysis

The following Four-Factor Analysis serves as the guide for determining which language assistance measures the Grantee will be required to undertake to guarantee access to Grantee's Community Development Block Grant (CDBG) programs by LEP persons.

Factor One - Methodology: The grantee must analyze the number or proportion of LEP persons served or encountered in the eligible service area population (served or encountered includes those persons who would be served by the program or activity if the person received education and outreach and the grantee provided sufficient language services).

Select the paragraph(s) below that best describes your methodology for the analysis by placing a check mark in the box beside the description. Also please fill in the blanks or circle the correct statement were indicated. These paragraphs may be modified or replaced with narrative that more accurately reflects the grantee's methodology.

- The Grantee utilized the PA Census tabulation for persons that speak English "Less than Well" provided by DCED to determine the **county's** LEP population(s). Based on this data, the Grantee **does/does not** (*chose one*) meet the 1,000 or 5% LEP persons' threshold for any language(s) identified.
- The Grantee utilized the PA Census tabulation for persons that speak English "Less than Well" provided by DCED to determine its **municipalities'** LEP population(s). Based on this data, the Grantee **does/does not** (*chose one*) have any municipalities within its borders that meet the 1,000 or 5% LEP persons threshold for any language(s) identified.
- The Grantee is administrating the CDBG program **on behalf of:** _____ (*list other municipalities where federal financial assistance will be used*). The grantee utilized the PA Census tabulation for persons that speak English "Less than Well" provided by DCED. Based on this data, _____ (*OBO municipality*) **does/does not** (*chose one*) meet the 1,000 or 5% LEP persons' threshold for any language(s) identified.

(Add additional lines if needed to address all OBO municipalities the Grantee is administering)

- Income surveys were conducted to determine eligibility in the program or activity service area. Questions were asked to determine if any LEP persons were located in the potential project area. According to the results of the surveys, there were _____ (*number*) LEP persons located in the proposed project area. The proposed project area has a total population of _____ (*number*). The number of LEP persons affected by the project or activity **does/does not** (*chose one*) meet the 1,000 or 5% LEP persons in the service area threshold for any languages identified.

(Add additional lines if needed to address all projects or activities the Grantee is administering and used the above LEP analysis methodology)

- Local elected officials, clergy, medical personnel, and school administrators were polled by telephone/questionnaire to request input regarding their knowledge of LEP persons within the community and/or proposed project area(s). Based on the results of the telephone poll/questionnaires, there are an _____ (*estimated number*) LEP persons out of _____ (*total persons benefitting from the program or activity*) located in _____ (*Grantee or service area name*). This **does/does not** (*chose one*) meet the 1,000 or 5% LEP persons of total service area threshold for any language(s) identified.

(Add additional lines if needed to address all projects or activities the Grantee is administering and used the above LEP analysis methodology)

Please list below all municipalities and/ or service areas under this program that qualify as meeting the threshold of 1,000 or 5% LEP person's threshold for any language(s) identified as indicated by the methodology used above. Include the name of the municipality/service area, the language(s) identified, and the number or percentage of persons. For example:

Apple Township Germanic 16%

If any of the blocks above contains a “does” meet the 1,000 or 5% LEP person threshold for any language(s) identified, the grantee must complete a Language Access Plan for that municipality and may stop further completion of this Four Factor Analysis. Please proceed to the Language Access Plan Certification on page 7 of this guidance. Please submit this page, along with the Language Access Plan Certification with your application.

If the grantee, after completing this section of the analysis, has **all** blocks above marked with “does not” meet the 1,000 or 5% LEP persons’ threshold for any languages identified, they must continue analyzing their **program or activity** with the following questions.

Additional Questions to be Answered:

Factor Two - The frequency with which LEP persons come into contact with the program or activity.

Select the paragraph below that best describes the amount of public contact of your program by placing a check mark in the box beside the description. These paragraphs may be modified or replaced with narrative that more accurately reflects the grantee's program or activity.

- The proposed program or activities that provide direct assistance to the resident, which would include but not be limited to acquisition, relocation, housing rehabilitation, water/sewer laterals, and public services. Therefore, residents are likely to have considerable direct contact with the program and its staff.
- The proposed project is a program or activity that does not provide direct assistance to individuals, such as road reconstruction, water/sewer line replacement, and commercial building demolition. As a result, LEP persons are not directly affected by the CDBG program or activity and no direct assistance will be provided to the residents. However, all citizen participation activities are open to the general public and every effort should be made to provide the needed materials to all residents.

If the first block above is marked, the grantee must complete a Language Access Plan for the program or activity and may stop further completion of this Four Factor Analysis. Please proceed to the Language Access Plan Certification on page 7 of this guidance. Please submit all pages of this analysis, along with the Language Access Plan Certification with your application.

If the second block is marked, the grantee must continue on with their analysis of their program or activity.

Factor Three - The nature and importance of the program, activity, or service provided by the program or activity.

- The proposed project does provide direct assistance to program and activity service area beneficiaries related to; housing rehabilitation, water/sewer laterals, public services, therefore, the nature of the activity or service is of significant importance to the proposed program and activity area(s) residents.
- The proposed program or activity does not provide direct assistance to individuals, such as road reconstruction, public facility architectural barrier removal, water/sewer line replacement. As a result, LEP persons may not be as directly affected by the program or activity with the CDBG program. However, all citizen participation activities are open to the general public and every effort should be made to provide the needed materials to all residents.

If the first block above is marked, the grantee must complete a Language Access Plan for the program and may stop further completion of this Four Factor Analysis. Please proceed to the Language Access Plan Certification on page 7 of this guidance. Please submit all pages, along with the Language Access Plan Certification with your application.

If the second block is marked, the grantee must continue on with their analysis of their program or activity.

Factor Four - The resources available and costs to the recipient.

Currently, internet sites can be utilized to translate some written materials. Additionally, local volunteers have been identified to provide oral translation services at public meetings and during conversations with LEP residents during the implementation of the proposed project. Furthermore, many of the common forms used in the implementation of a CDBG program or activity are available in multiple languages on the HUD and DOL websites. Additionally, translation activities are an eligible CDBG administrative or delivery expense. Therefore, limited LEP measures are reasonable given the resources available to Grantee. So grantees may not use this factor as the only factor determining the need for a Language Access Plan.

Please continue to Certification on the next page.





CERTIFICATION OF THE COMPLETION AND FINDINGS OF THE FOUR FACTOR ANALYSIS

_____ (Grantee) has completed the Four Factor Analysis and has determined that there are **no** items identified from the analysis above for this grantee, program or activity that will trigger the need for a Language Access Plan.

If the grantee determines that a LAP is not required, then the certification below should be signed and dated by the chief elected official and submitted with their application.

Certification: Based on the above Four-Factor Analysis, the Grantee is **not** required to develop a Language Access Plan. However, the Grantee will make all reasonable attempts to accommodate language access needs of residents requesting oral translation during citizen participation, income surveys and/or direct assistance intake activities including but not inclusive of public hearings, public notices, advertisements, income surveys and direct assistance intake documents.

Chief Elected Official *(signature and printed)*

Date

Attest

Grantee Name & Program



LANGUAGE ACCESS PLAN CERTIFICATION
for

(Grantee, Program or Activity)

As a result of the preceding Four-Factor Analysis, _____ (Grantee) has identified the following types of language assistance to be provided by the Grantee throughout the implementation of its CDBG program dependent on need:

Below are the minimum requirements to meet the needs of your identified Limited English Proficiency Populations. Some programs or activities do not require all items to be followed. Those marked "Required" are mandatory of all grantees having any LEP populations in any municipality or within their programs' service areas. Additional activities may be added to meet the needs of the grantees' LEP population(s).

All CDBG citizen participation materials, public notices, and project-related resolutions, will be published/posted in the LEP language(s) identified, in community newsletters, on bulletin boards at the offices and meeting location of the grantee, on the grantee website and in public places throughout the proposed project area(s) and/or the community, especially those areas with high concentration of the affected population. **Required**

Additionally, all published/posted citizen participation notices will include a statement in the identified LEP language(s) indicating that other "program materials are available in the LEP language(s) upon request". This statement must be in as many languages as has been identified during the grantee's analysis. **Required**

All citizen participation notices will include a statement that translators will be available at public meetings upon at least 72 hours' notice. This will be in the identified LEP language(s) in the English notification and also in the complete LEP language(s)' notification. **Required**

All public notices of income surveys and the income survey itself will be provided in the LEP language(s) identified. **As Needed**

All direct assistance program application documents and outreach materials will be provided in the LEP language(s) identified. **As Needed**

For income surveys in service areas meeting the threshold of LEP and/or direct assistance intakes, if needed, a translator will be retained to provide oral translation at the site of the income survey or intake to assist in filling out the survey/intake documents and explaining the program. The grantee may not require the LEP applicant to provide their own translator, though the applicant may bring someone if they choose. **As Needed**

If other populations of LEP persons are identified in the future, Grantee will provide additional measures to serve the language access needs of those persons. **Required**

The Grantee will complete a Language Access Plan which delineates how these activities will be carried out, by whom, and who will monitor the effectiveness of the activities for possible revision. This Plan once adopted by the grantee must be retain in the grantees' master file and utilized throughout the program.

Adopted:

Chief Elected Official (signature and printed)

Date

Attest (Name and Title)

Grantee Name & Program

DCED Land Use Implementation

Since 2000, when the Growing Smarter land use bills were signed into law, DCED has been encouraging effective local land use planning while respecting private property rights. These measures have included a review for certain projects occurring on previously undeveloped property, requiring the grantee to submit a letter from the appropriate local and county planning agency where they exist.

Obtaining Information about Planning and Zoning

For projects funded with CDBG funds (beginning with the 2001), where infrastructure and/or construction of new facilities (public/community facilities, water/sewer facilities, housing, economic development, etc.) will occur on previously undeveloped property, the grantee must submit a letter from the appropriate local and county planning agency (where they exist) specifically identifying the project(s) and certifying that the project(s) is(are) in compliance with all applicable land use and comprehensive plans, and zoning and subdivision ordinances. This letter should be inserted after this page in the CDBG Application. Prior to submitting this letter, CDBG Program applicants must review the questions below regarding comprehensive planning and zoning ordinances to determine the applicability of the PA Municipal Planning Code.

- Is there an adopted municipal comprehensive plan?
- Is there an adopted county comprehensive plan?
- Is there an adopted multi-municipal or multi-county comprehensive plan?
- Is there an adopted county or municipal zoning ordinance or a joint municipal zoning ordinance?
- Is the proposed project consistent with these comprehensive plans and/or ordinances?

This requirement is not applicable to projects that occur on developed or previously developed property.



MANAGEMENT PLAN/ LOCAL STAFF CAPACITY

APPLICANT NAME:	GRANT ADMINISTRATOR:
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Describe how your CDBG program will be managed and administered by addressing the following:

Identify the required tasks needed to accomplish your proposed activities and the staff/organization(s) that will accomplish these tasks, including the type of third party contracts intended for services.

- Briefly identify the staff needed to complete each task including their skills and/or experience. These tasks include but are not limited to: environmental review requirements; financial recordkeeping, including but not limited to the Integrated Disbursement and Information System (IDIS); procurement; contracting and labor standards; day to day administration and oversight of 3rd party agreements, contracts; closeout and audits.
- If more than one agency/organization will be involved, explain the coordination and lead responsibility.
- Justify the need for completing certain services with third party contracts which could otherwise be provided by the creation and/or development of local staff capacity.

(Attach Additional sheets as necessary.)



TIMELINESS

APPLICANT NAME: _____

Each applicant must provide an analysis of its past use of CDBG funds. The lack of timely performance must be addressed by the applicant and considered by the Department prior to contracting 2018 funds. Counties administering multiple grants are to indicate the total CDBG funds contracted to the County for each corresponding year, do not include competitive awards.

Grant Year	(A) Amount of Grant	(B) Amount Expended as of Application Submission	(C) Percent Expended	(D) Amount Remaining for Expenditure	(E) % Remaining for Expenditure
2013					
2014					
2015					
2016					
(F) TOTALS			(G)		(H)
2017 Grant: \$ _____			(I) 2018 Grant: \$ _____		
Date you received fully executed 2017 contract: _____			(J) Unexpended Funds Ratio: _____		

Instructions:

- In column (A) list the amounts of any CDBG grants (excluding Planning grants) that your municipality received for each corresponding year.
- In column (B) list the amounts expended, as of the date of the application, for each grant listed in column (A).
- In column (C) list the percent of funds expended by dividing the amount in column (B) by the amount in column (A).
- In column (D) list the amounts remaining to be expended, as of the date of this application, for each grant listed in column (A).
The amount expended in column (B) plus the amount remaining in column (D) must equal the corresponding grant amount in column (A).
- In column (E) list the percent of funds remaining to be expended by dividing the amount in column (D) by the amount in column (A).
- In line (F) provide the totals of columns (A), (B), and (D).
- Indicate at (G) the percentage of total funds expended by dividing the total of column (B) by the total of column (A).
- Indicate at (H) the percentage of total funds unexpended by dividing the total of column (D) by the total of column (A).

