



City of St. Louis

FAQs #4 – 2014 CDBG Request For Proposals

Questions & Answers Received as of July 17, 2013

Posted on July 24, 2013

Contact: CDBG@stlouis-mo.gov

General Questions

1. **We will be applying on behalf of an affiliated non-profit organization. Is a DUNS number required for the affiliated organization?**

CDA requires a DUNS number for the organization applying for the award. The organization applying for the award should be the same one that CDA will ultimately contract with for the provision of CDBG-eligible activities.

2. **How should we prove that we are not delinquent on local, state and federal taxes? Do we need to show processed payments for all the current year/most recent quarter, multiple years?**

CDA only requires the attachments listed on page 12 of the RFP. We are not requiring that you submit proof of payment during the RFP process.

3. **When will CDA release an RFP for single-family and multi-family housing projects and what type of funds will support those types of developments?**

Plans are to release the housing production RFP in the fall.

4. **How do we know that we are compliant with the requirements of the RFP?**

CDA outlines all of its requirements on pages 11-13 of the RFP. Please email CDBG@stlouis-mo.gov with specific questions by July 25, 2013.

5. Will third party verification of income and assets be required for all services under the CDBG grant?

Organizations must determine annual income for a person, family or a household for direct benefit activities, including activities such as homeownership assistance or receipt of public services.

Although third party verifications are a useful form of income verification because they provide independent verification of information and permit the organization to determine if any changes to current circumstances are anticipated over the next 12 months, it is not required that third party documentation be obtained. The organization may require that an individual self-certify, meaning he/she signs an income self-certification form, to be provided by the City, that his or her family income falls within the low- and moderate-income limits established for his/her family size.

There are several options that may be used to determine if program applicants are income eligible and the applicant should clearly describe in their application which option(s) will be used to determine income eligibility:

- Obtain evidence that the household/person assisted qualified under another program having income qualification criteria at least as restrictive as those used in the CDBG program as a definition of low- and moderate-income household/ person (at or below 80% of area median income);
- Obtain evidence that the assisted person is homeless (if applicable to the activity);
- Obtain a verifiable certification (self-certification form) from the assisted person that his/her family income does not exceed the applicable income limit; or
- Obtain a referral from a state, county or local employment agency or other entity that agrees to refer individuals it determines to be LMI persons based on HUD's criteria and agrees to maintain documentation supporting these determinations.

6. There are a few places in the RFP where I absolutely can not explain our program/methods in the space provided. What should I do?

CDA is requiring that applicants summarize programs and methods in a clear and concise way in order to expedite the review and funding approval process. We encourage you to demonstrate your capacity within the space provided as best as you can. For example, on page 19 of the RFP, when asked to describe recordkeeping methods, it is sufficient to say that your board of directors has formally adopted a document retention policy which provides for _____. We are not requiring that you include the entire policy in your response.

7. When will additional information be available for the Martin Luther King Corridor Initiative?

CDA anticipates that additional information will be available in the fall.

8. **Is there any information available online that would explain the reporting requirements of the CDBG program? What information will we need to maintain to document low/mod compliance? Is there anything that gives us guidance on that?**

The HUD regulation that details the reporting and recordkeeping requirements is 24 CFR Part 570.506 and can be found at the following link:

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&sid=d60d662bd91f849ee36d0e524aac0781&rgn=div5&view=text&node=24:3.1.1.3.4&idno=24#24:3.1.1.3.4.10.1.7>

In addition, HUD's Basically CDBG Guide provides a good description of the requirements. The applicable sections of the manual are attached to this document and the link to the entire document is available on the CDA website.

9. **If I have established priorities for my organization, should I try to reflect that somewhere in the application? If I have a certain activity that I would like to see funded before another proposed activity, how would I reflect that?**

The best place to state your priorities is on the last page of the RFP, under the comments section. Although you may state your organizational priorities in your application, we cannot guarantee that the priorities will be taken into consideration in our evaluation process.

