Community Development Commission (CDC) CDC Meeting Agenda
September 15, 2025 - 5:30 PM
City Council Chambers, City Hall, 3rd Floor,
1528 Third Avenue, Rock Island, IL

1. **Call to Order**

2. **Roll Call**
Ametra Carrol-Castaneda Christine Adamson Hershel Jackson Jen Osing Jeremy Crafton K.J. Whitley Richinda Sakho Calvin Dane Andrea Muller

3. **Public Comment**

4. **Meeting Minutes**

    a. Draft Meeting Minutes from the June 16,2025 meeting

5. **Old Business**

6. **Other Business/New Business**

    a. 2026 Public Service Application and Internal Public Facilities Application

    b. The Community Development Division request approval of the amendment to the Community Development Block Grant Program Manual.

    c. 2026 Community Input Survey in person input oppurtunity.

7. **Adjourn**
The next CDC meeting will be October 20, 2025.

This agenda may be obtained in accessible formats by qualified persons with a disability by making appropriate arrangements from 8:00 am to 5:00 pm, Monday through Friday, by contacting the City Clerk's Office at (309) 732-2010 or visiting in person at: 1528 Third Avenue, Rock Island, IL 61201.

Rock Island Community Development Minutes
City Hall, City Council Chamber
1528 3rd Avenue, Rock Island, IL
June 16, 2025
5:30 PM

Voting Members Present	Ametra Carrol-Castaneda Andrea Muller Calvin Dane Hershel Jackson Jen Osing Jeremy Crafton KJ Whitley Richinda Sakho
Voting Members Absent	Christine Adamson
Staff Present	Nichole Mata Jennifer Graff

Call to Order and Roll Call
Whitley called the meeting to order at 5:34 PM.

Public Comment
No public comment.

Meeting Minutes
Approval of the Meeting Minutes from May 20, 2025. Carrol-Castaneda made the motion and Jackon 2nd the motion. The motion carried unanimously on a vote of 7-0. Muller didn't cast a vote.

Old Business
No Old Business.

Other Business/New Business
Open Public Hearing at 5:41 PM for 2025-2029 Consolidated Plan and the 2025 Annual Action Plan. Whitley discussed the background on these plans. Mata explained the public hearing dates and times. Mata also explained the allocation amounts, broke down public service and infrastructure, funds and projects. Lastly, Mata discussed CIRLF. Sakho asked questions and Mata answered those questions. Public Hearing closed at 6:06 PM.

Open Public Hearing at 6:06 PM for the Updated Citizen Participation Plan (CPP). Mata explained the CPP process and locations for viewing documents. Public Hearing closed at 6:12 PM.

DRAFT for the 2025-2029 Consolidated PLan and 2025 Annual Action Plan. Whitley explained what the plans are. Whitley made the motion and Crafton second the motion. The motion carried on a vote of 7-0. Muller didn’t cast a vote.

Adjournment
Whitley asked for a motion to adjourn the meeting at 6:17 PM. Jackson made the motion and Osing second the motion. The motion carried unanimously on a vote of 7-0. Muller didn’t cast a vote.

A. Applicant Information

No data saved

Case Id: 30878
Name: NBLY TEST Shiner - 2025
Address: *No Address Assigned

A. Applicant Information

Please provide the following information.

A.1. Agency/Organization:

A.2. Executive Director:

A.3. Contact Person:

A.4. Address:

A.5. Address where services will be provided (if different from agency address above)

A.6. Phone Number (8:00 a.m. to 5:00 p.m., M-F):

A.7. Email:

A.8. Federal Tax Identification Number:

A.9. Program Requests

Program Applying For:	Request Amount:

☐ **Check box if your Agency will be submitting more than one CDBG application**

A.10. The total number of beneficiaries served by this program during CDBG 2026 will be:

A.11. The total number of Rock Island residents served by this program during CDBG 2026 will be:

The Community and Economic Development Department will be administering and managing the programs that are awarded CDBG funds. This will ensure HUD requirements are fulfilled.

B. Project Information

Please provide the following information.

B.1. Identify the population/area to be served and project location(s).

B.2. Describe:

The need for the program:

The services to be provided:

B.3. Describe how the project will continue without CDBG funding. Identify funding sources for this project that will take the place of CDBG funds. Describe how your agency is pursuing these sources of funding.

B.4. Describe your program's use of available resources (financial, staff, and volunteer) and in-kind donations to carry out this activity.

C. Budget

Please provide the following information.

Budget Sheet A is the program budget. Specify other funding sources. All expenses for program need to be identified. Round to the nearest dollar, *be specific with funding sources.*

Program Name:

Program Budget

Expenses	Past Year 2025-Budgeted	Past Year 2025-Actual	Current Year 2025-Budgeted	Current Year 2025-Sources	Upcoming Year 2026-Proposed Total Budget	Upcoming Year 2026-Proposed Total CDBG	Upcoming Year 2026-Proposed Non-CDBG Funding
	$0.00	$0.00	$0.00		$0.00	$0.00	$0.00

D. Required Documents

Please provide the following information.

Documentation

- [ ] **Cost Estimate** ***Required**

***No files uploaded*

- [ ] **Federal Tax Identification** ***Required**

***No files uploaded*

- [ ] **List of Board Members (please include name, phone number and email)** ***Required**

***No files uploaded*

Submit

No data saved

Case Id: 30878
Name: NBLY TEST Shiner - 2025
Address: *No Address Assigned

Submit

Please provide the following information.

Applicant Signature
***Not signed*

Date:

IDIS Setup

No data saved

Case Id: 30878
Name: NBLY TEST Shiner - 2025
Address: *No Address Assigned

IDIS Setup

Please provide the following information.

IDIS Number

National Objective

Project Name

HUD Matrix Code

Activity Number ID

Accomplishment Type

Project Description

Service Area

Administrative Documents

No data saved

Case Id: 30878
Name: NBLY TEST Shiner - 2025
Address: *No Address Assigned

Administrative Documents

Please provide the following information.

Documentation

☐ **Award Contract**

***No files uploaded*

Program Overview

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

Program Overview

Please review the following information.

ROCK ISLAND
ILLINOIS

CDBG Public Service Application

City of Rock Island
1528 Third Avenue
Rock Island, IL 61201
(309) 732-2907

The Community Development Block Grant (CDBG) is a US Department of Housing and Urban Development (HUD) program that provides funds annually to all entitlement jurisdictions. CDBG funds are used for community development and affordable housing activities that benefit low-income households and persons with special needs as well as public service needs, infrastructure improvements and economic development activities. The City of Rock Island receives around $150,000 for 2025.

Application Details and upcoming Meetings

Applications for the 2024 City of Rock Island CDBG Program are due and will close on January 6, 2025 @5pm CST. Late Applications will not be considered. All applications must be submitted through Neighborly on time to be considered. There will be a pre-application (submittal) meeting held on Monday, December 2nd, at 5:30PM CST. The meeting will be virtual.

Meeting ID

meet.google.com/yft-feoi-ewx

Phone Numbers

(US) +1 402-947-0292

PIN: 822 821 225#

If there are any questions on the application, please contact Nichole Mata, Community Development Manager at 30-732-2907 or at mata.nichole@rigov.org.

Eligible Activities

Organizations must demonstrate an eligible service below but are not limited to the list provided, public services such as:

- Youth programs including child care
- Services for seniors and disabled residents, including transportation
- Health, mental health, HIV/AIDS and substance abuse services
- Legal services and tenant/landlord counseling
- Services for abused/neglected children and survivors of domestic violence

Eligible Beneficiaries

- Clients served by the program are Rock Island residents. CDBG funds can only be paid out proportionately to the number of Rock Island clients served by the program.
- Program intake forms must be completed by clients collecting income and demographics information which is reported to HUD.
- At least 70% of the clients served through the program must be documented as extremely low, low or moderate income.
  For example, a household of 4, maximum annual income of $71,600.00.

Eligible Organizations

- Not for profit organization (501(c) 3 statues) in existence for at least 1 year.
- Located in Rock Island
- Insurance, 990 policies and procedures
- Significant % of clients served are Rock Island residents
- Agency owned properties are free and clear of delinquent property taxes, sewer bills or liens.
- Adhere to Federal Financial Requirements (regulation 2 CFR part 200)
- Organizational chart depicting staff positions in the agency and programs.
- Board of directors and regular board meetings.
- Staff will be proposing an amendment to the public service policies and procedures to address concerns about real and perceived conflicts of interest. Organizations with staff members serving on the Community Development Commission are advised that staff may not recommend that they receive funding in this application cycle as a result of that proposed amendment.

Federal Requirements
If funded, Federal Requirements WILL apply to your program:

- Documentation/Record Retention
- Financial/Accounting /Audit. Obtain a unique entity number and active System for Award Management (SAM) registration. System for Award Management (SAM): www.sam.gov
- Public Accessibility
- Non-discrimination
- Procurement/Purchasing standards
- Grievance policies
- Religious instruction/Participation
- Obtain a unique entity number and active System for Award Management (SAM) registration.
- Environmental/Historic/Wages (construction)

General Areas of Need-Every Applicant must meet at least one.

- Housing-Increasing affordable decent housing for homeowners with very low to moderate incomes.
- Infrastructure and Area Benefits- Increasing neighborhood quality and safety through mitigating or removing blighting conditions and providing improved neighborhood structures like sidewalks.
- Public Service - Providing services to residents suffering from homelessness, health conditions and youth.

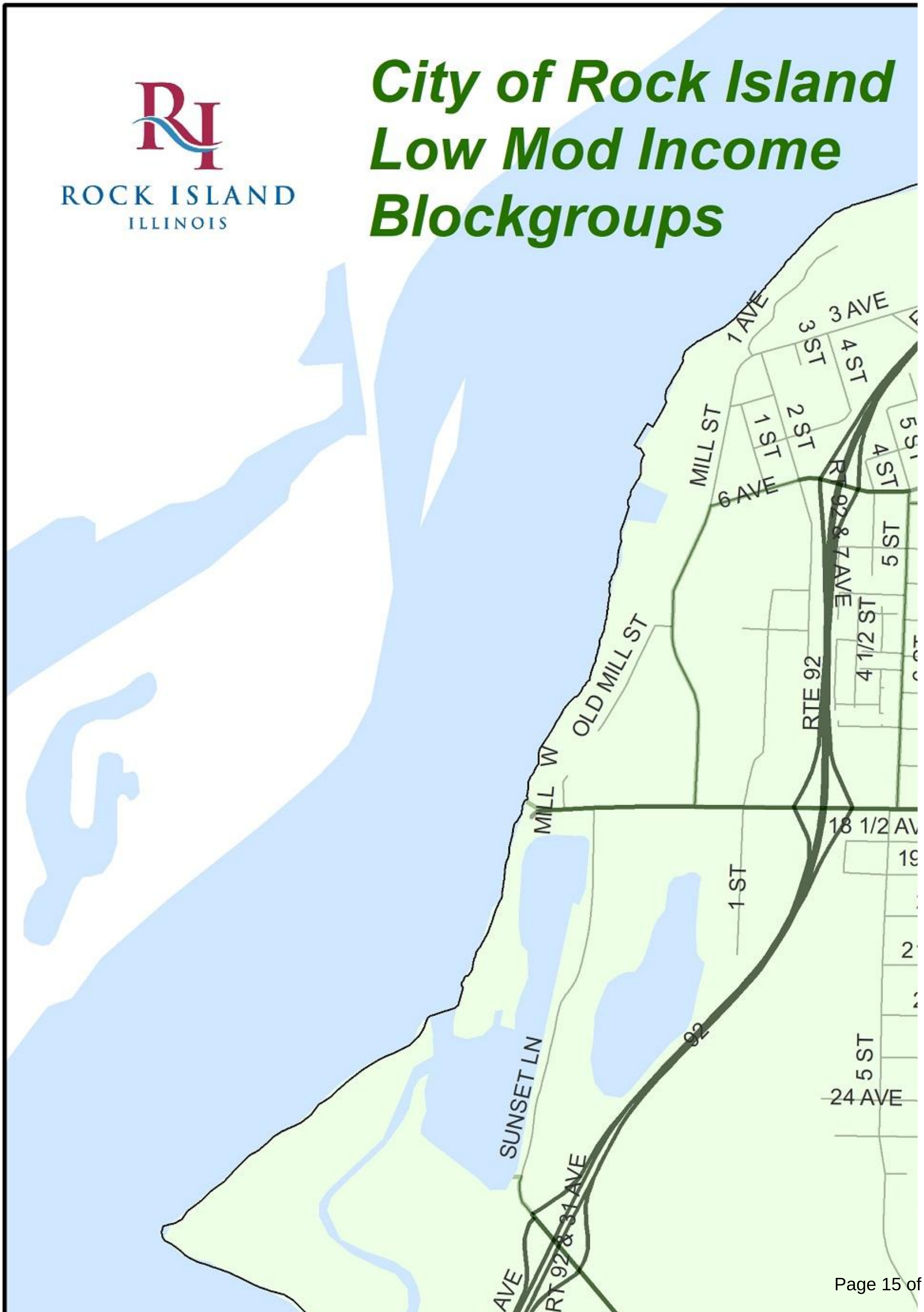
The current consolidated plan process identified the following goals as activity priorities:

- Improve housing conditions for income qualified residents
- Create suitable living environments
- Provide Public Services

For more information below on HUD's Public Service requirements please visit the link below.

Chapter 3 National Objective

Chapter 7 Public Service


ROCK ISLAND
ILLINOIS
City of Rock Island
Low Mod Income
Blockgroups
1 AVE
3 AVE
3 ST
4 ST
MILL ST
1 ST
2 ST
5 ST
4 ST
6 AVE
RT 92 & 7 AVE
5 ST
4 1/2 ST
RTE 92
OLD MILL ST
MILL W
18 1/2 AV
1 ST
92
5 ST
24 AVE
SUNSET LN
RT 92 & 31 AVE

A. Agency Information

Please provide the following information.

AGENCY INFORMATION

A.1. Agency Name

A.2. Address

A.3. Phone Number

A.4. Fax Number

A.5. Website

A.6 SAMS Number

A.7. Federal Tax ID Number_Old

A.7. Federal Tax ID Number

A.8. Is the Agency a 501 C(3)?

CONTACT INFORMATION

A.9. First Name

A.10. Last Name

A.11. Executive Director

A.12. Address

A.13. Phone Number

A.14. Email Address

B. Project Information

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

B. Project Information

Please provide the following information.

B.1. Identify the population/area to be served and project location(s).

B.2. Describe the need for the program.

B.3. Describe the services to be provided.

B.4. Does this program operate at least 40 hours per week?

If no, explain.

B.5. Does this program operate year-round?

If no, explain.

B.6. When does this program operate?

- ☐ **Summer**
- ☐ **Fall**
- ☐ **Winter**
- ☐ **Spring**

B.7. What parts of the week is this program available?

- ☐ **Weekdays**
- ☐ **Weeknights**
- ☐ **Weekends**
- ☐ **Holidays**

B.8. What time is this service available?