The above analysis is to be evaluated by all applicants and the Department to determine if each program year is achieving adequate levels of performance and where particular rates of expenditure may indicate problems.

- Now indicate at (I) the amount of your municipality's 2018 allocation of CDBG funds.
- Divide the total of column (D) by the amount at (I) and enter the result at (J). If this amount exceeds 1.5, proceed to address the remainder of this form.

If the result obtained in item 10. exceeds 1.5, this means that you have previous unexpended CDBG funds which amount to more than 1 1/2 times your 2018 grant. Please address the following:

- List any problems that are delaying particular year grants. Indicate the grant year and the reasons for delay.
- What steps have been taken, or are being taken, to alleviate the problems identified.

Your responses to the above are intended to provide you and DCED with a better understanding of existing and potential impediments to your timely performance. You should consider all of the above as you proceed to address your management plan for this year's Program.

If the problems you have outlined on this timeliness form are due to inadequate capacity on the part of your administering agency, this is expected to be considered and addressed in your Management Plan.

Instructions for Completion of Three Year Community Development Plan

A. Purpose

In order to rationally and effectively determine community development needs, set long and short term objectives, and to design programs to meet these objectives, applicants must develop a Three Year Community Development Plan (CDP). The CDP is to be submitted with the grant application and must be approved by the Department. The Plan is to be developed in a timely and meaningful fashion, and in a manner that permits concerned citizens to participate in its development, as well as to examine, appraise and comment on its contents. The activities proposed in the CDP should consider local and area wide plans. A properly prepared CDP should result in an approach that is coordinated with and mutually supportive of other programs. Activities proposed should address critical community development needs without reducing ongoing local financial support of these activities. All activities proposed in the CDP must clearly meet the identified needs of low and moderate income persons.

B. Instructions

1. Complete the Three Year Community Development Plan (CDP) by addressing each element listed below in a narrative with accompanying documentation. The CDP must be thoroughly addressed by entitlement applicants. A county that is applying for the county allocation, as well as the allocations of one or more entitlement boroughs and/or townships, must prepare a CDP for the county as well as an individual plan for each entitlement municipality. (Competitive applicants are not required to submit a three-year community development plan; however, an assessment of needs as specified in b. below is required.) The elements of the CDP are as follows:

- a. A description of the incidence and concentration of low and moderate income and minority persons within the jurisdiction of the applicant. This description must be based on the 2009-14 ACS data and/or surveys.

In addition to this narrative description, entitlement applicants must complete the Benefits to Minorities form that follows these instructions. For each of the three previous years, list by federal fiscal year the activities undertaken, CDBG funds budgeted for each activity, the service area of the activity and the percent of minorities within the service area.

- b. An assessment of the applicant's community development needs relating to each of the following: housing; public community facilities and improvements; public services; and economic development.
- c. A discussion of community development objectives. These objectives are to be developed as a result of the applicant's consideration of (a) and (b) above. Objectives must be developed to address identified needs with emphasis on objectives which are likely to benefit the low/moderate income and minority persons. Activities selected for inclusion must not benefit moderate-income persons to the exclusion of low-income persons Ref: 24 CFR 570.483(b)

If there are identified low and moderate income areas with minority concentrations that are not receiving consideration for funding, the grantee must provide an explanation if there are identified needs in these areas.

- d. A short term (1 year) and long term (3 year) plan which identifies activities that are designed to meet the community development objectives. The plan must include a description of the criteria considered in establishing the short and long-term plans.

- e. A summary of the CDP indicating each activity, the amount and source of funds needed for each activity and the national objective that each activity is intended to meet. Utilize the Three Year Summary form to complete this element.
- f. Indicate that the CDP was developed in consideration of local and/or area wide plans by listing those resources that were considered.
- g. **A map of the applicant's jurisdiction.** For county applications, the County must identify each non-entitled municipality on a map clearly depicting the elements listed below. For individual entitlement applicants, a jurisdictional map of the entitlement must clearly depict the elements below.

REQUIRED ELEMENTS:

- 1) Census geography with boundaries relative to clearly identified landmarks. The map must clearly identify the CT number, BG numbers.
 - 2) Incidence and concentration of low and moderate income persons and minority persons based upon ACS data or surveys.
 - 3) Location of each activity selected for funding, clearly delineating the area of benefit. This may be a separate map that is included with each proposed activity.
2. Other Requirements for Entitlement Municipalities: The following other CDP requirements apply to entitlement municipalities as indicated.
- a. Counties administering grants for non-entitlement municipalities shall submit CDPs which are related only to the non-entitlement municipalities and which are developed in cooperation with said municipalities. Each county must notify, in writing, each of the non-entitlement municipalities: (1) that the county will be preparing its annual application for CDBG funds; (2) of the amount of funds available for use in addressing the community development needs of the nonentitlement municipalities; (3) that each non-entitlement municipality is invited to submit in writing, a list of needs it would like to have considered and; (4) of the deadline by which such needs are to be submitted to the county. The county CDPs shall contain a certification that all non-entitlement municipalities were provided with the above notification. Counties must approve CDPs for non-entitlement funds.
 - b. Counties administering grants on behalf of other entitlement municipalities shall submit a CDP (or CDPs) which includes all the elements for each entitlement grant administered. These plans are distinct to the entitlement entity and must be clearly labeled and address the required elements.

These CDPs are to be developed by the counties in cooperation with each entitlement municipality. Each entitlement municipality must approve its CDP or that portion of the CDP affecting the municipality.

A well developed three-year plan that is thoughtful and looks at completing timely projects can be a valuable resource for future planning purposes.

Instructions for Completion of 3 Year Activities Summary

Purpose

All Entitlement Applicants must develop and identify activities that are to be carried out over a three-year funding period. The requirement does not apply to competitive applicants. Entitlement applicants are to identify project activities that will be funded through their CDBG entitlement allocations for the next three years. The first year is the federal fiscal year funds being applied for with this application. This will require a careful analysis of the Three Year Community Development Plan, as well as short and long-term objectives. The objective of the Three Year Activities Summary is to enable Entitlement applicants to plan for and implement significant community development projects. The entitlement applicant, through the preparation of the Three Year Activities Summary, will be able to:

- Identify various activities required to fulfill short and long term objectives.
- Determine the need and time of needed staff expertise.
- Plan the submission of applications to other funding sources and thereby leverage other financial sources.
- Coordinate local community development activities.

The Three Year Activities Summary includes:

- Listing of all activities for three fiscal years.
- Projected CDBG and other sources of funding.
- Indication of national objectives with calculation to demonstrate 70% or greater low and moderate income benefit.

The Three Year Activities Summary is a projection, and is intended to demonstrate that the Entitlement Application is attempting to undertake needed community development activities. It is recognized that both the Three Year Community Development Plan and the Three Year Activities Summary are documents which are periodically amended to reflect changing needs and past accomplishments.

THREE YEAR ACTIVITIES SUMMARY

Name of Applicant:

For Entitlement Municipalities Only

LIST OF ACTIVITIES	FUNDING / NATIONAL OBJECTIVES BY YEAR														
	Year 1					Year 2					Year 3				
	CDBG \$	OTHER \$	CDBG LMI \$	SB	UN	CDBG \$	OTHER \$	CDBG LMI \$	SB	UN	CDBG \$	OTHER \$	CDBG LMI \$	SB	UN
01 Acquisition of Real Property															
02 Disposition															
03A Senior Center/Facilities															
03F Park, Recreation Facilities															
03G Parking Facilities															
03I Flood & Drainage Facilities															
03J Water/Sewer Improvements															
03K Street Improvements															
03L Sidewalks															
03O Fire Station/Equipment															
03 Public Facilities Other															
04 Clearance & Demolition															
05A Public Services Senior Centers															
05B Public Service Handicapped															
05D Public Service Youth Programs															
05L Public Service Child Care															
05 Public Service Other															
06 Interim Assistance															
08 Relocation															
12 Construction of Housing															
13 Direct Homeownership Assistance															
14A Rehab Single Unit Residential															
14E Rehab Publicly/Private Owned Comm															
14G Acquisition For Rehabilitation															
15 Code Enforcement															
18A ED Direct Financial Assistance to For Profits															
19F Planned Repayment of Section 108 Loan Principal															
Other _____															
Other _____															
Other _____															
Low and Moderate Income Benefit	CDBG \$					CDBG \$					CDBG \$				
	CDBG LMI \$					CDBG LMI \$					CDBG LMI \$				
	% LMI					% LMI					% LMI				

Instructions for Completion of Activity Description

A. General Instructions

1. Introduction

Activities are directed toward certain needs identified in the Three Year Plan. Each activity must be evaluated to determine if it is eligible and meets a national objective (fundable) for CDBG assistance. The Activities Description is designed to obtain the necessary information to verify that each activity is eligible and fundable, and to provide the mechanism to document changes to activities and fiscal year programs that may trigger the citizen participation requirements.

Applicants must provide sufficient evidence with each activity to demonstrate that the proposed activity is eligible and that the national objective determination is supported by the information presented.

2. Definition of Activity

An activity is defined as the overall description of the work proposed to address specific needs within a particular area, or for particular individuals or groups of people. Various work components may be necessary to complete the overall activity. In certain instances it is possible for the work to be the overall activity or a component of the overall activity. The following example illustrates this:

Activity: STORM SEWER	Activity: STREET/ROAD IMPROVEMENTS
Components: Acquisition of R.O.W. Sewer Construction Street/Road Improvements	Components: Paving Sidewalks/Curbing/ Landscaping/Storm Sewer

3. Eligibility/Fundability

Each activity must be determined to be eligible as per Section 105 of the Housing and Community Development Act of 1974, as amended. Each activity must be analyzed in relation to the need and the intended primary beneficiaries to determine if a national objective is met. Each activity must meet one of the three national objectives: low and moderate income benefit, slums and blight or urgent need. Seventy percent (70%) of each grant amount must be assigned to activities that benefit low and moderate income persons.

List of Activities

When identifying the activities for CDBG funding, utilize the HUD IDIS Matrix Codes contained in Appendix E. Each activity must have a name that includes the location of the activity followed by the type of activity. For example: Elm Street reconstruction with related storm water improvements; Any Township, Lumber Road waterline extension; Veteran's Park playground replacement.

B. Specific Instructions for National Objectives

Refer to Section 570.483 – Criteria for National Objectives in the September 1988, HUD Regulations, for guidance along with the following information to complete this section:

1. **LMI Benefit Test** – Determine if the activity meets the LMI criteria in one of the four categories listed below. If an activity qualifies as meeting the LMI test and another national objective, such as slums and blight, it should be qualified under LMI.
 - a. **Area Benefit** – Check the appropriate box for census data or survey. If the service area coincides with census data, enter the appropriate Census tract, enumeration district, or block group, and the corresponding area population, low and moderate income population, and the percent of low and moderate income persons (must equal 51 percent or greater).

Survey

If the service area does not coincide with census data, enter the survey results including total families in the survey area, the number of responses, the number of low and moderate income persons and the percent of low and moderate income (LMI) persons.

Surveys must be conducted in accordance with HUD's prescribed guidance on conducting surveys outlined in CPD Notice 14-013 dated September 23, 2014.

- b. **Limited Clientele** – Check the appropriate box for presumed, income eligibility or nature/location.

Presumed – An activity, facility or service benefiting clientele that are presumed to be principally low and moderate income, i.e., handicapped, senior citizens, abused children, battered spouses, homeless, illiterate and migrant farm workers.

For presumed benefit activities, applicants are required to include the estimated number of persons to benefit that meet the criteria for presumption.

Income Eligibility – Requires information on family size and income that limits benefit exclusively to low and moderate income people, or where it is evident that at least 51 percent of the clientele are persons whose family income does not exceed low and moderate income limits.

Nature/Location – The activity's nature and/or location leads to the conclusion that clientele will primarily be low and moderate income persons.