10. **Who will serve on the selection committee? From my understanding there is a committee that is going to be set-up. Is that fully comprised of CDA staff, elected officials, community lay person(s)?**

Members of the CDA staff will review and rate all proposed activities and provide a recommendation to the Mayor, Board of Estimate and Apportionment and Board of Aldermen.

11. **Regarding the required attachments on page 12, do I have to submit those attachments for every application for each activity?**

CDA requires that you submit the attachments only once. Please remember that you must submit Sections I-IV once and Sections V-VII for EACH proposed activity.

Staffing / Personnel

12. **We have more staff positions than there are rows on page 18. What should we do?**

Attached please find a sheet that provides additional space for staff. Please submit it with your application, immediately after page 18.

- 13. For staff responsible for the administration of CDBG funds (e.g. reporting and accounting functions), can some of their personnel costs be allocated to an activity?**

Yes. CDA will allow organizations to allocate a percentage of time spent on responsibilities directly related to the administration of CDBG funds. Please note that CDA will require that the percentages be tied to time sheets maintained by your organization.

- 14. Can CDBG funds be used to pay for staff fringes and benefits?**

Yes, CDBG funds can be used to pay for the associated percentage of staff fringe benefits.

- 15. On the bottom of page 18, there is a bullet for personnel, affirmative action and grievance procedures. Do we need to attach them to our proposals?**

No. CDA will require these documents upon the award of CDBG funding to an organization.

Funding / Budget Questions

- 16. On page 17 of the RFP, can we also list our federal grants and grant outcomes in the aggregate? Because we have many grants with different outcomes, it will be hard to fit the information in the space provided.**

Yes, as long as your organization has more than 10 funding sources to list.

- 17. I have a question regarding FAQ No. 1 and the allowable percentage of salary to be paid through CDBG funding. The question states that CDA will not fund 100% of any salaries in 2014. Does this apply to full time positions only? Does this apply to part time positions as well?**

If a staff person spends 100% of his or her time on funded activities, his or her salary can be paid, whether full-time or part-time, but time sheets must document the actual number of hours worked and be based on a 40-hour (FTE) week.

- 18. Will the interim process still be enforced for next year's funding?**

CDA will still require that funded organizations submit interim requests for payment. Please note that funds will be paid on a reimbursable basis.

19. Can you please explain the allocation for Executive Directors' salaries?

Please see No. 17. The Director's time cannot exceed 40 hrs per week if the time is allocated to more than one activity. Please note that certain activities typically done by the Executive Director are not eligible for CDBG funding, such as fundraising.

20. Our operating budget includes activities and operations that are not on our 990. So, if we are submitting our 990 it would not be a match up to our current operations. So what would your preference be to submit? Should we match the budget with the 990?

We understand that some organizations may have subsidiary entities. We are only requesting that the 990 for the actual applicant organization be submitted. You may, in your application, provide a brief explanation of the difference in operating budget and 990.

21. Can you please explain what you mean by findings in the budget section?

A finding is defined as a violation of a statute, federal regulation, or OMB Circular.

22. Will you be funding an entire project or will you only provide partial funding for a project?

CDA encourages organizations to secure additional funding sources for activities, but it is not a requirement.

23. On page 20, under audit requirements, if you do not qualify for an A-133 audit do you skip this section entirely?

Please follow the instructions on page 11, which requires that you indicate not applicable (NA), where appropriate.

24. Are you going to allow "units of service" reimbursement?

Yes.

25. Where can I put a more typical budget narrative of the reasonableness of salaries? Could that be described in #2 as to why or how you think they are reasonable? Is that where you would describe the breakdown of what you have put over in the actual budget?

Question No. 2 on page 31 provides you an opportunity to describe your methods for ensuring reasonableness. You may also utilize the comments section on page 32.

26. **On page 31, it asks whether an organization expects funding cutbacks for next program year. And then (a) asks about how cutbacks would effect the organization services. So, I wanted to be clear here. The general area we are in now seems to be about the activity and not the whole organization. So, do you mean question #4 to be do you expect cutbacks and revenue sources related to the activity CDBG funding you are doing? How would they affect these CDBG funded activities vs. the whole organization?**

This section pertains to the specific activity that you are proposing.

