



**CITY OF YOUNGSTOWN  
COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM  
and  
HOME INVESTMENT PARTNERSHIPS (HOME) PROGRAM**

**IMPORTANT INSTRUCTIONS  
Fiscal Year 2015- 2016 (July 1, 2015 – June 30, 2016)**

41st Year Application/Proposal: Due February 27, 2015 - 2:00 P.M.

## **IMPORTANT NOTICE FOR APPLICANTS**

The annual demand for funds generally exceeds the amount made available from the Federal Community Development Block Grant (CDBG) Program to the City of Youngstown. The City is, therefore committed to funding projects that are ready to proceed immediately after funds are available and those prepared to spend the approved funds within 12 to 18 months from the date of allocation. Unspent funds remaining at the end of the Subrecipient agreement term may be reprogrammed by the City's Federal grant managing organization or the Community Development Agency (CDA). Please plan your projects accordingly.

If approved for funding, an agency may not submit a request to revise the project category or the project description that it listed on the submitted application. The CDBG managing agency (CDA), however, reserves the right to request revisions to the scope of services/work and/or budget line items during the pre-agreement period. This is in an effort to improve the benefit to low-moderate clients and communities to be served.

**FUNDS ARE NOT AN ON-GOING SOURCE OF SUPPORT. EVEN IF YOUR PROJECT IS FUNDED THIS YEAR, THERE IS NO GUARANTEE THAT YOUR PROJECT WILL RECEIVE FUNDING IN SUBSEQUENT YEARS.**



**City of Youngstown  
41st Year (2015-2016)**

**GRANT INFORMATION AND APPLICATION PROCESS**

**Community Development Block Grant (CDBG):** The Community Development Block Grant Program is a formula grant authorized under Title I of the Housing and Community Development Act of 1974, as amended. It is administered through the United States Department of Housing and Urban Development (HUD).

**CDBG Laws and Regulations (Statutory and Regulatory)**

When Congress passed the Housing and Community Development (HCD) Act of 1974, it broke down the barriers of prevailing practice where under separate categorical programs the federal government had made the decisions about every community development project undertaken by cities. The HCD Act departed from this model by creating the CDBG Program. CDBG merged seven categorical programs into a block of flexible community development funds distributed each year by a formula that considers population and measures of distress including poverty, age of housing, housing overcrowding, and growth lag. Grantees now determine what activities they will fund as long as certain requirements are met, including that each activity is eligible and will meet one of the three broad national objectives of the program.

**The HOME Investment Partnership Grant (HOME):** This is a federal grant from HUD. This grant program was created by the National Affordable Housing Act of 1990 to provide decent affordable housing to lower-income households and strengthen the ability of state and local governments to provide such housing. The eligibility criteria is much the same as that of CDBG, however, HOME funds are restricted for housing and housing related activities only.

**Objectives of CDBG:** To develop viable urban communities by providing decent housing, a suitable living environment, and expanding economic opportunities, principally for persons of low and moderate income.

**Entitlement Community:** As an entitlement community, the City of Youngstown receives an annual allocation of CDBG and HOME funds, contingent upon submission of an approved Consolidated Plan and Annual Action Plan. Recipient communities may undertake a wide range of community-based activities directed toward neighborhood revitalization, economic development, and community services, facilities, and improvements. Entitlement communities must, however, develop their funding priorities in conformance with the statutory standards, program regulations, and other federal requirements. The regulations implementing the CDBG program are found at 24 CFR Part 570. To review the regulations in their entirety, visit HUD's website at <http://www.hud.gov>.

**Consolidated Plan:** HUD requires all participating jurisdictions to submit a three-year or five-year strategic planning document called the Consolidated Plan. Our City's July 1, 2010 through June 30, 2015 plan describes the housing and community development needs of Youngstown for a five-year period. This document represents the City's vision for improving the quality of life in the predominately low-income areas of the city and provides details on how specific goals will be accomplished. It is through the Consolidated Plan that the City of Youngstown determines its funding priorities each program year. As conditions change, the Consolidated Plan may be amended.

**Annual Action Plan:** The Action Plan is the annual update to the Consolidated Plan. The plan describes resources available, how those resources are to be utilized, (including funded projects), and the geographic distribution of those resources.

