



Franklin County
Board of Commissioners

ECONOMIC DEVELOPMENT & PLANNING

Program Year 2022 Community Development Block

Grant Application/Program Guidelines

Amended Deadline to apply: March 31, 2022, 4:00 P.M.

Submit application to:

Ms. Sierra Faris

Economic Development and Planning Department

150 S. Front Street, Suite 10

Columbus, Ohio 43215

(614) 525-4874

**To submit, please email a PDF of your entire
application to:**

sierrafaris@franklincountyohio.gov

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i. ANNUAL ACTION PLAN SCHEDULE FOR THE 2022 PROGRAM YEAR

Franklin County has begun to plan for the 2022 CDBG Program Year. Public hearings will be held to provide technical assistance to those groups interested in applying for funding and to garner citizen input identifying the County's development needs. The Public Hearings will be held at 150 S. Front Street, Suite 10, South Conference Room, at the following dates and time:

September 24, 2021, 6:00 PM and September 25, 2021, 6:00 PM

Applications will be made available on the Franklin County web site at www.co.franklin.oh.us by **September 14, 2021** or by calling Sierra Faris in the Department of Economic Development & Planning @ (614) 525-4874 (after logging onto the County website click on Economic Development & Planning; and then from there Community Development to find the application). Additionally, individual technical assistance is available by contacting Ms. Faris and scheduling a meeting. Further, applications and surveys will be directly sent out to county governmental entities and non-profit agencies.

The following is a timeline of the planning and application process.

September - October 2021

- Local public hearings by applicants
- Provision of County technical assistance

Thursday, October 29, 2021, 4:00 p.m.

***REVISED* March 31, 2022, 4:00 p.m.**

- Applications should be submitted no later than this date and time to: Franklin County, Economic Development & Planning Department/C/O Sierra Faris, 150 S. Front Street, Suite 10 Columbus, Ohio 43215

April 2022

- Review and ranking of the applications by the Franklin County Community Development Advisory Committee

April 2022

- Publish proposed/draft Annual Action Plan

May 2022

- Second public hearings to receive citizen comment on the proposed Action Plan, held at 150 South Front Street, Suite 10, South Conference Room. Two sessions in the month of May will occur with at least one event being held virtually. Information will be advertised and posted on the county website.

June 2022

- Board of Commissioners are presented plan for approval

June 15, 2022

- Annual Action Plan submission to HUD

July 2022

- Project award letters sent

The 2022 Program Year will be effective as of **April 1, 2022**

**ii. STATEMENT OF ELIGIBLE COMMUNITY DEVELOPMENT
BLOCK GRANT PROGRAM ACTIVITIES
General Policies – 570.200**

Note: HUD's Title 24 Part 570's parts explaining eligibility of activities are summarized in this document to provide guidance to Franklin County CDBG Program applicants.

The primary objective of the CDGB Program is the development of viable urban communities, by providing decent housing and a suitable living environment, and expanding economic opportunities, principally for persons of low and moderate income.

Funds must be used to carry out activities that will meet one of the three broad National Objectives: benefit low- and moderate-income persons; aid in the prevention or elimination of slums or blight; or meet other community development needs having a particular urgency. At least 70 percent of the total CDBG funds expended must be used for activities that benefit low and moderate-income persons, over a one-, two-, or three-year period (selected by the grantee).

I. Basic Eligible Activities – 570.201

1.) Acquisition

Acquisition in whole or in part by purchase, long-term lease, donation, or otherwise, of real property for any public purpose.

2.) Disposition

Disposition of real property acquired with CDBG funds through sale, lease or donation, or otherwise, or its retention for public purposes.

3.) Public Facilities Improvements

Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except buildings for the general conduct of government. Eligible facilities include those serving persons having special needs such as homeless shelters; convalescent homes; hospitals; nursing homes; battered spouse shelters; halfway houses for run-away children, drug offenders, or parolees; group homes for the developmentally disabled; and temporary housing for disaster victims. In certain cases, non-profit entities and sub-recipients may acquire title to public facilities; when owned by non-profit entities or other such sub-recipients, such facilities must be operated so as to be open for use by the general public during all normal hours of operation.

Activities may include:

- Design features and improvements that promote energy efficiency; and
- Architectural design features and treatments intended to enhance the aesthetic quality of facilities and improvements.

4.) Clearance/Demolition

Clearance demolition, removal of buildings and improvements, and movement of structures to other sites. Demolition of HUD-assisted or HUD-owned housing units may be undertaken only with the prior approval of HUD. CDBG funds may also be used for physical removal of environmental contaminants or treatment of such contaminants to render them harmless.

5.) Provision of Public Services

Including labor, supplies and materials, such as those concerned with employment, crime prevention, childcare, health care, education, homebuyer down payment assistance, public safety, fair housing counseling, recreation, senior citizens, homeless persons, drug abuse counseling and treatment, and energy conservation counseling and testing. The services must meet each of the following criteria.

- Either be new or a quantifiable increase in the level of a service that which has been provided with state or local funds in the previous twelve calendar months; and
- The amount obligated for public services shall not exceed 15 percent of the annual grant, plus 15 percent of the program income received by the grantee and its subrecipients during the previous program year.

6.) Housing Activities

- Payment to housing owners for losses of rental income incurred in holding units for persons displaced by relocation activities.
- CDBG may be used for the construction of housing assisted under Section 17 of the U.S. Housing Act of 1937.
- Completion of urban renewal projects funded under Title I of the Housing Act of 1949, as amended.
- Direct assistance to facilitate and expand low- and moderate-income homeownership by subsidizing mortgage rates and principal amounts, financing the acquisition of housing occupied by low- and moderate-income persons, acquiring guarantees of financing obtained from private lenders, providing up to 50 percent of down payment, or paying reasonable closing costs.

7.) Microenterprise Assistance

“Persons developing microenterprises” are persons who have expressed interest and who are, or after an initial screening process, are expected to be, actively working toward developing businesses, each of which is expected to be a microenterprise at the time it is formed. A “microenterprise” is a business having five or fewer employees, at least one of whom is the owner. Microenterprise assistance provisions should facilitate economic development by:

- Providing credit and financial support, for the establishment, stabilization, and expansion of microenterprises; and

- Providing technical assistance, advice, and business support services to owners of microenterprises and persons developing microenterprises; and
- Providing general support, including peer support programs, counseling, childcare, transportation and other similar services to owners of microenterprises and persons developing microenterprises.
- The provision of technical assistance to public or non-profit entities to increase their capacity to carry out eligible neighborhood revitalization or economic development activities, provided the recipient determines, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance; and the National Objective claimed by the grantee can reasonably be expected to be met once the entity has received the technical assistance and undertakes the activity.

8.) Other Eligible Activities

- Payment of costs in support of activities eligible for funding under the CDBG program.
- Acquisition, construction, reconstruction, rehabilitation or installation of the distribution lines and facilities of privately owned utilities.
- Payment of the non-Federal share required in connection with a federal grant-in-aid program undertaken as part of CDGB activities.
- Relocation payments and assistance to displaced individuals, families, businesses, non-profit organizations, and farm operations.
- Interim assistance to correct objectively determinable signs of physical deterioration in areas where immediate action is necessary and where permanent improvements will be carried out as soon as practicable; or to alleviate emergency conditions threatening the public health and safety and requiring immediate resolution.

II. Eligible Rehabilitation and Preservation Activities – 570.202

1.) Assistance to Rehabilitate

CDBG funds may be utilized for the rehabilitation, preservation, or restoration of publicly or privately owned historic properties, except for buildings used for the general conduct of government. Grant funds may also go towards the renovation of closed schools or other buildings for use as an eligible public facility or housing. Other instances where assistance to rehabilitate is an eligible CDBG activity include:

- Improvements to and rehabilitations of privately owned residential buildings
- Improvements to and rehabilitations of low-income public housing and other publicly owned residential buildings
- Improvements to and rehabilitations of Publicly and privately owned commercial or industrial buildings (limited to improvements to the exterior of the building and the correction of code violations);

- Improvements to and rehabilitations of Non-profit owned, non-residential buildings.
- Improvements to and rehabilitations of manufactured housing when such housing is considered part of the community's permanent housing stock.