Eligibility

27. **Will Nuisance Coordinators / Neighborhood Liaisons be funded in 2014?**

Although nuisance coordinators and neighborhood liaisons play an important role in the community, their activities are generally considered ineligible because their focus is on facilitating relationships and communication, and not directly contributing to a CDBG-eligible activity.

28. **Planning is involved in achieving some eligible activities. Is this not allowed?**

CDA will only fund costs directly related to operating programs that meet eligible activities. Planning costs are not eligible under this RFP.

29. **Must requests be only for new activities? Or, can we request funding for activities/programs that we implement every year?**

Organizations may request funding for new and existing activities/programs.

30. **Are the activities listed after the bolded headings the only activities that will be funded - or are they given as examples? For example, under Public Services (Neighborhood Improvements) are 1) neighborhood cleanup campaigns, 2) graffiti removal, and 3) promotion of crime prevention and education programs the only activities eligible for funding?**

Activities that provide some flexibility use words such as “including” or “such as” in the description. Under Neighborhood Improvements, we are looking for proposals for those specific activities.

31. **Could we theoretically put in one proposal for three separate locations because they all serve youth? Like one application for the whole City of St. Louis?**

Yes.

32. **On page 23, on public services one of the activities is youth. Let's just say that an organization is going to propose an after school program, a mentoring program, and a recreation program. Does that all come under one activity?**

It could be one activity or three, since all of the programs are for youth. If the three programs are submitted as an activity, they will be rated together. If submitted as three separate activities, each program will be rated individually.

33. **We are envisioning multiple activities. There probably will be one coordinator for all of the various activities. So do they divide up there time in each separate activity?**

Yes, you will divide up the coordinator's CDBG-eligible time in each activity. The percentage must reflect the approximate amount of time that the coordinator will spend on each activity.

34. **We have a training and placement activity, however the training is offsite and we are not doing the training. Is that still eligible?**

If your organization has a role in conducting, managing and/or implementing the activity, it is eligible. However, it is subject to CDA's procurement policy if you are using a subcontractor to provide the training. Our policy requires, in part, that you competitively bid out the services to be performed.

35. **What are eligible costs to be covered under the Activity "Public Services (Child Care)"? For example, would these funds be available to cover the cost difference between the cost the center incurs per child vs. the cost the child's family is able to pay in tuition (if any at all)?**

If an organization wishes to provide a subsidy to low- and moderate-income families for participating in its program, that would be allowable. However, the organization must be able to demonstrate that its fees are reasonable. It must also show how the subsidy was determined, based on income of each family. In addition, the fees have to be based on actual expenses and costs, including salaries of staff, for the program.

Public Infrastructure / Facilities

36. **Does a privately owned building that is being rehabbed and used as a community center qualify for consideration under Priority No. 4? The center will provide free programming for and free access to the public.**

Buildings that qualify under this category must be owned by the City or a nonprofit organization. Public facilities and improvements by their nature are intended to benefit all the residents of an area. Thus, to qualify under the national objective of benefit to L/M income

persons, in most cases they must serve an area having a sufficiently high percentage of L/M income persons. The general rule is that the primarily residential area must have at least 51% L/M income residents.

When such facilities are owned by nonprofit entities, they may qualify for assistance under this category only if they are made available to the general public.

37. Is an occupancy permit required for organizations applying under “Public Facilities Rehabilitation”?

No.

38. How will funds for Public Infrastructure activities be disbursed? Would those funds be disbursed to our agency - or directly to the appropriate City of St. Louis department and "earmarked" for our "project"? If the latter, how should those funds be accounted for in the Proposed CDBG Activity Budget?

The entity completing the infrastructure project must apply for funding. If the project will be completed by a City department, that department must apply for the funding.

39. For a project with physical improvements (e.g. building rehab, construction of public improvements) and related budget line items (e.g. architecture, engineering, survey, environmental), is there an alternative budget format to use, or may we attach our own budget?

You may use the budget pages provided with FAQ No. 3 or the ones provided in the RFP.