**City of Youngstown Geographic Distribution of Funds:** Projects must primarily benefit low and moderate income residents of the City of Youngstown. The CDBG Program is designed to allow the City to determine how to best meet the needs of its low-and moderate-income residents. The City of Youngstown established nine main priorities within its Five-Year Consolidated Plan submitted to HUD. Within each of these nine main priorities, several goals were established. The priorities and goals established in the Consolidated Plan are intended to be the guiding principles for how funds are awarded.

### **The City of Youngstown Consolidated Planning Priorities and Goals:**

Each category is rated high (**H**), medium (**M**), or low (**L**) priority

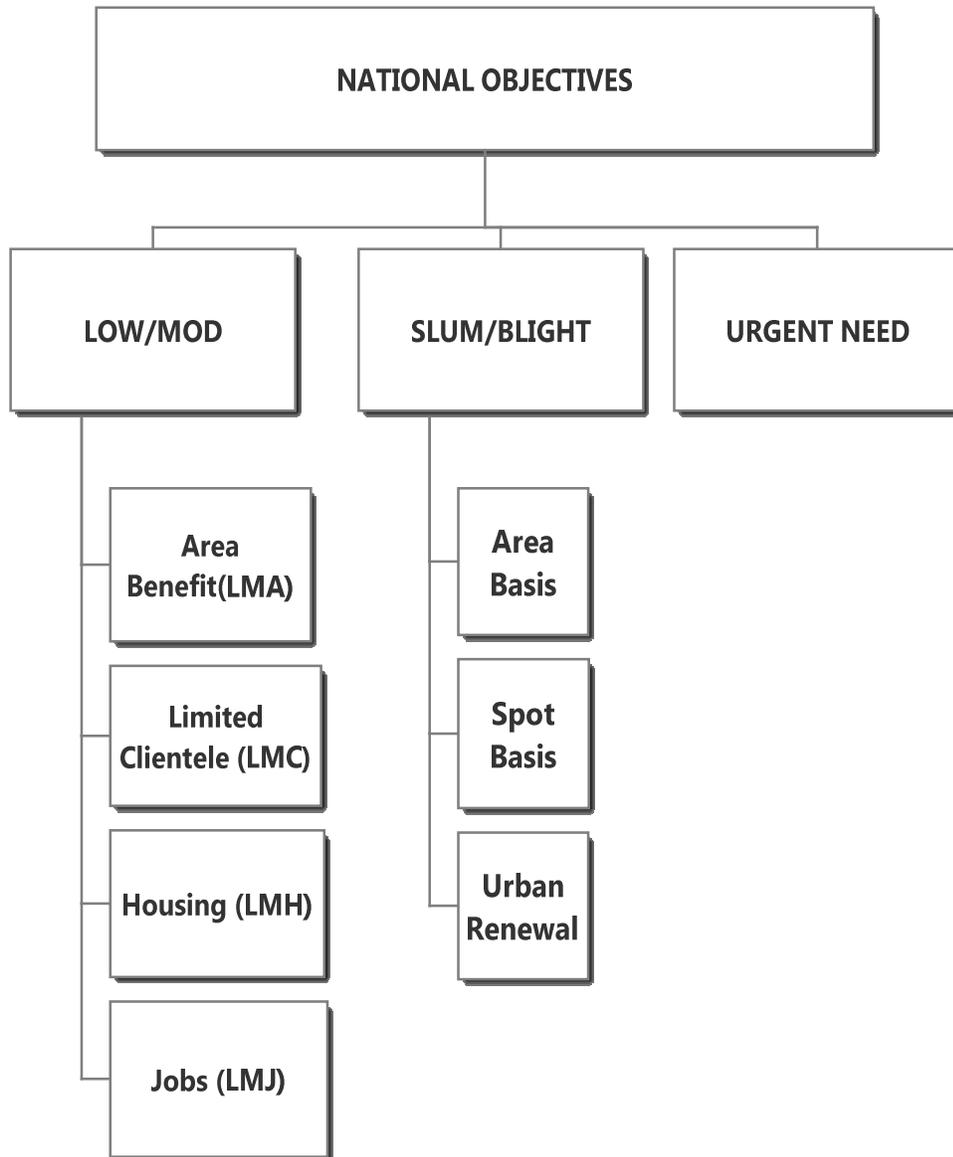
1. **Housing-H:** There are five objectives for housing:
  - a. **LMI Homeowner Rehab**
  - b. **Homebuyer Assistance**
  - c. **New Construction Owner/Occupied Housing**
  - d. **New Construction Rental**
  - e. **Homeless Assistance**
  