2.) Assistance to Finance

Financial assistance through grants, loans, loan guarantees, interest supplements, or other means may be provided for rehabilitation activities for the buildings described above, including:

- Assistance to private individuals and entities, including profit-making and non-profit organizations, to acquire for the purposes of rehabilitation, and to rehabilitate properties for use or resale for residential purposes;
- Labor, materials, and other rehabilitation costs, including repair, replacement of principal fixtures and components, installation of security devices, and renovation of existing structures;
- Loans for refinancing existing indebtedness secured by a property being rehabilitated, if the grantee determines that the financing is appropriate to achieve its community development objectives;
- Improvements to increase the efficient use of energy;
- Improvements to increase the efficient use of water;
- Connection of residential structures to water distribution or local sewer collection lines;
- Initial homeowner warranty premiums, hazard insurance premiums, flood insurance premiums and lead-based paint testing and abatement, for rehabilitation carried out with CDBG funds;
- Acquisition of tools to be lent to carry out rehabilitation;
- Rehabilitation services related to assisting participants in CDBG-funded rehabilitation activities (such as rehabilitation counseling, energy auditing, preparation of work specifications, loan processing and inspection);
- Rehabilitation of housing under Section 17 of the U.S. Housing Act of 1937;
- Lead-based paint hazard evaluation and reduction.

3.) Code Enforcement

Code Enforcement is eligible in deteriorating or deteriorated areas where such enforcement, together with public or private improvements, rehabilitation, and services to be provided, may be expected to arrest the decline of such areas.

III. Special Economic Development Activities – 570.203

1.) Eligible Special Economic Development Activities

Guidelines for selecting activities to assist under this paragraph are provided at 570.209. Recipients must ensure that the appropriate level of public benefit will be derived pursuant to those guidelines before obligating funds under this authority.

Special activities authorized under this section do not include assistance for the construction of new housing. Eligible special economic development activities include:

- The acquisition, construction, reconstruction, rehabilitation or installation of commercial or industrial buildings, structures, and other real property equipment and improvements, including railroad spurs or similar extensions. Such activities may be carried out by the recipient or public or private non-profit sub-recipients.
- The provision of assistance to a private for-profit business, for any activity where the assistance is appropriate to carry out an economic development project.
- Economic development services in connection with activities eligible under this section, including, but not limited to, outreach efforts to market available forms of assistance; screening of applicants; reviewing and underwriting applications for assistance; preparation of all necessary agreements; management of assisted activities; and the screening, referral, and placement of applicants for employment opportunities generated by CDBG-eligible economic development activities, including the costs of providing necessary training for persons filling those positions.

IV. Special Activities by Community-Based Development Organizations (CBDOs) – 570.204

1.) CBDO Eligibility

A CBDO qualifying under this section is an organization that has the following characteristics:

- Is an association or corporation organized under State or local law to engage in community development activities (which may include housing and economic development activities) primarily within an identified geographic area of operation within the jurisdiction of the recipient, or in the case of an urban county, the jurisdiction of the County.
- Has as its primary purpose the improvement of the physical, economic or social environment of its geographic area of operation by addressing one or more critical problems of the area, with particular attention to the needs of the persons of low and moderate income.
- May be either non-profit or for-profit, provided any monetary profits to its shareholders or members must be only incidental to its operations.
- Maintains at least 51 percent of its governing body's membership for low- and moderate-income residents of its geographic area of operation, owners or senior officers of private establishments and other institutions located in and serving its geographic area of operation, or representatives of low- and moderate-income neighborhood organizations located in its geographic area of operation; and
- Is not an agency or instrumentality of the recipient and does not permit more than one-third of the membership of its governing body to be appointed by, or to consist of, elected or other public officials or employees or officials of an ineligible entity; and
- Members of its governing body to be nominated and approved by the general membership of the organization or by its permanent governing body.
- Is not subject to requirements under which its assets revert to the recipient upon dissolution.

- Is free to contract for goods and services from vendors of its own choosing.

A CBDO that does not meet the above eligibility criteria may also qualify as an eligible entity under this section if it meets one of the following requirements.

- Is an entity organized pursuant to section 301(d) of the Small Business Investment Act of 1958 (15 U.S.C. 681(d)), including those that are profit making; or
- Is an SBA approved Section 501 State Development Company or Section 502 Local Development Company, or an SBA Certified Section 503 Company under the Small Business Investment Act of 1958, as amended; or
- Is a Community Housing Development Organization (CHDO) under 24 CFR 92.2, designated as a CHDO by HOME Investment Partnerships program participating jurisdiction, with a geographic area of operation of no more than one neighborhood, and has received HOME funds under 24 CFR 92.300 or is expected to receive HOME funds as described in and documented in accordance with 24 CFR 92.300(e)

A CBDO may also be determined to qualify as an eligible entity if the recipient demonstrates to the satisfaction of HUD, through the provision of information regarding the organization's charter and by-laws, that the organization is sufficiently similar in purpose, function, and scope to those entities otherwise qualifying.

2.) Eligible CBDO Activities

CDBG funds may be provided as grants or loans to any CBDO qualified to carry out a neighborhood revitalization, community economic development, or energy conservation project. CBDO's undertake the funded activities directly or through contract with an entity other than the grantee, or through the provision of financial assistance for activities in which it retains a direct and controlling involvement and responsibilities.

- *Neighborhood Revitalization*
Activities of sufficient size and scope to have an impact on the decline of a geographic location within the jurisdiction of a unit of general local government (but not the entire jurisdiction) designated in comprehensive plans, ordinances, or other local documents as a neighborhood, village, or similar geographical designation; of the entire jurisdiction of a unit of general local government that is under 25,000 population;
- *Community Economic Development*
Activities that increase economic opportunity, principally for persons of low and moderate income., or that stimulate or retain businesses or permanent jobs, including projects that include one or more such activities that are clearly needed to address a lack of affordable housing accessible to existing or planned jobs and those activities specified at 24 CFR 91.1(a)(1)(iii);
- *Energy Conservation*
Includes activities the address energy conservation, principally for the benefit of the residents of the recipient's jurisdiction.

V. Eligible Planning Urban Environmental Design and Policy-Planning-Management-

1.) Capacity Building Activities – 570.205

- Planning activities such as data gathering, studies, analyses, preparation of plans, and identification of actions that will implement such plans.
- Activities designed to improve the grantee's capacity to plan and manage programs and activities.

2.) Eligible Administrative Costs – 570.206

- Reasonable costs of overall program management, coordination, monitoring, and evaluation, including staff salaries, wages, and related costs, travel costs, administrative services such as general legal, accounting and audit services performed under third party contracts. Other eligible administration costs include goods and services required for administration of the program.
- Administration costs may include the provision of information and other resources to residents and citizen organizations participating in the planning, implementation, or assessment of activities being assisted with CDBG funds.
- Eligible administration costs may include the provision of fair housing counseling services and activities.
- Indirect costs may be paid for with CDBG funds.
- The preparation of applications for Federal programs where the grantee determines such activities are necessary or appropriate to achieve its community development needs is an eligible CDBG cost.

iii. STATEMENT OF INELIGIBLE COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM ACTIVITIES - 570.207

Note: HUD's Title 24 Part 570's parts explaining ineligibility of activities are summarized in this document to provide guidance to Franklin County CDBG Program applicants.

The general rule is that any activity that is not authorized under the provisions contained in this document is ineligible to be carried out with CDBG funds. This part provides guidance in determining the eligibility of other activities frequently associated with housing and community development.

- I. The following activities may not be assisted with CDBG funds:
 - A. The government building used for the general conduct of government, except for the removal of architectural barriers.
 - B. General government expenses, (except as noted in the subpart or under OMB Circular A-87).
 - C. Political activities (partisan).
- II. The following activities may not be assisted with CDBG funds unless authorized under Parts III and IV (Eligible rehab and preservation; special economic development)
 - A. Purchase of equipment
 1. Purchase of construction equipment is ineligible; but lease, depreciation, use allowances (See OMB A-21, A-87, A-122) are eligible. Purchase of equipment for solid waste disposal facility is eligible.
 2. Fire protection equipment is considered for this purpose to be an integral part of a public facility and thus, purchase of such equipment is eligible (570.201).
 3. The purchase of equipment, fixtures, motor vehicles, furnishings or other personal property not an integral structural fixture is generally ineligible, except when it is necessary for the administration of CDBG-assisted activities, or as part of a public service.
 - B. Operating and maintenance expenses related to public facilities. The general rule is that any expense associated with repairing, operating or maintaining public facilities, improvements and services is ineligible. Specific exceptions to this general rule are operating and maintenance expenses for public services activities, interim assistance, and office space for CDBG staff. Examples of ineligible operating and maintenance expenses.
 1. Maintenance and repair of streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for handicapped, parking and similar public facilities. Normally, activities will be considered maintenance if they will reoccur on a regular interval (will need to be repeated within five years).