- ☐ Mornings
- ☐ Afternoons
- ☐ Evenings
- ☐ Overnight

C. Project Results

Please provide the following information.

C.1. Describe how the program meets one of the current local objective(s) formulated through public input and approved by the City Council.

C.2 Define one clear, high-quality outcome that by which to measure the impact of the program. Include information for both the most recent completed and the upcoming year and describe the performance measure you will utilize to determine if the program met the proposed outcome. Proposed outcomes should be measurable, demonstrate impact, and within the scope of the program. Be specific in what the outcome is and how the outcome will be measured.

Please develop a Proposed Outcome that is MEASURABLE, DEMONSTRATES IMPACT, and is WITHIN THE SCOPE

- Outcomes should not be “satisfaction” outcomes; rather they should be based on results.
- Outcomes should be in terms of % and # of clients achieving program goal and the total number served.
- Actual Outcome for 2024 should be the actual results for the most recently completed program year.
- Actual Outcome should be stated in terms of % and # of clients that achieved program goal.
- Projected Outcome for 2025 should be stated in terms of “best case scenario”.
- Applicants must create ONE outcome that best represents the intended impact of this program.

	Proposed Outcome for Year 2026	Performance Measure for Year 2026	Actual Outcome for Year 2026	Projected Outcome for Year Beginning 2026

C.3. Name at least one other agency or business that provides similar services in your area. How are your program's services similar or different?

D. Resources

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

D. Resources

Please provide the following information.

D.1. Describe how the program will continue without CDBG in the future.

- **Identify funding sources for this program that will take the place of CDBG.**
- **Describe how your program is pursuing these sources of funding.**

D.2. Describe your program's use of available resources (financial, staff, and volunteer) and in-kind donations (e.g. food, space, supplies, equipment, services) to carry out this activity.

D.3. Describe how your program collaborates with other agencies for this particular program.

E. Program Compliance

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

E. Program Compliance

Please provide the following information.

E.1. If previously funded with CDBG: Describe your Program's record in managing previous CDBG funds and maintaining regulatory compliance for this program.
This includes but is not limited to: meeting proposed goals, promptly submitting accurate quarterly reports and payout requests; maintaining financial and program records in compliance with CDBG regulations; and expending CDBG funds in a timely manner.

E.2. If NOT previously funded with CDBG: Describe your program's experience and performance in implementing and administering grants from other funders for this program or a similar program. Describe the viability of your program and how you will comply with CDBG funding regulations.

E.3. Describe your Agency's existing administrative and financial capacity to implement/continue proposed project/activity.
REMINDER: A completed Succession Plan form will be required in step G. Required Documents.

F. Budget

Please provide the following information.

F.1. Prior Year 2024 (Please click "Add Row" to enter information.)

Expense	Budget	Actual
TOTAL	$0.00	$0.00

F.2. Current Year 2025 (Please click "Add Row" to enter information.)

Expense	Budget	Actual
	$0.00	$0.00

F.3 Upcoming Year 2026 (Please click "Add Row" to enter information.)

Expense	Budget	Actual
	$0.00	$0.00

F.4 Total Proposed Program Budget 2026
$0.00

F.5 Percent CDBG Total Proposed Budget 2026
0.00%

F.6. Personnel Costs

Position Title/Duties	Type	Program Total	Personnel Amount	CDBG Amount

F.7. Supplies and Services

Supplies and Services/Description	Total Amount	Program Total	CDBG Amount

F.8. CDBG Total Personnel Cost
$0.00

F.9. CDBG Total Supplies & Services
$0.00

F.10. Total CDBG request
$0.00

G. Required Documents

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

G. Required Documents

Please provide the following information.

AGENCY & BOARD INFORMATION

☐ **Articles of Incorporation & Current By-laws** ***Required**
***No files uploaded*

☐ **Board meeting schedule for 2024-2025** ***Required**
***No files uploaded*

☐ **Board minutes from last three meetings** ***Required**
***No files uploaded*

☐ **Board of Directors List - Download Form HERE.** ***Required**
***No files uploaded*

☐ **Certifications Form - Download form HERE** ***Required**
***No files uploaded*

☐ **Conflict of Interest policies for employees, board members, and contractors/vendors (can be separate policies or combined)** ***Required**
***No files uploaded*

☐ **Financial Statements from last three months** ***Required**
***No files uploaded*

☐ **Grievance policy for employees, program participants/clients and contractors/vendors (can be separate policies or combined)** ***Required**
***No files uploaded*

☐ **Illinois Secretary of State Certificate of Good Standing (dated no earlier than 06/1/22)** ***Required**
***No files uploaded*

☐ **Intake form that is used to collect required CDBG demographics (CDBG requires the following to be collected for each participant: household income, household size, race, ethnicity, gender of head of household, veteran status)** ***Required**
***No files uploaded*

☐ **Copy of IRS 501(c)(3) letter (and corresponding Fictitious Name resolution if applicable)** ***Required**
***No files uploaded*

☐ **Non-discrimination policies for employment and program participants/services (can be 2 separate policies or combined)** ***Required**
***No files uploaded*

☐ **Procurement/purchasing policy** ***Required**
***No files uploaded*

☐ **If applicable, a copy (single sided) of any surveys referenced in Proposed Outcomes and Performance Measures steps**
***No files uploaded*

☐ **Sources of Federal Funding worksheet - Download form HERE.** ***Required**
***No files uploaded*

☐ **Subrecipient checklist for Internal Control Form - Download Form HERE.** ***Required**
***No files uploaded*

☐ **Succession Plan Form - Download form HERE** ***Required**
***No files uploaded*

☐ **Supporting Agency Worksheets - Download form HERE. (Must include two utilizing ONLY the included form from agencies with which you collaborate on this particular program.** ***Required**
***No files uploaded*

AGENCY FINANCIAL INFORMATION

☐ **For applicants not currently funded with CDBG a copy of the most recent agency audit and management letter is required with the application.**
***No files uploaded*

☐ **Copy of most recent Federal 990 form- Return of Organization Exempt from 2023 Income Tax (Pages 1-12, no additional schedules unless requested) If not yet filed, submit a copy of the extension request submitted to the IRS**

with a letter from accountant stating expected submission date. *Required

***No files uploaded*

For applicants requesting funds for equipment or any kind or public facility improvements to be funded with CDBG, these items are also required:

☐ **A detailed projected operating budget for the next five program years (through 06/30/2029), including both revenue and expenditures, with sources of funding identified.**

***No files uploaded*

☐ **A detailed work write-up with projected costs by line item(s) ***

***No files uploaded*

Submit

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

Submit

Once an application is submitted, it can only be "Re-opened" by an Administrator.

CERTIFICATION

☐ **I have reviewed the application steps and have verified that all required documentation is attached.**

☐ **I understand that all information submitted as part of this application is subject to open records requests under Illinois law.**

Authorized Personnel Signature

***Not signed*

Date Signed

Admin Documents

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

Admin Documents

Please provide the following information.

Documentation

☐ **Environmental Review**

***No files uploaded*

☐ **Fully Executed Agreement**

***No files uploaded*

☐ **Purchase Order**

***No files uploaded*

☐ **Other Documentation**

***No files uploaded*

IDIS Setup

No data saved

Case Id: 30870
Name: NBLY TEST Shiner - 2025/2026
Address: *No Address Assigned

IDIS Setup

Please provide the following information.

Project Name

National Objective

Activity Number ID

HUD Matrix Code

Project Description

Accomplishment Type

Service Area

Memorandum

To:	Rock Island Community Development Commission (CDC)
From:	Nichole Mata
Subject:	The Community Development Division request approval of the amendment to the Community Development Block Grant Program Manual.
Date:	September 15, 2025

Introduction and Background Information:

The Community Development Division request approval of the amendment to the Community Development Block Grant Program Manual.
The Community Development Division has completed an update to the City's Community Development Block Grant (CDBG) Program Manual The program manual now contains an update adding section 23, Build America, Buy America Act, (BABA) to the program manual. It is highlighted in yellow for you to review the update.

Motion:	Move to approve the 2025 Amendment to the Community Development Block Grant Program Manual.
RC	Roll Call vote is needed.

Additional Information as applicable (i.e. provide alternative options, community or staff input, staffing impact; resident impact; etc.):

N/A

Recommendation:

The Community Development Division recommends that the Community Development Commission review the attached program manual update and recommend them for adoption by the Rock Island City Council.

Submitted by: Nichole Mata

Approved by:

Community Development Block Grant Program Manual

Community & Economic Development Department
Community Development Division
1528 Third Avenue
Rock Island, IL 61201

Approved by the Rock Island City Council on December 12, 2022
Amended December 9, 2024

Contents

Section 1: Introduction

The City of Rock Island has been an Entitlement Community in the Community Development Block Grant (CDBG) Program of the US Department of Housing and Urban Development (HUD) since 1975. The CDBG Program distributes federal funds to states, counties, and cities to fulfill the following program goals:

- Provide decent, safe, and sanitary housing;

- Provide a suitable living environment; and
- Expand economic opportunities principally for low and moderate-income persons.

Basic requirements for a local CDBG program are set forth in CDBG Program Regulations 24 CFR 570. Federal requirements allow for extensive flexibility in how a local CDBG program may be managed. In the City of Rock Island, as in other communities, staff develop five-year Consolidated Plans and corresponding Annual Action Plans that establish how CDBG funds shall be used. These documents describe community needs, priorities, and resources as well as objectives and performance measures. They do not on their own, however, describe the overall CDBG Program's policies and procedures.

Federal regulations in 24 CFR 570.501(b) state that "The recipient of HUD funds is responsible for ensuring that CDBG funds are used in accordance with all program requirements. The use of designated public agencies, subrecipients, or contractors does not relieve the recipient of this responsibility." The City's CDBG Program policies and procedures must be fully described in a Program Manual that guides City employees, agencies, contractors, and subrecipients on how to use and account for CDBG funds. This Program Manual is intended to satisfy that Federal requirement.

Note that references herein to the "CDBG Program" refers to the entirety of CDBG-funded programming and activities undertaken by the City. Individual programs and activities under the umbrella of the CDBG Program are explained in appendices to this Program Manual. Examples of these include the General Housing Rehabilitation Program and the Commercial/Industrial Revolving Loan Fund (CIRLF). The City Council may from time to time approve amendments to either the Program Manual itself or the appendices as Federal regulation may require or to better align with changing community needs.

Section 2: Staff and the Community Development Commission

The Community & Economic Development Department (CED) is responsible for administration of CDBG-funded programming including the Housing Rehabilitation Program. The Department is organized into four divisions, each of them headed by a manager reporting to the department director. The Community Development Division is the one primarily responsible for CDBG-funded programming but is assisted by the other divisions in various aspects of the programing.

The Community Development Division consists of three staff members.

- Community Development Manager: This position is responsible for supervision of the other two division staff members and coordinates all division activities. Adherence to policies and procedures as well as financial oversight are primary responsibilities as they pertain to the CDBG program. This position also ensures that overall goals are met.
- Housing Officer: This position is responsible for processing applications from people seeking housing rehabilitation assistance. They determine eligibility, update a waiting list for services, prepare contracts, and maintain case files.
- Construction Officer: This position is responsible for conducting inspections of properties receiving rehabilitation assistance, preparing scopes of work, monitoring the performance of contractors, and conducting final inspections. They are also responsible for lead-based paint hazard risk assessments and associated functions.

Other staff in the CED Department that assist with the CDBG program include:

- Planning & Zoning Manager: This position assists with historic preservation matters, specifically the Section 106 process.
- Geographic Information Systems (GIS) Specialist: This position uses mapping software to assemble the majority of what is included in environmental review documents. They also create site maps for projects when needed.
- Building Official: This position oversees CDBG-funded building demolitions when they occur.

The Community Development Commission, previously known as the Citizen's Advisory Committee, is overseen by the CED Department. This nine-person public body is responsible for holding public hearings required for development of the Annual Action Plan and the five-year Consolidated Plan. It is also responsible for making general recommendations about the use of CDBG funds as well as any similar funds overseen by the CED Department, such as those from the Illinois Housing Development Authority (IHDA). Members serve three-year terms and are eligible for two consecutive terms. Appointments to the Commission are made by the Mayor with the approval of the City Council. Members should have professional experience working in community development including but not limited to housing issues. Members should also be diverse and representative of the entire community.

Section 3: National Objectives

When developing a CDBG-funded project, program, or activity, it is helpful to follow a step-by-step process to ensure compliance with all applicable regulations. The next several sections of this Program Manual discuss those steps. The first step in that process is determining which of HUD's three National Objectives are being met and how. If a proposed undertaking does not meet one of them, it cannot be considered for funding. All CDBG-funded undertakings must meet at least one of HUD's three National Objectives. The three National Objectives are:

1. Provide a benefit to low- to moderate-income persons and/or households;
2. Aid in the prevention or elimination of slums or blight; or
3. Meet an urgent community development need of recent origin that threatens the health or welfare of residents.

The following is a brief discussion of each National Objective including definitions, criteria, and examples.

Criteria for Activities Benefiting Low/Moderate Income Persons

A low- or moderate-income person is defined in the statute as a member of a household having an annual income equal to or less than 80% of the median income as defined by HUD. The three pertinent median income limits for CDBG are as follows:

- Extremely Low Income 30% of median area income
- Very Low Income 50% of median area income
- Low Income 80% of median area income

The median income changes annually, therefore, the household's low- and moderate-income levels may also change. Every applicant must document the income levels of the potential beneficiaries of CDBG funding at the time of application submission to ensure that at least 51% of the beneficiaries' meet HUD guidelines. Due to an "exception criteria" from HUD this is reduced to 45.68% for LMI Area Benefit projects. Income guidelines are updated annually and located on HUD's website to review.

Activities, which benefit low/mod income persons, may be classified as providing:

- Area Benefit
- Limited Clientele Benefit to persons of low/moderate income
- Housing Benefit to persons of low/moderate income
- Job Creation or Retention for persons of low/moderate income

Examples of potentially eligible activities under the Area Benefit category may include activities such as street improvements; water and sewer line upgrades; and neighborhood facility construction. Potentially eligible activities under the Limited Clientele Benefit category may include the construction of a senior center; public services for the homeless; job training or job creation for low/mod income individuals; and meals on wheels for the elderly. Potentially eligible Housing Benefit Activities include the acquisition of property for permanent housing; rehabilitation of permanent housing; conversion of non-residential structures into permanent housing; and eligible activities connected with new housing construction. For an activity of Job Creation, the recipient must document that at least 51 percent of the jobs will be held by, or available to, low- and moderate-income persons. For activities designed for Job Creation or Retention, permanent jobs where at least 51 percent of the jobs, computed on a full-time equivalent basis, involve the employment of low- and moderate-income persons. Section IV contains information on specific guidelines for determining and documenting low- to- moderate income benefit.