2. **Public Facilities-M:** Support for improvements to parks, development of open space, growth of neighborhoods, expansion of health facilities, and improvement to other public facilities to advance the sustainability of the community

3. **Infrastructure-H:** Support for improvements that include streets, sidewalks, water/sewer, landscaping, and other infrastructure improvements to develop the sustainability of the community.
4. **Public Services-M:** Support for fair housing, youth programs, senior programs, health services, employment training, and other public service activities to increase the availability, affordability, and accessibility or promote a viable community.
5. **Clearance and Demolition-M:** Activities related to demolishing dilapidated structures and preparing the sites for development.
6. **Code Enforcement-M:** Refers to the payment of salaries and overhead costs that are associated with property inspections and follow-up actions (such as legal proceedings) directly related to the enforcement (not correction) of state and local codes.
7. **Acquisition of Real Property-M:** Refers to the purchase of real property that will be developed for a public purpose. An example of an acquisition activity is a purchase of a building that will be converted into a shelter for the homeless, or the purchase of land in a LMI residential neighborhood to be used as a park.
8. **Economic Development-M:** Support for job creation activities and business development to include downtown office buildings and parking, business park development, business façade improvement, and 108 loans or float loans when appropriate or necessary to improve the availability and accessibility to jobs.
9. **Planning-M:** Completion and implementation of the City's comprehensive plan, further implementation of Youngstown 2010 projects, the creation of new zoning code, and neighborhood revitalization planning activities.

### **Minimum Criteria for Receipt of Funding**

The proposed project must:

- Provide services that benefit primarily low-moderate income persons residing in the City of Youngstown;
- Meet at least one of the Consolidated Plan measurable objectives; and
- Meet a HUD National Objective



**Low and Moderate Income Benefit**

An activity could qualify as benefiting low- and moderate-income households, if the following certain conditions are met:

- a. Area Benefit: Benefits all residents where at least fifty-one percent (51%) are L/M income.
- b. Limited Clientele: Benefit a limited number of people as long as at least fifty-one percent (51%) are L/M income.
- c. Housing: Provides or improves residential structures which house L/M income persons.
- d. Jobs: Creates or retains permanent jobs of which at least fifty-one percent (51%) are available to or held by L/M income persons.

*See chart on page 17 for HUD Income Limits Documentation System Income Limit Summary*

### **Slum and Blight Eligibility**

An activity could qualify as addressing a slum and blight benefit, if either of the following conditions is met.

- a. Area Basis- Eliminates or prevents slums or blight in a designated area.
- b. Spot Basis- Eliminates specific conditions on a spot basis not located in a slum or blighted area.
- c. Urban Renewal- Activities in a designated Urban Renewal Project.

### **Urgent Need Eligibility**

Meet a need having particular urgency that the grantee (City) is unable to finance on its own. The qualifying criteria for this category are: the existing conditions must pose a serious and immediate threat to the health or welfare of the community; the conditions must be recent in origin; and other sources of funding are not available.

### **General Eligibility**

For the purposes of this application process, the applicant's proposed CDBG projects must comply with an eligible activity **AND** a National Objective as explained above.

**Eligible Activities:** The following criteria should be used to determine whether a CDBG assisted project complies with one of the basic eligible activities as required.

- **Housing:** Homeowner rehabilitation is one of the most common community development programs administered nation-wide. CDBG funds provide a wide range of flexibility and allow communities to do emergency repair programs, spot rehabilitation, or full rehabilitation.
- **Disposition:** To pay costs incidental to disposing of real property acquired with CDBG funds, as long as after disposition, the property still meets a CDBG National Objective. The property may be disposed through sale, lease, donation, or otherwise. Funds may also be used to pay reasonable costs of temporarily managing such property, until final disposition is complete.
- **Public Facilities and Improvements:** To acquire, construct, reconstruct, rehabilitate, or install public facilities and improvements. (Activities under this paragraph may be directed to the removal of material and architectural barriers that restrict the mobility and accessibility of elderly or severely disabled persons to public facilities and improvements). In the CDBG Program, public facilities and public improvements are broadly interpreted to include all improvements and facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated so as to be open to the general public. This would include neighborhood facilities, firehouses, public schools, and libraries. Public improvements include streets, sidewalks, curbs and gutters, parks, playgrounds, water and sewer lines, flood and drainage improvements, parking lots, utility lines, and aesthetic amenities on public property such as trees, sculptures, pools of water and fountains, and other works of art. The regulations specify that facilities that are designed for use in providing shelter for persons having special needs are considered to be public facilities (and not permanent