- c. **Housing** – Check the appropriate box for rehabilitation or new housing (limitations described in 570.207(b)(3)).

One Unit Structures – Each household receiving CDBG assistance must be low and moderate income; check yes if local program design requires this.

Multi-Unit Structures – Indicate whether total number of assisted units are occupied or to be occupied by persons of low and moderate income households; if two units to be assisted, one must be low and moderate income.

For the new construction of multi-family, non-elderly rental housing, where less than 51 percent of the units to be constructed will be occupied by persons of low and moderate income households, indicate that the percent LMI units of total units between 20 percent to 50 percent, and the amount of CDBG funds, limited to the percent of total development costs, not greater than the percent LMI units.

- d. **Job Creation/Retention** – Complete each box by indicating the appropriate number of jobs created and/or retained, the number of jobs created and/or retained that will benefit persons that are low and moderate income, and the percent of jobs created and/or retained that will benefit persons that are low and moderate income.

2. **Slums/Blight Test** – If the activity does not meet the low and moderate income benefit test, then it may be considered as meeting the slums and blight test. Check each box for area or spot basis, as appropriate.

- a. **Area Basis** – Activity must meet both criteria.

Boundary Identified/Qualified

The area must be delineated geographically and must meet the federal and state definitions for a slum/blighted area with documentation maintained on the conditions of area upon which the qualification is made. The state definition of a slum blighted area (16 PA. Code, Chapter 21) is as follows: "A portion of an urban community which contains unsafe, unsanitary, inadequate, or overcrowded dwellings or is inadequately planned because of excessive land coverage, the lack of proper light and open spaces, the defective design and arrangement or economically or socially undesirable land uses."

The Federal definition, although less comprehensive, is far more focused. It defines a slum/blight area as one: “Where there is a substantial number of deteriorating or dilapidated buildings throughout the area.”

Activity Addresses Conditions

The activity addresses one or more of the conditions which contributed to the deterioration of the area. Residential rehabilitation must correct substandard conditions (DCED’s *Housing Rehabilitation Guidebook* prescribed standards) before less critical deficiencies are completed.

b. **Spot Basis**

Activities Limited To

Acquisition, relocation, clearance, rehabilitation and historic preservation that eliminate certain conditions of blight or physical activity decay are the only eligible activities.

Rehabilitation Limitation

Rehabilitation is limited to the extent necessary to eliminate specific conditions detrimental to public health and safety.

3. **Urgent Need** – Check each box as each specific criterion must be met. The activity must be designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community; CDBG assistance must be limited to correcting the urgent condition; the condition must be of recent origin or has recently become urgent (within the past 18 months); and the municipality must certify that it is unable to finance the activity on its own, and that other sources of funding are not available.

NOTE: Activities being considered for the Urgent Need category must be cleared by DCED prior to being included in the Grant Application.

C. Countywide/Area-Wide Activities (Referred to as Fair Share)

If a county uses any part of its county allocation for a countywide or areawide activity, it must determine if this activity will benefit any federal or state entitlement municipality. If any federal or state entitlement municipality benefits from an activity undertaken with a county’s allocation, then the proportional cost of the project benefiting the entitlement municipality(ies) must be met by funds other than the county’s allocation.

D. Environmental Review Requirements

As you plan your activities for the Fiscal Year, information has been provided in Appendix E Environmental Tip Sheets. The information being provided will help to properly identify the level of environmental review needed so that activities may be undertaken in timely manner. In addition, all projects must be reviewed by the local jurisdiction prior to being submitted, certifying that the proposed projects are not in an identified Floodway.

E. Public Facilities and Improvements - HUD Matrix Code 03 series

For public/community facilities that receive CDBG funds, the following information must be included in the activity description form to support the requirements at 570.482:

1. Is the facility open to the general public?
2. What are the hours of operation?
3. What are the fees for membership or to rent the facility?
4. Are the fees reasonable when compared to similar facilities in the general area so as not to preclude low and moderate income persons from using the facility?
5. Provide a list of services/programs available.
6. Provide the website, if applicable, for the facility.

Appendix B – CDBG Public Service Activities

A. Eligibility

Eligibility defined at 24 CFR 570.201(e) and 570.482 of CDBG Entitlement Regulations. For additional information, please refer to the *State Community Development Block Grant Program -- Guide to National Objectives and Eligible Activities*.

Eligible CDBG public services include but are not limited to the following:

Child Care	Job Training	Education Programs
Health Care	Recreation Programs	Public Safety Services
Fair Housing Activities	Services for Senior Citizens	Services for Homeless
Drug Abuse Counseling/Treatment	Energy Conservation Counseling & Testing	
Homebuyer Downpayment Assistance	Welfare (excluding income payments)	

Eligible public service costs include labor, supplies and materials.

To be eligible for CDBG funding, a public service activity must be:

- a new service, or
- a quantifiable increase in the level of an existing service

1. New Service

If it is a new public service activity (new to the community) at the time CDBG funds are first used to support the activity, it can be considered a new activity for three (3) consecutive years.(DCED's policy) Therefore, CDBG funds could be used to support the activity in the second and/or third year without any consideration as to whether there is a quantifiable increase in the level of service from one year to the next.

2. Quantifiable Increase

At the time CDBG funds are first used for a public service activity that is already in existence, it must be demonstrated that as a result of the CDBG funds there will be a quantifiable increase in the level of the existing service. (The purpose of this requirement is to prevent CDBG funds from being used to merely replace other funds without an increase in the level of the public service.)

The quantifiable increase must be over and above the level of service provided by the local government, or by another agency or organization on behalf of the local government, through funds raised by the local government or received from the commonwealth.

The increase in the level of service must be an increase over that which existed in the twelve (12) months immediately prior to the submission of the application or modification proposing the use of CDBG funds for the service.

CDBG funds can only be used to pay for the quantifiable increase in the public service, except, if CDBG funds are substituted for federal or private funds, a quantifiable increase in the public service is not necessary. Again, CDBG funds may not be used to substitute for local or commonwealth funds.

3. Questions on Eligibility

a. *Define quantifiable increase.*

The regulations do not prescribe what constitutes a quantifiable increase. DCED's policy takes the position, generally, that a quantifiable increase must be legitimate and not artificial, involving additional staff costs and time resulting in an increase in the number of clients served. With these general parameters, DCED considers each request. Examples of what has not been accepted include such requests as: a new van to replace an old one resulting in less breakdowns and less interruptions in service, possibly allowing for serving more clients; a dental service expanding the level of service from performing fillings and cleaning to orthodontics.

b. *How does the three year timeframe work?*

After a determination has been made that an activity qualifies as a new service or a quantifiable increase, that activity may be funded for the initial year and two successive years without further evaluation or qualification, provided the level of service stays the same.

Whether CDBG was used only in the first year, for only two years or for all three years, the grantee cannot come back after year three and use CDBG funds for this particular public service on the basis that it is a new activity, or at the quantifiable increase in level of service that originally qualified it. (The "three-consecutive year" requirement applies to the activity and not to years of CDBG assistance). After the three years have expired, the activity must be qualified based on a quantifiable increase in the level of service.

c. *Does CDBG funding in a public service trigger other compliance requirements, similar to CDBG funding of an infrastructure project?*

Any private sector professional service or purchase of materials or supplies directly funded by CDBG must adhere to the competitive procurement requirements, as specified in DCED's Contract/Procurement Manual. Provided CDBG funds are not used to fund any construction contract over \$2,000 that may be undertaken to compliment the public service, federal wage rates would not apply. Adhering to the civil rights requirements applies to all activities.

B. Fundability

Each public service activity must meet either the low and moderate income benefit or slum and blight national objective. Low and moderate income can be met either by area benefit or limited clientele. Limited clientele must be based on documentation that clearly shows that 51% or greater of the beneficiaries will be, or has been in the case of an existing service, low and moderate income. Public service activities may also be qualified based on the area slum and blight category.

Appendix C – Service Areas and Survey Methodology for Area Benefit Activities

Definition – Area Benefit (570.483 (b)(1))

An activity, the benefits of which are available to all the residents in a particular area, where at least 51 percent of the residents are low and moderate income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries, but must be the entire area served by the activity. An activity that serves an area that is not primarily residential in character shall not qualify under the criterion.

A. Process

1. Determine Service Area Boundary

a. Problem/Solution

What is/are the problem(s), or need(s)? What is the solution? Where multiple problems or needs are to be addressed, are they clearly delineated, and is there a primary problem or need? Who principally or primarily will be served?

b. Nature/Type Activity

Does the nature or type of activity inherently help to determine the service area, i.e., direct benefit, or area wide in nature (new sanitary sewer collection or water distribution; neighborhood park or Central Business District [CBD] improvements)?

c. Level of Funding

Are there sufficient funds to meet the need or solve the problem, or if only partially, will proposed activity be functional, and beneficiaries able to be determined?

d. Document Service Area Boundary

After considering the activity problem and solution, the nature and type of activity, and the level of funding, determine and document the appropriate boundary of the service area.

2. Document Low and Moderate Income Percent for Activity's Beneficiaries

a. Census Data

If service area boundary coincides with HUD 2009-14 ACS data, determine if the data is equal to or greater than 51% low and moderate income, and document results.

If service area nearly coincides with ACS data, consult with DCED to evaluate the data and determine if it is reasonable to justify the low and moderate income benefit. ACS data for different census geography (i.e., Census Tract [CT], Enumeration District [ED], or Block Group [GBG]) may be added to determine over all LMI percent.

b. Survey

If ACS data cannot appropriately be used, a survey may be conducted to determine the percentage of low and moderate income people within the service area.

Surveys must be conducted and evaluated in accordance with HUD's most current CPD Notice on Survey Methodology.

Appendix D – Determining Service Areas

A. Streets

1. **Dead End/Cul-de-sacs**

Street that serves only those residents living along the street; survey must be done unless it serves presumed low-moderate beneficiaries, i.e., public housing.

2. **Local/Neighborhood Street**

- Through street with primary beneficiaries being that street.
- Can be justified by using smallest census geography for a borough or city (i.e., B.G.), or by doing survey of particular street.
- In townships where there may only be E.D.'s, and the village service area does not coincide with an E.D., then survey is needed.

3. **Minor Collector (arterial)**

- Street that certainly serves more than a block group or neighborhood, but due to traffic patterns, land use, etc., the primary beneficiaries are less than the entire City, Borough or Township. This area might combine a number of block groups, CT's of ED's.
- Cannot isolate one smaller area for low-moderate benefit.

4. **Major Collector (arterial)**

- Street that serves the entire municipality (e.g., main street).
- In some instances where main street carries a lot of truck traffic or cars from one municipality to another, it is acceptable to limit the service area to the local jurisdiction in most instances.
- Cannot isolate small area for low-moderate benefit.

B. Storm Sewers

While rehab of streets only is not too complicated in understanding the improvement, storm sewers can become very complicated.

- What is the problem? Engineer's analysis can be very helpful.
- Is the problem and solution limited or comprehensive in solving a number of problems? Is problem localized or system-wide?
- Is problem more a storm water effect on residences, or a street problem?
- Does solution, i.e., size of line, give indicator to service area intended?

C. Multiple Problems

- Some activities have multiple problems that need directed to determine if there is a primary reason for activity (storm water, sanitary, water, street problems).
- Engineer's analysis is important.

D. Renovations-Sanitary Sewer/Storm/Water

- Localized or system-wide effect? What is primary? Source, distribution, collection, treatment, pressure, etc.
- If the problem is an inflow or infiltration issue, the jurisdiction needs to look at who is being served by the sewage treatment plant.

E. New Water/Sanitary Sewer

- Easier to deal with when connection / tap-in to system determines beneficiaries.
- Up until time of fundability determination, grantee responsible for ensuring low-moderate benefit. After fundability determination, grantee not responsible for people moving in or out, and low-moderate not met.
- Size of lines may be questionable in relation to service area, or knowledge of new development by grantee that is not included in service area that is under construction.
- Prior to installation of any new system or extension, jurisdiction must insure no new development or significant changes to the service area have or will occur.

F. Parks

- Nature of the park where improvements are made.
- Type of facilities constructed or improved.
- Primary service area & agency responsible for operation/maintenance

G. Fire Stations

- Logical service area for station, excluding multi-alarm fires (eg: Primary response area is defined by the fire department).

H. Central Business District (CBD)

- Logical service area for the downtown will primarily be the municipality.