2. Filling of pot holes in street, repairing sidewalk cracks.
 3. Salaries, utility costs, etc. for operation of public works and facilities.
- C. New housing construction or for any program to subsidize or finance new residential construction.
1. As provided under last resort replacement housing provisions set forth in 24 CRF, Part 42.
 2. When carried out by a subrecipient pursuant to part V,A,(2). Activities to support preliminary action for L/M housing are not considered as activities to subsidize or finance new residential construction.
- D. Assistance may not be used for income payments for housing or any other purpose. Examples of ineligible income payments include the following: payments for income maintenance, housing allowances, down payments, and mortgage subsidies.

III. In accordance with First Amendment Church/State Principles, as a general rule, CDBG assistance may not be used for religious activities or provided to primarily religious entities for any activities, including secular activities. The following restrictions and limitations therefore apply to the use of CDBG funds:

A. CDBG funds may not be used for the acquisition of property or the construction or rehabilitation (including historic preservation and removal of architectural barriers) of structures to be used for religious purposes or which will otherwise promote religious interests. This limitation includes the acquisition of property for ownership by primarily religious entities and the construction or rehabilitation (including historic preservation and removal of architectural barriers) of structures owned by such entities (except as permitted under this section for rehabilitation and repairs undertaken in connection with public services) regardless of the use to be made of the property or structure. Property owned by primarily religious entities may be acquired with CDBG funds at no more than fair market value for a non-religious use.

B. CDBG funds may be used to rehabilitate buildings owned by primarily religious entities to be used for a wholly secular purpose under the following conditions:

1. The building (or portion thereof) that is to be improved with the CDBG assistance has been leased to an existing or newly established wholly secular entity (which may be an entity established by the religious entity).
2. The CDBG assistance is provided to the lessee (and not the lessor) to make the improvements.
3. The leased premises will be used exclusively for secular purposes available to persons regardless of religion.
4. The lease payments do not exceed the fair market rent of the premises as they were before the improvements are made.

5. The portion of the cost of any improvements that also serve a non- leased part of the building will be allocated to and paid for by the lessor.

6. The lessor enters into a binding agreement that unless the lessee, or a qualified successor lessee, retains the use of the leased premises for a wholly secular purpose for at least the useful life of the improvements, the lessor will pay to the lessee an amount equal to the residual value of the improvements.

7. The lessee must remit the amount received from the lessor under subparagraph (B)(6) of this section to the recipient or subrecipient from which the CDBG funds were derived. The lessee can also enter into a management contract authorizing the lessor religious entity to use the building for its intended secular purpose, e.g., homeless shelter, provision of public services. In such case, the religious entity must agree in the management contract to carry out the secular purpose in a manner free from religious influences in accordance with the principles set forth in paragraph (II)(C) of this section.

C. As a general rule, CDBG funds may be used for eligible public services to be provided through a primarily religious entity, where the religious entity enters into an agreement with the recipient or subrecipient from which the CDBG funds are derived that, in connection with the provision of such services:

1. It will not discriminate against any employee or applicant for employment on the basis of religion and will not limit employment or give preference in employment to persons on the basis of religion.

2. It will not discriminate against any person applying for such public services on the basis of religion and will not limit such services or give preference to persons on the basis of religion.

3. It will provide no religious instruction or counseling, conduct no religious worship or services, engage in no religious proselytizing, and exert no other religious influence in the provision of such public services.

4. The portion of a facility used to provide the public services shall contain no religious symbols or decorations, other than those permanently affixed to or part of the structure.

D. Where the public services provided under (II)(C) of this section are carried out on property owned by the primarily religious entity, CDBG funds may also be used for minor repairs to such property which are directly related to carrying out the public services where the cost constitutes in dollar terms only an incidental portion of the CDBG expenditure for the public services.

iv. 2022 CDBG Application **Checklist**

The following items **must** be submitted by **Thursday, October 28, 2021. UPDATED: March 31, 2022, by 4 PM** in order for staff to consider your application complete and eligible for funding in 2022.

- 1. Complete all pages of the Application Form – submit 2 copies of application: 1 original mailed in or delivered and the second e-mailed* as a PDF; both with all documentation & attachments.
- 2. For a construction project – A Professional Engineer's Estimate with Original Seal & Signature (The engineer's cost estimate must be divided into major infrastructure sections and must delineate soft costs such as engineering, construction management, inspections, etc.)

or

- 3. For a non-construction project or program – A detailed budget (see Appendix I of the application)

(Submit any approving legislation or relevant capital or non-capital improvement plan)
- 4. Map Defining Geographic Scope of Project for Service Area (if applicable)
- 5. Photographs of the Project Site (if applicable)
- 6. Certification of Local Funds by Financial Officer with Original Signature
(Local Government Only)
- 7. Copies of Award Letters or Letters of Commitment from Other Funding Sources
- 8. Copy of Advertisement of Public Hearing, Flyers, Sign-in Sheet and Minutes
(Required of Local Governments Only)

I certify that all the items listed above are contained in the attached CDBG application. I understand that failure to include any of above items and/or if there are any errors will result in an incomplete application. Failure to disclose easements and to follow HUD and Franklin County easement procedures will result in a loss of funds. The application will be returned with a request for any missing or corrected information to be returned within 5 working days.

Signature of CEO

Date

Print Name

Title

***EDIT** – only one copy must be sent. Please email a PDF to Sierra Faris at SierraFaris@franklincountyohio.gov

**v. FRANKLIN COUNTY COMMUNITY
DEVELOPMENT BLOCK GRANT
PROGRAM 2022 APPLICATION¹**

Applicant Name²

Address

City/Zip

DUNS Number

Project Name:

Project Location:

CDBG Target Area³ (Census Tract/Block Group):

TOTAL PROJECT COST: \$

FUNDING REQUESTED: \$

Project Contact

Project Address

City/Zip

Daytime Phone

Hours Available

E-mail address

-
1. Funds will be available for release on or about **September 1, 2022** from U.S. Department of HUD.
 2. Nonprofit organizations must attach articles of incorporation, IRS letter certifying 501(C)3 Status, and list of Board of Directors.
 3. See CDBG Eligible Target Areas in Appendix D, (only applicable to CDBG projects)

ACTIVITY STATUS (Check One)

 NEW EXPANSION

CDBG Project Type: (Select only one from A through K, and one subgroup, if applicable)

 Symbol denotes that photographs of the project or project site must be included with the application.

A. **Acquisition or disposal of real property**

B. **Public facilities and improvements of:**

Flood Drainage Facilities 

Senior Centers 

Handicapped Centers 

Sidewalks 

Homeless Centers 

Solid Waste Disposal Facilities 

Streets or Bridges 

Parking Facilities 

Water or Sewer Facilities 

Parks/Recreational Facilities  Youth Centers 

Neighborhood Facilities 

C. **Clearance and demolition** 

D. **Code enforcement**

E. **Plan/ Study**

F. **Economic Development**

Job Creation

Job Retention

G. **Downtown revitalization**

Public Improvements 

Facades 

Planning

H. **Removal of architectural barriers/ ADA improvements at the following locations:**

Curbs/Sidewalks/Ramps 

Public Service Centers 

Municipal Buildings 

Non-Profit Facilities 

Recreational Facilities 

I. **Providing public services**

Abused and Neglected Children

Homeless Services

AIDS Patients

Public Safety Services

Battered and Abused Spouses

Recreation Programs

Child Care Services

Screening for Lead-Based Paint/Lead

Hazards Poisoning

Crime Awareness

Education Programs

Senior Services

Employment Training

Substance Abuse Services

Fair Housing Activities

Tenant/Landlord Counseling

Handicapped Services

Transportation Services

Health Services

Youth Services

J. **Housing Related client services or programs**

Housing Counseling

Fair Housing

Utility Assistance

Energy Efficient Improvements 

Hunger & Nutrition

K. **Other- Please describe**

1.0 PROJECT DESCRIPTION & INFORMATION

1.1 PROJECT ACTIVITIES:

What does the project entail? How is it to be done or delivered? If a public service project, what service is to be provided to whom? If an economic development project, is the project a service, study or specific physical development activity? Further, is the project a remediation or redevelopment? Will the project have a long-term, permanent impact in the community? If so, how?