To test whether a project will meet the low-and moderate-income benefit National Objective, it is helpful to follow these guidelines:

- To determine a project's eligibility using Area Benefit, refer to the low- and moderate-income area map available on HUD's website (http://egis.hud.gov/cpdmaps/) applicants may also contact the Office of Community Reinvestment staff to request an income survey be conducted of the service area of the project. At least 45.68% of households within the identified service area must meet the low- to- moderate income limits as set by HUD.
- To calculate Limited Clientele Benefit, determine the total household income of each user by household size. At least 51% of users must meet the income limits.
- To calculate Housing Benefit Activities, households meeting the income guidelines must occupy single-family structures. If the structure contains more than one unit, at least 51% of the units must be occupied by households meeting the income limits.

Note: The income of all adults (not necessarily related) living in the household must be combined and compared to the income limit for the number of persons living in the household. Staff from the Office of Community Reinvestment is available to assist applicants in this evaluation.

Criteria for Activities to Prevent or Eliminate Slums or Blight

Activities that address the prevention or elimination of slums or blight may be classified as:

- An Area Basis
- A Spot Basis
- An Urban Renewal Basis

To qualify under the National Objective of slums or blight on an *Area* Basis, the activity must meet all of the following criteria:

- The area must be designated as a slum/blight area by the governing jurisdiction; and must meet the definition of a slum, blighted, deteriorated, or deteriorating area under state or local law.
- A substantial number of deteriorated or deteriorating buildings or public improvements must be located throughout the area.
- Documentation must be maintained by the governing jurisdiction on the boundaries of the area and the conditions, which qualified the area under this objective at the time of designation.
- The activity must address one of the conditions which contributed to the deterioration of the area.

Potentially eligible activities include assistance to commercial or industrial businesses; public facilities and improvements; and code enforcement provided the assistance is designed to address one or more of the specific conditions which qualified the area.

To qualify under the National Objective of prevention or elimination of slums or blight on a *Spot* Basis, the activity must meet all the following criteria:

- The activity must be designed to eliminate specific conditions of blight or physical decay at a specific location not incorporated in a slum or blighted area.
- The activity must be limited to acquisition, clearance, relocation, historic preservation, or building rehabilitation to eliminate specific conditions detrimental to public health and safety.

Potentially eligible activities under the objective to prevent or eliminate slums or blight on a spot basis include the removal of faulty wiring or falling plaster; historic preservation of a public facility; and demolition of a vacant, deteriorated, (non-historic) abandoned building.

To qualify under the National Objective of slums or blight on an *Urban Renewal* Basis, the activity must meet all of the following criteria:

- Located within an urban renewal project area or Neighborhood Development Program (NDP) action area; i.e., an area in which funded activities were authorized under an urban renewal Loan and Grant Agreement or an annual NDP Funding Agreement, pursuant to Title I of the Housing Act of 1949; and
- Necessary to complete the urban renewal plan, as then in effect, including *initial* land redevelopment permitted by the plan.

Despite the restrictions in (b) (1) and (2) of 24 CFR 570.208, any rehabilitation activity which benefits low- and moderate-income persons pursuant to paragraph (a)(3) of that section can be undertaken without regard to the area in which it is located or the extent or nature of rehabilitation assisted.

Criteria for Activities to Meet an Urgent Community Development Need

To qualify an activity under the objective of meeting an Urgent Community Development Need, an activity must be designed to alleviate existing conditions in which the governing jurisdiction certifies all of the following:

- The existing conditions pose a serious and immediate threat to the health, safety or welfare of the community.
- The existing conditions are of recent origin (within the last 18 months)
- The grantee is unable to finance the activity
- Other funding resources are not available.

A condition will generally be considered of recent origin if it developed or became critical within 18 months preceding certification. Activities meeting the urgent needs criteria involve emergency or disaster situations with substantial costs which overextend the ability of a community to pay the costs through local taxation. Examples of activities meeting the Urgent Community Development Need objective include ruptured sewer and water mains; damages resulting from major catastrophes; or emergencies such as floods and earthquakes.

Section 4: Eligible and Ineligible Activities

Once an activity has been classified as meeting a National Objective, the second step is to determine whether CDBG funds may be used for a specific project or activity. Many types of activities qualify for CDBG assistance. This section describes these in detail by type. The proper classification of an activity insures that CDBG funds are used only for eligible activities and may further identify applicable statutes, requirements, and regulations for certain activities.

Activities that are Eligible

HUD has established the listing of eligible activities below as provided in the CDBG regulations. It should be noted that the list occasionally changes and that several activities have specific eligibility requirements. The following are considered eligible activities:

Public Facility/Infrastructure Improvements – Related Activities

- Acquisition of Real Property (land and/or building) - in whole or in part, by purchase, long-term lease, donation or other. §570.201(a)
- Disposition of Real Property (land and/or building) - the payment of costs incidental to the disposition of real property acquired with CDBG funds. §570.201(b)
- Installation, construction, reconstruction, rehabilitation, and installation of public facilities (except government buildings). §570.201(c)
- Clearance and demolition. §570.201(d)
- Interim Assistance for Public Facilities and Improvements - including limited improvement to a deteriorating area as a prelude to permanent improvements and activities to alleviate an emergency condition. §570.201(f)
- Privately-Owned Utilities - including acquisition, reconstruction, rehabilitation, and installation of such. §570.201(l)
- Code Enforcement. §570.202(c)
- Fire Protection Equipment – considered for this purpose to be an integral part of a public facility and thus, purchase of such equipment would be eligible under §570.201(c)
- Construction Equipment – limited to the purchase of construction equipment for use as part of a Solid Waste Disposal facility. §570.201(c)
- Removal of material and architectural barriers that restrict the mobility and accessibility of elderly or severely disabled persons to public facilities. §507.201(c)
- Relocation costs incurred by displacement from CDBG projects. §570.201(i)
- Loss of rental income by owners holding units for persons displaced by CDBG projects. §570.201(j)
- Homeownership assistance, such as down payment assistance or mortgage interest subsidy for homebuyers. §570.201(n)

Rehabilitation and Preservation – Related Activities

- Rehabilitation of properties – including privately-owned homes, publicly-owned housing, publicly or privately-owned commercial or industrial buildings, nonresidential buildings owned by nonprofits, and manufactured housing when it is part of the permanent housing stock. §570.202(a).
- Historic Preservation - the rehabilitation, preservation and restoration of historic properties. Historic properties publicly or privately owned, may include those listed on or eligible for listing on the State or National Registers of Historic Places. §570.202(d).
- Renovation of closed buildings. §570.202(e).
- Lead-based paint testing, evaluation, reduction, and clearance. §570.202(f).
- Improvements to increase the efficient use of energy and or water in a structure. §570.202(b)
- Connection of residential structures to water distribution lines or local sewer collection lines. §570.202(b).
- Rehabilitation Services to include rehabilitation counseling, energy auditing, preparation of work specifications, loan processing, and inspections. §570.202(b)

Public Service Activities. §570.201(e)

- Employment training
- Crime Prevention
- Child Care
- Health and drug abuse and education

- Furnishings and Personal Property – limited to such items necessary for use by a recipient or its subrecipients in the administration of activities assisted with CDBG funds, or when eligible as firefighting equipment, or when such items constitute all or part of a Public Service.
- Operating and maintenance expenses associated with Public Service activities, interim assistance, and office space for program staff employed in carrying out the CDBG program. The use of CDBG funds to pay allocable costs of operating and maintaining a facility used in providing a Public Service even if no other costs of providing such service are assisted with CDBG funds.
- Fair housing counseling and homebuyer pre-purchase counseling
- Energy Conservation

Economic Development Activities. §570.203, §570.204 and §570.201(o)

- Acquisition, construction, rehabilitation, or installation of commercial or industrial buildings or railroad spurs.
- Grants, loans, loan guarantees, interest subsidies to businesses.
- Administrative costs directly related to economic development projects.
- Special activities by Community-Based Development Organizations (CBDOs) that are part of a broader effort to revitalize a neighborhood.
- Assistance to micro-enterprises, such as loans, grants, technical assistance, or supportive services.

Planning and Administration. §570.205 and §570.206

- Preparation of general plans such as the Consolidated Plan.
- Functional plans such as housing plans.
- Neighborhood plans and general historic preservation plans.
- Policy planning, management, and capacity building activities.
- Monitoring
- General program administration
    - General management, office expenses, travel, legal services, and salaries
    - Public information, Fair Housing activities, indirect costs, and preparation of applications for federal funds.
    - Does not include costs to directly deliver a specific project.

Activities that are Ineligible

Despite apparent inclusion within the listing of eligible activities, some activities fall within a category of explicitly ineligible activities. In general, any activities not authorized under the provisions of eligible activities are ineligible for funding.

- Purchase of Equipment - for example, construction, fixtures, motor vehicles, furnishings and other personal property not an integral structural fixture is generally ineligible;
- Operating and Maintenance Expenses – any expense associated with repairing, operating or maintaining public facilities, improvements and services in ineligible. Examples of ineligible operating and maintenance include: the maintenance and repair of publicly owned streets (filling of pot holes in streets, repairing of cracks in sidewalks, replacement of expended street light bulbs), parks (the mowing of recreational areas), water and sewer facilities, neighborhood facilities, senior centers, centers for persons with disabilities;

- Payment of staff salaries, utility costs and similar expenses necessary for the operation of public works and facilities;
- New Housing Construction – the construction of new permanent residential structures or for any program to subsidize or assist such new construction is ineligible except when carried out by an entity pursuant to §570.204(a).
- Income payments – any series of subsistence - type grant payments, such as housing allowances, food, clothing or utilities.

Section 5: Documenting Benefit

Once an activity has been determined eligible, it is necessary to determine how that eligibility will be demonstrated in documentation. The following chart provides examples of how that can be done.

Benefit to Low-and Moderate-Income (LMI) Persons (§570.208(a)): Required Documentation

Activities benefiting low- and moderate-income (LMI) persons: Activities meeting the criteria in this section as applicable, will be considered to benefit low- and moderate-income persons unless there is substantial evidence to the contrary. In assessing any such evidence, the full range of direct effects of the assisted activity will be considered. (The recipient shall appropriately ensure that the activities that meet these criteria do not benefit moderate-income persons to the exclusion of low-income persons.)

As described in Section II, Low/Moderate income benefit activities are classified as Area Benefit; Limited Clientele; Housing Activities; or Job Creation or Retention.

Documenting Area Benefit (§570.208(a)(1))

HUD provides census data for the areas that qualify under the low/moderate income benefit on an area basis. The most current data and the accompanying maps delineating the areas for this application cycle are based on Census data (see Appendix A, C and D). The activity may benefit all the area's residents. It is important that all the boundaries of the service area be clearly defined. This area need not be coterminous with census tracts or other officially recognized boundaries but must include the entire area served by the activity. This National Objective is met if an eligible *non-housing* activity is undertaken and at least 45.68% of the residents in the defined service area who benefit from this activity are LMI.

Examples of eligible Area Benefit projects are:

- New sidewalks in a low/moderate income neighborhood
- A new paved road or water and sewer system in a low/moderate income neighborhood
- A new playground in a low/moderate income neighborhood

To qualify a project as Area Benefit for persons of low- and moderate-income, an applicant/subrecipient must:

- Establish the boundaries of the service area of the proposed community development project. The service area must be primarily residential in character and the activity must meet locally identified needs.
- Document the income of the families in the service area. If the HUD low- and moderate-income area data available does not show the area to be part of a low- and moderate-income block group, and there is reason to believe that the area is a "pocket of poverty," the City can provide technical assistance for conducting a survey of the households in the service area.

Documenting Limited Clientele Benefit (§570.208(a)(2))

Activities in this category benefit a specific group of people, rather than all the residents in a area. These are *non-housing* activities that are eligible because they are designed to benefit a limited number of persons. HUD requires that at least 51 percent of the members of these specific groups be persons of low- to moderate- income. Data on incomes of users is often available from the files of the service agency or sponsoring organization.

Examples of eligible Limited Clientele activities are:

- Construction or rehabilitation of a community center, center for senior citizens, homeless shelter, job training facility, or domestic abuse shelter
- Public services for the homeless or battered spouses, "Meals on Wheels" for the elderly, or food pantries, etc.

To qualify under this category, the activity must meet one of the following tests:

- Benefit a clientele 51 percent of which must meet the HUD definition for low/moderate income persons. Those benefiting from the activity must be documented, by family size and income, to show that at least 51% are LMI;

- The activity has income eligibility requirements limiting the activity to LMI persons only;
- Benefit a clientele generally presumed to be principally low/moderate income persons. The following groups are currently presumed to meet this criterion:
    - Abused children
    - Severely disabled adults (as defined by the Bureau of Census)
    - Elderly persons (62 years of age and over)
    - Illiterate adults
    - Migrant farm workers
    - Battered spouses
    - Persons with HIV/AIDS
    - Homeless persons
- Be of such nature and location that it may be concluded that the beneficiaries will primarily be low- and moderate-income persons.

Documenting Limited Clientele Benefit with User Data

Applicants/Subrecipients who need documentation for limited clientele projects can obtain information about beneficiaries and users with CDBG survey forms. Nonprofit organizations, depending upon the type of activity they conduct, may already have user or intake forms and statistics. For example, health care centers may use intake forms to document family income; day care centers may use admittance applications to obtain data, etc.

The Office of Community Reinvestment will aid in the development of a CDBG survey form for any organization that does not currently have one.

The following activities Do not qualify under the Limited Clientele category:

- Activities that benefit all the residents of an area;
- Activities involving acquisition, construction or rehabilitation of property for housing; or
- Activities that benefit LMI persons through the creation or retention of jobs,
- Except job training and placement and/or other employment support services. §570.208(a)(2)(iv)

LMI Housing Activities (§570.208(a)(3))

CDBG funds are primarily used for the rehabilitation of residential and mixed-use buildings. The original intent of the CDBG program was for housing rehabilitation, there are limitations on the way funds may be used for the construction of new housing. Important questions to ask when determining the eligibility of housing activities are:

- Does the activity benefit LMI households, or remove blight, and
- Is the subrecipient an eligible public or private non-profit organization or a special limited profit corporation?

Note: Only permanent housing is eligible under this subcategory for LMI benefit.

Examples of eligible Housing Activities benefiting low- and moderate-income persons/households are:

- Acquisition of land or existing buildings.
- Rehabilitation of owner-occupied or rental units.
- Conversion of non-residential structures to housing units.
- Newly constructed homes developed by a Community Based Development Organization (CBDO as pursuant to §570.204(a)).
- Purchase assistance for LMI homebuyers.

Note: The income of *all* adults (not necessarily related) living in the household must be combined and compared to the income limit for the number of persons living in the household.

Activities that include acquisition, construction or rehabilitation of housing units may qualify as meeting the National Objective of benefiting LMI households only to the extent that the required number of units is occupied by LMI households upon completion.

The required number of LMI units for Housing Activities cover both owner-occupied and rental units. *At completion*:

- If the unit is a single unit, the occupant must be an LMI household.
- In duplexes, at least one of the units must be occupied by an LMI household.
- When CDBG assistance is provided to buildings with more than two units, at least 51% of the units must be occupied by LMI households.

Documenting LMI Housing Activities

For each activity, the following records must be kept:

- Fair Housing and Equal Opportunity rules apply to the use of CDBG funding therefore occupancy record identifying the occupants' race and ethnicity as well as female-headed households must be maintained on file.
- Documentation of household size and income must be maintained on file. Also include a copy of the HUD income limit for the relevant funding year as income limits typically change from year to year.