D. ACTIVITY DESCRIPTION

Describe the activity sufficiently to demonstrate that it is an eligible activity, and that its scope is adequate to meet the identified needs of intended beneficiaries. Particular attention must be focused on the impact the proposed solution will have upon low and moderate income people, e.g. user fees, benefit assessments, etc. (For activities with user fees, complete "Local Effort/User Fee Analysis".)

For Competitive Applicants - Due to the competitive review process, the activity should be described comprehensively to substantiate the cause and magnitude of the need, and "third party" support (reports, newspaper articles, letters from affected residents, businesses, etc.), should be provided. Focus as specifically as possible on the impact of the problem on the residents of the affected area.

Please provide a satellite image or photography of the project area.

1. Identify what is the problem and location of the problem. Identify the location of the project by street name(s) if applicable.

This project has been reviewed to determine if any of the project is within the designated FLOODWAY using the best available data, and it has been determined that it is or is not located in the FLOODWAY.

Identify FIRM MAP or other source used for this determination. _____

2. How will the problem be corrected: Specify type and quantity of materials to be used to correct the problem.

3. Who are the primary beneficiaries; who will receive the daily benefits of the proposed project. The project and service area must be identified on the map and may be different. (Include photos)

4. Public Facilities and Improvements -HUD Matrix Code 03 series

For public community facilities that receive CDBG funds, the following information must be included in the activity description form to support the requirements at 570.201(c), 570.482 and 570.200(b):

1. Who owns the facility?
2. Is the facility open to the general public?
3. What are the hours of operation?
4. What are the fees for membership or to rent the facility?
5. Are the fees reasonable when compared to similar facilities in the general area so as not to preclude low and moderate income persons from using the facility?
6. Provide a list of services/programs available.
7. Provide the website, if applicable, for the facility?

(Attach Additional sheets as necessary.)



LIMITED CLIENTELE WORKSHEET REPORTING

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

For LMC Benefit Activities ONLY (Use One Form per Activity qualifying as LMC)

Activities in this category provide benefits to a specific group of persons rather than everyone in an area. It may benefit particular persons without regard to the area in which they reside, or it may be an activity that provides a benefit on an area basis but only to a specific group of persons who reside in the area. In either case, at least 51 percent of the beneficiaries of the activity must be L/M income persons.

Examples of activities that qualify under the limited clientele category include:

- Acquisition of a building to be converted into a shelter for the homeless;
- Rehabilitation of a center for training severely disabled persons to enable them to live independently;
- Clearance of a structure from the future site of an neighborhood center that will exclusively serve the elderly; and
- Public services activities like the provision of health services

With respect to determining the beneficiaries of activities as LMI and qualifying under the limited clientele category, activities must meet one of the following tests:

- **Exclusively** benefit a clientele who are generally presumed by HUD to be principally L/M income persons. The following groups are currently presumed by HUD to be made up principally of L/M income persons:
 - ✓ Abused children,
 - ✓ Elderly persons,
 - ✓ Battered spouses,
 - ✓ Homeless persons,
 - ✓ Adults meeting Bureau of Census' definition of severely disabled adults*,
 - ✓ Illiterate adults,
 - ✓ Persons living with the disease AIDS, and
 - ✓ Migrant farm workers.

Reference: 24 CFR 570.483(b)(2)(ii)(A) or

- Require information on family size and income so that it is evident that at least 51 percent of the clientele are persons whose family income does not exceed the L/M income limit. (This includes the case where the activity is restricted exclusively to L/M income persons). *Reference: 24 CFR 570.483(b)(2)(ii)(B) and (C); or*
- Be of such nature and in such location that it may reasonably be concluded that the activity's clientele will primarily be L/M income persons (for example, a day care center that is designed to serve residents of a public housing complex). *Reference: 24 CFR 570.483(b)(2)(ii)(D); or*
- Be an activity that serves to remove material or architectural barriers to the mobility or accessibility of elderly persons or of adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," provided it is restricted, to the extent practicable, to the removal of such barriers by assisting:
 - ✓ The reconstruction of a public facility or improvement, or portion thereof, that does not qualify under the L/M Income Area Benefit criteria;
 - ✓ The rehabilitation of a privately-owned nonresidential building or improvement that does not qualify under the L/M Income Area Benefit criteria or the L/M Income Jobs criteria; or
 - ✓ The rehabilitation of the common areas of a residential structure that contains more than one dwelling unit and that does not qualify under the L/M Income Housing criteria. *Reference: 24 CFR 570.483(b)(2)(iii); or*
- Be a microenterprise assistance activity carried out in accordance with the provisions of HCDA Section 105(a)(22) or 24 CFR 570.482(c) with respect to those owners of microenterprises and persons developing microenterprises assisted under the activity during each program year who are low- and moderate-income persons. (Note that, for these purposes, once a person is determined to be L/M income, he/she may be presumed to continue to qualify as such for up to a three-year period. This would enable the provision of general support services to such a person during that three-year period, without having to check to determine whether the person's income has risen.) *Reference: 24 CFR 570.483(b)(2)(iv); or*

LIMITED CLIENTELE WORKSHEET REPORTING

- Bean activity designed to provide job training and placement and/or other employment support services, including, but not limited to, peer support programs, counseling, child care, transportation, and other similar services, in which the percentage of low- and moderate-income persons assisted is less than 51 percent which qualifies under the Limited Clientele national objective in the following **limited circumstance**:
 - ✓ In such cases where such training or provision of supportive services assists business(es), and the only use of CDBG assistance is to provide the job training and/or supportive services; and the proportion of the total cost of the services borne by CDBG funds is no greater than the proportion of the total number of persons benefiting from the services who are L/M income. *Reference: 24 CFR 570.483(b)(2)(v)*

Activities Excluded from Limited Clientele Qualification

There are two sets of activities that are precluded from qualifying under this category based on statutory limitations:

- Activities involving the acquisition, construction, or rehabilitation of property for housing, including homeownership assistance (these must qualify under the Housing subcategory, because of Section 105(c)(3) of the authorizing statute) or
- Activities where the benefit to L/M income persons is the creation or retention of jobs (these must qualify under the Jobs subcategory with certain exceptions as noted under the previous Area Benefit section, because of the different presumptions provided under Sections 105(c)(1)(C) and (4) of the authorizing statute)

Please go to the next page to complete the form for your LMC activity

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LIMITED CLIENTELE WORKSHEET REPORTING*To Be Completed as part of the Application for CDBG Funding – LMC Activity*

NAME OF ACTIVITY:	CONTRACT YEAR:
-------------------	----------------

PART 1: IDENTIFY THE CLIENTELE TO BENEFIT**PRESUMED BENEFIT**

To qualify under Limited Clientele criteria, the activity must exclusively benefit clientele who are generally presumed by HUD to be principally low-moderate income (L/M) persons (24CFR570.483(b)(2)(ii)(A)). Please select one of the following groups that are generally presumed by HUD to be principally L/M persons for this project.

Please select one of the presumed categories that the beneficiaries of the proposed activity will be qualified as.

- | | |
|---|---|
| <input type="checkbox"/> Abused children | <input type="checkbox"/> Severely disabled adults (as defined by Bureau of Census*) |
| <input type="checkbox"/> Elderly persons (age 62 and older) | <input type="checkbox"/> Illiterate adults |
| <input type="checkbox"/> Battered spouses | <input type="checkbox"/> Persons living with AIDS |
| <input type="checkbox"/> Homeless persons | <input type="checkbox"/> Migrant farm workers |

*Persons are considered severely disabled if they:

- Use a wheelchair or another special aid for 6 months or longer;
- Are unable to perform one or more functional activities (seeing, hearing, having one's speech understood, lifting and carrying, walking up a flight of stairs and walking);
- Need assistance with activities of daily living (getting around inside the home, getting in or out of bed or a chair, bathing, dressing, eating and toileting) or instrumental activities or daily living (going outside the home, keeping track of money or bills, preparing meals, doing light housework and using the telephone);
- Are prevented from working at a job or doing housework;
- Have a selected condition including autism, cerebral palsy, Alzheimer's disease, senility or dementia or mental retardation; or
- Are under 65 years of age and are covered by Medicare or receive Supplemental Security Income (SSI).

Note: Exclusively means that all of the beneficiaries of the activity must meet the criteria for being presumed.

If the beneficiaries fall into any other category but those above, then Presumed Benefit category may not be used to qualify for Limited Clientele.

OTHER OPTIONS FOR QUALIFYING FOR THE LIMITED CLIENTELE CATEGORY

Please select one of the other options to qualify the activity as LMC, if the Presumed Benefit option above cannot be used.

- Require documentation on family size and income in order to show that at least 51 percent of the clientele are LMI; For example: A summer lunch program that uses other funding with an income requirement; or
- Have income eligibility requirements limiting the activity to LMI persons only; For example, construction of a waterline that will only service a senior (62 or older) housing complex; or
- Be of such a nature and in such a location that it can be concluded that clients are primarily LMI. For example, is a day care center that is designed to serve residents of a public housing complex.

Please complete Part 2 to complete this form

LIMITED CLIENTELE WORKSHEET REPORTING

NAME OF ACTIVITY:	CONTRACT YEAR:
-------------------	----------------

PART 2: DOCUMENTATION

(attach separate sheets of paper if necessary)

Provide the following information as applicable to the proposed activity based on your responses in Part 1 of this form.

PRESUMED BENEFIT

Number of estimated beneficiaries in the Service Area: _____
(This may be from Census, ACS, or actual membership information)

Source of information : _____

**Please attach documentation that the facility or service will exclusively benefit clientele who are generally presumed to be principally LMI persons.*

ACTIVITIES REQUIRING DOCUMENTATION ON FAMILY SIZE AND INCOME

Number of estimated beneficiaries (total persons): _____

How many LMI persons _____ % _____

**Please attach a blank sample of the intake document used to acquire this information.*

INCOME ELIGIBILITY REQUIREMENTS THAT LIMIT THE ACTIVITY EXCLUSIVELY TO LMC PERSONS

Explain the income eligibility requirements that will limit the activity to only LMC persons:
**Please attach activity guidelines that state these requirements.*

NATURE OR LOCATION OF ACTIVITY ESTABLISH THAT IT WILL BE USED PRIMARILY BY LMC PERSONS

Explain the intent of the activity or its location that would presume the beneficiaries to be LMC persons:

**Please attach a map of the location of the activity and the service area.*

7) I certify the following:

1. That the persons performing force account work are W-2 form registered employees, (and not 1099 form contractors) of the Grantee; and
2. If temporary workers are hired, that they will be W-2 form registered employees (and not 1099 form contractors), and that the employer's policies for temporary employees will be followed.

Signature of Chief Elected Official *Date*

Printed Name *Title*

DCED Use Only

Grant Manager Approval *Date*

DCED Comments

A SAMPLE



PROJECT BUDGET

APPLICANT NAME:

Total Source of Funds

Activity	CDBG	Local (with eligible in-kind)	Program Income	Total
1 Construction Costs				
2 Professional Fees				
3 Labor Standards				
4 Land Acquisition (if any)				
5 Environmental Review				
TOTAL				

* **DO NOT** include any general administrative costs, miscellaneous, contingency costs, etc. in budget.

Complete the table above. The budget is to reflect full project cost. Immediately following this page, attach itemized cost estimate for each line item, identifying the source and use of funds.

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PROJECT COMPLETION TIMETABLE

APPLICANT NAME:

Beginning with the application submission date, outline below a reasonable timetable for project completion. Include all significant milestones, emphasizing those related to environmental clearance, procurement of third party services, plans, permits, bids, contracts, financing, acquisition of property, construction, and completion.

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ACTIVITY DESCRIPTION – ADMINISTRATIVE EXPENSES

APPLICANT NAME:	TOTAL GRANT AMOUNT: \$
	TOTAL ADMINISTRATIVE COSTS*: \$
HUD MATRIX CODE: 21A	% OF TOTAL GRANT: %
NATIONAL OBJECTIVE JUSTIFICATION: 24 CFR 570.483(f) Planning and Administrative Costs – CDBG funds expended for eligible planning and administrative costs by units of general local government in conjunction with other CDBG assisted activities will be considered to address the national objectives.	

COUNTY APPLICANTS administering On Behalf of Grantee (OBO) – Must complete the box below.

ENTITLEMENT	BUDGETED ADMINISTRATIVE COST
APPLICANT NAME:	\$ *
OBO:	\$ *
TOTAL ADMIN:	\$ *

Please describe the expenses to be paid using CDBG administrative funds.
For example, staff salaries and benefits, advertisements, office supplies. In addition, please identify if administrative expenses are included in a cost allocation plan or if the grantee has an indirect cost rate being used to determine administrative expenses.