housing), and thus are covered under this category of basic eligibility. Such shelters would include nursing homes, convalescent homes, hospitals, shelters for victims of domestic violence, shelters and transitional facilities/housing for the homeless, halfway houses for run-away children, drug offenders or parolees, group homes for the developmentally disabled, and shelters for disaster victims.

- **Clearance:** This activity is related to demolition of buildings and improvements; removal of demolition products (rubble) and other debris; physical removal of environmental contaminants or treatment of such contaminants to render them harmless; and movement of structures to another site. Demolition of HUD-assisted housing units may be undertaken only with the prior approval of HUD.

- **Public Services:** For the provision of public services (including labor, supplies and materials), including but not limited to those concerned with employment, crime prevention, childcare, health, drug abuse, education, fair housing counseling, energy conservation, welfare (but excluding the provision of income payments), homebuyer down payment assistance, or recreational needs.

- **Direct Financial Homeownership Assistance:** For the provision of financial assistance to low or moderate income households to assist them in the purchase of a home. The specific purposes for which financial assistance using CDBG funds may be provided are as follows:

- (1) Subsidize interest rates and mortgage principal amounts, including making a grant to reduce the effective interest rate on the amount needed by the purchaser to an affordable level;

- (2) Finance the cost of acquiring property already occupied by the household at terms needed to make the purchase more affordable;

- (3) Pay all or part of the premium (on behalf of the purchaser) for mortgage insurances required by up-front private mortgagee;

- (4) Pay any or all of the reasonable closing costs associated with the home purchase on behalf of the purchaser; or

- (5) Pay up to 50 percent of the down payment required by the mortgagee for the purchase on behalf of the purchaser.

- **Micro-enterprise Assistance.** A micro-enterprise is a business having five or fewer employees, one or more of whom owns the business. Funds are to be utilized in facilitating economic development through the establishment, stabilization, and expansion of micro-enterprise businesses. This category authorizes the use of CDBG funds to provide financial assistance of virtually any kind to an existing micro-enterprise or to assist in the establishment of a micro-enterprise. It also authorizes the provision of:

(1) Technical assistance to a new or existing micro-enterprise or to persons developing a micro-enterprise, such as advice and business support services; and

(2) General support to owners of micro-enterprises or to persons developing a micro-enterprise, which could include, but not limited to, child care, transportation, counseling, and peer support programs.

- **Technical Assistance:** For the provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities.

- **Rehabilitation:** To be used to finance the costs of rehabilitation as detailed below.

Eligible types of property are:

(a) Residential property, whether privately or publicly owned. This includes manufactured housing, when such constitutes part of the community's housing stock;

(b) Commercial or industrial property, but where such property is owned by a for-profit rehabilitation under this category is limited to exterior improvements of the building and correcting code violations; and

(c) Non-profit-owned, non-residential buildings and improvements that are not considered to be public facilities or improvements.

**Application Process:** The City of Youngstown Community Development Agency reserves the right to accept or reject any and all proposals received. In addition, the City of Youngstown reserves the right to negotiate with all qualifying organizations or to cancel in whole or in part a request for proposal if deemed in the best interest of the City of Youngstown as it relates to the city priorities.

**Eligible Applicants:** Non-profit organizations and local governments that deliver services to low-income clients within the City of Youngstown's service area may apply for funding. To receive consideration for funding through the City of Youngstown, all non-profit organizations must have their non-profit status and the supporting documentation from the IRS at the time of application.

The application must be completed in a professional and accurate manner, with all sections thoroughly completed with details that are sufficient to demonstrate knowledge and capacity to carry out the proposed program or project type.