LMI Job Creation or Retention Activities (§570.208(a)(4))

- For an activity that creates jobs, the recipient must document that at least 51 percent of the jobs will be held by, or will be available to, low- and moderate-income persons.
- For an activity that retains jobs, the recipient must document that the jobs would actually be lost without the CDBG assistance and that either or both of the following conditions apply with respect to at least 51percent of the jobs at the time the CDBG assistance is provided:
    - The job is known to be held by a low- or moderate-income person; or
    - The job can reasonably be expected to turn over within the following two years; and that steps will be taken to ensure that it will be filled by, or made available to, a low- and moderate-income person upon turnover.

Jobs that are not held or filled by a low- or moderate-income person may be considered available to low- and moderate-income persons for these purposes only if:

- Special skills that can only be acquired with substantial training or work experience or education beyond high school are not a prerequisite to fill such jobs, or the business agrees to hire unqualified persons and provide the needed training; and
- The recipient and the assisted business take actions to ensure that low- and moderate-income persons receive first considerations for filling such jobs.

For purposes of determining whether a job is held by or made available to a low- or moderate-income person, the person may be presumed to be a low- or moderate-income person if:

- He/she resides within a census tract (or block numbering area) that either:
- Meets the requirements of paragraph (A)(4)(c) of this section; or
- Has at least 70 percent of its residents who are low- and moderate-income persons, or
- The assisted business is located within a census tract (or block numbering area) that meets the requirements of paragraph (A)(4)(c) of this section and the job under consideration is to be located within that census tract.

A census tract (or block numbering area) qualifies for the presumptions permitted under paragraphs (A)(4)(b)(i)(*1*) and (ii) of this section if it is either part of a Federally-designated Empowerment Zone or Enterprise Community or meets the following criteria:

- It has a poverty rate of at least 20 percent as determined by the most recently available decennial census information;
- It does not include any portion of a central business district, as this term is used in the most recent Census of Retail Trade, unless the tract has a poverty rate of at least 30 percent as determined by the most recently available decennial census information; and

It evidences pervasive poverty and general distress by meeting at least one of the following standards:

- All block groups in the census tract have poverty rates of at least 20 percent;
- The specific activity being undertaken is in a block group that has a poverty rate of at least 20 percent, or
- Upon the written request of the recipient, HUD determines that the census tract exhibits other objectively determinable signs of general distress such as high incidence of crime, narcotics use, homelessness, abandoned housing, and deteriorated infrastructure or substantial population decline.

Prevention or Elimination of Slums and Blight: Required Documentation

Activities, which eliminate or prevent slums and blight, can be conducted on an Area Basis, a Spot Basis, or in an Urban Renewal Area.

Elimination of Slum or Blight on an Area Basis
Potentially eligible activities with the objective of eliminating slums and blight on an Area Basis include assistance to commercial/industrial properties for exterior or code related improvements, public facilities and improvements, as well as code enforcement, provided the assistance is designed to address one or more of the specific conditions that qualified the area as one of slum and blight.

Elimination of Slums or Blight on a Spot Basis
In order to qualify under the National Objective of elimination of slums and blight on a Spot Basis the activity must meet the following criteria:

- It must be designed to eliminate specific conditions of blight or physical decay on a Spot Basis not located in a slum or blighted area; or
- It must be limited to acquisition, clearance, relocation, historic preservation, or building rehabilitation to eliminate special conditions detrimental to public health and safety. Potentially eligible activities under the objective to eliminate slums or blight on a spot basis include the removal of faulty wiring or falling plaster; historic preservation of a public facility; or demolition of a vacant, deteriorated, (non-historic) abandoned building.

Elimination of Slums or Blight in an Urban Renewal Area
This category is intended to permit the redevelopment of areas in which activities were begun with funds received under Federal Urban Renewal and related programs (replaced by the CDBG Program). In order to qualify under the objective to eliminate slums or blight in an Urban Renewal Area, an activity must be:

- Located within an urban renewal project area; and
- Necessary to complete the urban renewal plan

Urgent Need: Required Documentation

The records to document urgent need should include the following:

- Photographs of the condition
- Building Department statements regarding health and safety hazards
- State and Federal designation of the condition as a disaster

In addition, if a participating unit of general local government within an urban county uses CDBG funds for an urgent need, the county Must be able to document that the participating local government was unable to finance the activity.

This chart provides a quick reference guide on documentation.

National Objective	Requirements	Example of Data Source
Low/Mod Income Benefit	● Map identifying the boundaries of the service area ● Income characteristics of the users. Most recent quarterly/annual reports on beneficiaries and users by income.	● Survey of residents' incomes in the service area. ● Census and Block Group ● Information. ● Income surveys of all users of project or service as approved by the City.

Removal of Slum or Blight	● Board resolution designating area under state or local law. ● Substantial number of buildings or public improvements must be deteriorated. ● Map delineating boundaries of area. Activity addresses one or more of the deteriorated conditions. ● Detailed narrative describing programs and comprehensive plans for improvements.	● Pre-rehabilitation inspection reports and a Phase I ● Environmental Site Assessment. ● Infrastructure conditions report. Detailed survey of building conditions and code violations. ● Urban renewal plans.
Urgent Need	● Certification that condition poses serious threat to the health and welfare of the community. ● Condition is recent. ● Governing jurisdiction is unable to finance the project. ● No other resources or funds are available.	● "Turndown letters" indicating no other source of funding is available. ● Health Department reports documenting a serious condition. ● Evidence that applicants designed activity to address the urgent need.

Section 6: Subrecipient Application Process

Nonprofits and other agencies may request CDBG funding for their activities. In order to apply, they must submit a written request to the CED Department. The request shall be made using a format and/or forms provided by staff. The application period shall be from January 1 to January 31 of each calendar year. Applications received late will not be considered for that calendar year but may be submitted again the next year. The application must include a complete project description and/or scope of work with detailed cost estimates. If there are other sources of funding involved, those need to be clearly identified. A public announcement shall be made when the application period begins. Other City departments shall not be considered subrecipients, but shall submit project proposals and funding requests in the same manner and within the same timeframe as described above.

Staff will evaluate all applications using the following criteria.

1. Consolidated Plan Need/Strategy
    a. Affordable Housing: Preserve existing units of affordable and special needs housing throughout the city and create additional units of such housing in areas where they are currently lacking and near employment centers.
    b. Neighborhood Improvements: Public improvements to parks/infrastructure that directly affect the quality of neighborhoods/communities.
    c. Facility Development: Acquisition, rehabilitation, and/or construction of facilities from which human/social services are provided to area residents.

   d. Homelessness: Increase the availability of emergency-shelter and transitional- housing services and facilities.

2. Leveraging of Other Resources
3. Project Readiness
4. Community Impact/Urgency
5. Urgent need for which no other funding is available. Factors considered include the extent of the project's physical improvements, and it's economic, environmental, and/or community health benefits. Consideration will be given to the number of low- and moderate-income residents that will benefit from the project, in relation to the amount of CDBG funds requested.
6. Organizations that have staff serving on the CDC shall be ineligible to apply for public service funding due to real or perceived conflicts of interest.

Having evaluated the applications, staff will make recommendations to the Community Development Commission regarding which activities should be funded as part of the development process for the Annual Action Plan. The Commission shall in turn make a recommendation to the City Council about the Annual Action Plan which shall include said activities.

The amount of funding awarded will be based on the applicants' project or activity proposal and its ability to assist the City in fulfilling its priorities. The applicant's demonstrated ability to expend funds within the program fiscal year will also be considered. Funding amounts and the release of funds is contingent upon the congressional approval of HUD's annual CDBG budget. Should Congress elect to reduce CDBG funding, the City will be required to modify allocations consistent with these reductions.

Section 7: Subrecipient Agreements

When an activity is approved for funding as described in the previous section, a Subrecipient Agreement shall be required. The agreement shall detail the obligations of both the CED Department and the subrecipient (formally the applicant). The agreement shall remain in effect the entire length of the project or activity. Agreements shall be approved by the City Council. AS stated previously, other City departments shall not be considered subrecipients, but shall enter into such an inter-departmental memorandum of understanding (MOU) with the CED Department for each project or activity receiving CDBG funding. The MOU shall also be approved by the City Council.

The agreement shall include, at a minimum, the following information.

- Scope of Work: The agreement shall include a description of the work to be performed, a schedule for completing the work, and a comprehensive budget.
- Project Management: The agreement shall specify that the CED Department shall manage the entire project from beginning to end on behalf of the subrecipient unless otherwise stated.
- Records and Reports: The agreement shall specify what documents and records must be produced by the subrecipient and provided to the CED Department.
- Program Income: The agreement shall include the program income requirements set forth in §570.504(c).

- Uniform Administrative Requirements: The agreement shall require the subrecipient to comply with applicable uniform administrative requirements as described in §570.502.
- Other program requirements: The agreement shall require the subrecipient to carry out each activity in compliance with all Federal laws and regulations described in subpart K of the regulations, except that:
  - The subrecipient does not assume the City's environmental responsibilities described at §570.604; and
  - The subrecipient does not assume the City's responsibility for initiating the review process under the provisions of 24 CFR part 52.
- Suspension and Termination: The agreement shall specify that, in accordance with 24 CFR 85.43, suspension or termination may occur if the subrecipient materially fails to comply with any term of the award, and that the award may be terminated for convenience in accordance with 24 CFR 85.44.
- Reversion of Assets: The agreement shall specify that upon its expiration the subrecipient shall transfer to the City any CDBG funds on hand at the time of expiration and any accounts receivable attributable to the use of CDBG funds. It shall also include provisions designed to ensure that any real property under the subrecipient's control that was acquired or improved in whole or in part with CDBG funds (including CDBG funds provided to the subrecipient in the form of a loan) is either:
  - Used to meet one of the national objectives in §570.208 (formerly §570.901) until five years after expiration of the agreement, or for such longer period as determined to be appropriate by the city; or
  - Not used in accordance with this section, in which event the subrecipient shall pay the city an amount equal to the current market value of the property less any portion of the value attributable to expenditures of non-CDBG funds for the acquisition of, or improvement to, the property. The payment is program income to the City.

<u>Section 8: Subrecipient Reimbursement Requests</u>

The City provides reimbursement payments to subrecipients based on verification of expenditures. This is done by submission of a request for payment form with all required back-up documentation. The payment request is reviewed for completeness and accuracy by the Housing Officer. It is then submitted to the Community Development Manager for approval. The payment request is then submitted to the Finance Department for processing. Subrecipients must submit requests in a timely manner as described in their Subrecipient Project Agreement. The City, in turn, has thirty days to issue payment.

Each request for payment must have adequate documentation of eligible costs. Documentation may include invoices, payroll records, purchase orders, copies of canceled checks, timesheets reflecting time spent directly on CDBG activities, et cetera. Requests must only be for costs directly related to the approved activity and included in the approved budget attached to the contract. Subrecipients may not use CDBG funds for the following:

- General administrative costs;
- "Overhead" costs; or
- Costs applicable to all subrecipient activities regardless of funding source.

CDBG expenditures as shown in the City's accounting system are reviewed every two weeks by the Community Development Manager who initiates the paperwork for a drawdown of funds through the

Integrated Disbursement and Information System (IDIS) reporting system based on actual expenses. The Community Development Manager submits the request for funds and the Finance Department approves the drawdown.

Section 9: Subrecipient Performance Monitoring

The procedures established in this manual are intended to ensure program compliance with the requirements of the 24 CFR 570 and all other applicable laws and regulations. Staff will monitor subrecipient activities for compliance with program requirements in a variety of ways.

First, many activities will be carried out under the direct supervision of the Community Development Manager that will assist subrecipients in defining project scope, soliciting contractor bids, hiring contractors, and supervising project completion. The city will ensure timely project implementation through the use of management tools, including a critical (timed) path for implementation, and the use of quarterly performance reports from the subrecipient. These reports detail recent progress, target completion dates for various phases of the project and, if applicable, the clients served. Staff will conduct periodic site visits to monitor progress. Should a project fall behind schedule, the City will provide technical assistance to the subrecipient to bring the project into compliance with established schedules and deadlines.

Second, Staff will utilize “Desk Monitoring” to assess the quality of program performance over the duration of the contract. Desk monitoring of subrecipients shall concentrate on program, financial, and regulatory performance of the subrecipient, including capital improvement projects. Primary monitoring objectives are to make sure that subrecipients comply with all regulations governing administrative, financial, and programmatic operations. In conducting monitoring and performance reviews, staff will primarily rely on information obtained from the subrecipient's performance reports, records, audits, allowed costs, review of financial reports, eligibility and number of beneficiaries served, compliance with federal regulations and City program requirements. Staff may also consider relevant information pertaining to a subrecipient's performance gained from other sources, including litigation, citizen comments, and other information provided by or concerning the subrecipient. As a guide to complete desk monitoring the City staff will use HUD's CPD Monitoring Handbook 6509.2 as a guide for review, the handbook is located at: https://www.hudexchange.info/resource/290/hud-community-planning-and-developmentmonitoring-handbook-65092-rev6/

A subrecipient's failure to perform under the terms of the contract with the City and/or maintain records in the prescribed manner may result in a finding that the subrecipient has failed to meet the applicable requirement to which the contract pertains. If staff finds that a subrecipient has failed to comply with program and/or contract requirements or has failed to meet a performance criterion, staff will take the following steps:

1. Issue a letter of warning advising the recipient of the deficiency and putting the subrecipient on notice that additional action will be taken if the deficiency is not corrected or is repeated;
2. Recommend, or request the subrecipient to submit, proposals for corrective actions, including the correction or removal of the causes of the deficiency.

City staff will offer technical assistance to subrecipients when monitoring indicates less than complete compliance with CDBG regulations or contract requirements. Such assistance may include, but is not limited to, providing applicable copies of Office of Management and Budget (OMB) circulars, in particular OMB's Uniform Grant Guidance or the latest edition of Playing by the Rules guidance for CDBG projects located at https://www.hudexchange.info/resource/687/playing-by-the-rules-a-handbook-for-cdbgsubrecipients-on-administrative-systems/.

If the subrecipient fails to undertake appropriate corrective or remedial actions which resolve the deficiency to the satisfaction of the Community Development Manager, the Staff may take one or more of the following actions. Such actions shall be designed to prevent a continuation of the performance deficiency; mitigate, to the extent possible, the adverse effects or consequences of the deficiency; and prevent a recurrence of the deficiency. Prior to a reduction, withdrawal, or adjustment of a grant or other appropriate action, taken pursuant to (1), (2), or (3) below, the subrecipient shall be notified of such proposed action and given an opportunity within a prescribed time period for an informal consultation. These actions may include but are not limited to the following:

1. Advise the subrecipient in writing that additional assurances are required;
2. Advise the subrecipient to suspend disbursement of funds for the deficient activity;
3. Advise the subrecipient to reimburse the City program account in any amounts improperly expended.

