



CITY OF YOUNGSTOWN

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

and

HOME INVESTMENT PARTNERSHIPS (HOME) PROGRAM

APPLICATION INSTRUCTIONS

49th Year Application / Proposal

Due Wednesday, February 15th, 2023 before 2:00 P.M.

**Department of Community Planning and Economic Development
City Hall, 4th Floor
26 South Phelps Street
Youngstown, Ohio 44503**

ATTENTION: Compliance Director/ Debra Byrd

IMPORTANT NOTICE FOR APPLICANTS

The purpose of this information is to guide interested parties through the City of Youngstown's Community Development Block Grant (CDBG) Request for Proposals (RFP) process for the Fiscal Year 2023.

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 twelve to eighteen months from the date of allocation. Unspent funds remaining at the end of the Subrecipient agreement term may be reprogrammed by City of Youngstown Department of Community Planning and Economic Development (CPED), Community Development Agency (CDA) Division. CDA is the City of Youngstown's federal grant managing department.

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. However, during the pre-agreement period, CDA reserves the right to request revisions to the scope of services/work and/or budget line items. This is to improve the benefit to low-and-moderate clients and the communities to be served.

FUNDS ARE NOT AN ONGOING SOURCE OF SUPPORT.

**EVEN IF A PROJECT IS FUNDED THIS YEAR, THERE IS NOT A GUARANTEE THAT THE PROJECT
WILL RECEIVE FUNDING IN SUBSEQUENT YEARS.**

City of Youngstown 49th Year (FY 2023-2024)

GENERAL INFORMATION

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). Section 109 of Title I of the Housing and Community Development Act of 1974 prohibits discrimination based on race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development Block Grant Program. The governing statute for the CDBG program found at Section 104(b)(2) of the Housing Community Development (HCD) Act of 1974, as amended, (42 U.S.C. 5304), requires that each grantee certify to HUD's satisfaction that (1) the grant will be conducted and administered in conformity with the Fair Housing Act (42 U.S.C. 3601-20) and that (2) the grantee will affirmatively further fair housing.

Entitlement Community

An entitlement community is a city or county that is awarded an annual grant on a formula basis prescribed in federal legislation or regulation rather than based on individual project review. Eligible grantees are as follows:

- Principal City of Metropolitan Statistical Areas (MSAs) In the United States is a metropolitan statistical area (MSA) - a geographical region with a relatively high population density at its core and close economic ties throughout the area. In the United States, a principal city is the main core city in a metropolitan area. The largest city in each metropolitan or statistical area is designated a "principal city." Additional cities qualify if specified requirements are met concerning population size and employment.
- Qualified urban counties with populations of at least 200,000 (excluding the population of entitled cities may receive block grant funding.

As an entitlement community the City of Youngstown receives an annual allocation of CDBG and HOME funds. Estimated funding for FY 2023 is \$3,500,000 CDBG and \$673,000 HOME. Receipt of these funds is contingent upon submission of an approved Consolidated Plan and Annual Action Plan. Communities may undertake a wide range of community-based activities directed toward neighborhood revitalization, economic development, community services, public services, and public 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>.

How does HUD decide how much funding the City of Youngstown will receive?

HUD calculates our funding percentage each year using census data with a formula that considers our total population, the number of persons living in poverty, and the number of housing units where persons are living in overcrowded conditions. Our funding amount is further impacted by the number of new entitlement communities and the funding available at the national level. As more communities are authorized to receive funding, each slice of the pie becomes smaller.

Objectives of CDBG

To develop viable urban communities by providing decent housing, a suitable living environment (through infrastructure and public services to improve the physical environment and residents' lives in our community), and expanding economic opportunities, principally for persons of low and moderate income.

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 practices 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 if certain requirements are met, including that each activity is eligible and will meet one of the three broad national objectives of the program. The general provisions governing the CDBG program and eligible activities are cited at 24 CFR (Code of Federal Regulations) Part 570 – Community Development Block Grants

The HOME Investment Partnership Grant (HOME)

This grant program was created by the National Affordable Housing Act of 1990. The eligibility criteria are much the same as that of CDBG, however, HOME funds are restricted for housing and housing related activities only. In general, under the HOME Investment Partnerships Program, HUD allocates funds by formula among eligible State and local governments to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing, with primary attention to rental housing, for very low-income and low-income families. Generally, HOME funds must be matched by nonfederal resources. State and local governments that become participating jurisdictions may use HOME funds to carry out multi-year housing strategies through acquisition, rehabilitation, new construction of housing, and tenant-based rental assistance. Participating jurisdictions may help in several eligible forms, including loans, advances, equity investments, interest subsidies and other forms of investment that HUD approves. HOME laws and requirements are outlined at 24 CFR Part 92.