City of Youngstown funds are provided to awarded projects on a reimbursement basis only. This means that the funds will be available to the organization only after it has paid for eligible project costs. Organizations must demonstrate financial viability to operate a federally-funded

program strictly on a reimbursement basis. A financially viable organization is one that is able to:

- Operate without financial hardship for a minimum of 90 days pending reimbursement;
- Demonstrate an existing and consistent cash flow; and
- Have a separation of duties for personnel time allocations, etc.

Note also that costs incurred prior to completion of the environmental review process and contract approval will not be reimbursed. Additionally, organizations that are current subrecipients must be in good standing with the City of Youngstown(i.e. have no outstanding reporting delinquencies, outstanding monitoring findings, program capacity issues, or other issues as deemed disqualifying by the City of Youngstown).

**Conflict of Interest:** The standards in OMB Circular A-110, Subpart C, provide that no employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or perceived conflict of interest would be involved. Such a conflict would arise when an employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein has a financial or other interest in the firm selected for the award. Any vendors seeking a contract with the City of Youngstown for the sale of property, goods, or services, may be required to file a conflict of interest inquiry form with the City.

**Proposal Review Criteria:** The review process for proposals requesting grant funds consists of a review by City staff and a committee that includes specified City Council members. A 30-day public comment period for citizen input, full City Council review and approval, and HUD review and approval follows. Staff review verifies that the proposal is one that includes an eligible activity as determined by HUD guidelines. If the proposal is deemed ineligible, the applicant will be informed and the proposal removed from consideration. Staff will evaluate proposals based on information provided in the submitted application. CDA staff, evaluators, or other City personnel **will neither request nor accept missing information once the proposal has been submitted.**

**Note:** The City Council makes the final decisions regarding program funding. The allocations are incorporated into the overall CDBG and HOME budgets and submitted to HUD in the annual Action Plan. Once the City receives funds from HUD, the City executes contracts with each of the selected organizations (subrecipient agencies). If the approved budget funding level is different from that requested on the proposal budget, the subrecipient must submit a revised budget and performance measurement system before an agreement is executed. Note that the proposal does not obligate the City of Youngstown to commit to award a contract for any costs incurred in preparation of the proposal. Furthermore, the City reserves the right to accept or reject any or all proposals if it is in the best interest of the City to do so.

**RFP Process Table**

|  |                          |
|--|--------------------------|
| Issue CDBG/HOME RFP  | January 23, 2015         |
| CDBG/HOME Orientation  | January 23, 2015         |
| <b>Deadline for submission of applications (2:00p.m.)</b>            | <b>February 27, 2015</b> |
| CDA review of applications   | March 2015               |
| City Council review applications; approve CDBG/HOME budgets          | March – April 2015       |
| 30 day comment period and public hearings                            | April – May 2015         |
| Submit Annual Plan to HUD  | May 2015                 |
| Applicants notified regarding awards; proceed with agreement process | May 2015 – June 2015     |
| HUD review and approval  | June 2015                |
| Subrecipient agreement/contract approvals                            | June – July 2015         |
| CDBG/HOME fiscal/contract year begins                                | July 1, 2015             |

**APPLICATION INSTRUCTIONS**

The 41st year application is accessible through a link on the Community Development Agency’s (CDA) webpage, which is attached to the City of Youngstown’s community website: [http://www.cityofyoungstownoh.org/city\\_hall/departments/cda/cda.aspx](http://www.cityofyoungstownoh.org/city_hall/departments/cda/cda.aspx)

The application, which is enabled in PDF form at the abovementioned link, should be completed on a computer. Although the format is not editable, there is space for you to provide your answers. You must print out your completed application for signatures before submitting it to CDA.

Please be careful when moving through the application since some questions only require you to put an “X” in the Yes or No box (right click adjacent to the check boxes, find ‘properties’ and select ‘checked’).

Read each part of the application carefully to make certain that you provide answers to all questions and submit all required attachments. Review the attachment checklist at the end of the application.

**Applicants should be direct and concise in responding to all questions.**

**PART I – General Information**

This section provides general information about your organization and the program and activities that you are proposing. Make certain that you provide an appropriate response for each inquiry.

*All applicants must complete this section.*

**PART II – National Objectives and Consolidated Plan Priorities**

*All applicants must complete this section.*

**PART III – Organizational Capacity and Experience**

Make certain that you answer all sections and provide all requested attachments.  
*All applicants must complete this section.*

**PART IV – Proposal Narratives**

*All applicants must complete this section.*

**PART V – Anticipated Benefits, Timetable, and Scope of Services**

*All applicants must complete this section.*

**PART VI – Budget Forms and Attachments**

Make certain that you answer all sections and provide all requested attachments.