A. SPECIFIC LOCATION:

B. PROJECT COMPONENTS:

C. PHYSICAL DIMENSIONS (if applicable):

D. SERVICES PROVIDED:

1.2 DOCUMENT THE NEED FOR THE PROJECT (in five, one-sentence bulletpoints)

1.3 PERSONS BENEFITTED & CDBG COST PER BENEFICIARY (See Appendix A)

- How many persons will the project benefit within the qualified geographic area?
 - 1,000+
 - 500-999
 - 300-499
 - 200-299
 - 100-199
 - At least 50
- What is the CDBG cost per beneficiary? To calculate this divide the CDBG requested amount by the number of beneficiaries.
 - \$500 or less
 - \$501- \$1,500
 - \$1,501- \$2,500
 - \$2,501- \$4,000
 - \$4,001- \$6,000
 - \$6,001- \$10,000
- In 2-3 sentences explain how the number of persons benefitted was calculated.

1.4 WHAT ARE THE PROJECT'S PROPOSED OBJECTIVES, PERFORMANCE MEASURES & OUTCOMES? (List up to two, one-sentence bullet point answers for each question)

- What is the objective of the project? – e.g. benefit low and moderate income households
- What is the project's performance measure? – e.g. – the provision of neighborhood sidewalks
- What is the quantifiable outcome? – e.g. 2000 lineal feet of sidewalk will be installed.

B. Is this one phase of a multi-phase project or multi-year plan?

Explain in 2-3 one-sentence bullet points.

(If yes, please include anticipated future plans/phases)

- Yes No N/A (not a construction project)

C. If project is housing or public service, is this a one-year operating budget?

Explain in 2-3 one-sentence bullet points.

- Yes No

2.2 FUTURE FUNDING⁵:

(Attach letter(s) of commitment as to who will maintain this project once completed and who will continue to operate this program after one year.)

	Dollars	Percent
a) Local Revenue	\$	
b) State/Federal/Other (Attach commitment letters)		
(Agency)	\$	
(Agency)	\$	
(Private)	\$	
Subtotal Local Share⁶	\$	
c) CDBG Funds Requested	\$	
GRAND TOTAL⁷ (Exclude engineering costs)	\$	<u>100%</u>

NOTE: PROJECTS REQUIRING GREATER THAN \$250,000 IN BLOCK GRANT FUNDS MUST BE SUBMITTED AS A MULTI-PHASED PROJECT, WITH EACH PHASE HAVING A COMPLETION SCHEDULE WITHIN THE YEAR OF FUNDING. THERE IS NO ASSURANCE GIVEN THAT SUBSEQUENT YEAR FUNDINGS WILL OCCUR.

5 NOTE: Local government must pass ordinance of intent to commit maintenance and operating funds for storm drainage, community facilities, parks, etc.

6 These projects require the following minimum match:

Provide basic facilities (water, sanitary sewer, storm drainage) 10% local match

Repair/replace basic facilities	20% local match
Street Improvements (includes sidewalks and streets)	30% local match
Community facilities or recreation	40% local match
Plans and studies	50% local match
Economic Development Activities	50% local match

7 For Public Improvements the grand total should be the sum of construction and contingency only (again, no engineering costs will be paid for with County federal funds.)

3.0 PROJECT SCHEDULE

Begin Date End Date

3.1 Engineering/ Design

3.2 Bid Advertisement & Award

3.3 Construction

If not a construction project:

Show a schedule of major activities, such as planning, organizing, hiring, outreach, etc. Funds should be available by **September 1, 2022**. Please develop your project schedule accordingly.

Activity	Activity (Component of project) Completion Date

4.0 EASEMENTS OR ACQUISITION OF BUILDING OR LAND (IF APPLICABLE)⁸

4.1 Will there be easements or the acquisition of building, land or right of way?

Yes No N/A

5.0 CITIZEN INVOLVEMENT (for Local Governments only)

Describe and document the meetings, notices, flyers, advertisements, etc. you had in planning this project. Attach letters of support, commitments of other funds, resolutions from city or village council, township trustees, school board, park commission, neighborhood civic association. (See Citizen Participation Plan in Appendix I)

Public Hearing Date:

*Attach copy of ad, flyers, and meeting minutes

Community meeting during application process:

If you are a government body applying for funding, you must hold at least one public hearing meeting inviting your citizens to discuss your proposal. The meeting must be conducted either in the month of September or October 2021. The date and time of your public hearing must be communicated (by email on the Community's letterhead) to Sierra Faris at SierraFaris@franklincountyohio.gov so that the Franklin County Board of Commissioners can be invited to the forum. Failure to conduct such a hearing and to communicate its date, time, and place to the County in advance of its occurring will prompt that community's application to be viewed as having failed to fulfill the County and HUD's citizen participation requirements, and thus will render the application as incomplete and ineligible for funding.

Public Hearing date:

Location:

Time:

Meeting point of contact and phone number:

⁸ NOTE: If acquisition of easements or property will occur as a result of a public improvement, please contact Sierra Faris at (614) 525-4874 immediately. Failure to disclose easements will result in a loss of funding. Improper acquisition could result in serious repercussions including long delays and possible loss of grant funds.

6.0 COORDINATION WITH OTHER MUNICIPALITIES AND/OR AGENCIES

Is this project the result of collaboration between other municipalities or agencies? Attach commitment letter, resolution, ordinance, etc. showing commitment. Please explain in 2-3, one-sentence bullet points.

7.0 PROJECT EMPLOYMENT

Will this project need to hire staff or additional employees?

Yes No Don't Know

Identify total jobs benefiting from proposed activities (broken down by full time and part time jobs)

	Full-time	Part-Time
--	------------------	------------------

- Existing
- Retained
- New
- Total

8.0 AFFIRMATIVE ACTION PROGRAM (additional application points are awarded to agencies/entities with an affirmative action program)

Does your local government or organization have an affirmative action program?

Yes No

If yes, please attach.

9.0 MINORITY, FEMALE, DISADVANTAGED BUSINESS ENTERPRISE PROCUREMENT (additional application points are awarded to agencies/entities that have adopted a minority, female, disadvantaged business procurement program)

Does your local government or organization have a policy or program to procure services and materials from Minority, Female, or other Disadvantaged Business Enterprises?

Yes No

If yes, please attach policy.

10.0 FAIR AND AFFORDABLE HOUSING ACTIVITIES (additional application points are awarded to agencies/entities that have adopted a fair housing program)

FAIR HOUSING ACTIVITIES:

1) Did your community sign a resolution supporting fair housing?

Yes No

2) Did your community conduct fair housing activities during the month of April?

Yes No

If yes to either question, attach copies of supporting documentation.

3) Did your community formally adopt a fair housing ordinance?

Yes No

If yes, attach a copy of the council resolution.

4) If a fair housing ordinance was adopted, are there enforcement provisions?

Yes No

If yes, attach a copy of the documentation that explains enforcement.

AFFORDABLE HOUSING ACTIVITIES:

1) Did your community facilitate actions to remove barriers to affordable housing?

(i.e. mixed income housing, or subsidized housing)

Yes No

If yes, attach explanatory documentation.

2) Did your community participate in Franklin County’s Housing Program?

(This includes referrals, marketing, and local building department cooperation.)

Yes No

If yes, attach explanatory documentation.

3) Did your community support the development of affordable housing?

Yes No

If yes, explain in 3-5, one-sentence bullet points or document.

11.0 PROJECT ELIGIBILITY BY NATIONAL OBJECTIVES

(Your project **must** meet one of the following national objectives below; please complete the objective section (1, 2 or 3) applicable to your project.)

If you are completing Objective 1 - ACTIVITIES BENEFITING LOW & MODERATE (L/M) INCOME PERSONS, you need to select and complete the applicable sub-section: either LM Income Area Benefit; LM Income Limited Clientele; LM Income Housing or LM Income Jobs.)

OBJECTIVE 1: ACTIVITIES BENEFITING LOW & MODERATE (L/M)⁹ INCOME PERSONS:

L/M Income Area Benefit

In what specific census tract(s) and block group(s) will your program or project operate?

9 Low-and moderate (L/M) income household is defined as a household in which the total household income is equal to or less than the Section 8 Housing Assistance Payments Program low-income limit established by HUD. For a current Columbus, Ohio HUD income limits based on family size, please contact Sierra Faris at (614) 525-4874.