Microenterprise Assistance

40. What is the definition of microenterprise?

The CDBG regulations provide the following definitions of microenterprise:

- A “microenterprise” is a commercial enterprise that has five or fewer employees, one or more of whom owns the enterprise.
- "Persons developing microenterprises" means persons who have expressed interest in and who are, or after an initial screening process are expected to be, actively working toward developing businesses, each of which is expected to be a microenterprise at the time it is formed. §570.201(0)(3)

41. We have a program that provides legal education, legal counseling, legal advice and/or legal representation on a wide range of business law issues to low- to - moderate income business owners. We also assist businesses who serve low- to moderate-income communities. Would such activities qualify under microenterprise assistance?

Eligible microenterprise activities under the CDBG program include providing:

- Credit, including, but not limited to, grants, loans, loan guarantees, Individual Development Accounts (IDAs), and other forms of financial support for the establishment, stabilization, and expansion of microenterprises;
- Technical assistance, advice, and business services to owners of microenterprises and persons developing microenterprises;
- General support to owners of microenterprises and persons developing microenterprises. General support may include such activities as peer support programs, counseling, childcare, or transportation; and
- Training, technical assistance, or other support services to increase the capacity of recipients or subrecipients to carryout microenterprise activities.

Microenterprise assistance can qualify under limited clientele criteria if the business owner is low- to moderate-income (LMI). If the owner is not LMI, the microenterprise assistance can still qualify if it meets the job creation/retention criteria.

42. Would small nonprofits qualify as microenterprises? If so, what would be the measurement for low- to moderate income?

No. By definition, microenterprises are limited to commercial enterprises.

43. Regarding microenterprise assistance, would the business itself and its service activities have to be located in the City or would it be sufficient if the business owner were a City resident?

The business must be located in the City. If jobs are created, those positions must be made available to or be held by City residents. If the business is providing goods and services to an area, then it must be located within an eligible LMI area in the City.

Outputs

44. **The example on page 28 utilizes the household activity output for a summer youth program. Our other grant sources allow us to count the number of youth for reporting purposes. Is that allowable.**

The example on page 28 of the RFP is just one way that an organization can report. You may use the persons activity output for your youth program. But, please keep in mind that you must utilize the household income and size to determine if the youth is eligible as low/mod.

45. **The RFP, on page 28 asks an applicant to provide outputs based on 3 periods of 4-months each. If we have a summer program, how should we report our activity, as it only occurs during the summer months?**

Thank you for bringing your circumstance to our attention. We will provide some flexibility on page 28. You can either report no activity during the periods where your program is not in operation. Or, you can report on the months in operation, if the program only operates for three months. Please note if you are reporting monthly.

46. **We have four objectives that are all related to the household activity output. Will this be considered four activities requiring four forms? Or is this considered one activity?**

We are unable to provide an answer without having specific information. However, please see Question No. 30.

47. **In our programming, we may or may not have different households each period for each activity, so the totals on page 28 of the RFP account for duplicated households in each period. Will this be all right, or do you need to see the number of unique households served each period?**

For the purposes of the RFP, we are looking for the number served for each period, which may include some duplication.

Home Repair

48. **What generally would be considered "light home repair". Would the addition of a wheel chair ramp to a home be under the heading of light home repair?**

Assuming that you are referring to the Minor Home Repair Program activity, accessibility modifications to person 62 or older or persons with disabilities are eligible.

Collaborations / Partnerships

49. **Formation of partnerships and collaborations. How/will those activities be treated in 2014? If I am partnering with a neighboring neighborhood organization or combining activities to increase the service area to service youth, will we be a sub-recipient or will we be just one activity on one of the applications?**

In FAQ No. 2, CDA outlined some guidelines for preparing successful collaborative proposals:

- Any organization planning to lead a specific activity must submit its own proposal. For example, A, B, C and D organizations are planning to collaborate in providing services to a service area. Although A is taking the lead on organizing the collaboration, each organization may have an activity that it will “lead” or manage throughout the 2014 program year. In this instance, we will need a completed proposal package from each organization. In its proposal, each organization will provide information on the collaboration and information on the activity that it is proposing to provide.
- For all activities, you must provide staffing information for all persons involved with the activity. This includes job descriptions, resumes, etc.