**PART VII – Budget Narratives**

**PART VIII – Financial Management (Provide as an attachment)**

**PART IX – Insurance/Worker’s Compensation/Payroll Taxes/Audits**

In signing the application for funding for which these guidelines apply, you agree that you are responsible to comply with such requirements as outlined.

**PART X – Attachment Checklist**

**PART XI – Economic Development** Complete all questions in this part *only if you are proposing an economic development project or activity*

Refer to Census Tract Map – Use a highlighter to indicate the area of the City that your proposed activity will take place.

**PART XII – Public Facility, Housing, Infrastructure, or Planning Project** Complete all questions in this part *only if you are proposing a Housing, Public Facility, Infrastructure, or Planning Project.* Refer to Census Tract Map – Use a highlighter to indicate the area of the City that your proposed activity will take place.

**PART XIII – Public Service Project: Youth, Senior, Fair Housing or Anti-crime** Complete all questions in this part *only if you are proposing a public service activity including programs for youths, seniors, fair housing activities, anti-crime, or other public services.*

Refer to Census Tract Map – Use a highlighter to indicate the area of the City in which your proposed activity will take place.

**Excel Budget Worksheet** (also linked on the CDA webpage) has been automated for your convenience. The areas shaded in gray are the only areas where you can input information into the budget. You simply put the proper dollar amount in the appropriate line item and the rest is done for you.

If you need to list an item in your budget that is not already identified within the budget categories, simply enter the description of that budget item in one of the fields titled “Other” within the appropriate section of the budget.

### **PROGRAM BUDGET WORKSHEETS – Pages A, B, and C**

Item A – Personnel Services – Personnel services are for the program and activity for which you are requesting Block Grant funding. List the job titles of each staff person involved in the program and the number of hours per week that they spend on the program. If the staff person is a part time employee, provide the total number of hours per week this person works and the number of hours per week that this staff persons works on the proposed activity. Place a “FT” next to each full-time employee.

List each staff person’s total annual salary and fringe benefit costs attributed to the program and the amount attributable to the CDA request.

***NOTE: FOR ITEMS B THROUGH D, PROVIDE PROGRAM TOTALS ONLY, NOT FIGURES FOR THE ENTIRE ORGANIZATION.***

Item B – Operating/Administrative Expenses – List the total expenses related to the operation/administration of your program and the amount you are requesting to be funded from CDA.

Item C – Capital Expenditures – Capital Expenditures are assets purchased at a cost over \$300.00. Please describe the asset, total cost, and CDA funding request for the asset.

Item D – Direct Program/Activity Costs – Describe any additional costs other than salaries that are directly attributable to the program/activity that you are proposing.

Program Totals – List the totals for each of the items from the prior budget worksheet pages.

**41st Year Program Revenue Sources:** This section requests information on the funding sources for your program. Please list all sources and be sure that the total of the funding sources and the program budget total match.

*All applicants must complete this section.*

### **Explanation: “Units of Service” and “Program Income”**

Units of service typically represent the number of people, households, housing units, jobs, businesses or organizations your program will serve over the period of the program. The “unit” may vary slightly depending on nature of the program and the type of service provided. Some programs serve households, while others serve individuals. In either event, whether it is a five-person household that was provided with a new furnace or one youth that participated in a twelve-week learning program, each represents one (1) unit of unduplicated service.

**Example:** In a 12-week summer youth program, each child participating in the program represents one unit of unduplicated service. It does not matter if a child comes six weeks, eight weeks, or all twelve weeks. When they register for the program each represents one unit of unduplicated service. The unit of service is not how many times a child comes, but rather how many children come and receive the service.

**Example:** In a housing rehabilitation program, a unit of unduplicated service would typically represent a household. You would count how many households were provided with service. If it were a fully occupied duplex with a family in each unit and a roof was put on the duplex, this would represent two (2) units of unduplicated service. If it were a single-family home that was provided with a new furnace, it would represent one (1) unit of unduplicated service.

**Example:** In a homeless program, a unit of unduplicated service would typically represent each homeless person who was provided with shelter, meals, or etc. It does not matter if the homeless person stays one night or three nights, each person served represents one unit of unduplicated service.