Please utilize Appendix D to complete the following questions of this subsection:

Are any of the census tracts and block groups cited above listed in Appendix D? Yes No

- If none are cited your program or project is not eligible to utilize this subsection for eligibility purposes.

If some or all of the census tracts and block groups are cited in Appendix D please identify:

Which are:

And which aren't:

If all of your census tracts and block groups are in an eligible area your project is eligible; if not all, the total number of individuals in the applicable areas will have to be divided by the total number of LMI individuals – to be eligible at least 51% of the total individuals must be low or moderate income.

Total individuals in program/project area

Total LMI individuals in program/project area

% of total individuals who are LMI (divide total individuals by LMI individuals)

L/M Income Limited Clientele

(Project must directly benefit one of the groups below and documentation is required)

Clientele	Number of Persons
------------------	--------------------------

Abused Children

Elderly Persons

Battered Spouses

Homeless Persons

Severely Disabled Persons

Illiterate Adults

Persons Living with AIDS

Migrant Farm Workers

L/M Income Housing

How many LMI households will benefit?

L/M Income Jobs

How many permanent jobs will be created or retained

by L/M income persons or be available to L/M income persons?

OBJECTIVE 2: PREVENTION/ELIMINATION OF SLUMS OR BLIGHT:

(The following documents must be submitted to qualify for this objective.)

1. Resolution

2. Photos of the area

3. Map of the area and project site

Check the appropriate basis:

Is the designation on an area basis?

Is the designation on a spot basis?

Is the designation in regards to an urban renewal area?

(If you have selected this basis, you must include a copy of the Applicable Urban Renewal Plan)

OBJECTIVE 3: URGENT NEEDS:

(The urgent need objective is normally only applicable in the aftermath of a disaster.)

Urgent Need

If your project is urgently needed, the following documents must be submitted:

1. A statement from an appropriate authority, or an independent expert approved by the U.S. Department of Housing & Urban Development, verifying that the condition is a serious and immediate threat and transpired within the last 18 months.

2. A statement of the financial condition of the city, village or township verifying that the applicant is unable to finance the project.

3. Turn-down letters from other federal, state, local or private funding sources along with a statement that no other sources exist.

12.0 CONSOLIDATED PLAN PRIORITIES

(Please select the theme and objective from the priorities listed in Appendix G that best describes your project)

Theme 1 - Affordable Housing Opportunity Objective#:

Theme 2 - Neighborhood Revitalization Objective#:

Theme 3 - Economic Dev. & Econ. Opportunity Objective#:

Theme 4 - Education & Supportive Service Linkages Objective#:

13.0 AGENCY INFORMATION

A. AGENCY BACKGROUND

1) How many years has the agency been in service?:

2) In 5, one-sentence bullet points per category, list the types of services the agency provides, the agency's capabilities, the number and characteristics of clients served, and attach a license to operate (if appropriate).

- Services
 -
 -
 -
- Capabilities
 -
 -
 -
- Number of Clients and Characteristics
 -
 -

3) In 2-3 sentences, list the agency's prior experience with federal programs.

B. PERSONNEL

- Attach a staff list of key agency staff pertaining to the project which lists the staff member's name, position title, years of experience, and a 2-3 bullet point list of their responsibilities as they relate to the project.
- In 2-3 sentences, describe the agency's capacity to carry out this activity.

C. FINANCIAL CAPACITY

- Attach the agency's current operating budget, itemizing revenues and expenses. Identify set commitments for ongoing funding.
- In 5-8 sentences, describe the agency's fiscal management, including financial reporting, record keeping, accounting systems, payment procedures, and audit requirements.

D. MONITORING

In 2-5 sentences, describe how you will monitor progress implementing the program. Attach copies of all data collection tools that will be used to verify achievement of program goals and objectives. Identify who will be responsible for monitoring the program's progress.

E. AUDIT REQUIREMENTS

In accordance with the Office of Management and Budget Circular 2 CFR Part 200, Parts 84 and 95 the Federal Government requires that organizations expending \$200,000 or more in Federal financial assistance in a fiscal year must secure an audit. Agencies requesting \$200,000 or more must chose one of the three ways of meeting this requirement and state which method they chose:

If your agency already conducts audits of all its funding sources including HOME, the agency must submit a copy of its most recent audit, and may, at its discretion, include the HOME portion of the audit cost in its HOME project budget.

If your agency already conducts audits of its funding sources but has neither received nor included HOME in the past, the scope of the audit would be modified to incorporate HOME audit requirements. The associated cost of the augmentation could then be included in the HOME project budget, accompanied by the auditor's written cost estimate.

If your agency does not have a current audit process in place, your agency will be required to include a 10-percent aside in the HOME project for the provision of an audit.

F. INSURANCE/BONDING/WORKER'S COMPENSATION

State whether or not the agency has liability insurance coverage, in what amount, and with what insuring agency. State whether or not the agency pays all payroll taxes and worker's compensation as required by Federal and state laws. State whether or not the agency has fidelity bond coverage for principal staff who handle the agency's accounts, in what amount, and with what insuring agency.

14.0 STANDARD REQUIRED DOCUMENTS

- **Articles of Incorporation/Bylaws**
Articles of incorporation are the documents recognized by the State as formally establishing a private corporation, business or agency.
- **Non-profit Determination**
Non-profit organizations must submit tax-exemption determination letters from the Federal Internal Revenue Service.
- **List of Board of Directors**
A list of the current board of directors or other governing body of the agency must be submitted. The list must include the name, telephone number, address, occupation or affiliation of each member and must identify the principal officers of the governing body.
- **Authorization to Request Funds**
Documentation must be submitted of the governing body's authorization to submit the funding request. Documentation of this requirement consists of a copy of the minutes of the meeting in which the governing body's resolution, motion or other official action is recorded.
- **Designation of Authorized Official**
Documentation must be submitted of the governing body's action authorizing the representative of the agency to negotiate for and contractually bind the agency. Documentation of this requirement consists of a signed letter from the Chairperson of the governing body providing the name, title, address, and telephone number of each authorized individual.
- **Organizational Chart**
An organizational chart must be provided that describes the agency's administrative framework and staff positions, indicates where the proposed project will fit into the organization structure, and identifies any staff positions of shared responsibility.
- **Staff List**
A staff list of key agency staff pertaining to the project which lists the staff member's name, position title, years of experience, and a 2-3 bullet point list of their responsibilities as they relate to the project.
- **Resume of the Chief Program Administrator**
- **Resume of the Chief Fiscal Officer**
- **Financial Statement and Audit**

APPENDIX A
EVALUATION AND SELECTION PROCESS

APPENDIX A
FRANKLIN COUNTY COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
EVALUATION AND SELECTION PROCESS

The Franklin County Economic Development Department will evaluate grant applications for review by the Franklin County Board of Commissioners and the Community Development Advisory Committee. A maximum of **100** points is possible.

Part I – Meeting National Objectives (25%)

- This section is designed to evaluate each application based on HUD eligibility requirements and guidelines. A maximum of 25 points is possible in this section.

NOTE: Points will be awarded based upon the evaluation criteria (number of persons, jobs or cost/beneficiary) that results in the highest points.

National Objective 1:

Benefit Low- and Moderate-Income Persons

- The application will be evaluated against only one of the following low/mod categories:
A) geographic area; B) limited clientele; C) housing; D) jobs.
- A. The project or service benefits a **geographic area** where at least 51% of residents benefiting are low- and moderate- income as verified by 2010 Census data. An example is a street-resurfacing project in a residential neighborhood, construction of a neighborhood playground, or a community center servicing the entire city when the city is predominantly lower income.
- 25 points** – project or service will benefit 1,000+ persons within the qualified geographic area or CDBG cost is \$500 or less per beneficiary.
- 20 points** – project or service will benefit between 500-999 persons within the qualified geographic area or CDBG cost is between \$501 - \$1,500 per beneficiary.
- 15 points** – project or service will benefit between 300-499 persons within the qualified geographic area CDBG cost is between \$1,501 - \$2,500 per beneficiary.
- 10 points** – project or service will benefit between 200-299 persons within the qualified geographic area of CDBG cost is between \$2,501 - \$4,000 per beneficiary.
- 5 points** – project or service will benefit between 100-199 persons within the qualified geographic area or CDBG cost is between \$4,001 - \$6,000 per beneficiary.
- 1-4 points** – project or service will benefit at least 50 persons within the qualified geographic area or CDBG cost is between \$6,001 - \$10,000 per beneficiary.