The City of Rock I shall have the same rights as the Secretary of HUD as to other remedies for noncompliance per §570.912 and §570.913.

Section 10: Records to Be Maintained

The City shall establish and maintain sufficient records to enable HUD to determine whether the City has met all of the requirements for activities administered by the City under the CDBG program. At a minimum, the following records will be maintained:

1. Records providing a full description of each activity assisted (or being assisted) with CDBG funds, including its location (if the activity has a geographical locus), the amount of CDBG funds budgeted, obligated and expended for the activity, and the provision in subpart C under which it is eligible.
2. Records demonstrating that each activity undertaken meets one of the criteria set forth in §570.208. (Criteria for National Objectives) The city of Rock Island may substitute evidence that the assisted person is homeless. Such records shall include the following information:
    a. For each activity determined to benefit low- and moderate-income persons, the income limits applied and the point in time when the benefit was determined.
    b. For each activity determined to benefit low- and moderate-income persons based on the area served by the activity as per HUD Notice CPD 05-06:
        i. The boundaries of the service area;
        ii. The income characteristics of families and unrelated individuals in the service area; and
        iii. If the percent of low- and moderate-income persons in the service area is less than 51 percent, data showing that the area qualifies under the exception criteria set forth at §570.208(a)(1)(ii).

c. For each activity determined to benefit low- and moderate-income persons because the activity involves a facility or service designed for use by a limited clientele consisting exclusively or predominantly of low- and moderate-income persons:
    i. Documentation establishing that the facility or service is designed for the particular needs of or used exclusively by senior citizens, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers, for which the regulations provide a presumption concerning the extent to which low- and moderate-income persons benefit; or
    ii. Documentation describing how the nature and, if applicable, the location of the facility or service establishes that it is used predominantly by low- and moderate-income persons; or
    iii. Data showing the size and annual income of the family of each person receiving the benefit.

3. Records that demonstrate that The City of Rock Island has made the determinations required as a condition of eligibility of certain activities, as prescribed in §570.201(f)-interim assistance, §570.201(i)(2) - emergency, §570.201(p) – technical assistance, §570.201(q) – higher education institutions, §570.202(b)(3) – rehabilitation loans, §570.206(f) - Submission of applications for federal programs, §570.209 – economic development, §570.210 – prohibition employee relocation, and §570.309 – restriction on location.
4. Records which demonstrate compliance with §570.505 - regarding any change of use of real property acquired or improved with CDBG assistance.
5. Records that demonstrate compliance with the citizen participation requirements prescribed in 24 CFR part 91, subpart B, for entitlement recipients.
6. Records that demonstrate compliance with the requirements in §570.606 regarding acquisition, displacement, relocation, and replacement housing.
7. Financial records, in accordance with the applicable requirements listed in §570.502 - uniform administrative requirements - including source documentation for entities not subject to parts 84 and 85 of the regulation. The city of Rock Island shall maintain evidence to support how the CDBG funds provided to such entities are expended. Such documentation must include, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity.
8. Records required to be maintained in accordance with other applicable laws and regulations set forth in subpart K of this part.
9. Fair housing and equal opportunity records containing:
    a. Documentation of the analysis of impediments and the actions The City of Rock Island has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in The City of Rock Island.
    b. Data on the extent to which each racial and ethnic group and single-headed households (by gender of household head) have applied for, participated in, or benefited from, any program or activity funded in whole or in part with CDBG funds. Such information shall be used only as a basis for further investigation as to compliance with nondiscrimination requirements. No recipient is required to attain or maintain any statistical measure by race, ethnicity, or gender in covered programs.

c. Data on employment in each of The City of Rock Island operating units funded in whole or in part with CDBG funds, with such data maintained in the categories prescribed on the Equal Employment Opportunity Commission's EEO–4 form; and documentation of any actions undertaken to assure equal employment opportunities to all persons regardless of race, color, national origin, sex or handicap in operating units funded in whole or in part under this part.
d. Data indicating the race and ethnicity of households (and gender of single heads of households) displaced because of CDBG funded activities, together with the address and census tract of the housing units to which each displaced household relocated. Such information shall be used only as a basis for further investigation as to compliance with nondiscrimination requirements. No recipient is required to attain or maintain any particular statistical measure by race, ethnicity, or gender in covered programs.
e. Documentation of actions undertaken to meet the requirements of §570.607(b) which implements section 3 of the Housing Development Act of 1968, as amended (12 U.S.C. 1701U) relative to the hiring and training of low- and moderate-income persons and the use of local businesses.
f. Data indicating the racial/ethnic character of each business entity receiving a contract or subcontract of $25,000 or more paid, or to be paid, with CDBG funds, data indicating which of those entities are women's business enterprises as defined in Executive Order 12138, the amount of the contract or subcontract, and documentation of recipient's affirmative steps to assure that minority business and women's business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction and services. Such affirmative steps may include, but are not limited to, technical assistance open to all businesses but designed to enhance opportunities for these enterprises and special outreach efforts to inform them of contract opportunities. Such steps shall not include preferring any business in the award of any contract or subcontract solely or in part on the basis of race or gender.

Section 11: Environmental Review

The CDBG Program requires that the environmental effects of each activity carried out with CDBG funds be assessed in accordance with the provisions of HUD's regulations covering the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed in HUD's implementing regulations at 24 CFR Parts 50 and 58. The assessment is conducted considering other federal laws covering areas such as noise, air quality, historic properties, flood plains, wetlands, water quality, solid waste disposal, manmade hazards, farmlands protection, wild and scenic rivers, coastal areas, and endangered species.

The 1994 Amendments to the CDBG Program statute significantly changed the environmental review responsibilities of CDBG Program participants. It requires that units of general local government such as cities and counties assume the responsibility for the environmental review, including the publication of the environmental review process, and then later request that the funds be released by HUD. For subrecipients, the City as the unit of general local government will continue to be responsible for the environmental review.

CDBG-funded projects cannot begin until the environmental review process has been completed. The only tasks that may be undertaken prior to completing the environmental review assessment are administrative activities, feasibility and engineering studies, outreach, and planning activities. These have no effect on the human and physical environments and are exempted under Section 58.34 of 24 CFR Part 58.

The environmental review process should be initiated as soon as the proposed activities are determined. Environmental review expenses are considered as administrative costs under the CDBG Program. Private citizens and organizations can object to the release of funds for CDBG projects on certain procedural grounds relating to the environmental review. Therefore, it is important that all procedural requirements be met.

Section 12: Lead-Based Paint

Lead poisoning is one of the most common health hazards to humans. There is a lot of lead in the urban environment. Although anyone can be lead-poisoned, children and women of childbearing age are at the greatest risk. Childhood lead poisoning is considered a major health problem because of its extremely damaging and irreversible effects. This can include brain damage, liver and kidney disorders, behavioral problems, blindness, permanent learning disabilities, and even death.

Lead poisoning is commonly the result of exposure to lead-based paint hazards. CDBG-funded activities cannot use lead-based paint and must account for any pre-existing lead-based paint hazards at a project site. Such hazards commonly include deteriorated lead-based paint on friction surfaces, impact surfaces, and accessible (chewable) surfaces as well as contaminated dust and soil. Lead-based paint that is intact and in good condition is usually not considered a hazard.

Determining if lead-based paint hazards exist and where they are located requires a licensed professional. In the case of the City, the Construction Officer is required to be so licensed and uses the following two methods to determine if lead-based paint hazards exist at a project site.

1. Scoring the Building Based on Risk Factors: Use the Lead Toxicity Risk Assessment developed by EPA as a guide to help you detect potential lead problems. This is not scientific, but less costly, and can help establish the likelihood of lead problems. A copy of the Lead Toxicity Risk Assessment may be obtained from EPA.
2. Testing: There are two testing methods that produce accurate lead readings:
    a. XRF-X-Ray Fluorescence Detector: This is the newest testing technology, which is also available in portable form. The XRF portable is capable of measuring between 30-50 samples in three hours and provide immediate results.

b. Laboratory Testing: Samples are collected from the property and sent to a laboratory. This is a more time-consuming approach.

Housing rehabilitation is a common CDBG-funded activity and certain requirements apply when a residential property being rehabilitated was constructed before 1978. At a minimum, the City and/or contractors are required to:

1. Notify a purchaser or lessee of the presence of any known lead-based paint and/or lead-based paint hazards;
2. Paint test surfaces to be disturbed or removed during rehabilitation for the presence of lead-based paint, or presume lead-based paint and notify the occupants of the results within 15 days of when the evaluation report is received or the presumption is made;
3. Provide each occupied dwelling unit discussed in the preceding section with the EPA-approved lead hazard information pamphlet *Protect Your Family from Lead in Your Home* or EPA-approved equivalent;
4. Reduce lead hazards as required by the applicable subparts of Part 35; and
5. Perform clearance testing, including dust testing, before re-occupancy after all but minimal ("de minimis") amounts of paint disturbances. (See in the following section for details.)

The CDBG regulation at 24 CFR 570.608 states that the following subparts of Part 35 apply to the use of CDBG funds in pre-1978 housing:

- A - (Disclosure of Known Lead-Based Paint and/or Lead-Based Paint Hazards upon Sale or Lease of Residential Property),
- B - (General Lead-Based Paint Requirements and Definitions for All Programs)
- J - (Rehabilitation),
- K - (Acquisition, Leasing, Support Services, or Operation), and
- R - (Methods and Standards for Lead-Based Paint Hazard Evaluation and Hazard Reduction Activities).

Part 35, Subpart A, is called the Lead Disclosure Rule; and Part 35, Subparts B, J, K, and R, are called the Lead Safe Housing Rule. Certain properties are exempt from the requirements of the Lead Safe Housing Rule. They include:

1. Housing built on or after January 1, 1978;
2. Zero-bedroom dwellings, including efficiency apartments, single-room occupancy housing, dormitories, or military barracks;
3. Housing exclusively for the elderly or people with disabilities, unless a child under age 6 resides or is expected to reside there;
4. Units that have been found to be free of lead-based paint by a certified lead-based paint inspector;
5. Units where all lead-based paint has been removed;
6. Unoccupied housing that will remain vacant until it is demolished;
7. Non-residential portions of mixed-use buildings, except that spaces serving both residential and non-residential uses are covered by the rule;
8. Units that are to be rehabilitated without disturbing a painted surface; and

9. Units that are subject to emergency repair action needed to safeguard against imminent danger to human life, health or safety or to protect the property from further structural damage.

For properties that are covered by the Lead Safe Housing Rule, the lead-based paint requirements for rehabilitation depend on the amount of Federal rehabilitation assistance provided. The amount of Federal rehabilitation assistance is the average per unit amount of Federal funds for the hard costs of rehabilitation, excluding lead-based paint hazard evaluation and hazard reduction activities. In calculating this assistance amount, one must consider both the total amount of Federal assistance to be used (including CDBG and other funds) and the hard costs of rehabilitation (including Federal and non-Federal funds). Whenever these two amounts are not the same, the smaller of the two determines the type and level of lead-based paint requirement. For a structure with more than one dwelling unit, the thresholds are applied against the average amount of Federal assistance per unit or the average hard cost of rehabilitation per unit, whichever is lower.

The following is a general overview of the requirements based on dollar thresholds per year per assisted housing unit:

- Up to and including $5,000: Notice, provision of pamphlet, paint testing of surfaces to be disturbed or presumption of lead-based paint, safe work practices as part of rehabilitation (except for minimal amounts of paint disturbances), repair any paint that is disturbed, and clearance after the work and before re-occupancy.
- $5,001–$25,000: Notice, provision of pamphlet, paint testing or presumption, risk assessment to identify lead-based paint hazards, interim control or standard treatment of lead-based paint hazards, and clearance.
- Over $25,000: Notice, provision of pamphlet, paint testing or presumption, risk assessment, abatement of lead-based paint hazards, ongoing lead-based paint maintenance, and clearance.

Lead Safe work practices and clearance testing are not required when maintenance or hazard reduction activities do not disturb painted surfaces or do not exceed the following thresholds:

1. 20 square feet on exterior surfaces;
2. 2 square feet in any one interior room or space, or 10 percent of the total surface area on an interior or exterior component type with a small surface area (e.g., window sills, baseboards, and trim).

This is referred to as the *de minimus* rule and can be found at §35.1350(d) Safe work practices. When work is done under this rule, appropriate documentation shall be retained to demonstrate compliance.

The *Protect Your Family from Lead in Your Home* pamphlet can be downloaded in English and Spanish from www.hud.gov/offices/lead or www.epa.gov/lead, and single paper copies can be obtained from the National Lead Information Clearinghouse at 1-800-424-LEAD. Persons with hearing or speech impediments may access this telephone number via TTY by calling the tollfree Federal Information Relay Service at 1-800-877-8339.

The information in the preceding section is intended to provide basic information on lead-based paint requirements. The applicable portions of 24 CFR Part 35 must be reviewed when undertaking an activity subject to these requirements.

Section 13: Procurement

The purpose of a procurement policy is to ensure that sound business judgement is utilized in all procurement transactions. That supplies, equipment, construction and services are obtained efficiently and economically, and in compliance with applicable federal and state law, and executive orders, and to ensure that all procurement transactions are conducted in a manner that provides full and open competition. These procedures will ensure that all solicitations incorporate clear and accurate descriptions of the technical requirements for the goods or services being procured. 30 ILCS 500 and Section of the Illinois Code must be followed on all applicable purchases. All other appropriate sections of the Illinois Code shall also apply.

The City shall maintain compliance with the federal requirements at 2 CFR, Sections 200.318-200.327. These requirements apply to the procurement of all supplies, equipment, and construction and services that include any federal program funding. 2 CFR references are noted in this section. All other appropriate sections of Illinois Code and local code shall also apply. When federal requirements conflict with local or state requirements, the federal requirement, or most restrictive requirement will be followed. The following federal requirements are included in this Program Manual for ease of reference.