**Example:** You are proposing an economic development initiative that will create employment. The unit of measure would be the number of jobs created or retained. You must report the total number of jobs created or retained and the number of jobs that went to LMI persons.

**Program Income:** Program income is income that is directly generated from the use of CDA funds. Program income must be used in accordance with the terms stated in the grant agreement.

## **SUBMIT ONE (1) ORIGINAL AND FOUR (4) COPIES**

**(THE ORIGINAL *and* EACH COPY MUST INCLUDE ALL ATTACHMENTS)**

City of Youngstown  
Community Development Agency  
9 West Front St.  
Youngstown, Ohio 44503  
(330) 744-0854

Applicants are encouraged to call Mark Williams at (330) 744-0854 with any questions concerning their application.

**APPLICATIONS ARE DUE TO THE COMMUNITY DEVELOPMENT  
AGENCY NO LATER THAN 2:00 PM  
FRIDAY FEBRUARY 27, 2015.**

ANY APPLICATIONS RECEIVED AFTER THIS DEADLINE WILL BE MARKED AS SUCH  
AND RETURNED TO THE RESPONDENT

### **Monitoring and Recordkeeping**

**Agreement Procedures:** Mandatory training will be held in late June for funded service providers. Information presented in the training will enable the agencies to carry out their contractual responsibilities. Much of the information is regarding the proper completion of financial and performance reports and proper documentation required for reimbursements.

**Environmental Review:** As part of HUD requirements and regulations, an environmental review must be completed before executing a contract. Most of our recently funded activities have been classified, by their nature, as exempt. With these activities, we are not required to complete an environmental assessment. **Please note that no organization will be reimbursed for any charges that were incurred prior to the environmental review.**

**Disbursement of Funds:** Organizations are required to submit their invoices and documentation by the 15<sup>th</sup> of the month. Agencies should refer to their organization's agreement with the City for additional details regarding this process.

**Monitoring Reviews:** Monitoring is an important component of the allocation process. Thus, it is critical that the City of Youngstown and subrecipients maintain the appropriate documentation to support their activities in accordance with federal guidelines and the City of Youngstown's grant reporting requirements. Each quarter, subrecipients are required to submit documentation for the performance, eligibility, reimbursement, and characteristics of individuals served (e.g., race, ethnicity, income). This information is received as part of the quarterly desk review process.

The City will also conduct on-site monitoring of organizations. HUD representatives may also make on-site visits as part of their monitoring duties to the City of Youngstown. The risk assessment analysis, conducted by the CDBG/HOME compliance staff helps to establish which agencies will receive on-site monitoring visits. Client files will be reviewed by CDA staff to ensure compliance with HUD guidelines. Organizations, by contract, must verify and maintain income data for each client. These records must be maintained for at least five years after the end of the contract.

In conducting performance reviews, the CDA staff will rely on information obtained from the subrecipients' performance reports, maintained records, findings from on-site monitoring, and audit reports. Performance monitoring reviews typically result in a formal written report from CDA compliance staff. The report summarizes the monitoring review and indicates whether or not the subrecipient was found to be in noncompliance with any applicable regulations or requirements. Noncompliance with any rules or regulations could result in suspension or termination of the contract and reallocation of funds

If findings or concerns are presented in a monitoring report, the subrecipient is given a specific time frame in which to respond to the reported deficiencies. In addition, the CDA compliance department, on behalf of the City of Youngstown, may either provide the subrecipient with the recommended corrective action or require the subrecipient to submit proposals for corrective actions for approval.

**Recordkeeping:** Accurate recordkeeping is crucial to the successful management of federal grant-funded activities. Insufficient documentation (if records are missing, inadequate, or inaccurate) is likely to lead to monitoring findings, which are often difficult to resolve. Organizations receiving funding must complete an application for each individual and household client and maintain supporting documentation in participant files. If it is determined at the time of monitoring that supporting documentation is incorrect or insufficient, the

subrecipient may be required to repay any and all reimbursements paid to their organization. The organization may also be denied future reimbursements. Noncompliance with any rules or regulations could result in suspension or termination of the contract and reallocation of funds.

**Access to Records/Maintenance of Records:** HUD and the Comptroller General of the United States or their authorized representative have the right to access Grantee and subrecipient program records. Recipients of HUD funds must keep documentation on funded programs for five years beyond program close-out.