Divide the CDBG amount requested by the number of beneficiaries.

B. Program or service benefits a **limited clientele**: elderly, abused children, battered spouses, homeless persons, low-and moderate-income persons or more, and/or persons with disabilities.

- 25 points - project will benefit 1000+ persons
- 20 points - project will benefit 500 persons
- 15 points - project will benefit 400 persons
- 10 points – project will benefit 300 persons
- 5 points – project will benefit at least 100 persons

Divide the number of beneficiaries by the total population of the community according to the 2010 census.

In many cases, applications are taken from individuals as a condition of participation in this program or the activity will exclusively serve these persons. An example is a day care scholarship program for lower income households, a senior citizen center, or the purchase of a senior citizens bus.

C. Activity which assists in the acquisition, construction, or improvement of permanent residential **housing** or structures that benefit L/M income persons only to the extent that housing is occupied by L/M income persons. This includes activities directed towards homeownership.

- 25 points - project will benefit more than 100 households.
- 20 points - project will benefit 50 -100 households.
- 15 points – project will benefit less than 50 households.

D. Special economic development activities that are located in a predominately L/M income neighborhood and serve the L/M income residents or involve the creation of **jobs**, the majority of which are for the employment of L/M income persons. This activity must create or retain permanent jobs, at least 51% of which, on a full time equivalent (FTE) basis are either held by L/M income persons or considered to be available to L/M income persons.

- 25 points - project will create or retain 150+ FTE jobs.
- 20 points - project will create or retain 100-149 FTE jobs.
- 15 points - project will create or retain 50-99 FTE jobs.
- 10 points – project will create or retain 25-49 FTE jobs
- 5 points – project will create or retain 5-24 FTE jobs

National Objective 2:

Aid in the Prevention/Elimination of Slums and Blight

The project or activity will eliminate or prevent slums or blighting on an area basis. See areas designated blighted areas in Appendix D. The project must address one or more of the conditions which contributed to the deterioration of the area when it was declared a blighted area.

Slum and Blight:

- 25 points** – the entire project is located in a blighted area and the project will address one or more of the conditions which contributed to the deterioration of the area when it was declared a blighted area.
- 20 points** – More than 50% of the project or activity is located in a blighted area and project will address one or more of the conditions which contributed to the deterioration of the area when it was declared a blighted area.

15 points – the project or activity qualifies on a **specific spot** basis rather than a blighted **area**. These activities are limited to: historic preservation, clearance and acquisition. A 2-3 sentence description of the specific condition of blight or physical decay must be made.

National Objective 3:

Urgent Needs:

This activity must have a particular urgency and be designed to alleviate a serious and immediate threat to health or welfare of the community.

25 points – condition developed or became critical, example a major catastrophe such as a flood or earthquake that threatens the community's residents with the spread of serious disease. Evidence was presented to confirm that other financial resources were not available.

Part II – Project Design and Impact (40%)

A. Leveraging of Funds – Possible 10 Points

Points will be given for projects where more than the minimum share is given. The total share includes in-kind and local share as well as funds leveraged from other sources such as OPWC, United Way etc. Award letters or other documentation must be submitted that states the source of funds, the amount committed and the date when funds will be available. **If funds are not committed, points will not be awarded for that portion.** Points will only be awarded on the portion of match that exceeds the minimum amount (for construction projects) required (there are no match standards for non-construction projects).

% More than Minimum:

10 points - 100%

8 points - 80.0%

6 points - 50.0%

4 points - 25%

2 points - 10%

B. Community or Project Support – Possible 5 Points

5 points – Community or agency met with those affected by the proposed activity residents, businesses, others. There was evidence of involvement and support that were documented by news articles, flyers, sign-in forms, minutes, petitions, letters of support etc.

3 points – Written support or request for problem to be addressed (letters, council minutes).

1 point - Verbal support or requests for problem to be addressed

C. Quality of the Application – Possible 5 Points

5 points – the grant application is clear, complete, typewritten and includes all supporting documentation and the community need and strategy is clearly stated.

3 points – the grant application is missing information or materials at the time of submission that can be easily obtained, but the need and strategy is clearly stated.

1 point – the grant application is complete but the need and strategy is not clearly stated.

D. Long Term Impact – Possible 5 Points

Public Improvement projects:

(Roads, bridge, sanitary sewers, storm sewers, waterlines etc.)

5 points - Useful life is greater than 40

4 points - Useful life is 31-40

3 points - Useful is 21-30

2 points - Useful life is 11-20

1 point - Useful life is 7-10 years

Other Projects:

5 points – the project or service will have a long term, permanent impact on the community. The impact is measurable and sustainable. The impact is clearly quantified in the grant application (i.e. dollars saved, investment generated, jobs created or retained).

3 points – project or service is a long term, permanent improvement to the community. Activity can continue or physical improvements can be maintained without additional future federal funds.

1 point – there is a strong likelihood that the project or service can continue without additional future federal funds, but the project or service will not make a long term permanent improvement to the community.

E. Health or Safety Need – Possible 5 Points

5 points – project alleviates an emergency, survival, health or safety need as clearly documented by an appropriate (third party) authority.

3 points – project alleviates a high degree or traffic endangerment, helps to reduce a high crime area, or similar situations.

1 point – project alleviates a lesser degree of the above listed concerns.

F. Percent of L/M Population Served - Possible 10 points

10 points - 80.1+%

7 points - 70.1-80.0%

5 points - 60.1-70.0%

3 points - 50.1-60.0%

1 point - 41.1-50.0%

Part III – Timeliness/Past Performance (10%)

A. Timeliness/Past Performance/Past Receipt – Possible 10 points

10 points – the applicant has not received CDBG funding in the past five years;

5 point – the applicant's most recent CDBG funded project was completed and all CDBG funds spent within 18 months of the award date with CDBG staff approved time extensions due to weather, site conditions, contractor problems or other problems beyond the control of the applicant; applicant had no findings on their most recent CDBG monitoring.

-10 points – the applicant failed to complete the project within the contract period and had findings on most recent CDBG monitoring.

-10 points – (this in regards to jurisdictions/governmental bodies only) if the applicant was awarded funding during the previous HUD program year. The rationale behind this deduction is to encourage the geographic disbursement of HUD funds throughout the County.

Part IV – Fair Housing/ Affordable Housing Activities (15%)

A. Fair Housing Activities– Possible 10 Points (community must provide documentation to receive points)

10 points – community has fair housing activities that were formally adopted by its legislative authority.

5 points – community has a fair housing ordinance that was formally adopted by its legislative authority, but does not have enforcement provisions.

1 point – community has a resolution that supports fair housing.

NOTE: Resolutions of fair housing support, such as acknowledging fair housing month, and/or fair and open housing statements, must be current and formally adopted by the legislative authority.

B. Affordable Housing Activities – Possible 5 Points
(Community must provide documentation to receive points)

5 points – Community supports or has facilitated actions to remove barriers to affordable housing. Such measures include mixed income housing or subsidized housing.

3 points – Community supports or participates in any of the county’s housing programs (i.e. exterior maintenance, housing rehab loans). This includes referring residents to county programs, assistance with marketing program to residents, local building department cooperation, etc.

1 point – None of the above, but community advocates or supports the development of fair housing.

Part V – Consolidated Plan (10%)

A. Consolidated Plan Priorities – Possible 10 Points

10 points - Community or agency met one of the themes and objectives outlined in Appendix G.

APPENDIX B
NEIGHBORHOOD PUBLIC IMPROVEMENTS
&
FACILITIES PROGRAM POLICIES

Policy 1: *All Public Improvement/Facility Projects require a Local Match*

<u>Type of Project</u>	<u>CDBG Grant</u>	<u>Local Match</u>
Providing basic facilities (i.e., water, sewer, storm drainage)	90%	10% (of grant)
Repair or upgrade of basic facilities (i.e., water, sewer, storm drainage)	80%	20%
Street improvements (including sidewalks & street lights)	70%	30%
Parks and Community Facilities	60%	40%
Plans & studies (not including detailed engineering for approved projects)	50%	50%

Policy 2: *All architecture and engineering/inspection costs are the responsibility of the local community.*

NOTE: Townships may continue to request the services of the county engineer.