§200.318 General Procurement Standards:

(a) The Non-Federal entity must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in §200.317 through 200.327.
(b) Non-Federal entities must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

(c)(1) The Non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of contracts. No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the 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 or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value. The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity.
(2) If the non-Federal entity has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian tribe, the non-Federal entity must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.
(d) The Non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.
(e)To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the Federal Government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. Competition requirements will be met with documented procurement actions using strategic sourcing, shared services, and other similar procurement arrangements.
(f)The Non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
(g) The Non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost. (h)The Non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. See also §200.214.
(i) The Non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
(j)(1) The Non-Federal entity may use a time-and-materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time- and-materials type contract means a contract whose cost to a non-Federal entity is the sum of:
(i)The actual cost of materials; and

(ii)Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.
(2) Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal entity awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.
(k) The Non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction. [85 FR 49543, Aug. 13, 2020, as amended at 86 FR 10440, Feb. 22, 2021]
(h) The Non-Federal entity's procedures must avoid acquisition of unnecessary or duplicative items. Consideration should be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the most economical approach.
(i) To foster greater economy and efficiency, and in accordance with efforts to promote cost-effective use of shared services across the Federal Government, the non-Federal entity is encouraged to enter into state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. Competition requirements will be met with documented procurement actions using strategic sourcing, shared services, and other similar procurement arrangements.
(j) The Non-Federal entity is encouraged to use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.
(k) The Non-Federal entity is encouraged to use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost. (h)The Non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. See also §200.214.
(l)The Non-Federal entity must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to, the following: Rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.
(m) (1) The Non-Federal entity may use a time-and-materials type contract only after a determination that no other contract is suitable and if the contract includes a ceiling price that the contractor exceeds at its own risk. Time- and-materials type contract means a contract whose cost to a non-Federal entity is the sum of:
(iii) The actual cost of materials; and
(iv) Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.
(2) Since this formula generates an open-ended contract price, a time-and-materials contract provides no positive profit incentive to the contractor for cost control or labor efficiency. Therefore, each contract must set a ceiling price that the contractor exceeds at its own risk. Further, the non-Federal

entity awarding such a contract must assert a high degree of oversight in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.
(n) The Non-Federal entity alone must be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluation, protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction. [85 FR 49543, Aug. 13, 2020, as amended at 86 FR 10440, Feb. 22, 2021]

§200.322 Domestic Preferences for Procurements:

(a)As appropriate and to the extent consistent with law, the non-Federal entity should, to the greatest extent practicable under a Federal award, provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the
United States (including but not limited to iron, aluminum, steel, cement, and other manufactured products). The requirements of this section must be included in all subawards including all contracts and purchase orders for work or products under this award.
(b)For purposes of this section:
(1) “Produced in the United States” means, for iron and steel products, that all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States.
(2) “Manufactured products” means items and construction materials composed in whole or in part of non- ferrous metals such as aluminum; plastics and polymer-based products such as polyvinyl chloride pipe; aggregates such as concrete; glass, including optical fiber; and lumber.

§200.323 Procurement of Recovered Materials:

A non-Federal entity that is a state agency or agency of a political subdivision of a state and its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds $10,000 or the value of the quantity acquired during the preceding fiscal year exceeded $10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

§200.324 Contract Cost and Price:

(a) The Non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.
(b) The Non-Federal entity must negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed. To establish a fair

and reasonable profit, consideration must be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.
(c)Costs or prices based on estimated costs for contracts under the Federal award are allowable only to the extent that costs incurred, or cost estimates included in negotiated prices would be allowable for the non-Federal entity under subpart E of this part. The non-Federal entity may reference its own cost principles that comply with the Federal cost principles.
(d)The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

§200.325 Federal Awarding Agency or Pass-Through Entity [HSEMD] Review:

(a) The Non-Federal entity must make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the non-Federal entity desires to have the review accomplished after a solicitation has been developed, the Federal awarding agency or pass-through entity may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.
(b) The Non-Federal entity must make available upon request, for the Federal awarding agency or pass-through entity pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:
(1) The Non-Federal entity's procurement procedures or operation fails to comply with the procurement standards in this part;
(2) The procurement is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation;
(3) The procurement, which is expected to exceed the Simplified Acquisition Threshold, specifies a "brand name" product;
(4) The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or
(5) A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.
(c) The Non-Federal entity is exempt from the pre-procurement review in paragraph (b) of this section if the Federal awarding agency or pass-through entity determines that its procurement systems comply with the standards of this part.
(1) The Non-Federal entity may request that its procurement system be reviewed by the Federal awarding agency or pass-through entity to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third-party contracts are awarded on a regular basis;
(2) The Non-Federal entity may self-certify its procurement system. Such self-certification must not limit the Federal awarding agency's right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the non-Federal entity that it is complying with these standards. The non-Federal entity must cite specific policies, procedures, regulations, or standards as being in compliance with these requirements and have its system available for review.

§200.326 Bonding Requirements:

For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, the Federal awarding agency or pass-through entity may accept the bonding policy and requirements of the non-Federal entity provided that the Federal awarding agency or pass-through entity has made a determination that the Federal interest is adequately protected. If such a determination has not been made, the minimum requirements must be as follows:

(a) A bid guarantee from each bidder equivalent to five percent of the bid price. The “bid guarantee” must consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute such contractual documents as may be required within the time specified.

(b) A performance bond on the part of the contractor for 100 percent of the contract price. A “performance bond” is one executed in connection with a contract to secure fulfillment of all the contractor's requirements under such contract.

(c) A payment bond on the part of the contractor for 100 percent of the contract price. A “payment bond” is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

Section 14: Program Income

The receipt and expenditure of program income as defined in §570.500(a) shall be recorded as part of the financial transactions of the City of Rock Island CDBG grant program. Program income received before grant closeout may be retained by The City of Rock Island if the income is treated as additional CDBG funds subject to all applicable requirements governing the use of CDBG funds.

Section 15: Uniform Administrative Requirements

The City shall follow the Office of Management and Budget (OMB) Uniform Grant Guidelines which are located at 2CFR200 and can be found at http://www.ecfr.gov/. Additionally, the City will ensure that all subrecipients comply with the Uniform Grant Guidelines.

Section 16: Labor Standards

Participants in The City of Rock Island's CDBG program are responsible for full compliance with labor standards regulations at all contracting levels, including the general contractor, subcontractors, and any other lower level subcontractor. Construction work that is financed in whole or in part with CDBG funds must adhere to federal labor standards. Labor Standard requirements include the Davis-Bacon Act, Copeland "Anti-Kickback Act" and Contract Work Hours and Safety Standards Act.

These requirements are commonly known as the "Davis-Bacon and Related Acts", abbreviated as "DBRA". These Acts require that:

- Contractors with a history of non-compliance cannot participate in federally-assisted
- projects.
- Workers must be paid weekly wages set by the Department of Labor and be paid overtime at time-and-a half for hours worked beyond a forty (40) hour work week.
- No laborer or mechanic may be forced by their employer to work in conditions that are unsanitary, hazardous, or dangerous to the worker's health.

- The City and the subrecipients must monitor compliance through contractor reports and on-site interviews with workers.

Down Payment Assistance (without construction or rehabilitation involved) or rehabilitation of owner-occupied homes do not trigger Labor Standards requirements.

The following activities trigger Federal Labor Standards:

- CDBG-funded construction or rehabilitation of properties with eight (8) or more total residential units.
- Other construction projects using over $2,000 in CDBG funds. This could include public improvements to neighborhoods or housing projects, such as streets or sidewalks.
- Clearance of land or site improvements with CDBG funds which will ultimately result in eight (8) or more units (or homes) being built on the project site or which will be used for public improvements such as a park or parking lot.

“Construction” is broadly defined and includes the “Hard Costs” of rehabilitation, repairs, painting, decoration and the installation of equipment when installation costs are more than incidental. It does not include soft costs, such as design or engineering costs.

The following do not trigger Federal Labor Standards:

- Owners, supervisors and managers of the construction company
- Bona-fide self-employed contractors
- Government (state, local) employees involved with the project
- Utilities work (performed by utility companies)
- Construction work that is determined to not be part of a CDBG assisted project or building

Laws and Regulations that apply:
Davis-Bacon Act (DBA):
Pay workers the prevailing wage. All laborers and mechanics employed by contractors or subcontractors who work on a federally funded or assisted construction project where the contract is in excess of $2,000 must be paid the “prevailing wage” for workers performing similar construction in the market area and they must be paid at least weekly. This wage rate is set periodically by the Department of Labor (DOL) and the CDBG Coordinator will request a wage determination from HUD prior to requesting bids or proposals from contractors. Published wage rates for CDBG projects must be posted on-site for review by employees’ and the general public.

1. Exceptions to Wage Rate: Workers classified as Apprentices and Trainees may be compensated at a rate that is less than the Davis-Bacon rate:
    a. Apprentices – These are formal trainees that are registered in an apprenticeship program that has been approved by the DOL or by a state apprenticeship agency that has been recognized by the DOL. (A new apprentice is approved for probationary employment for 90 days and then registered.
    b. Trainee – These are registered participants in an employment training program that has been approved by the DOL. There is no provision for state agency approval. Probationary employment is an option that may be include in the program.

Contract Work Hours and Safety Standards Act (CWHSSA):
Applies to both federal contracts and indirect federally assisted contracts except where the assistance is solely in the nature of a loan guarantee or insurance. CWHSSA violations carry a liquidated damage penalty ($10 a day per violation). Intentional violations of CWHSSA are considered a federal criminal misdemeanor.

1. Work Hours – Contractors must pay one and a half times the base hourly rate for each hour more than 40 that any employee works in a seven (7) day period.
2. Safety Standards – DOL has written standards that define what is unsanitary, hazardous, or dangerous. Laborers and mechanics may not be required to work in these conditions.

Copeland Act (Anti-Kickback Act):

1. No “Kick-Backs” to employers. All laborers and mechanics must be paid without “strings” attached to their paychecks and they must be paid at least weekly.
2. Take only Eligible Payroll Deductions. They must be paid at least the prevailing wage rate and cannot be required to have deductions taken from their check other than those that are permitted by DOL regulations.
3. Contract Language. All contracts for construction, reconstruction or repair (regardless of value) must contain the following prohibition: “No contractor or subcontractor shall induce, by any means, any person employed in such publicly-funded construction, reconstruction, or repair to give up any part of the compensation to which he/she is otherwise entitled by authorized payroll deductions.”
4. Submit Payroll Evidence. Weekly payroll and compliance statements are required to be submitted to the City of Rock Island’s CDBG Housing Officer.

Fair Labor Standards Act (FLSA):
Contains federal minimum wage rate and overtime (O/T) requirements. These requirements generally apply to any labor performed and may be pre-empted by other federal standards such as the DBRA prevailing wage requirements and CWHSSA O/T provisions. Only the DOL has the authority to administer and enforce FLSA. HUD will refer to the DOL any possible FLSA violations that are found on HUD projects.

Section 17: Section 3

The purpose of Section 3 of the Housing and Urban Development Act of 1968 is to ensure that when employment or contracting opportunities are generated because a federally funded or assisted project or activity necessitates the employment of additional persons or the awarding of contracts for work, preference must be given to low- and very low-income persons, particularly those who are recipients of government assistance for housing and/or to business concerns residing in the community where the project is located. It is important to note that Section 3 requirements apply to an entire project or activity regardless if it's fully or partially funded with CDBG.

Section 3 requirements apply to a variety of HUD housing and community development assistance programs, including CDBG. Specifically, for entitled state and local governments that receive a combined total of $200,000 or more in Community Planning and Development assistance, the Section 3 regulations require that contractors who receive contract work funded with CBDG in excess of $100,000 are encouraged to provide, to the greatest extent feasible, training, employment, and contracting opportunities generated by the expenditure of CDBG funds to low- and very low- income persons, and business concerns owned by low- and very low- income persons, or which employ very low- income persons.

Section 3 is triggered when the normal completion of construction and rehabilitation project creates the need for new employment, contracting, or training opportunities. All new employment opportunities including laborers, mechanics, administrative support and professional services qualify as Section 3 jobs. The City will assist each contracting agency with the preparation of a Section 3 plan that must be included in each contract for construction services that exceeds $100,000. If the expenditure of CDBG funding does not result in new employment, contracting, or training opportunities Section 3 requirements have not been triggered. As a condition of funding, subrecipients must submit reports (as applicable) with their Progress Reports on newly hired employees to the City for reporting to HUD.

Subrecipients responsibilities with regard to Section 3:

1. Implement procedures to notify Section 3 residents and business concerns about training, employment, and contracting opportunities generated by CDBG projects or activities;
2. Notify potential contractors and subcontractors working on Section 3 projects of their responsibilities;
3. Incorporate the Section 3 Clause into all covered solicitations and contract [see 24 CFR Part 135.38 below];
4. Facilitate the training and employment of Section 3 residents and the award of contracts to Section 3 business concerns;
5. Refrain from entering into contracts with contracts that are in violation of Section 3 regulations;
6. Document actions taken to comply with Section 3; and
7. Submit Section 3 reports.

All section 3 covered contracts shall include the following clause (referred to as the section 3 clause):

1. The work to be performed under this contract is subject to the requirements of section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701u (section 3). The purpose of section 3 is to ensure that employment and other economic opportunities generated by HUD assistance or HUD-assisted projects covered by section 3, shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly persons who are recipients of HUD assistance for housing.
2. The parties to this contract agree to comply with HUD's regulations in 24 CFR part 135, which implement section 3. As evidenced by their execution of this contract, the parties to this contract certify that they are under no contractual or other impediment that would prevent them from complying with the part 135 regulations.
3. The contractor agrees to send to each labor organization or representative of workers with which the contractor has a collective bargaining agreement or other understanding, if any, a notice advising the labor organization or workers' representative of the contractor's commitments under this section 3 clause, and will post copies of the notice in conspicuous places at the work site where both employees and applicants for training and employment positions can see the notice. The notice shall describe the section 3 preference, shall set forth minimum number and job titles subject to hire, availability of apprenticeship and training positions, the qualifications for each; and the name and location of the person(s) taking applications for each of the positions; and the anticipated date the work shall begin.
4. The contractor agrees to include this section 3 clause in every subcontract subject to compliance with regulations in 24 CFR part 135, and agrees to take appropriate action, as provided in an applicable provision of the subcontract or in this section 3 clause, upon a finding that the

subcontractor is in violation of the regulations in 24 CFR part 135. The contractor will not subcontract with any subcontractor where the contractor has notice or knowledge that the subcontractor has been found in violation of the regulations in 24 CFR part 135.

5. The contractor will certify that any vacant employment positions, including training positions, that are filled (1) after the contractor is selected but before the contract is executed, and (2) with persons other than those to whom the regulations of 24 CFR part 135 require employment opportunities to be directed, were not filled to circumvent the contractor's obligations under 24 CFR part 135.
6. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, termination of this contract for default, and debarment or suspension from future HUD assisted contracts.
7. With respect to work performed in connection with section 3 covered Indian housing assistance, section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e) also applies to the work to be performed under this contract. Section 7(b) requires that to the greatest extent feasible (i) preference and opportunities for training and employment shall be given to Indians, and (ii) preference in the award of contracts and subcontracts shall be given to Indian organizations and Indian-owned Economic Enterprises. Parties to this contract that are subject to the provisions of Section 3 and Section 7(b) agree to comply with section 3 to the maximum extent feasible, but not in derogation of compliance with Section 7(b).

Definitions of Section 3 Residents and Business Concerns are as follows:

Section 3 residents are:

- Residents of Public and Indian Housing; or
- Individuals that reside in the City and whose income does not exceed the local HUD income limits set forth for low- or very low-income households.

Section 3 Business Concerns are one of the following:

- Businesses that are 51% or more owned by Section 3 residents;
- Businesses whose permanent, full-time employees include persons, at least 30% of whom are currently Section 3 residents, or within three (3) years of the date of first employment with the firm were Section 3 residents; or
- Businesses that provide evidence of a commitment to subcontract in excess of 25% of the dollar amount of all subcontracts to be awarded to businesses that meet the qualifications described above.