**Inadequate Performance or Non-Compliance:** If a subrecipient or its CDBG-funded or HOME-funded activity is found to be out of compliance with federal regulations or with any of the terms stipulated in the contract/agreement with the City of Youngstown, funding can be withheld until compliance is achieved. In the event that compliance cannot be achieved, then funding can be withheld. The organization may be required to repay funds disbursed to them. Additionally, funds may be withheld from any subrecipient that does not submit reports or reimbursement requests accurately and on time. Reimbursements can resume when the organization demonstrates acceptable reporting actions. If program performance is found to be substantially inadequate in meeting the stated objectives and measures, the subrecipient may be required to submit a written explanation. Inadequate program performance may adversely affect future CDBG funding requests to the City.

CDA will provide technical assistance regarding program administration and training on HUD rules and regulations as needed. Each subrecipient is responsible, however, to make certain that their relevant program staff acquire a basic knowledge of the Block Grant program, follow administrative standards, and adhere to all statutory and regulatory principles as outlined in the subrecipient agreement.

**Performance Measurement System:** Federally-funded agencies are required to measure the outcomes of their programs to document program effectiveness, increase service quality, and improve public accountability. Program results are directly linked to funding decisions and public support for program. HUD's performance measurement system provides a consistent method to access data from grantees and aggregate the data nationally to demonstrate the positive impact CDBG are making at a national level.

Recipients of CDBG and HOME funds will be required to meet one of the three outcomes and one of the three objectives below. Additionally, specific indicators are required for each activity based on the objectives and outcomes selected. Common indicators include information such as number of persons served, number of jobs created, number of housing units assisted, income levels of persons assisted, and race/ethnicity. CDA's compliance department staff will work with recipients of HUD funds to ensure that the requirements of the performance system are met.

Performance Measurement System (for more information see HUD website at:  
<http://www.hud.gov/offices/cpd/about/performance/index.cfm>)

|                             | Outcome 1   | Objective 2   | Objective 3  |
|-----------------------------|---|---|--|
| Objectives                  | Availability/Accessibility  | Affordability   | Sustainability   |
| Suitable Living Environment | Accessibility for the purpose of creating suitable living environment | Affordability for the purpose of creating suitable living environment | Sustainability for the purpose of creating suitable living environment |
| Decent Housing              | Accessibility for the purpose of providing decent housing             | Affordability for the purpose of providing decent housing             | Sustainability for the purpose of providing decent housing             |
| Economic Opportunity        | Accessibility for the purpose of creating economic opportunity        | Affordability for the purpose of creating economic opportunity        | Sustainability for the purpose of creating economic opportunity        |

**2014 INCOME LIMITS DOCUMENTATION SYSTEM**  
**Summary for Mahoning County, Ohio: Median Income - \$52,700**  
<http://www.huduser.org/portal/datasets/il/il2014summary.odn>

| Income Limit Category | 1 person | 2 persons | 3 persons | 4 persons | 5 persons | 6 persons |
|-----------------------|----------|-----------|-----------|-----------|-----------|-----------|
| Very Low 50%          | \$19,050 | \$21,750  | \$24,450  | \$27,150  | \$29,350  | \$31,500  |
| Extremely Low 30%     | \$11,450 | \$13,050  | \$14,700  | \$16,300  | \$17,650  | \$18,950  |
| Low 80%               | \$30,450 | \$34,800  | \$39,150  | \$43,500  | \$46,950  | \$50,450  |

**DUNS Number**

HUD requires a DUNS number to track some federally-funded projects. The DUNS number is a unique nine-character number that identifies your organization. It is a tool of the federal government that essentially tracks how federal money is distributed. Most large organizations, libraries, colleges, and research universities already have a DUNS number. Ask your grant manager or chief financial officer to provide your organization’s DUNS number.

If your organization does not have a DUNS number, use the Dun and Bradstreet (D&B) online registration to receive one free of charge. See <http://www.fedgov.dnb.com/webform/>. The following information is needed to obtain a DUNS number:

- Name of organization
- Organization address
- Name of CEO/organization owner
- Legal structure of the organization (corporation, partnership, proprietorship)
- Year the organization started
- Primary type of business
- Total number of employees (full and part time)