We also noted that with any collaborative effort, we will assess the capacity of all organizations participating in the proposed collaboration. Because of this, one organization’s capacity strengths or deficiencies may affect the outcome of the other collaborators.

Please note the following additional information on collaborations:

- The lead organization for the activity will be ultimately responsible for the successful completion of the proposed objectives and any CDBG compliance requirements.
- CDA will only approve collaborations that will result in a fixed rate per unit completed/accomplished (for example, \$10 per unit based on a budget for operations and administration of \$10,000 and a volume of 1,000 units). CDA will require a cost allocation plan for all contracts with per unit costs, to ensure that the reimbursement is tied to the actual cost of services.
- CDA will require that the lead organization submit, for CDA approval, a contract with its partner that spells out its responsibilities and funding to be received. All CDA and CDBG requirements must be incorporated into this agreement.

50. **Question relating partnerships and collaborations. Not sure if it is already detailed on the website. Just as you gave the examples about outcomes/inputs, can you make sure that there are living examples for the individuals who are applying for the RFP’s so that they can see examples of what a partnership or collaboration would be so that it can be more specific?**

Because this is the first year that we are implementing the new RFP requirements, we are unable to provide specific examples of successful partnerships or collaborations.



- Withdraw and reallocate funding if HUD determines, after notice and opportunity to comment, that the grantee will not submit a satisfactory report.
- ✓ Following submission, grantees must make copies of the report submitted to HUD available for examination by the public upon request. The copies made available must include a summary of comments received as a result of the public participation process.

13.3 Recordkeeping Requirements

The following is a summary of the topics in this section, applicable statutory and regulatory cites, and other reference materials available from HUD.

Key Topics in This Section	General Administrative Financial Project/Activity National Objectives Determining and Documenting Income Records on Subrecipients Record Retention Access to Records
Regulatory/Statutory Citations	Section 104(e); (a)(2)(D) and (a)(3)(b) §570.506, §570.508
Other Reference Materials on This Topic	CDBG Guide to Eligible Activities and National Objectives, Chapters 2 & 3 <i>Managing CDBG: A Guidebook for CDBG Grantees on Subrecipient Oversight</i>

13.3.1 Overview

- ✓ Accurate recordkeeping is crucial to the successful management of CDBG-funded activities. Insufficient documentation is likely to lead to monitoring findings, and these findings will be more difficult to resolve if records are missing, inadequate or inaccurate.
- ✓ To assess strengths and weaknesses in this area, grantees should think about the following:
 - Is there a clearly defined process for acquiring, organizing, storing, retrieving, and reporting information about CDBG-funded activities?
 - How can the documentation and reporting systems be strengthened to meet the HUD requirements?
 - Who is responsible for the majority of the recordkeeping and reporting tasks, and are they properly trained and supported?
 - How can standardized procedures and the removal of duplicative records streamline the recordkeeping and reporting process?
 - What types of records and reports could be automated (i.e., computerized) that are not now?



13.3.2 General Administrative

- ✓ Grantees must maintain files and records that relate to the overall administration of the CDBG program. These records will include the following:
 - Consolidated Plan submission to HUD, which includes the application, program descriptions, certifications, etc.;
 - Executed grant agreement;
 - Description, geographic location and budget of each funded activity;
 - Eligibility and national objective determinations for each activity;
 - Personnel files;
 - Property management files;
 - HUD monitoring correspondence;
 - Citizen participation compliance documentation;
 - Fair Housing and Equal Opportunity records;
 - Lump sum agreements;
 - Environmental review records; and
 - Documentation of compliance with other Federal requirements (e.g., Davis-Bacon, Uniform Relocation Act, and Lead-Based Paint).