Section 18: MBE/WBE

It is national policy for federal programs to award a fair share of contracts to minority and woman-owned business firms. Subrecipients that are awarding contracts for construction and services to be supported with City CDBG funds shall take appropriate affirmative action to support minority and women-owned businesses (MBE and WBE businesses) and are encouraged to procure goods and services from labor surplus areas. At the time of contract execution, contractors shall complete and include with their contract the MBE/WBE participation forms that are a part of all CDBG bid documents and shall submit with the contract the required information on the solicitation of MBE/WBE firms in the proposed project or service.

Steps to affirmatively promote efforts to utilize MBE/WBE businesses should include:

- Placing qualified small and minority businesses and women's businesses enterprises on bid solicitation lists;
- Contacting these enterprises whenever they are potential sources for the services needing to be procured;
- Dividing the work to be performed, when economically feasible, into smaller tasks or quantities to permit maximum participation by these MBE/WBE and small firms;
- Establishing delivery schedules, where possible, which encourage the participation of these firms;

- Using the services and assistance of the Small Business Administration (SBA) and the Department of Commerce and Economic Opportunity to promote MBE/WBE participation; and
- Requiring prime contractors, if subcontracts are to be awarded, to affirmatively promote the solicitation and utilization of these firms by utilizing the above listed steps.

Contractors and their subcontractors will be required to demonstrate a good faith effort to promote the utilization of MBE/WBE firms for all CDBG-funded projects and services as a condition of the award of CDBG funds.

Section 19: Equal Employment Opportunity

CDBG requires that subrecipients comply with the regulations discussed below governing employment and contracting opportunities.

- Equal Employment Opportunity, Executive Order 11246, as amended: Prohibits discrimination against any employee or applicant for employment because of race, color, religion, sex, or national origin. Provisions to effectuate this prohibition must be included in all construction contracts exceeding $10,000. Implementing regulations may be found at 41 CFR Part 60.
- Employers must not discriminate.
- Employers must remove physical and administrative barriers to employment.
- Employers must make reasonable accommodations for individuals with known disabilities (e.g., job restructuring, providing readers of sign interpreters, making facilities accessible).

Section 20: Civil Rights and Section 504

The CDBG regulations also require adherence to the following regulations governing the accessibility of federal-assisted buildings, facilities, and programs.

- Americans with Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, and 225): Provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, state and local government services, and telecommunications. The Act, referred to as the ADA, also states that discrimination includes the failure to design and construct facilities (built for first occupancy after January 26, 1993) that are accessible to and usable by persons with disabilities. The ADA also requires the removal of architectural and communication barriers that are structural in nature in existing facilities. Removal must be readily achievable, easily accomplishable, and carried out without much difficulty or expense. Fair Housing Act: Multi-family dwellings must also meet the design and construction requirements at 24 CFR 100.205, which implement the Fair Housing Act (42 U.S.C. 3601-19).

- Section 504: Section 504 or the Rehabilitation Act of 1973 prohibits discrimination in federally assisted programs based on handicap. Section 504 imposes requirements to ensure that "Qualified individuals with handicaps" have access to programs and activities that receive Federal funds. Under Section 504, recipients and subrecipients are defined more broadly than under the CDBG program. Section 504 recipients and subrecipients include any entity that receives Federal funding.

- For any recipient or subrecipient principally involved in housing or social services, all of the activities of the agency, not just those directly receiving federal assistance, are covered under Section 504.
- Contractors and vendors are subject to Section 504 requirements only in the work they do on behalf of a recipient or subrecipient. The ultimate beneficiary of the Federal assistance is not subject to Section 504 requirements.
- Under Section 504, recipients and subrecipient are not required to take actions that create undue financial and administrative burdens or alter the fundamental nature of the program.

The Architectural Barriers Act of 1968 (42 USC 4151-4157):
This Act requires certain Federal and Federally-funded buildings and other facilities to be designed, constructed or altered in accordance with standards that ensure accessibility to, and use by, physically challenged people.

Removal of Physical Barriers:

- For new construction of multi-family projects, 5 percent of the units in the project (but not less than one unit) must be accessible to individuals with mobility impairments, and an additional 2 percent of the units (but not less than one unit) must be accessible to individuals with sensory impairments.
- The Section 504 definition of substantial rehabilitation multi-family projects includes construction in a project with 15 or more units for which the rehabilitation costs will be 75 percent or more of the replacement cost. In such developments, 5 percent of the units in the project (but not less than one unit) must be accessible to individuals with mobility impairments, and an additional 2 percent (but not less than one unit) must be accessible to individuals with sensory impairments.
- When rehabilitation less extensive than substantial rehabilitation is undertaken, alterations must, to the maximum extent feasible, make the unit accessible to and usable by individuals with disabilities, until 5 percent of the units are accessible to people with mobility impairments. Alterations to common spaces must make the project accessible to the maximum extent feasible.
- Accessible units must be, to the maximum extent feasible, distributed throughout projects and sites, and must be available in a sufficient range of sizes and amenities so as not to limit choice.
- Owners and managers of projects with accessible units must adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals with disabilities. They also must take reasonable non-discriminatory steps to maximize use of such units by eligible individuals.
- When an accessible unit becomes vacant, before offering the unit to a non-Severely disabled individual, the owner/manager should offer the unit; first, to a current occupant of the project requiring the accessibility feature; and second, to an eligible qualified applicant on the waiting list requiring the accessibility features. The usual standards for ensuring compliance with Section 504 are the Uniform Federal Accessibility Standards (UFAS), although deviations are permitted in specific circumstances.

Provide Program Accessibility:

- Individuals with disabilities must be able to find out about, apply for, and participate in federally assisted programs or activities.

- Special communication systems may be needed for outreach and ongoing communication (e.g., Telecommunications Devices for the Deaf (TDD), materials on tape or in Braille, accessible locations for activities and meetings).
- Policies and procedures must be non-discriminatory (e.g., housing providers may not ask people with disabilities questions not asked of all applicants, screen individuals with disabilities differently or assess an individual's ability to live independently).

Section 21: Uniform Relocation Act

The City of Rock Island will strive to avoid activities that result in the displacement of area residents and businesses. Where displacement is unavoidable, all Federal requirements regarding displacement will be met. This section focuses on the procedures involved in obtaining property and/or permanent and temporary easements. All of the applicable procedures are set forth by the Federal Uniform Relocation and Real Property Acquisition Policies Act (URA). The objectives of the URA are:

- To ensure that owners of real property to be acquired for Community Development Block Grant (CDBG)-assisted projects are treated fairly and consistently,
- Encourage and expedite acquisition by agreements with property owners,
- To ensure that persons displaced from their homes or places of business as a result of CDBG-assisted activities are treated consistently and equitably and do not suffer disproportionate injury as the result of a project designed for the benefit of the public as a whole.

The URA applies to all federally assisted activities that involve the acquisition of real property, easements, or the displacement of persons, including displacement caused by rehabilitation and demolition activities. If CDBG assistance is used in any part of a project, the URA governs the acquisition of real property and any resulting displacement, even if local funds were used to pay the acquisition costs. Private persons, corporations or businesses that acquire property or displace persons for a CDBG-assisted project are subject to the URA.

Under the URA, all persons displaced as a direct result of acquisition, rehabilitation, or demolition, for a CDBG-assisted project, are entitled to relocation payments and other assistance under the URA. All acquisitions made in order to support a CDBG activity are subject to the URA. Acquisition that takes place on or after the date of submission of a CDBG application to fund an activity on that property is subject to URA, unless the Grantee shows that the acquisition was unrelated to the proposed CDBG activity. Acquisition that takes place before the date of submission of the application will be subjected to the URA if the Office of Community Reinvestment determines that the intent of the acquisition was to support a subsequent CDBG activity.

The URA provisions apply to all types of long-term acquisition of property, including when acquiring full fee title, fee title subject to retention of a life estate or a life use, long-term leases (including leases with options for extensions) of 50 years or more, and to permanent and temporary easements necessary for the project. However, the Grantee may apply these regulations to any less-than-full acquisition.

The relocation assistance provisions are applicable to homeowners, tenants, businesses and non-profits that must move because of an acquisition. Such homeowners and tenants are considered displaced persons. If the project involves displacement of the owner or tenant, please contact the Office of Community Reinvestment before proceeding with the acquisition process.

Section 22: Real Property Acquisition/Easement/Compensation

Below are the steps required acquire real property:

1. Determine what Properties will be acquired: The subrecipient, with its Engineer or Attorney, should review every proposed activity to determine property acquisition needs and identify the particular properties to be obtained. Activities such as street widening, water and sewer improvements, or sidewalk construction do not have an obvious property acquisition requirement, but there is often a need to acquire easements or rights-of-way.
2. Determine Ownership of Properties to be acquired: The subrecipient must provide proof of ownership for the easement, land or building by conducting a title search of properties to be acquired for the project. This can be accomplished through a title
3. search. If the owner has acquired the property through a means other than a warranty deed, then the subrecipient must obtain either an attorney title opinion letter, or purchase title insurance through a title surety company. Permanent easement ownership may be determined by a search of records and accompanying attorney opinion letter stating the owner of record. In the case of public improvement activities, be sure to verify that the property to be improved is in the public domain. Sometimes rights-of-way are privately owned.
4. Establish a File for Each Property or Easement to be acquired: The subrecipient must establish and maintain a file for each property or easement to be acquired and include copies of all acquisition documents. Files must be retained for a period of specified in the subrecipients funding agreement.
5. Notify Owner of Interest in Acquiring the Real Property or Easement: As soon as feasible, the subrecipient shall notify the owner in writing of the subrecipient’s interest in acquiring the real property or easement and the basic protections provided to the owner by law. In this initial

notice to the property owner any applicable Housing and Urban Development (HUD) relocation notice should be delivered to the property owner or sent by certified or registered first-class mail with return receipt requested. Copies of certified mail return receipts or hand-delivered receipts must be placed in the subrecipients file.

6. Determine Value and Obtain Appraisal(s) and/or Market Estimates for Each Property or Easement: Before the initiation of negotiations, the value of the real property or easement should be determined by the subrecipient thru a market estimate using all available data or resources.
7. Establish and Offer Just Compensation: Upon completion of Step 5, the Grantee shall make a written offer to the owner to acquire the property for the full amount believed to be just compensation. The offer should identify the following:
    a. A statement of the amount offered as just compensation,
    b. A description and location identification of the real property and the interest in the real property to be acquired (e.g., fee simple, easement, etc., and
    c. An identification of the buildings, structures, and other improvements (including removable building equipment and trade fixtures) which are included as part of the offer of just compensation. Where appropriate, the statement shall identify any other separately held ownership interest in the property, e.g., a tenant-owned improvement, and indicate that such an interest is not covered by this offer.
8. Complete Acquisition or Decide not to Acquire: Subrecipient or the subrecipient's attorney shall make all reasonable efforts to contact the owner or the owner's representative to discuss the offer to purchase the property, including the basis for the offer of just compensation, and explain the acquisition policies and procedures, including the payment of incidental expenses. The owner shall be given a reasonable opportunity to consider the offer and present material that the owner believes is relevant to determining the value of the property and/or to suggest modifications in the proposed terms and conditions of the purchase. The time given can vary significantly depending on the circumstances, but property owners must be given a reasonable amount of time to consider the offer.

Voluntary Sale:
On occasion a subrecipient will be fortunate enough to find a suitable piece of property in which the property owner is interested in selling. This situation is known as a Voluntary Sale.   An example of this situation would be a property that is already listed by the property owner for sale through a broker or self-sale. For this situation to be applicable the property owner must seriously want to sell the property.

Below are the steps for completing a voluntary sale transaction:

1. Determine Ownership of Property/Easement to be acquired: The subrecipient must always provide proof of ownership for the acquisition of easements, land or buildings, even when using the voluntary sale process. This is accomplished by conducting a title search to determine ownership of properties to be acquired. If the owner has acquired the property through a means other than a warranty deed, then the Grantee must obtain either an attorney title opinion letter, or purchase title insurance through a title surety company.
2. Establish a File for the Property: The subrecipient must establish and maintain a file for each property/easement to be acquired and include copies of all acquisition documents. Records must be retained for the period of time stated in the subrecipients funding agreement.

3. Inform the owner in writing of their interest in the property: Subrecipient must state the following in its offer:
    1. The subrecipient and the City will not use its power of eminent domain to acquire the property if negotiations fail.
    2. The subrecipient must also inform the owner of the value of the property based upon the available information.
    3. The offer must be made by certified mail.
4. Complete Acquisition: If the owner finds the offer to be acceptable, a purchase option or sales contract must be signed.

Relocation

In the event the subrecipient is acquiring a property that will require individuals to be temporarily or permanently relocated, the subrecipient must follow additional rules and regulations stated in the URA. If relocation procedures are required, the subrecipient should contact the City and staff will assist the subrecipient in meeting all the applicable regulations for the Uniform Relocation Act (URA). All of the URA rules and procedures are documented in the HUD 1378 Handbook.

Section 23: Build America, Buy America Act (the Act) (BABA)

Buy America Preference (BAP)/ Build America, Buy America Act (the Act) (BABA)

The Build America, Buy America Act (the Act) (BABA), enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established Buy America Preference (BAP) a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects after May 14, 2022. The domestic content procurement preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects, are produced in the United States. Note: BAP does not apply to CDBG-DR, CDBG-MIT, CDBG-CV, ESG-CV, HOPWA-CV, or Community Compass.

Examples of CDBG projects that are considered infrastructure projects, according to BABA, include:

• Rehabilitation, maintenance, and reconstruction of buildings and real property, including housing, and

• Construction and repair of public facilities and improvements, such as water, sewer, or other utilities, roads, bridges, sidewalks, homeless shelters, or broadband infrastructure.

Housing projects with five or more units should be considered as public infrastructure subject to BABA unless another BABA waiver or exemption applies.

Products covered under the BAP include:

1. Iron and steel
2. Construction materials
3. Manufactured products.

Products should be classified into just one of these categories. The classification must be made based on the product's status when brought to the work site.

Items that consist completely or predominantly of iron, steel, or a combination of both. "Predominantly" means the cost of the iron and steel content exceeds 50% of the total cost of all the item's components. All manufacturing processes, starting from the initial melting stage and continuing through the application of coatings, must occur in the United States.

Articles, materials, or supplies used for construction activities that consist of only one of the items described below. For the purposes of the HUD Phased Implementation Waiver timeline described below, construction materials are divided into two categories: specifically, listed construction materials and not listed construction materials. Specifically, Listed Construction Materials: Items include (1) non-ferrous metals; (2) lumber; and (3) plastic- and polymer based composite building materials, pipe, and tube. Not Listed Construction Materials: Items include (1) all other plastic- and polymer-based materials (such as polymers used in fiber optic cables), (2) glass, (3) fiber optic cable, (4) optical fiber, (5) engineered wood, and (6) drywall. All manufacturing processes for the construction material must occur in the United States.

Manufactured products include articles, materials, or supplies that have either been:

1. Processed into a specific form or shape, or
2. Combined with other articles, materials, or supplies to create a product with different properties than the individual articles, materials, or supplies.