Consolidated Plan (24 CFR Part 91)

As mentioned above, HUD requires all participating jurisdictions to submit a three-year or five-year strategic planning document called the Consolidated Plan. Our City's current plan, which extends from 2020 through 2024, 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. Through the Five-Year Consolidated Plan, the City of Youngstown (through the grant administering agency, CDA) integrates community stakeholders' input to determine funding priorities for each program year. As conditions change, the Consolidated Plan may be amended.

Annual Action Plan

The Action Plan is the annual update to the Five-Year 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-H**

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. CDBG Public Service funds also support crime prevention programs and activities.

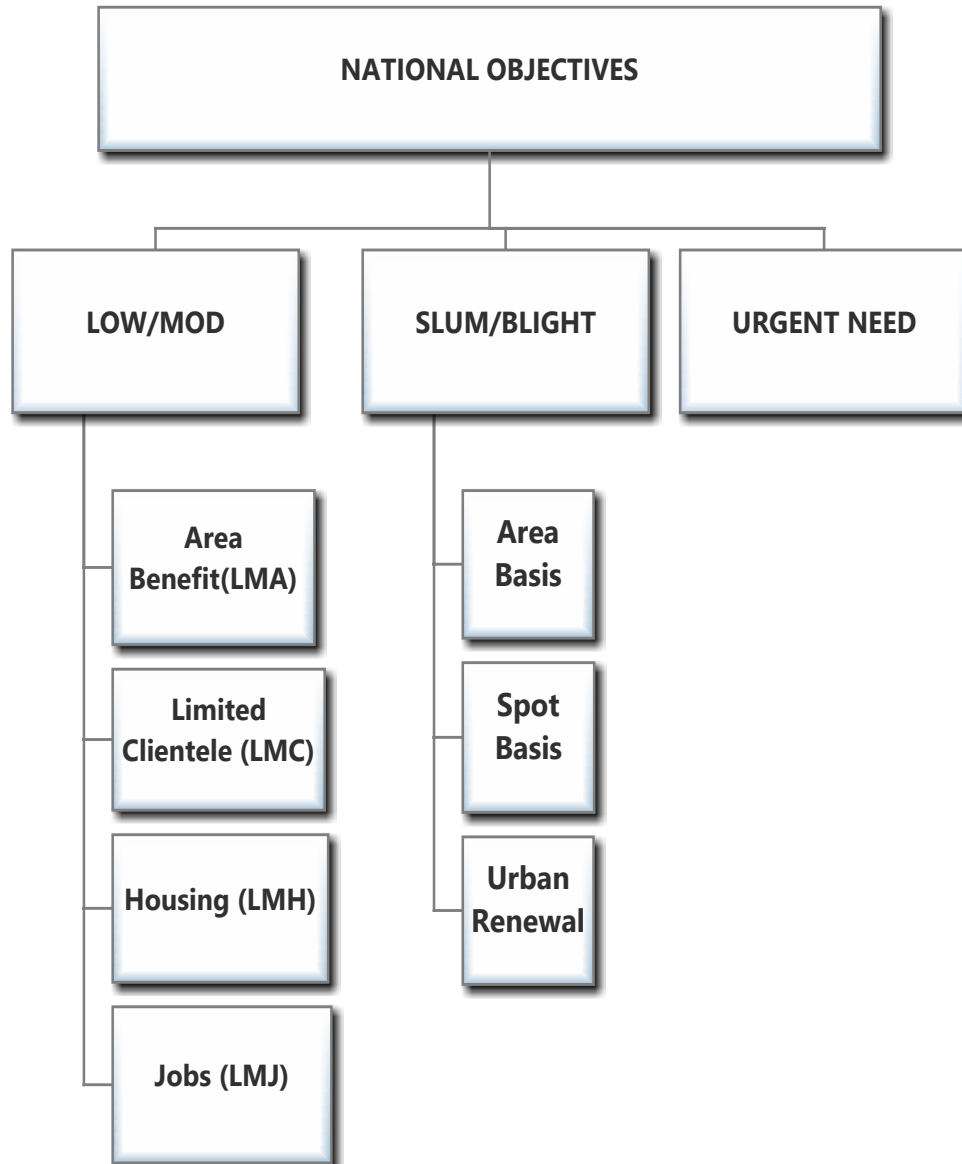
5. **Economic Development-H**

Support for workforce development programs and employment training for vulnerable populations. Microenterprise programs also provide services to similar populations. Economic development programs bolster the skills of participants and are closely tied to employment opportunities in the City of Youngstown and other areas located in the Mahoning Valley.