13.3.3 Financial

- ✓ Financial recordkeeping is one of the primary areas subject to HUD reviews and one in which inadequate recordkeeping can lead to serious problems.
- ✓ Financial records to be maintained include:
 - Chart of accounts;
 - Manual on accounting procedures;
 - Accounting journals and ledgers;
 - Source documentation (purchase orders, invoices, canceled checks, etc.);
 - Procurement files (including bids, contracts, etc.);
 - Real property inventory;
 - Bank account records (including revolving loan fund records, if applicable);
 - Draw down requests;
 - Program Income records and reports;
 - Payroll records and reports;
 - Financial reports;
 - Audit files; and
 - Relevant financial correspondence.



- ✓ Oftentimes, the financial functions of grantee CDBG program operations are often handled by staff with accounting skills, but not necessarily with a CDBG program background, or are shared with staff from other departments outside of the administering agency.
- ✓ To ensure proper financial recordkeeping and reporting, grantees should help their financial staff understand:
 - What information needs to be kept and why;
 - When that information should be collected and how often;
 - How the information should be acquired, organized and stored;
 - How the information should be reported; and
 - How long the records must be kept.

13.3.4 Project/Activity

- ✓ For each type of activity undertaken, the grantee should determine what data must be maintained in individual case files and establish a system for ensuring that every file contains the necessary information.
- ✓ The list will vary from activity to activity, but each project/activity file should include the following documentation:
 - Eligibility of the activity;
 - Evidence of having met a national objective (see below);
 - If applicable, subrecipient agreement;
 - Any bids or contracts;
 - Characteristics and location of the beneficiaries;
 - Compliance with special program requirements, including environmental review records;
 - Budget and expenditure information (including draw requests); and
 - The status of the project/activity.

13.3.5 National Objectives

LMI Area Benefit

- ✓ Grantees must maintain the following records regarding LMI areas qualifying under the area benefit national objective:
 - Boundaries of the service area (including maps);
 - Income characteristics of families and unrelated individuals in the service area; and
 - Data showing that the area qualifies under the exception rule if the percent of LMI persons in the service area is less than 51 percent. [24 CFR 570.208(a)(1)(ii)]
- ✓ An exhibit follows this chapter provides a shortened version of what records to maintain depending upon national objective chosen.



LMI Limited Clientele

- ✓ The grantee must maintain the following records regarding limited clientele activities:
 - Documentation showing that the activity is designed for and used by a segment of the population presumed by HUD to be LMI persons; or
 - Documentation describing how the nature and, if applicable, the location of the activity establishes that it is used predominantly by LMI persons; or
 - Data showing the size and annual income of the family of each person receiving the benefit and that at least 51% of those served are LMI; or
 - Data showing that the activity is a special project removing accessibility barriers in the limited cases described above.

LMI Housing

- ✓ Grantees must maintain the following records on housing activities:
 - A copy of the written agreement with each landlord or developer receiving CDBG assistance indicating the total number of dwelling units in each multi-unit structure assisted and the number of those units which will be occupied by LMI households after assistance;
 - The total cost of the activity, including both CDBG and non-CDBG funds; and
 - For each unit occupied by a LMI household, the size, ethnicity and income of the household.
 - For rental housing only:
 - Rent charged (or to be charged) after assistance for each dwelling unit in each structure assisted; and
 - Information as necessary to show the affordability of units occupied (or to be occupied) by LMI households pursuant to criteria established and made public by the grantee.
 - For each property acquired on which there are no structures, evidence of commitments ensuring that the criteria in §570.208(a)(3) will be met when the structures are built.
 - Where applicable, records documenting that the activity qualified under the exception criteria for new construction of non-elderly, multi-unit housing.