Policy 3: *Local match funds may include local, state or federal funds.*

Local funds can include state shared taxes, local general funds, bonds and levies, and special assessments under special conditions, and may also include other state and/or federal funds. (rev. 1/16/91)

Policy 4: *Funding Agreement Amendments*

All amendments and adjustments to the Funding Agreement shall be by resolution of the Board of Commissioners. Claims by the contractor for extra cost shall not be honored unless made in writing and approved **before** execution of the work involved.

CHANGE ORDERS WILL NOT BE APPROVED FOR INCORRECT BID QUANTITIES.

Change Orders may be authorized by ED&P only within the limits of the above budgeted amount shown in the Funding Agreement, Attachment II, Work Program Budget.

Policy 5: *Projects to remove architectural barriers to the elderly and handicapped in buildings of general government shall not be funded through the Franklin County CDBG Program.*

Policy 6: *A road or ditch improvement must have a Resolution/Ordinance to assume maintenance responsibility.*

Policy 7: *Before a senior or community center facility uses CDBG funds for a study or construction, the local government must pass a resolution authorizing local funds to operate programs, support staff, and maintain the building based on an estimated first year's expense.*

Policy 8: *After a project is submitted and approved, and before a community receives any Franklin County CDBG funds, the chief executive officer/designated official must execute a Funding Agreement, which is required by HUD and contains specific administrative, financial and contractual obligations to be complied with by the county and the community.*

Policy 9: *Public improvement projects must be under contract for construction within 12 months after the county's execution of the Grant Agreement (HUD 7082) with HUD; and completed and all CDBG funds spent within 12 months of the same date.*

Policy 10: *If your jurisdiction has an adopted County plan, (through the County planning division) the infrastructure project forwarded for fund under this application must conform to and be consistent with goals and objectives of that plan.*

APPENDIX C

PUBLIC SERVICES PROGRAM/APPLICATION REQUIREMENTS

Public Services include, but are not limited to, activities that improve: facilities; employment rate; crime prevention; child care; health services; drug abuse; education; fair housing counseling; energy conservation; welfare; or recreational needs.

The public service must be a new service, or a quantifiable increase in the level of service above which was provided by or on behalf of the unit of local government/service agency in the twelve months prior to the submission of the statement.

In addition, the following documentation must be provided to Economic Development & Planning Department in order for public services activities to be considered for funding.

1. Program Description

Describe the agency/local government program and the service it provides, its clientele, and how this activity meets a national objective (LMI or limited clientele). Discuss whether the service is new or the expansion of an existing service.

2. Level of Service

- a) Define how the service is measured. Identify a unit of service (night of shelter, meals delivered per day, individuals served per month, etc).
- b) Identify the previous year's source of funds and respective funding levels.
- c) Document previous calendar year's level of service using the units described in (a) above.
- d) Identify the coming year's projected source of funds and funding levels.
- e) Project the coming year's level of service both with and without CDBG funding.
- f) Indicate the percentage of clients or persons served who reside in your community.

3. Continuation of Program

- a) Please describe strategy to maintain program in future years (CDBG funding can only be requested for one year).

APPENDIX D

FRANKLIN COUNTY CDBG ELIGIBLE TARGET AREAS

To determine whether your proposed program area is in a Franklin County CDBG eligible target area please follow the instructions below.

Step 1: Visit the website below:

<https://fca.maps.arcgis.com/apps/webappviewer/index.html?id=168b1243af9f4abd52b08895f79b1a>

Step 2: Locate your proposed project area on the map. The areas on the map that are hatched indicate CDBG eligible census tract block groups (based on HUD data for Fiscal Year 2021). Two different colors show the areas within and outside of Columbus (based on County Auditor’s boundary data).

Step 3: Click on the hatched block groups in your project area and a window will appear with a 12-digit “Block Group Number / GEOID” (i.e. 390490003101).

Step 4: List all eligible block group numbers within your proposed project area in the appropriate sections throughout this application.

The chart below provides a reference for the CDBG eligible block groups in Franklin County providing a breakdown of total population, total LMI population and LMI concentration for each block group. Please follow the instructions above to determine whether your proposed project area is within, or includes, CDBG eligible target areas.

Block Group Number / GEOID	County	Tract	Block Group	Total LMI Persons	Total Persons	CONCENTRATION (>= 51%)
390490003101	Franklin County	310	1	490	955	51.31%
390490003102	Franklin County	310	2	1185	1730	68.50%
390490003103	Franklin County	310	3	280	525	53.33%
390490003201	Franklin County	320	1	700	1190	58.82%
390490003302	Franklin County	330	2	975	1315	74.14%
390490003303	Franklin County	330	3	465	680	68.38%
390490005004	Franklin County	500	4	715	1010	70.79%
390490006002	Franklin County	600	2	835	1150	72.61%
390490006003	Franklin County	600	3	450	850	52.94%
390490006004	Franklin County	600	4	500	755	66.23%
390490006005	Franklin County	600	5	645	850	75.88%
390490007101	Franklin County	710	1	595	755	78.81%
390490007102	Franklin County	710	2	415	560	74.11%
390490007103	Franklin County	710	3	765	1245	61.45%
390490007104	Franklin County	710	4	560	770	72.73%
390490007201	Franklin County	720	1	450	610	73.77%
390490007202	Franklin County	720	2	480	655	73.28%
390490007203	Franklin County	720	3	710	790	89.87%
390490007301	Franklin County	730	1	610	715	85.31%

390490007302	Franklin County	730	2	765	820	93.29%
390490007303	Franklin County	730	3	595	635	93.70%
390490007304	Franklin County	730	4	375	480	78.13%
390490007305	Franklin County	730	5	600	740	81.08%
390490008101	Franklin County	810	1	700	1050	66.67%
390490008103	Franklin County	810	3	550	790	69.62%
390490008201	Franklin County	820	1	845	860	98.26%
390490008202	Franklin County	820	2	340	465	73.12%
390490009101	Franklin County	910	1	645	715	90.21%
390490009102	Franklin County	910	2	860	1065	80.75%
390490009103	Franklin County	910	3	950	1060	89.62%
390490009104	Franklin County	910	4	585	660	88.64%
390490009201	Franklin County	920	1	445	610	72.95%
390490009202	Franklin County	920	2	375	460	81.52%
390490009203	Franklin County	920	3	475	595	79.83%
390490010001	Franklin County	1000	1	220	220	100.00%
390490010002	Franklin County	1000	2	920	1485	61.95%
390490010003	Franklin County	1000	3	735	960	76.56%
390490010004	Franklin County	1000	4	370	400	92.50%
390490010005	Franklin County	1000	5	1050	1245	84.34%
390490010006	Franklin County	1000	6	610	995	61.31%
390490011101	Franklin County	1110	1	870	995	87.44%
390490011102	Franklin County	1110	2	930	935	99.47%
390490011103	Franklin County	1110	3	785	835	94.01%
390490011213	Franklin County	1121	3	125	140	89.29%
390490011221	Franklin County	1122	1	1125	1425	78.95%
390490011222	Franklin County	1122	2	50	50	100.00%
390490012001	Franklin County	1200	1	1000	1175	85.11%
390490012002	Franklin County	1200	2	555	650	85.38%
390490012003	Franklin County	1200	3	500	510	98.04%
390490012004	Franklin County	1200	4	1090	1095	99.54%
390490012005	Franklin County	1200	5	235	245	95.92%
390490013001	Franklin County	1300	1	1185	1260	94.05%
390490013002	Franklin County	1300	2	1450	1480	97.97%
390490013003	Franklin County	1300	3	965	965	100.00%
390490013004	Franklin County	1300	4	995	1035	96.14%
390490014001	Franklin County	1400	1	655	860	76.16%
390490014002	Franklin County	1400	2	445	500	89.00%
390490015001	Franklin County	1500	1	710	735	96.60%
390490015002	Franklin County	1500	2	930	930	100.00%
390490015003	Franklin County	1500	3	245	280	87.50%
390490016001	Franklin County	1600	1	695	810	85.80%
390490016002	Franklin County	1600	2	460	520	88.46%
390490017001	Franklin County	1700	1	790	830	95.18%