Minimum Criteria for Receipt of Funding

The proposed project must:

- Provide services that benefit primarily low-and-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 (24 CFR 570.208)



Low-to-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 (See chart on page 17 for HUD Income Limits Documentation System Income Limit Summary).

B. Limited Clientele

Benefits a limited number of people or a targeted population if 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.

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 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 block grant project must comply with an eligible activity **AND** a National Objective as explained above.

Eligible Activities (24 CFR Part 570): 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 nationwide. CDBG funds provide a wide range of flexibility and allow communities to do emergency repair programs, spot rehabilitation, or full rehabilitation.

Public Facilities and Infrastructure 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 to be open to the 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 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 runaway children, drug offenders or parolees, group homes for the developmentally disabled, and shelters for disaster victims.

Public Services

For the provision of public services, including but not limited to services concerned with employment, crime prevention, childcare, health, drug abuse education, or fair housing counseling.

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, childcare, transportation, counseling, and peer support programs.

Eligible Costs: 2 CFR Part 200, Subpart E – Cost Principles (information formerly in OMB Circular A-122, A-21, and A-87– Cost Principles for Non-Profit Organizations, Institutions of Higher Education, and Units of Local Government):

General provisions, basic considerations, and selected Items of Cost 2 CFR **200.420 - 200.475** - Examples-

- 200.421: advertising and public relations costs.
- 200.465: materials and supplies costs, including costs of computing devices.
- 200.452: maintenance and repair costs.

THE APPLICATION PROCESS

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.

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. Thus, organizations must demonstrate financial viability to operate a federally funded program strictly on a reimbursement basis. A financially viable organization is one that can:

- Operate without financial hardship for a minimum of 90 days pending reimbursement.
- Demonstrate an existing and consistent cash flow; and

- Have in place sufficient internal control procedures (see 24 CFR 85.20 (b)(3) and 84.21(a)(3) – **Standards for Financial Management Systems**) to allow a separation of duties for personnel time allocations, etc.

(Note)

Organizations Costs incurred prior to completion of the environmental review process and obtaining an executed agreement 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 2 CFR Part 215 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. The staff review verifies that the proposal is one that includes an eligible activity as determined by HUD guidelines. The staff will further evaluate proposals based on information provided in the submitted application. Evaluators or other City personnel **will not request or accept missing information once the proposal has been submitted.**

(Note)

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 or HUD to do so.

APPLICATION INSTRUCTIONS

The application, which is enabled in PDF form, will be posted at [City of Youngstown, Ohio \(youngstownohio.gov\)](http://City_of_Youngstown,_Ohio_(youngstownohio.gov)).

Follow the following path to access the application on the website:

- Government tab at top of page
- City Departments
- Community Planning and Economic Development
- Community Development Division
- Forms and documents
- Click on “view list”.

- Current Grant Year
- 49th Year Application

Complete the application electronically. **Please do not use ink or pencil to complete this application.** Although the format is not editable, there is space for you to provide your answers. You must print out your completed application and obtain signatures before submitting it to CPED.

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.

Units of Service

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.

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 / 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 XII / Public Service, Microenterprise, 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 webpage)

This form 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 calculations are 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 CDBG or HOME 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 block grant funds.

Item C – Capital Expenditures: 2 CFR 200.439 – Equipment and other capital expenditures. (a) See 200.13 Capital expenditures, 200.33 Equipment, 200.89 Special purpose equipment, 200.48 General purpose equipment, 200.2 Acquisition cost, and 200.12 Capital assets. Pay attention to the rules of allowance that apply to equipment and other capital expenditures.

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.

49th 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.

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. The federal government has given local government the authority to collect this information. 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
- Year the organization started.
- Primary type of business
- Total number of employees (full and part time)

System for Award Management (SAM) – is the Official U. S. Government system that consolidated the capabilities of four (4) contract registration systems. All agencies, who apply for federal funds must register in this system. There is no fee to register at www.SAM.gov.