Grantee uses a Cost Allocation Plan: <input type="checkbox"/> Yes <input type="checkbox"/> No	Grantee uses an Indirect Cost Rate: <input type="checkbox"/> Yes <input type="checkbox"/> No
---	--

* Cannot be rounded up

Environmental Tips Sheet

Check the proposed activity below that best describes your project:

1. APPLICANT NAME:
2. ACTIVITY:

EXEMPT ACTIVITIES (58.34)

- Studies and plans
- Site inspections, testing or sampling
- Engineering plans, designs and associated costs
- Information and financial services
- Administrative and management activities
- Public services (re: no physical impacts or changes)
- Purchase of tools or insurance
- Technical assistance and training
- Payment of principal and interest on loans

Environmental Review (ER) process that needs to be followed and documentation to be included in your ER Record:

- Describe your activity and make a written determination of Exemption
- Determine compliance with 58.6 ("Other Requirements" checklist)
- Exempt Form signed by your Certifying Officer – place a copy in your file and send a copy to DCED

Environmental Tips Sheet

Check the proposed activity below that best describes your project:

1. APPLICANT NAME:
2. ACTIVITY:

CATEGORICALLY EXCLUDED ACTIVITIES NOT SUBJECT TO REVIEW under the Related Federal Laws and Authorities 58.35 (b) Such activities include:

These activities are usually associated with (ESG Projects):

- Tenant based rental assistance
- Supportive services
- Operating costs
- Equipment purchases
- Homeownership assistance
- Pre-development costs

Environmental Review (ER) process that needs to be followed and documentation to be included in your ER Record:

- Describe your activity and make a written determination of Exemption
- Determine compliance with 58.6 (“Other Requirements” checklist)
- Exempt Form signed by your Certifying Officer – place a copy in your file and send a copy to DCED

Environmental Tips Sheet

Check the proposed activity below that best describes your project:

1. APPLICANT NAME:
2. ACTIVITY:

CATEGORICALLY EXCLUDED SUBJECT TO REVIEW
under the Related Federal Laws and Authorities 58.35 (a) Such activities include:

- Acquisition, repair, improvement, reconstruction or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are already in place and will be retained in the same use without change in size or capacity of more than 20 percent
- Projects to remove barriers restricting mobility and accessibility to elderly and handicapped persons
- Rehabilitation of residential buildings (with one to four units), when the density is not increased beyond four units, the land use is not changed and the footprint of the building is not increased in a floodplain or in a wetland
- Rehabilitation of multifamily residential buildings when the unit density is not changed more than 20 percent, the project does not involve changes in land use from residential to non-residential and the estimated cost of rehabilitation is less than 75 percent of the total costs of replacement after rehabilitation
- For non-residential structures (including commercial, industrial and public buildings), the facilities and improvements are in place and will not change in size or capacity by more than 20 percent, and the activity does not involve a change in land use
- An individual action on up to four dwelling units, where there is a maximum of four units on any one site
- An individual action on a project of five or more housing units developed on scattered sites, when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site
- Acquisition (including leasing) or disposition of existing structures, or acquisition of vacant land, provided that the structure or land acquired or disposed of will retain the same use

Combinations of the above activities.

Environmental Review process that needs to be followed and documentation to be included in your ER Record:

- Determination of Level of Review
- Statutory Check list 58.5
- Checklist 58.6 (Other Requirements)
- Source Documentation (FIRM Maps, aerial maps, letters sent to any agencies, agency websites consulted, agency responses, and any other relevant information that provides support for your findings within the Statutory Checklist)
- Finding of No Significant Impact/Notice of Intent to Request for Release of Funds–(FONSI/NOI) Publication
- Affidavit of Proof of Publication/Advertisement
- Request for Release of Funds (RROF) Certification Form (Signed)

Environmental Tips Sheet

Check the proposed activity below that best describes your project:

1. APPLICANT NAME:
2. ACTIVITY:

ENVIRONMENTAL ASSESSMENT (58.36)

All other activities – projects that create a new, or relocate existing activities or result in a substantial increase in size.

EXAMPLE:

- Demolition
- Distribution lines for a new water system
- Paving a new road
- Infrastructure for a 25-unit new subdivision for low-income housing
- Construction of an addition to a homeless shelter
- Substantial rehab

Environmental Review process that needs to be followed and documentation to be included in your ER Record:

- Determination of Level of Review
- Statutory Check list 58.5
- Environmental Assessment Checklist
- Checklist 58.6 (Other Requirements)
- Source Documentation (FIRM maps, aerial maps, letters sent to any agencies, agency websites consulted, agency responses, and any other relevant information that provides support for your findings within the Statutory Checklist)
- Finding of No Significant Impact/Notice of Intent to Request for Release of Funds–(FONSI/NOI) Publication
- Affidavit of Proof of Publication/Advertisement
- Request for Release of Funds (RROF) Certification Form (Signed)

Environmental Impact Statements (EIS) – if your project would require an EIS contact your Grant Manager for guidance.

All forms and templates necessary to complete any of these areas may be found on DCED's website: dced.pa.gov

Instructions for Completion of Local Effort/User Fee Analysis

Must be completed for all sewer and water system improvements receiving CDBG assistance.

1. Enter applicant's name.
2. Analysis—Debt Service Portion—User Fee

A. Current

- 1.) Enter the total amount to be paid for debt repayment for this service only during the current year. If not applicable, enter N/A.
- 2.) Enter the number of units (Equivalent Domestic Units) now served by this system. If not applicable, enter N/A.
- 3.) Enter the total user fee being charged for each unit being serviced by the existing system (per month/quarter, whichever is applicable). If not applicable, enter N/A.
- 4.) Divide the dollar amount in (1) above by the number of units in (2) above.
- 5.) Enter the debt balance as of December 31, last year for this service only.
- 6.) Enter the date upon which all current debt for this service will be retired (paid off).
- 7.) Enter any balance of cash reserves for this system only as of December 31, last year. Submit a copy of the last completed Financial Report.

B. Proposed Project

- 1.) Enter the total number of units to be served by the proposed project.
- 2.) Enter the proposed user fee and indicate the proposed payment, monthly, quarterly, etc.
- 3.) Enter the total new debt anticipated excluding CDBG financing.
- 4.) Enter the total amount of CDBG funds being requested.



LOCAL EFFORT/ USER FEE ANALYSIS

1. APPLICANT NAME: _____

2. ANALYSIS - DEBT SERVICE PORTION - USER FEE

	Water	Sewer
A. Current (if applicable)		
(1) Annual Debt Service		
(2) Number of Units (E.D.U.'s) Now Served		
(3) Existing User Fee		
(4) Debt Service Portion of Average Annual user Fee (Divide 1 by 2 above)		
(5) Balance Current Debt Projected to _____		
(6) Current Debt Retirement Date _____		
(7) Fund Surplus Investments Cash Balance, etc., as of _____		
B. Proposed Project		
(1) Number of Units (E.D.U.'s) to be Served		
(2) Proposed Under Fee and Schedule		
<input type="checkbox"/> Monthly <input type="checkbox"/> Quarterly <input type="checkbox"/> Other (Explain) _____		
(3) Total New Debt (Other than CDBG)		
(4) Total CDBG Funding Requested		

3. OPERATION AND MAINTENANCE PORTION - USER FEE

	Water	Sewer
A. Last Year's Operation and Maintenance Cost		
B. Operation and Maintenance Portion of Average Annual User Fee		

4. REPAYMENT RATES AND TERMS

Explain repayment rates and terms of other new-debt listed in 2.b(3) above.

5. CURRENT AND PROJECTED DEBT

Attach additional sheets to illustrate and support current and projected debt as well as why CDBG funds are critical to the completion of the proposed project.

6. AGREEMENT WITH SERVICE PROVIDER

Provide copy of service provider agreement.

Instructions for Completion of LMI Principal Benefit Determination

1. Applicant Name – Name of Municipality.
2. Date – Enter date of submission.
3. Submission Type – Check as appropriate.
4. Fiscal Year – Enter the Federal Fiscal Year of the grant application.
5. Contract Number – If this submission is to revise or amend an existing CDBG grant, enter the CDBG Contract Number otherwise, leave blank.

Principal Benefit Form

- A. **Activity** – Enter the number and description of the activity using the list from Activities Description Instructions, refer to the HUD IDIS Matrix Codes in Appendix E.
- B. **National Objective met/CDBG** – Enter total CDBG dollars budgeted in support of each activity under the appropriate National Objective met in columns 1-3. If an activity qualifies as meeting the low and moderate income national objective, then 100 percent of CDBG funds budgeted for the activity are counted as benefiting LMI. If less than 51 percent benefit is demonstrated, the activity does not meet the National Objective of Benefit to LMI (except new Housing) and no CDBG funds are counted as benefiting LMI. When counting CDBG funds benefiting LMI for assistance to Housing Rehab and New Housing, CDBG dollars benefiting LMI are determined by multiplying the total costs (CDBG and non-CDBG costs) of the acquisition, construction, or rehabilitation by the percent of the units in such housing that will be occupied by persons of low and moderate income households. For example, if 8 of 10 units are to be occupied by LMI persons, and the total costs are \$120,000 - \$100,000 CDBG and \$20,000 other, then \$96,000 is counted toward benefiting the LMI category.
- C. **CDBG Total/Percent LMI** – Enter total amount for all activities in each national objective. Indicate percent of CDBG funds benefiting LMI of total CDBG funds for activities. (Must be 70 percent or greater.)

Note: Administration costs should not be included in the determination of principal benefit.



LMI PRINCIPAL BENEFIT DETERMINATION

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

1. APPLICANT/GRANTEE NAME:			2. DATE:		
3. TYPE <input type="checkbox"/> Original <input type="checkbox"/> Revised <input type="checkbox"/> Modification		4. FISCAL YEAR	5. CONTRACT NUMBER:		

A. ACTIVITY		B. NATIONAL OBJECTIVE MET/CDBG			
HUD Code	Activity	1. LMI CDBG Dollars	2. Slums/Blight CDBG Dollars	3. Urgent Need CDBG Dollars	4. Total CDBG Dollars
01	Acquisition of Real Property				
02	Disposition				
03A	Senior Center/Facilities				
03F	Parks, Recreation Facilities				
03G	Parking Facilities				
03I	Flood and Drainage Facilities				
03J	Water / Sewer Improvements				
03K	Street Improvements				
03L	Sidewalks				
03O	Fire Station / Equipment				
03Z*	Public Facilities - Other				
04	Clearance and Demolition				
05A	Public Service - Senior Centers				
05B	Public Service - Handicapped				
05D	Public Service - Youth Programs				
05L	Public Service - Child Care				
05Z*	Public Service - Other				
06	Interim Assistance				
08	Relocation				
12	Construction of Housing				
13	Direct Homeownership Assistance				
14A	Rehab: Single-Unit Residential				
14E	Rehab: Publicly or Privately Owned Comm./Ind.				
14G	Acquisition - for Rehabilitation				
15	Code Enforcement				
18A	ED Direct Financial Assistance to For-Profits				
19F	Planned Repayment of Section 108 Loan Principal				
_____	Other				
_____	Other				
C. CDBG TOTALS					
% LMI OF TOTAL					

Note: Administration costs should not be included in the determination of principal benefit.



BUDGET SUMMARY

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

1. APPLICANT/GRANTEE NAME:		2. DATE:
3. TYPE <input type="checkbox"/> Original <input type="checkbox"/> Revised <input type="checkbox"/> Modification	4. FISCAL YEAR	5. CONTRACT NUMBER:

	Code HUD Code Title / H&CD Act Citation	CDBG	CDBG Program Income	Other	Total
01	Acquisition of Real Property / 105 (a)(1)				
02	Disposition / 105 (a)(7)				
03A	Senior Center/Facilities / 105 (a)(2)				
03F	Parks, Recreation Facilities / 105 (a)(2)				
03G	Parking Facilities / 105 (a)(2)				
03I	Flood and Drainage Facilities / 105 (a)(2)				
03J	Water / Sewer Improvements / 105 (a)(2)				
03K	Street Improvements / 105 (a)(2)				
03L	Sidewalks / 105 (a)(2)				
03O	Fire Station / Equipment / 105 (a)(2)				
03Z*	Public Facilities - Other / 105 (a)(2)				
04	Clearance and Demolition / 105 (a)(4)				
05A	Public Service - Senior Centers / 105 (a)(8)				
05B	Public Service - Handicapped / 105 (a)(8)				
05D	Public Service - Youth Programs / 105 (a)(8)				
05L	Public Service - Child Care / 105 (a)(8)				
05Z*	Public Service - Other / 105 (a)(8)				
06	Interim Assistance / 105 (a)(14)				
08	Relocation / 105 (a)(11)				
12	Construction of Housing / 105 (a)(18)				
13	Direct Homeownership Assistance / 105 (a)(24)				
14A	Rehab: Single-Unit Residential / 105 (a)(18)				
14E	Rehab: Publicly or Privately Owned Comm./Ind. / 105 (a)(4)				
14G	Acquisition - for Rehabilitation / 105 (a)(1)				
15	Code Enforcement / 105 (a)(3)				
18A	ED Direct Financial Assistance to For-Profits / 105 (a)(17)				
19F	Planned Repayment of Section 108 Loan Principal				
	Other				
	Other				
	Program Administration / 105 (a)(13) & 105 (a)(12) Total				
	General (HUD Code 21A) \$				
	Planning (HUD Code 20) \$				
	Audit \$				
	Pre-Agreement \$				
68	TOTAL				

Note: One (1) Budget Summary must be completed for each fiscal year CDBG Grant.