A manufactured product may include components that are construction materials or iron and steel products, unless the manufactured product also meets the definition of iron and steel or construction materials. In such instances, the product should be recategorized in the appropriate category. Manufactured products must meet two production requirements. First, the final product must be manufactured in the United States. Second, at least 55% of the cost of the components making up the manufactured product must be associated with components that were mined, produced, or manufactured in the United States.

Cement and cementitious materials; aggregates such as stone, sand, or gravel; or aggregate binding agents or additives (collectively known as Section 70917(c) materials) are generally exempt from the BAP. However, Section 70917(c) materials may be used to produce a manufactured product, such as pre-cast concrete. Manufactured products that incorporate Section 70917(c) components are subject to the BAP.

Materials and activities not covered by the BAP:

1. Temporary products and materials that are removed at or before project completion, such as temporary scaffolding, equipment, or tools
2. Equipment and furnishings such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of or permanently affixed to the structure
3. Technical assistance and management costs
4. Design and planning costs, project scoping, or advance assistance. However, domestic preferences must be considered in planning to ensure compliance for construction projects e.g., design-build contracts
5. Acquisition and demolition projects where there are no articles, materials, or supplies that are incorporated into an infrastructure project

Buy America Preference may be waived if projects must be completed immediately to protect life, ensure safety, or prevent the destruction of property. These exigent circumstances guidance is in effect until November 23, 2027.

Department of Housing and Urban Development (HUD) has implemented a department wide public interest de minimis, Small Grants, and Minor Components waiver to the Buy America Domestic Content

Procurement Preference (Buy America Preference, or BAP) as applied to iron, steel, manufactured products, and construction materials requirement of the Act for recipients of Federal Financial Assistance, with the threshold for the waiver being set at $250,000.00. BAP will also be waived for a de minimis portion that compromises no more than 5 percent of the total cost of covered materials used in a project, up to $1 million. Currently in effect until November 23, 2027.
Project/product-specific waivers are available on a limited, case-by-case basis, after HUD's review, a public comment period, and final approval from the Office of Management and Budget's Made In America Office (MIAO). Project-specific waivers are generally available for three reasons:

• Public interest: Adhering to the BAP would be inconsistent with the public interest.
• Nonavailability: Covered materials are not produced in the USA in sufficient and reasonably available quantities or of a satisfactory quality.

• Unreasonable cost: Inclusion of domestically produced covered materials will increase the cost of the overall project by more than 25 percent.
Subrecipients will work with Community Development staff to apply for project/product specific waivers.

Build America, Buy America Procedures

1. Once final allocations are released by HUD, and the CDBG Budget has been approved by Council final projects will be determined.
2. Once determined a project total will exceed the BABA threshold of 250k total funds (both federal and non-federal), send subrecipient an email to confirm project total hasn't changed and the BABA Applicability form. Save email or response in project file.
3. Once completed BABA applicability form has been returned, review and determine if any general waivers are available.
4. If project total is over 250k AND there aren't any other federal agencies committing more funds than CDBG, send email requesting materials list. See example below.
5. Once materials list is received and reviewed to determine if a de minimis waiver would apply, CD staff will make a final determination. If de minimis waiver does not apply, CD staff notifies subrecipient or contractor they will need to adhere to BABA requirements.
6. Throughout the project, prior to a final reimbursement request being processed, all material purchase orders must be submitted and include a statement such as "Company Name hereby certifies the steel used are 100% melted and manufactured in United States of America" "This material was galvanized in the USA…", "Meet the Buy America Requirement", etc.
7. If subrecipient is unable to obtain necessary materials in America, ample documentation showing the attempt to obtain American made materials must be provided.

Example email:
Thanks Cindy. Since the project total does meet the threshold for BABA, I will need a bit more info to determine if there are any general waivers available. Could you please send a full material listing, with cost of each and note which of the following categories it would fall in: 1. iron and steel, 2. specifically listed construction materials, 3. not listed construction materials, or 4. manufactured products?

1. Iron and Steel Products The term “iron and steel products” is defined in 2 CFR 184.3 and means articles, materials, or supplies that consists wholly or predominantly of iron or steel, or a combination of both.
2. Specifically, listed construction materials. The term “specifically listed construction materials” for HUD programs includes:
   a. non-ferrous metals;
   b. lumber;
   c. composite building materials; and
   d. plastic and polymer-based pipe and tube.
3. Not Listed Construction Materials The term “not listed construction materials” refers to the category of construction materials that are subject to the BAP, but not included in HUD’s specifically listed construction materials, as defined in the Phased Implementation Waiver. This includes:
   a. plastic and polymer-based products other than composite building materials or plastic and polymer-based pipe or tube;
   b. glass (including optic glass); and
   c. drywall.
4. Manufactured Products is defined in 2 CFR 184.3 and means:
   a. Articles, materials, or supplies that have been:
      i. Processed into a specific form and shape; or
      ii. Combined with other articles, materials, or supplies to create a product with different properties than the individual articles, materials, or supplies.
   b. If an item is classified as an iron or steel product, a construction material, or a section 70917(c) material under 2 CFR 184.4(e) and the definitions set forth in this section, then it is not a manufactured product. However, an article, material, or supply classified as a manufactured product under 2 CFR 184.4(e) and paragraph (1) of this definition may include components that are construction materials, iron or steel products, or section 70917(c) materials.

Please advise.

Applicability Form to be completed.
Build America, Buy America Reporting Applicability Form

The Build America, Buy America Act (BABA) requires that all iron, steel, manufactured products, and construction materials used for infrastructure projects receiving federal financial assistance (FFA) are produced in the United States, unless otherwise exempt or subject to an approved waiver. This requirement is known as the “Buy America Preference (BAP)” and the specific requirements are codified in 2 CFR § 184, https://www.ecfr.gov/current/title-2/subtitle-A/chapter-I/part-184.
Please return to Community Development before the start of the project. The following information will help us determine and document whether BABA will need to apply to your project:
Agency Name: ____
Address: ____
CDBG Project Number: ____________________Type(s) FFA: CDBG,_____________________________
Project Type: ____

Project Total: FFA: $____________________________Leveraged Funds: $______________________
Materials used for project:____

____

If the project is receiving other federal financial assistance and the amount exceeds the CDBG funds being utilized, we may request a copy of executed contracts between the agency providing additional FFA and contractors.
If the project is primarily being funded with CDBG, additional documentation may be required.
If a general waiver applies to the project, staff will notify the agency. If one does not apply, there may be project specific waivers. Staff will work with the agency to determine eligibility.
If you have any questions, please email mata.nichole@rigov.org and reference your project number.

Community Development Staff

Are the funds being used for an infrastructure project, as defined by BABA?	YES / NO
Does HUD contributes the largest portion of Federal funds to the project?	YES / NO
Does another Federal agency contributes the largest portion of FFA to the project?	YES / NO
Are the materials being used subject to BAP?	YES / NO
Does a general waiver apply?	YES / NO
If not, does a project-specific waiver apply?	YES / NO

Waiver Form to be completed

September 12, 2025

<Agency Name>
<Project Number>

Subject: General Waiver of Buy America (BAP)

The Build America, Buy America Act (BABA) requires that all iron, steel, manufactured products, and construction materials used for federally funded infrastructure projects are produced in the United States, unless otherwise exempt or subject to an approved waiver. This requirement is known as the "Buy America Preference (BAP)" and the specific requirements are codified in 2 CFR § 184. The U.S. Department of Housing and Urban Development (HUD) approved several general applicability waivers for specific public interest circumstances. When the circumstances of any public interest general waiver are applicable to an infrastructure project, BABA's domestic content procurement preference does not apply. This project is eligible for the following waiver(s):

	HUD General Waivers
	Phased Implementation • All Other Construction Materials (all other plastic- and polymer-based products, glass, fiber optic cable, optical fiber, engineered wood, and drywall): Applies to CDBG funds obligated from FY25 appropriations • Manufactured Products: Applies to CDBG funds obligated from FY25 appropriations
	Exigent Circumstances • BAP may be waived if projects must be completed immediately to protect life, ensure safety, or prevent the destruction of property • Currently effective until November 23, 2027
	De Minimis, Small Grants, and Minor Components • BAP waived for projects with a total cost of $250,000 or less • BAP waived for a de minimis portion that comprises no more than 5 percent of the total cost of covered materials used in a project, up to $1 million • Currently effective until November 23, 2027
	Product/ Project Specific Waivers • Public interest: Adhering to the BAP would be inconsistent with the public interest. • Nonavailability: Covered materials are not produced in the USA in sufficient and reasonably available quantities or of a satisfactory quality. • Unreasonable cost: Inclusion of domestically produced covered materials will increase the cost of the overall project by more than 25 percent. An application must be submitted to the Made In America Office to be considered for a project-specific waiver.
	Project is not eligible for any waivers. Please provide the following: Full materials listing including cost of each and note which of the following categories it would fall in: 1. iron and steel 2. specifically listed construction materials 3. not listed construction materials 4. manufactured products

It is important to note that if your project is not eligible for a HUD General Waiver and you do not pursue a project-specific waiver, your project must adhere to all BAP preferences. Please retain this letter and all material sourcing and purchasing documentation with your project files.

If you have any questions, please contact Community Development Manager, Nichole Mata, at 309-732-2907 or Mata.nichole@rigov.org.

____________________________________ ________________

Nichole Mata, Community Development Manager Date

Community Survey for CDBG Funding 2025

Each year, Cities across the country receive federal Community Development Block Grant (CDBG) funds from the US Department of Housing and Urban Development. The Cities of Davenport, Moline, & Rock Island each receive CDBG funds for use within their own borders. This survey helps provide insight on what is important to each community individually, and to the region as a whole.

CDBG can be used for eligible activities in the areas of housing, economic development, public facilities, social services, and planning. All funded activities must meet one of the following national objectives: assisting low and moderate-income households; eliminating or preventing slums or blight; or responding to an urgent need.

Individuals requiring accommodations should call 563-326-7765 or TTY 563-326-6145 for assistance. Interpretive Services are available at no charge.

Las personas que necesiten adaptaciones deben llamar al 563-326-7765 o al TTY 563-326-6145 para solicitar ayuda. Los servicios de interpretación están disponibles gratuitamente.

The survey closes on September 26,2025

You can also take this survey online at:
https://www.surveymonkey.com/r/QC2025cdbg
Or scan the QR code:

What is your Zip Code? (this is needed to ensure that responses from each city can be reviewed separately as needed). __________

Community Priorities: Tell us where you think funding should be used in your City:

Each City has the ability to focus funds on particular areas within its own borders, based on the income of residents. Within each City, would you like to see funds focused on specific areas of the City or available City-wide?

Specific Area _______ City-wide _______ Combination of both _____

Review the list of Community Services below and rank 1-4 in order of highest priority. 1=highest priority and 4=lowest priority

Affordable Housing ______ Economic Development _____ Infrastructure & Area Benefit ______ Public Services ______

Community Services:
Tell us what services you would like to have available in your City:

Pick 3 services in each category – Affordable Housing, Economic Development, Infrastructure & Area Benefit; and Pick 5 services in the Public Services category.

HOUSING (Choose 3 services in this category)	
Down Payment Assistance (Owner Occupied)	
Energy Efficiency Improvements (Both Rental & Owner Occupied)	
Homebuyer Counseling (Owner Occupied)	
Housing for Persons with Disabilities (Both Rental & Owner Occupied)	
Lead Based Paint Removal (Both Rental & Owner Occupied)	
Owner Occupied Housing Rehab	
Rental Rehabilitation	
Residential Historic Preservation (Both Rental & Owner Occupied)	
Senior Housing (Renter Occupied)	
Transitional Housing (Renter Occupied)	
ECONOMIC DEVELOPMENT (Choose 3 services in this category)	
Business Mentoring	
Commercial Building rehabilitation	
Commercial Historic Preservation	
Employment Centers/ Job Services	
Energy Efficiency Improvements	
Job Creation/ Retention	
Lead Based Paint Removal	
Small Business Loans	
INFRASTRUCTURE & AREA BENEFITS (Choose 3 services in this category)	
Accessibility Improvements	
Building Façade Improvements	
Demolition of Blighted Structures	
Historic Preservation	
Parking Improvements	
Road Reconstruction	
Sidewalk Improvements	
Street Lighting	

Street/ Alley Improvements	
Streetscape Improvements	
Transportation Improvements	
Water retention Improvements (i.e. Stormwater Retention/ Permeable Pavers)	
Water/ Sewer Improvements	
PUBLIC SERVICES (Choose 5 services in this category)	
Childcare Centers	
Community Centers	
Domestic Violence Services	
Emergency Shelters	
Family and Nutrition Services	
Food Banks	
Health Care Facilities	
HIV/AIDS Services	
Homeless Services	
Lead Hazard Screening	
Libraries	
Mental Health Services	
Parks and Recreation	
Senior Programs and Services	
Services for persons with Disabilities	
Substance Abuse Services	
Tenant/ Landlord Training	
Transportation Services (i.e. Public Transit/ Paratransit)	
Youth Services and Programs	

Please Check all of the services that you currently use:

City Services		**Community Services**	
Libraries		Community Centers	
Parks & Recreation		Food Banks/ Pantries	
Public Transit/ Paratransit		Senior Programs or Services	
None		Youth Programs or Services	
Health Services		None	
Community Health Care Facilities		**Social Services**	
Family and Nutrition Services		Domestic Violence Services	
HIV/AIDS Services		Emergency Shelters	
Services for Persons with Disabilities		Employment Services	
Substance Abuse Services		Financial Literacy	
None		Homeless Services	
Other (please specify):		None	

Are there services you need but are unable to receive in your community?

____

Demographics: Tell us more about yourself and household (this section is Optional)

Homeownership:

□ Homeowner

□ Renter

Other (please specify):

____

Your Age:

□ Under 18

□ 19-24

□ 25-34

□ 35-44

□ 45-54

□ 55-64

□ 65+

Your Race & Ethnicity:

□ White or Caucasian

□ Black or African American

□ American Indian and Alaska Native

□ Asian or Asian American

□ Native Hawaiian and Other Pacific Islander

□ Some other Race

□ Two or More Races

□ Hispanic or Latino Ethnicity (of any race)

Household Size:

□ 1-2

□ 3-4

□ 5-7

□ 8+

Household Income:

□ Up to $14,999

□ $15,000 - $29,999

□ $30,000 - $44,999

□ $45,000 - $55,999

□ $60,000 - $74,999

□ $75,000—$100,000

□ Over $100,000

Please Share any additional comments or suggestions for CDBG:

____

____

____

Thank you for your participation in this survey!

Please return responses no later than September 26, 2025, to any of the following locations:

Davenport	Moline	Rock Island
City of Davenport Attn: CED—CDBG Survey 226 W. 4th Street Davenport, IA 52803 Phone 563-326-7765 Email ced.info@davenportiowa.com Fax 563-328-6714 TTY 563-326-6145	City of Moline Attn: CED—CDBG Survey 619 16 Street Moline, IL 61265 Phone 309-524-2044 Email housing@moline.il.us Fax 309-524-2044	City of Rock Island Attn: Nichole Mata 1528 Third Avenue Rock Island, IL 61201 Phone 309-732-2907 Email mata.nichole@rigov.org