LMI Job Creation/Retention

- ✓ Records to be maintained for job creation activities are differentiated by whether the grantee will document whether the jobs will be **available** to LMI persons or whether LMI persons will hold the jobs.
- ✓ Where the grantee chooses to document that at least 51 percent of the jobs will be **available** to LMI persons, documentation for each assisted business shall include a copy of a written agreement, containing:
 - A commitment by the business that it will make at least 51 percent of the full-time equivalent (FTE) jobs available to LMI persons and will provide training for any of those jobs requiring special skills or education;



- A listing by job title of the permanent jobs to be created, indicating which jobs will be available to LMI persons, which jobs require special skills or education, and which jobs are part-time;
 - A description of the actions to be taken by the grantee and business to ensure that LMI persons receive first consideration for these jobs; and
 - A listing by job title of the permanent jobs filled, which jobs were available to LMI persons, as well as a description of how first consideration was given to such persons for these jobs. The description should include what type of hiring process was used; names of LMI persons interviewed for a particular job; and which LMI interviewees were hired.
- ✓ Where the grantee chooses to document that at least 51 percent of the jobs will be **held by** LMI persons, documentation for each assisted business should include a copy of a written agreement, containing:
- A commitment by the business that at least 51 percent of the permanent jobs on a full-time equivalent (FTE) basis will be held by LMI persons;
 - A listing by job title of the permanent jobs to be created (identifying which are part-time, if any);
 - A listing by job title of the permanent jobs filled and which jobs were initially held by LMI persons; and
 - For each LMI person hired, information on the size and annual income of the person's family prior to the time the person was hired for the job, or evidence the person qualifies as presumed to be LMI based upon location of the business or the person's residence.
- ✓ For benefit based on job retention, the following documentation must be kept:
- Evidence that, in the absence of CDBG assistance, the jobs would be lost;
 - For each business assisted, a listing by job title of permanent jobs retained, indicating which of those jobs are part-time and (where it is known) which are held by LMI persons at the time the assistance is provided;
 - Where applicable, identification of any of the retained jobs (other than those known to be held by LMI persons) which are projected to become available to LMI persons through job turnover within two years of the time CDBG assistance is provided, and information on how the turnover projections were calculated;
 - For each retained job claimed to be held by a LMI person, information on the size and annual income of the person's family or evidence that the person may be presumed to be LMI based on the location of the business or the person's residence; and
 - For jobs claimed to be available to LMI persons based on job turnover: a description covering the items required for "available to" jobs identified above; a listing of each job that has turned over to date, indicating which of those jobs were either taken by, or made available to LMI persons; and a description of how "first consideration" was given to LMI persons for those jobs.

Slum/Blight Area Basis

- ✓ Records to be maintained for area-wide slum and blight activities include:
- Boundaries of the area.



- Description of the conditions that qualified the area at the time of its designation in sufficient detail to demonstrate how the area met the qualifying criteria (i.e., in accordance with 570.208(b)(1), the area meets a definition of a slum, blighted, deteriorated or deteriorating area under state or local law).
- How the assisted activity addressed one or more of the conditions that contributed to the deterioration of the area.
- For each residential rehabilitation activity:
 - Local definition of "substandard" that must be at least as stringent as the Housing Quality Standards (HQS) used in the Section 8 Housing Assistance Payment Program—Existing Housing;
 - Pre-rehabilitation inspection report describing the deficiencies in each structure to be rehabilitated; and
 - Details and scope of CDBG-assisted rehabilitation, by structure.

Slum/Blight Spot Basis

- ✓ Records to be maintained for spot elimination of slum and blight:
 - A description of the specific condition of blight or physical decay treated; and
 - For rehabilitation carried out under this category, a description of the structure, including:
 - The specific conditions detrimental to public health and safety that were identified; and
 - Details and scope of the CDBG-assisted rehabilitation, by structure.

Slum/Blight Urban Renewal

- ✓ Records to be maintained for slum/blight urban renewal activities:
 - A copy of the HUD approved Urban Renewal Plan in effect at the time the CDBG activity is carried out, including maps and supporting documentation.

Urgent Need

- ✓ Records to be maintained for urgent need activities include:
 - Documentation concerning the nature and degree of seriousness of the condition requiring assistance;
 - Evidence that the grantee certified that the CDBG activity was designed to address the urgent need;
 - Information on the timing of the development of the serious condition; and
 - Evidence confirming that other financial resources to alleviate the need were not available.

13.3.6 Determining and Documenting Income

- ✓ Annual income is the gross amount of income anticipated by all adults in a family during the 12 months following the effective date of the determination.