BUDGET SUMMARY | COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

LIMITATIONS

Administration:

18% of CDBG Amount

Total Grant: \$ _____

Administration: \$ _____

Percent: _____ %

18% of Program Income

Total Program Income: \$ _____

Administration: \$ _____

Percent: _____ %

Public Services:

15% of CDBG Amount

Total Grant: \$ _____

Public Services: \$ _____

Percent: _____ %

PROGRAM INCOME

Program income must be accounted for separate from the CDBG grant. For grantees with open CDBG grant contracts, program income is governed by the regulations, procedures and requirements of the CDBG Program for the grant year to which the income is to be utilized. Interest earned on the drawdown of CDBG funds is not considered program income. However, interest earned on CDBG draws is governed by the CD&H Alert dated July 2013. Program Income Reuse Guidelines including Reuse Plan is available on the federal resources library dced.pa.gov/community/federal-program-resource-library/cdbg.

RELOCATION

Whenever relocation is proposed, provide the following information:

Number of businesses to be relocated: _____

Number of persons to be relocated: _____

Number of businesses to receive relocation payments and/or assistance: _____

Number of persons to receive relocation payments and/or assistance: _____

GENERAL INSTRUCTIONS

The Budget Summary provides a general listing of the activities for funding from a municipality's federal fiscal year CDBG grant. The two activities that are marked with an asterisk (*) are a general category for either public service (05) or public facilities (03) that do not fit under the listed public services or public facilities activities. The "Other" activity listing (bottom of the budget summary) is for activities that do not fit any of the listed activities. The numbering for the budget summary reflects the HUD Integrated Disbursement Information System (IDIS) matrix codes which are included in Appendix E. Only the total for administration, not the individual components (i.e. general, planning, audit, pre-agreement) should be shown in the columns for CDBG, CDBG Program Income, Other and Total.

Supplemental CDBG Required Plans and Documentation

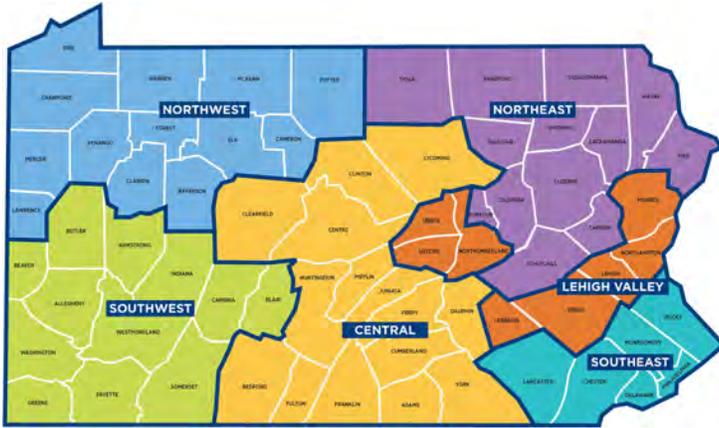
The following documents, plans, templates, and other resources are available on DCED's website at the following link: dced.pa.gov/community/federal-program-resource-library/cdbg

- **Citizen Participation Plan and Sample Public Notices**
(Municipally adopted and reviewed annually)
- **Definition of Family versus Household Income**
(Required for eligibility)
- **Environmental Tip Sheets**
(Guidance and Required Documentation)
- **Fair Housing Notice and Sample Ad and Resolution**
(Required with application submission and annual action steps)
- **MBE/WBE Plan**
(Municipally adopted and implemented, when applicable)
- **Residential Anti-Displacement and Relocation Plan**
(Municipally adopted and reviewed annually)
- **Revisions and Modifications Templates**
- **Section 3 Plan**
(Municipally adopted and implemented, when applicable)
- **Three year Activity Extension Template**

Please review and note which items require an annual review and update. This list will be updated periodically as the Center for Community Development Operations updates program resources.

Regional Offices

Pennsylvania Department of Community and Economic Development
dced.pa.gov



Central

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Appendix A

CDBG MATRIX CODES

CDBG Matrix Codes by Category

Matrix codes are listed here by category so you can quickly review the available choices.

Acquisition, Disposition, Clearance, Relocation

- | | | | |
|----|------------------------------|-----|-------------------------------|
| 01 | Acquisition of Real Property | 04A | Cleanup of Contaminated Sites |
| 02 | Disposition of Real Property | 08 | Relocation |
| 04 | Clearance and Demolition | | |

Administration and Planning

- | | | | |
|-----|-------------------------------------|-----|---|
| 19H | Technical Assistance to Grantees | 21E | Submission of Applications for Federal Programs |
| 20 | Planning | 21H | CDBG Funding of HOME Admin |
| 20A | State Planning Only | 21I | CDBG Funding of HOME CHDO Operating Expenses |
| 21A | General Program Administration | 21J | State Administration |
| 21B | Indirect Costs | 14H | Rehab: Administration |
| 21C | Public Information | | |
| 21D | Fair Housing Activities (subject to | | |

Economic Development

- | | | | |
|-----|---|-----|--|
| 14E | Rehab: Publicly or Privately Owned Commercial/Industrial (CI) | 17D | CI: Other Improvements |
| 17A | CI: Acquisition/Disposition | 18A | ED: Direct Financial Assistance to For-Profits |
| 17B | CI: Infrastructure Development | 18B | ED: Technical Assistance |
| 17C | CI: Building Acquisition, Construction, Rehabilitation | 18C | ED: Micro-Enterprise Assistance |

Housing

- | | | | |
|-----|---|-----|---|
| 12 | Construction of Housing | 14G | Rehab: Acquisition |
| 13 | Direct Homeownership Assistance | 14H | Rehab: Administration |
| 14A | Rehab: Single-Unit Residential | 14I | Lead-Based Paint/Lead Hazards Testing/Abatement |
| 14B | Rehab: Multi-Unit Residential | 14J | Housing Services |
| 14C | Rehab: Public Housing Modernization | 16A | Residential Historic Preservation |
| 14D | Rehab: Other Publicly Owned Residential Buildings | 19E | Operation/Repair of Foreclosed Property |
| 14F | Rehab: Energy Efficiency Improvements | | |

Public Facilities and Infrastructure Improvements

- | | | | |
|-----|---|-----|--|
| 03A | Senior Centers | 03L | Sidewalks |
| 03B | Handicapped Centers | 03M | Child Care Centers |
| 03C | Homeless Facilities (not operating costs) | 03N | Tree Planting |
| 03D | Youth Centers | 03O | Fire Stations/Equipment |
| 03E | Neighborhood Facilities | 03P | Health Facilities |
| 03F | Parks, Recreational Facilities | 03Q | Facilities for Abused and Neglected Children |
| 03G | Parking Facilities | 03R | Asbestos Removal |
| 03H | Solid Waste Disposal Improvements | 03S | Facilities for AIDS Patients (not operating costs) |
| 03I | Flood Drainage Improvements | 03Z | Other Public Facilities/Improvements |
| 03J | Water/Sewer Improvements | | |
| 03K | Street Improvements | | |

Public Services

- | | | | |
|-----|--|-----|--|
| 05A | Senior Services | 05N | Services for Abused and Neglected Children |
| 05B | Handicapped Services | 05O | Mental Health Services |
| 05C | Legal Services | 05P | Screening for Lead Poisoning |
| 05D | Youth Services | 05Q | Subsistence Payments |
| 05E | Transportation Services | 05R | Homeownership Assistance (not direct) |
| 05F | Substance Abuse Services | 05S | Rental Housing Subsidies |
| 05G | Services for Battered and Abused Spouses | 05T | Security Deposits |
| 05H | Employment Training | 05U | Housing Counseling |
| 05I | Crime Awareness/Prevention | 05V | Neighborhood Cleanups |
| 05J | Fair Housing Activities (subject to Public Services cap) | 05W | Food Banks |
| 05K | Tenant/Landlord Counseling | 03T | Operating Costs of Homeless/AIDS Patients Programs |
| 05L | Child Care Services | 05Z | Other Public Services |
| 05M | Health Services | | |

Section 108 Loans

- | | | | |
|-----|---|-----|---|
| 19F | Planned Repayments of Section 108 Loans | 24A | Payment of Interest on Section 108 Loans |
| 19G | Unplanned Repayments of Section 108 Loans | 24B | Payment of Costs of Section 108 Financing |
| | | 24C | Debt Service Reserve |

Other

- | | | | |
|-----|---------------------------------------|-----|--|
| 06 | Interim Assistance | 19C | Non-Profit Organization Capacity Building |
| 09 | Loss of Rental Income | 22 | Unprogrammed Funds |
| 11 | Privately Owned Utilities | 23 | Tornado Shelters Serving Private Mobile Home Parks |
| 15 | Code Enforcement | | |
| 16B | Non-Residential Historic Preservation | | |

Definitions of the matrix codes are provided in the table that follows.

MATRIX CODE DEFINITIONS

Matrix codes are used to indicate—but do not establish—activity eligibility. An activity must be eligible in accordance with the regulations at 570.482. Grantees need to refer to the regulations to determine an activity’s eligibility; the codes defined below are used in IDIS chiefly to categorize activities for reporting purposes.

Code	Definition
01	<p>Acquisition of Real Property</p> <p>Acquisition of real property that will be developed for a public purpose. Use code 01 for the CDBG-funded purchase of real property on which, for example, a public facility or housing will be constructed.</p> <p><i>When CDBG funds are used to:</i></p> <ul style="list-style-type: none"> • <i>acquire a public facility that will be rehabilitated with CDBG funds and continue to be used as a public facility, assign the appropriate 03* code.</i> • <i>acquire housing that will be rehabilitated, use code 14G.</i>
02	<p>Disposition of Real Property</p> <p>Costs related to the sale, lease, or donation of real property acquired with CDBG funds or under urban renewal. These include the costs of temporarily maintaining property pending disposition and costs incidental to disposition of the property.</p>
03A	<p>Senior Centers</p> <p>Acquisition, construction, or rehabilitation of facilities (except permanent housing) for seniors.</p> <p>03A may be used for a facility serving both the elderly and the handicapped, provided it is not intended primarily to serve persons with handicaps. If it is, use 03B instead.</p> <p><i>For the construction of permanent housing for the elderly, use code 12; for the rehabilitation of such housing, use the appropriate 14* code.</i></p>
03B	<p>Handicapped Centers</p> <p>Acquisition, construction, or rehabilitation of centers, group homes, and other facilities (except permanent housing) for the handicapped.</p> <p>03B may be used for a facility serving both the handicapped and the elderly provided it is not intended primarily to serve the elderly. If it is, use 03A instead.</p> <p><i>For the construction of permanent housing for the handicapped, use code 12; for the rehabilitation of such housing, use the appropriate 14* code.</i></p>
03C	<p>Homeless Facilities (not operating costs)</p> <p>Acquisition, construction, or rehabilitation of temporary shelters and transitional housing for the homeless, including battered spouses, disaster victims, runaway children, drug offenders, and parolees.</p> <p><i>For the construction of permanent housing for the homeless, use code 12; for the rehabilitation of such housing, use the appropriate 14* code.</i></p>