Learn More about CDBG: <https://www.onecpd.info/cdbg-entitlement/>

APPLICATIONS ARE DUE NO LATER THAN 2:00 PM

Wednesday, February 15th, 2023

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

TECHNICAL ASSISTANCE AND QUESTIONS

All questions related to the RFP and submission must be submitted in writing. Questions will be accepted until 2:00 pm on Wednesday February 8, 2023, Submit to dbyrd@youngstownohio.gov

Use the subject title **RFP QUESTION**.

To expedite the response to your question, also provide the following in your email:

1. Applicant Agency name.
2. Name and title of agency staff that attended the RFQ meeting; and
3. Topic of the question:
 - a) Projects Specifics and Eligibility
 - b) Budget
 - c) General Administration; and/or
 - d) Other (specify)

CDA staff will provide a written response to your question by **4:00 pm on the second business day following your request.**

Monitoring and Compliance

Agreement Procedures

Your agency representative will get a Statement of Award letter (in May or June) if your organization is selected to receive CDBG or HOME funding. The letter will provide instructions on how to obtain an agreement between your organization and the City of Youngstown.

CDA staff will conduct a training for CDBG funded (date and location to be announced) service providers. A separate session may be provided for HOME funded organizations. Information presented in the trainings will enable the agencies to carry out their contractual responsibilities. Much of the information is regarding compliance with federal regulations, the proper completion of financial and performance reports, proper documentation required for reimbursements, and other relevant information.

Environmental Review (24 CFR Part 58)

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 CDBG or HOME funded organization will be reimbursed for any charges incurred prior to CDA completing the environmental review.**

Disbursement of Funds

Disbursement Organizations are required to submit their invoices and documentation to receive reimbursement for eligible costs. Eligible items of cost are written at Agencies should refer to their organization's agreement with the City for additional details regarding this process.

Time and Effort Log (definition)

A Time and Effort Log is a document that provides the required documentation to show that the work an employee does aligns with the funding source from which the same employee is paid. Time and Effort Logs **are not** timecards from which compensation is determined. Supervisors must ensure they collect actual Time and Effort Logs from all staff including administrative and support staff.

Time and Effort Log Compliance: 2 CFR 200.430

2 CFR 200.430 states charges to federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must be supported by a system of internal control which provides reasonable assurance that the charges are accurate, allowable, and properly allocated. Instead of basing their time on a budget estimate, employees spending less than 100% of their time on the CDBG, ESG, or HOME program must track actual time spent on the program.

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 monitoring 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 compliance staff. The report summarizes the monitoring review and indicates whether 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 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 (24 CFR 570.503 (b)(2))

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 or household client (whichever is applicable) 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 all reimbursements paid to their organization. The organization may also be denied future reimbursements. Non-compliance 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. If 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 compliance staff 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, document program effectiveness, and increase service quality, and improve public accountability. Program results are linked to funding decisions and public support for programs. 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 broad objectives:

- **Creating Suitable Living Environment**
Activities that will benefit communities, families, or individuals by addressing issues in their living environment.

- **Providing Decent Housing**
Activities that are focused on housing activities that are proposed to meet individual or community housing needs.
- **Creating Economic Opportunities**
Activities that are related to economic development, commercial revitalization, or job creation.
- **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, and number of housing units.
- **Availability/Accessibility**
Activities that will make services, facilities, housing, or shelter available or accessible to people.
- **Affordability**
Activities that provide affordability in a variety of ways to include lowering the cost or improving the quality of a service or product.
- **Sustainability**
Activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to people or by removing or eliminating slums or blighted areas

Performance Measurement System (for more information see HUD website)

2022 INCOME LIMITS DOCUMENTATION SYSTEM

Summary for Mahoning County, Ohio: Median Income - \$65,200

FY 2022 Income Limits Summary

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

FY 2022 Income Limit Area	Median Family Income Click for More Detail	FY 2022 Income Limit Category	Persons in Family							
			1	2	3	4	5	6	7	8
Youngstown-Warren-Boardman, OH HUD Metro FMR Area	\$65,200	Very Low (50%) Income Limits (\$) Click for More Detail	25,950	29,650	33,350	37,050	40,050	43,000	45,950	48,950
		Extremely Low Income Limits (\$)* Click for More Detail	15,600	18,310	23,030	27,750	32,470	37,190	41,910	46,630
		Low (80%) Income Limits (\$) Click for More Detail	41,550	47,450	53,400	59,300	64,050	68,800	73,550	78,300

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

The **Youngstown-Warren-Boardman, OH HUD Metro FMR Area** contains the following areas: Mahoning County, OH; and Trumbull County, OH.