Code	Definition
03D	<p>Youth Centers</p> <p>Acquisition, construction, or rehabilitation of facilities intended primarily for young people age 13 to 19. These include playground and recreational facilities that are part of a youth center.</p> <p><i>For the acquisition, construction or rehabilitation of facilities intended primarily for children age 12 and under, use 03M; for facilities for abused and neglected children, use 03Q.</i></p>
03E	<p>Neighborhood Facilities</p> <p>Acquisition, construction, or rehabilitation of facilities that are principally designed to serve a neighborhood and that will be used for social services or for multiple purposes (including recreation). Such facilities may include libraries and community centers.</p>
03F	<p>Parks, Recreational Facilities</p> <p>Development of open space areas or facilities intended primarily for recreational use.</p>
03G	<p>Parking Facilities</p> <p>Acquisition, construction, or rehabilitation of parking lots and parking garages. Also use 03G if the primary purpose of rehabilitating a public facility or carrying out a street improvement activity is to improve parking.</p> <p><i>If parking improvements are only part of a larger street improvement activity, use 03K.</i></p>
03H	<p>Solid Waste Disposal Improvements</p> <p>Acquisition, construction, or rehabilitation of solid waste disposal facilities.</p>
03I	<p>Flood Drainage Improvements</p> <p>Acquisition, construction, or rehabilitation of flood drainage facilities, such as retention ponds or catch basins. Do not use 03I for construction/rehabilitation of storm sewers, street drains, or storm drains.</p> <p><i>Use 03J for storm sewers and 03K for street and storm drains.</i></p>
03J	<p>Water/Sewer Improvements</p> <p>Installation or replacement of water lines, sanitary sewers, storm sewers, and fire hydrants. Costs of street repairs (usually repaving) made necessary by water/sewer improvement activities are included under 03J.</p> <p><i>For water/sewer improvements that are part of:</i></p> <ul style="list-style-type: none"> • <i>more extensive street improvements, use 03K (assign 03K, for example, to an activity that involves paving six blocks of Main Street and installing 100 feet of new water lines in one of those blocks).</i> • <i>a housing rehabilitation activity, use the appropriate 14* matrix code.</i> <p><i>For construction or rehabilitation of flood drainage facilities, use 03I.</i></p>

Code	Definition
03K	<p>Street Improvements</p> <p>Installation or extension of the useful life of streets, street drains, storm drains, curbs and gutters, tunnels, bridges, and traffic lights/signs. Also use 03K:</p> <ul style="list-style-type: none"> • for improvements that include landscaping, street lighting, and/or street signs (commonly referred to as "streetscaping"). • if sidewalk improvements (see code 03L) are part of more extensive street improvements.
03L	<p>Sidewalks</p> <p>Improvements to sidewalks. Also use 03L for sidewalk improvements that include the installation of trash receptacles, lighting, benches, and trees.</p>
03M	<p>Child Care Centers</p> <p>Acquisition, construction, or rehabilitation of facilities intended primarily for children age 12 and under. Examples are daycare centers and Head Start preschool centers.</p> <p><i>For the construction or rehabilitation of facilities for abused and neglected children, use 03Q; for the construction or rehabilitation of facilities for teenagers, use 03D.</i></p>
03N	<p>Tree Planting</p> <p>Activities limited to tree planting (sometimes referred to as "beautification").</p> <p><i>For streetscape activities that include tree planting, use 03K; for sidewalk improvement activities that include tree planting, use 03L.</i></p>
03O	<p>Fire Stations/Equipment</p> <p>Acquisition, construction, or rehabilitation of fire stations and/or the purchase of fire trucks and emergency rescue equipment.</p>
03P	<p>Health Facilities</p> <p>Acquisition, construction, or rehabilitation of physical or mental health facilities. Examples of such facilities include neighborhood clinics, hospitals, nursing homes, and convalescent homes.</p> <p><i>Health facilities for a specific client group should use the matrix code for that client group. For example, use 03Q for the construction or rehabilitation of health facilities for abused and neglected children.</i></p>
03Q	<p>Facilities for Abused and Neglected Children</p> <p>Acquisition, construction, or rehabilitation of daycare centers, treatment facilities, or temporary housing for abused and neglected children.</p>
03R	<p>Asbestos Removal</p> <p>Rehabilitation of any public facility undertaken primarily to remove asbestos.</p>
03S	<p>Facilities for AIDS Patients (not operating costs)</p> <p>Acquisition, construction, or rehabilitation of facilities for the treatment or temporary housing of people who are HIV positive or who have AIDS.</p> <p><i>For the construction or rehabilitation of facilities for AIDS education and prevention, use 03P.</i></p>

Code	Definition
03T	<p>Operating Costs of Homeless/AIDS Patients Programs</p> <p>Costs associated with the operation of programs for the homeless or for AIDS patients, such as staff costs, utilities, maintenance, and insurance.</p> <p>Because payment of operating costs for these programs is a public service under CDBG, all CDBG expenditures for 03T activities are included in the calculation of the Public Services cap.</p>
03Z	<p>Other Public Facilities and Improvements</p> <p>Do not use this code unless an activity does not fall under a more specific 03* code. Also, do not use one activity for multiple facilities and then assign it an 03 because the types of facilities are different.</p> <p>One legitimate use of 03 is for activities that assist persons with disabilities by removing architectural barriers from or providing ADA improvements to government buildings (activities that otherwise would not be eligible for CDBG funding).</p>
04	<p>Clearance and Demolition</p> <p>Clearance or demolition of buildings/improvements, or the movement of buildings to other sites.</p>
04A	<p>Cleanup of Contaminated Sites</p> <p>Activities undertaken primarily to clean toxic/environmental waste or contamination from a site.</p>
05A	<p>Senior Services</p> <p>Services for the elderly. 05A may be used for an activity that serves both the elderly and the handicapped provided it is not intended primarily to serve persons with handicaps. If it is, use 05B instead.</p>
05B	<p>Handicapped Services</p> <p>Services for the handicapped, regardless of age.</p>
05C	<p>Legal Services</p> <p>Services providing legal aid to low- and moderate-income (LMI) persons.</p> <p><i>If the only legal service provided is for the settlement of tenant/landlord disputes, use 05K.</i></p>
05D	<p>Youth Services</p> <p>Services for young people age 13 to 19 that include, for example, recreational services limited to teenagers and teen counseling programs. Also use 05D for counseling programs that target teens but include counseling for the family as well.</p> <p><i>For services for children age 12 and under, use 05L; for services for abused and neglected children, use 05N.</i></p>
05E	<p>Transportation Services</p> <p>General transportation services.</p> <p><i>Transportation services for a specific client group should use the matrix code for that client group. For example, use 05A for transportation services for the elderly.</i></p>

Code	Definition
05F	Substance Abuse Services Substance abuse recovery programs and substance abuse prevention/education activities. If the services are provided for a specific client group, the matrix code for that client group may be used instead. For example, substance abuse services that target teenagers may be coded either 05D or 05F.
05G	Services for Battered and Abused Spouses Services for battered and abused spouses and their families. <i>For services limited to abused and neglected children, use 05N.</i>
05H	Employment Training Assistance to increase self-sufficiency, including literacy, independent living skills, and job training. <i>For activities providing training for permanent jobs with specific businesses, use 18A.</i>
05I	Crime Awareness/Prevention Promotion of crime awareness and prevention, including crime prevention education programs and paying for security guards.
05J	Fair Housing Activities (subject to Public Services cap) Fair housing services (e.g. counseling on housing discrimination) that meet a national objective. <i>For fair housing services activities carried out as part of general program administration (and thus not required to meet a national objective), use 21D.</i>
05K	Tenant/Landlord Counseling Counseling to help prevent or settle disputes between tenants and landlords.
05L	Child Care Services Services that will benefit children (generally under age 13), including parenting skills classes. <i>For services exclusively for abused and neglected children, use 05N.</i>
05M	Health Services Services addressing the physical health needs of residents of the community. <i>For mental health services, use 05O.</i>
05N	Services for Abused and Neglected Children Daycare and other services exclusively for abused and neglected children.
05O	Mental Health Services Services addressing the mental health needs of residents of the community.
05P	Screening for Lead Poisoning Activities undertaken primarily to provide screening for lead poisoning. <i>For lead poisoning testing/abatement activities, use 14I.</i>

Code	Definition
05Q	<p>Subsistence Payments</p> <p>One-time or short-term (no more than three months) emergency payments on behalf of individuals or families, generally for the purpose of preventing homelessness. Examples include utility payments to prevent cutoff of service and rent/mortgage payments to prevent eviction.</p>
05R	<p>Homeownership Assistance (not direct)</p> <p>Homeowner downpayment assistance provided as a public service. If housing counseling is provided to those applying for downpayment assistance, the counseling is considered part of the 05R activity.</p> <p>Assistance provided under 05R must meet the low/mod housing national objective. Therefore, unless the assistance is provided by a 105(a)(15) entity in a CRSA, it is subject to the public service cap and only low/mod households may be assisted. If the assistance is provided by a 105(a)(15) entity in a CRSA, the housing units for which CDBG funds are obligated in a program year may be aggregated and treated as a single structure for purposes of meeting the housing national objective (that is, only 51% of the units must be occupied by LMI households).</p> <p><i>For more extensive types of homeownership assistance provided under authority of the National Affordable Housing Act, use code 13.</i></p>
05S	<p>Rental Housing Subsidies</p> <p>Tenant subsidies exclusively for rental payments for more than three months. Activities providing this form of assistance must be carried out by 105(a)(15) entities.</p>
05T	<p>Security Deposits</p> <p>Tenant subsidies exclusively for payment of security deposits.</p>
05U	<p>Housing Counseling</p> <p>Housing counseling for renters, homeowners, and/or potential new homebuyers that is provided as an independent public service (i.e., not as part of another eligible housing activity).</p>
05V	<p>Neighborhood Cleanups</p> <p>One-time or short-term efforts to remove trash and debris from neighborhoods. Examples of legitimate uses of this code include neighborhood cleanup campaigns and graffiti removal.</p>
05W	<p>Food Banks</p> <p>Costs associated with the operation of food banks, community kitchens, and food pantries, such as staff costs, supplies, utilities, maintenance, and insurance.</p>
05Z	<p>Other Public Services</p> <p>Do not use this code for public services activities unless an activity does not fall under a more specific 05* code.</p> <p>Examples of legitimate uses of this code are referrals to social services, neighborhood cleanup, graffiti removal, and food distribution (community kitchen, food bank, and food pantry services).</p>

Code	Definition
06	<p>Interim Assistance</p> <p>Only for activities undertaken either to:</p> <ul style="list-style-type: none"> • Make limited improvements (e.g., repair of streets, sidewalks, or public buildings) intended solely to arrest further deterioration of physically deteriorated areas prior to making permanent improvements. • Alleviate emergency conditions threatening public health and safety, such as removal of tree limbs or other debris after a major storm.
08	<p>Relocation</p> <p>Relocation payments and other assistance for permanently or temporarily displaced individuals, families, businesses, non-profit organizations, and farms.</p>
09	<p>Loss of Rental Income</p> <p>Payments to owners of housing for loss of rental income due to temporarily holding rental units for persons displaced by CDBG-assisted activities.</p>
11	<p>Privately Owned Utilities</p> <p>Acquisition, reconstruction, rehabilitation, or installation of distribution lines and facilities of federally regulated, privately owned utilities. This includes placing new or existing distribution lines/facilities underground.</p>
12	<p>Construction of Housing</p> <p>Construction of housing with CDBG State funds must be carried out by 105(a)(15) entities. See Section 105(a)(15) of the HCDA for details.</p>
13	<p>Direct Homeownership Assistance</p> <p>Homeownership assistance to LMI households as authorized under 105(a)(24).</p> <p>Forms of assistance include subsidizing interest rates and mortgage principal, paying up to 50% of downpayment costs, paying reasonable closing costs, acquiring guarantees for mortgage financing from private lenders, and financing the acquisition by LMI households of the housing they already occupy.</p> <p>If housing counseling is provided to households receiving direct homeownership assistance, the counseling is considered part of the code 13 activity.</p> <p>All recipients of assistance provided under matrix code 13 must be LMI.</p>
14A	<p>Rehab: Single-Unit Residential</p> <p>Rehabilitation of privately owned, single-unit homes.</p>
14B	<p>Rehab: Multi-Unit Residential</p> <p>Rehabilitation of privately owned buildings with two or more permanent residential units.</p> <p><i>For the rehabilitation of units that will provide temporary shelter or transitional housing for the homeless, use 03C.</i></p>
14C	<p>Rehab: Public Housing Modernization</p> <p>Rehabilitation of housing units owned/operated by a public housing authority (PHA).</p>

Code	Definition
14D	<p>Rehab: Other Publicly Owned Residential Buildings</p> <p>Rehabilitation of permanent housing owned by a public entity other than a PHA.</p> <p><i>For the rehabilitation of other publicly owned buildings that will provide temporary shelter or transitional housing for the homeless, use 03C.</i></p>
14E	<p>Rehab: Publicly or Privately Owned Commercial/Industrial</p> <p>Rehabilitation of commercial/industrial property. If the property is privately owned, CDBG-funded rehab is limited to:</p> <ul style="list-style-type: none"> • Exterior improvements (generally referred to as “facade improvements”). • Correction of code violations <p><i>For more extensive rehabilitation of privately owned commercial/industrial property, use 17C; for infrastructure developments and improvements at commercial/industrial sites, use 17B.</i></p>
14F	<p>Rehab: Energy Efficiency Improvements</p> <p>Housing rehabilitation with the sole purpose of improving energy efficiency (e.g., a weatherization program).</p> <p><i>For energy efficiency improvements to public housing units, use 14C; for other publicly owned residential buildings, use 14D.</i></p>
14G	<p>Rehab: Acquisition</p> <p>Acquisition of property to be rehabilitated for housing. 14G may be used whether CDBG funds will pay only for acquisition or for both acquisition and rehabilitation.</p>
14H	<p>Rehab: Administration</p> <p>All delivery costs (including staff, other direct costs, and service costs) directly related to carrying out housing rehabilitation activities. Examples include appraisal, architectural, engineering, and other professional services; preparation of work specifications and work write-ups; loan processing; survey, site and utility plans; application processing; and other fees.</p> <p>Do not use 14H for the costs of actual rehabilitation and do not use it for costs unrelated to running a rehab program (e.g., tenant/landlord counseling).</p> <p><i>For housing rehabilitation administration activities carried out as part of general program administration (and thus not required to meet a national objective), use code 21.</i></p>
14I	<p>Lead-Based Paint/Lead Hazards Testing/Abatement</p> <p>Housing rehabilitation activities with the primary goal of evaluating and reducing lead-based paint/lead hazards.</p> <p><i>For lead-based paint/lead hazards screening, use 05P.</i></p>
14J	<p>Housing Services</p> <p>Housing services in support of the HOME Program, eligible under 105(a)(20).</p>

Code	Definition
15	<p>Code Enforcement</p> <p>Salaries and overhead costs associated with property inspections and follow-up actions (such as legal proceedings) directly related to the enforcement (not correction) of state and local codes.</p> <p><i>For the correction of code violations, use the appropriate rehabilitation code.</i></p>
16A	<p>Residential Historic Preservation</p> <p>Rehabilitation of historic buildings for residential use.</p>
16B	<p>Non-Residential Historic Preservation</p> <p>Rehabilitation of historic buildings for non-residential use. Examples include the renovation of an historic building for use as a neighborhood facility, as a museum, or by an historic preservation society.</p>
17A	<p>Commercial/Industrial: Acquisition/Disposition</p> <p>Land acquisition, clearance of structures, or packaging of land for the purpose of creating industrial parks or promoting commercial/industrial development. 17A activities must be carried out by the grantee or by non-profits.</p>
17B	<p>Commercial/Industrial: Infrastructure Development</p> <p>Street, water, parking, rail transport, or other improvements to commercial/industrial sites. 17B also includes the installation of public improvements, such as the construction of streets to and through commercial/industrial areas. 17B activities must be carried out by the grantee or by non-profits.</p>
17C	<p>Commercial/Industrial: Building Acquisition, Construction, Rehabilitation</p> <p>Acquisition, construction, or rehabilitation of commercial/industrial buildings. 17C activities must be carried out by the grantee or by non-profits.</p>
17D	<p>Commercial/Industrial: Other Improvements</p> <p>Commercial/industrial improvements not covered by other 17* codes. 17D activities must be carried out by the grantee or by non-profits.</p>
18A	<p>Economic Development: Direct Financial Assistance to For-Profits</p> <p>Financial assistance to for-profit businesses to (for example) acquire property, clear structures, build, expand or rehabilitate a building, purchase equipment, or provide operating capital. Forms of assistance include loans, loan guarantees, and grants.</p> <p>With one exception, a separate 18A activity must be set up for each business assisted. The exception is an activity carried out under 570.483(b)(4)(vi), for which job aggregation is allowed.</p>
18B	<p>Economic Development: Technical Assistance</p> <p>Technical assistance to for-profit businesses, in accordance with 105(a)(17)(F).</p>

Code	Definition
18C	<p>Economic Development: Micro-Enterprise Assistance</p> <p>Financial assistance, technical assistance, or general support services to owners and developers of micro-enterprises. A micro-enterprise is a business with five or fewer employees, including the owner(s).</p> <p>With one exception, a separate activity must be set up for each micro-enterprise assisted. The exception is an activity carried out under 570.483(b)(4)(vi), for which job aggregation is allowed.</p>
19A	Obsolete – use code 21H.
19B	Obsolete – use code 21H.
19C	<p>CDBG Non-Profit Organization Capacity Building</p> <p>Activities specifically designed to increase the capacity of non-profit organizations to carry out eligible community revitalization or economic development activities. Such activities may include providing technical assistance and specialized training to staff.</p>
19D	<p>CDBG Assistance to Institutes of Higher Education</p> <p>Obsolete. Instead of using this matrix code, set the INSTITUTION OF HIGHER EDUCATION field to “yes” on the Add/Edit Subordinate Organization screen to indicate that the activity will be carried out by an institution of higher education. Then assign the appropriate matrix code based on the nature of the activity to be undertaken by the institution.</p>
19E	<p>CDBG Operation and Repair of Foreclosed Property</p> <p>Activities to prevent the abandonment and deterioration of housing acquired through tax foreclosure. These include making essential repairs to the housing and paying operating expenses to maintain its habitability.</p>
19F	<p>Planned Repayments of Section 108 Loans</p> <p>Repayments of principal for Section 108 loan guarantees.</p>
19G	<p>Unplanned Repayments of Section 108 Loans</p> <p>Unplanned repayments of principal for Section 108 loan guarantees.</p>
20	<p>Planning</p> <p>Program planning activities, including the development of comprehensive plans (e.g., a consolidated plan), community development plans, energy strategies, capacity building, environmental studies, area neighborhood plans, and functional plans.</p>
20A	<p>State Planning ONLY</p> <p>Planning activities that meet an LMI or SB* objective. Refer to 570.483(b)(5) and 570.483(c)(3).</p>

Code	Definition
21A	<p>General Program Administration</p> <p>Overall program administration, including (but not limited to) salaries, wages, and related costs of grantee staff or others engaged in program management, monitoring, and evaluation.</p> <p>Also use 21A to report the use of CDBG funds to administer federally designated Empowerment Zones or Enterprise Communities.</p> <p><i>For CDBG funding of HOME admin costs, use 21H; for CDBG funding of HOME CHDO operating expenses, use 21I.</i></p>
21B	<p>Indirect Costs</p> <p>Costs charged under an indirect cost allocation plan.</p>
21C	<p>Public Information</p> <p>Providing information and other resources to residents and citizen organizations participating in the planning, implementation, or assessment of CDBG-assisted activities.</p>
21D	<p>Fair Housing Activities (subject to Admin cap)</p> <p>Fair housing activities carried out as part of general program administration rather than as a public service. They are subject to the Admin cap, but do not have to meet a national objective.</p> <p><i>For fair housing activities carried out as a public service, use 05J.</i></p>
21E	<p>Submission of Applications for Federal Programs</p> <p>Preparation of (1) documents that must be submitted to HUD to receive CDBG funds or (2) applications to other federal programs for community development assistance.</p>
21H	<p>CDBG Funding of HOME Admin</p> <p>CDBG funding of administrative costs for HOME Program activities eligible under HCDA 105(a)(13)(A).</p>
21I	<p>CDBG Funding of HOME CHDO Operating Expenses</p> <p>CDBG funding of CHDO operating expenses for HOME Program activities eligible under HCDA 105(a)(13)(A).</p>
21J	<p>State Administration</p> <p>Costs incurred by the state to administer the CDBG Program.</p>
23	<p>Tornado Shelters Serving Private Mobile Home Parks</p> <p>Construction or improvement of tornado-safe shelters for residents of manufactured housing and the provision of assistance (including loans and grants) to nonprofit and for-profit entities, in accordance with Section 105(a)(24). {Note that two pars. 24 have been enacted.}</p>
24A	<p>Payment of Interest on Section 108 Loans</p> <p>Payment of interest on the guaranteed loan.</p>

Code	Definition
24B	Payment of Costs of Section 108 Financing Payment of issuance, underwriting, servicing, trust administration, and other costs associated with private sector financing of debt obligations.
24C	Debt Service Reserve A debt service reserve to be used in accordance with requirements specified in the contract entered into pursuant to CFR 570.705(b)(1).

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Appendix B

NATIONAL OBJECTIVE CODES

The national objective codes (NOCs) are listed below with descriptions and applicable CFR citations. The NOCs that may be used with each matrix code are identified in Appendix C.

NOC	Description	24 CFR Citation
LMA	Low/mod area benefit Activities providing benefits that are available to all the residents of a particular area, at least 51% of whom are low/mod income. The service area of an LMA activity is identified by the grantee, and need not coincide with Census tracts or other officially recognized boundaries.	570.483(b)(1)
LMAFI	Low/mod area benefit, community development financial institution (CDFI) Job creation and retention activities that are carried out by a CDFI and that the grantee elects to consider as meeting the low/mod area benefit criteria.	570.483(e)(4)
LMASA	Low/mod area benefit, community revitalization strategy area (CRSA) Job creation and retention activities that are carried out pursuant to a HUD-approved Community Revitalization Strategy (CRS) and that the grantee elects to consider as meeting the low/mod area benefit criteria.	570.483(e)(5)
LMC	Low/mod limited clientele benefit Activities that benefit a limited clientele, at least 51% of whom are low/mod income. LMC activities provide benefits to a specific group of persons rather than to all the residents of a particular area.	570.483(e)(5)
LMCMC	Low/mod limited clientele, micro-enterprises Activities carried out under Section 105(a)(22) that benefit micro-enterprise owners/developers who are low/mod income.	570.483(b)(2)(iv)
LMCSV	Low/mod limited clientele, job service benefit Activities that provide job training, placement and/or employment support services in which the percentage of low/mod persons assisted is less than 51%, but the proportion of the total cost paid by CDBG does not exceed the proportion of the total number of persons assisted who are low/mod.	570.483(b)(2)(v)
LMH	Low/mod housing benefit Activities undertaken to provide or improve permanent residential structures that will be occupied by low/mod income households.	570.483(b)(3)

NOC	Description	24 CFR Citation
LMHSP	<p>Low/mod housing benefit, CDFI or CRSA</p> <p>Activities carried out by a CDFI or pursuant to a HUD-approved Community Revitalization Strategy (CRS) to provide or improve permanent residential structures which the grantee elects to consider as a single structure for purposes of determining national objective compliance. For example, two single-unit homes rehabilitated in a CRS may be considered a single structure; at least one of the units must be occupied by a low/mod household. If ten single-unit homes were assisted, at least six (51%) must be occupied by low/mod households.</p>	570.483(e)(4) and (e)(5)
LMJ	<p>Low/mod job creation and retention</p> <p>Activities undertaken to create or retain permanent jobs, at least 51% of which will be made available to or held by low/mod persons.</p>	570.483(b)(4)
LMJFI	<p>Low/mod job creation and retention, public facility/improvement benefit</p> <p>Public facility/improvement activities that are undertaken principally for the benefit of one or more businesses and that result in the creation/retention of jobs.</p>	570.483(b)(4)(vi) (F)
LMJP	<p>Low/mod job creation, location-based</p> <p>Activities where a job is held by or made available to a low/mod person based on the location of the person's residence or the location of the assisted business.</p>	570.483(b)(4)(iv)
SBA	<p>Slum/blight area benefit</p> <p>Activities undertaken to prevent or eliminate slums or blight in a designated area.</p>	570.483(c)(1)
SBS	<p>Slum/blight, spot basis</p> <p>Activities undertaken on a spot basis to address conditions of blight or physical decay not located in designated slum/blight areas.</p>	570.483(c)(2)
URG	<p>Urgent need</p> <p>Activities that alleviate emergency conditions of recent origin which pose a serious and immediate threat to the health or welfare of the community; eligible only if the grantee cannot finance the activity on its own and no other sources of funding are available.</p>	570.483(d)