390490017002	Franklin County	1700	2	580	765	75.82%
390490017003	Franklin County	1700	3	485	660	73.48%
390490018101	Franklin County	1810	1	995	1030	96.60%
390490018102	Franklin County	1810	2	710	755	94.04%
390490018103	Franklin County	1810	3	410	500	82.00%
390490018104	Franklin County	1810	4	505	505	100.00%
390490018105	Franklin County	1810	5	385	395	97.47%
390490018202	Franklin County	1820	2	660	1075	61.40%
390490018203	Franklin County	1820	3	560	1060	52.83%
390490019021	Franklin County	1902	1	595	730	81.51%
390490019023	Franklin County	1902	3	415	645	64.34%
390490023001	Franklin County	2300	1	430	520	82.69%
390490023002	Franklin County	2300	2	660	775	85.16%
390490025101	Franklin County	2510	1	575	860	66.86%
390490025102	Franklin County	2510	2	610	815	74.85%
390490025103	Franklin County	2510	3	875	1205	72.61%
390490025201	Franklin County	2520	1	535	630	84.92%
390490025202	Franklin County	2520	2	770	995	77.39%
390490025203	Franklin County	2520	3	565	925	61.08%
390490026001	Franklin County	2600	1	895	950	94.21%
390490026002	Franklin County	2600	2	665	890	74.72%
390490026003	Franklin County	2600	3	1415	1805	78.39%
390490027101	Franklin County	2710	1	1060	1235	85.83%
390490027102	Franklin County	2710	2	650	670	97.01%
390490027301	Franklin County	2730	1	1170	1370	85.40%
390490027302	Franklin County	2730	2	665	865	76.88%
390490027403	Franklin County	2740	3	400	775	51.61%
390490027501	Franklin County	2750	1	850	1030	82.52%
390490027502	Franklin County	2750	2	1155	1400	82.50%
390490027602	Franklin County	2760	2	680	1080	62.96%
390490027603	Franklin County	2760	3	1075	1485	72.39%
390490027701	Franklin County	2770	1	410	580	70.69%
390490027702	Franklin County	2770	2	970	1465	66.21%
390490028001	Franklin County	2800	1	525	635	82.68%
390490028002	Franklin County	2800	2	395	505	78.22%
390490028003	Franklin County	2800	3	120	145	82.76%
390490028004	Franklin County	2800	4	435	675	64.44%
390490029001	Franklin County	2900	1	1440	1570	91.72%
390490029002	Franklin County	2900	2	1060	1070	99.07%
390490030003	Franklin County	3000	3	540	660	81.82%
390490036001	Franklin County	3600	1	575	725	79.31%
390490036002	Franklin County	3600	2	515	685	75.18%
390490037001	Franklin County	3700	1	355	545	65.14%
390490037002	Franklin County	3700	2	880	1035	85.02%

390490037003	Franklin County	3700	3	330	605	54.55%
390490037004	Franklin County	3700	4	595	700	85.00%
390490037005	Franklin County	3700	5	345	475	72.63%
390490038002	Franklin County	3800	2	865	1335	64.79%
390490040002	Franklin County	4000	2	685	1095	62.56%
390490042001	Franklin County	4200	1	495	520	95.19%
390490043002	Franklin County	4300	2	500	905	55.25%
390490043003	Franklin County	4300	3	790	790	100.00%
390490043004	Franklin County	4300	4	490	530	92.45%
390490045001	Franklin County	4500	1	620	840	73.81%
390490045002	Franklin County	4500	2	615	625	98.40%
390490045003	Franklin County	4500	3	415	485	85.57%
390490045004	Franklin County	4500	4	355	655	54.20%
390490045005	Franklin County	4500	5	1430	1785	80.11%
390490046104	Franklin County	4610	4	425	795	53.46%
390490046201	Franklin County	4620	1	620	765	81.05%
390490046202	Franklin County	4620	2	825	945	87.30%
390490046203	Franklin County	4620	3	450	625	72.00%
390490047001	Franklin County	4700	1	335	395	84.81%
390490047002	Franklin County	4700	2	1175	1280	91.80%
390490047003	Franklin County	4700	3	785	940	83.51%
390490047004	Franklin County	4700	4	505	575	87.83%
390490047005	Franklin County	4700	5	575	625	92.00%
390490047006	Franklin County	4700	6	890	1045	85.17%
390490048101	Franklin County	4810	1	625	895	69.83%
390490048102	Franklin County	4810	2	545	860	63.37%
390490048103	Franklin County	4810	3	1095	1485	73.74%
390490048201	Franklin County	4820	1	990	1205	82.16%
390490048202	Franklin County	4820	2	245	300	81.67%
390490048203	Franklin County	4820	3	645	840	76.79%
390490049001	Franklin County	4900	1	390	465	83.87%
390490049002	Franklin County	4900	2	715	815	87.73%
390490049003	Franklin County	4900	3	865	1230	70.33%
390490049004	Franklin County	4900	4	905	1045	86.60%
390490049005	Franklin County	4900	5	1295	1540	84.09%
390490049006	Franklin County	4900	6	345	380	90.79%
390490050001	Franklin County	5000	1	475	565	84.07%
390490050002	Franklin County	5000	2	710	845	84.02%
390490050003	Franklin County	5000	3	570	580	98.28%
390490050004	Franklin County	5000	4	500	520	96.15%
390490050005	Franklin County	5000	5	205	280	73.21%
390490050006	Franklin County	5000	6	810	960	84.38%
390490050007	Franklin County	5000	7	620	630	98.41%
390490051001	Franklin County	5100	1	1150	1160	99.14%

390490051002	Franklin County	5100	2	235	345	68.12%
390490053001	Franklin County	5300	1	325	455	71.43%
390490053002	Franklin County	5300	2	605	845	71.60%
390490053003	Franklin County	5300	3	490	755	64.90%
390490053004	Franklin County	5300	4	580	690	84.06%
390490054101	Franklin County	5410	1	1410	1675	84.18%
390490054201	Franklin County	5420	1	550	690	79.71%
390490054202	Franklin County	5420	2	585	640	91.41%
390490054203	Franklin County	5420	3	695	935	74.33%
390490055001	Franklin County	5500	1	570	675	84.44%
390490055002	Franklin County	5500	2	610	845	72.19%
390490055003	Franklin County	5500	3	595	620	95.97%
390490055004	Franklin County	5500	4	550	600	91.67%
390490055005	Franklin County	5500	5	475	900	52.78%
390490055006	Franklin County	5500	6	665	665	100.00%
390490055007	Franklin County	5500	7	105	150	70.00%
390490056101	Franklin County	5610	1	570	700	81.43%
390490056102	Franklin County	5610	2	895	1050	85.24%
390490056201	Franklin County	5620	1	705	815	86.50%
390490056202	Franklin County	5620	2	420	585	71.79%
390490056203	Franklin County	5620	3	475	620	76.61%
390490056204	Franklin County	5620	4	430	560	76.79%
390490058201	Franklin County	5820	1	450	705	63.83%
390490058202	Franklin County	5820	2	700	1225	57.14%
390490059001	Franklin County	5900	1	620	770	80.52%
390490059002	Franklin County	5900	2	415	580	71.55%
390490059004	Franklin County	5900	4	575	620	92.74%
390490060001	Franklin County	6000	1	290	365	79.45%
390490060002	Franklin County	6000	2	805	890	90.45%
390490061001	Franklin County	6100	1	525	705	74.47%
390490061002	Franklin County	6100	2	520	700	74.29%
390490061003	Franklin County	6100	3	640	740	86.49%
390490061004	Franklin County	6100	4	420	445	94.38%
390490063511	Franklin County	6351	1	775	1485	52.19%
390490063512	Franklin County	6351	2	625	1210	51.65%
390490063521	Franklin County	6352	1	500	955	52.36%
390490063522	Franklin County	6352	2	800	1005	79.60%
390490063523	Franklin County	6352	3	725	990	73.23%
390490063532	Franklin County	6353	2	1030	1685	61.13%
390490063533	Franklin County	6353	3	575	1010	56.93%
390490063711	Franklin County	6371	1	910	1615	56.35%
390490063713	Franklin County	6371	3	1035	1930	53.63%
390490063721	Franklin County	6372	1	1365	2125	64.24%
390490063723	Franklin County	6372	3	1000	1870	53.48%

390490063832	Franklin County	6383	2	1440	2590	55.60%
390490063834	Franklin County	6383	4	790	1300	60.77%
390490063862	Franklin County	6386	2	995	1815	54.82%
390490063871	Franklin County	6387	1	1245	2140	58.18%
390490063933	Franklin County	6393	3	845	1390	60.79%
390490063952	Franklin County	6395	2	825	1215	67.90%
390490063962	Franklin County	6396	2	470	760	61.84%
390490063964	Franklin County	6396	4	935	1625	57.54%
390490067222	Franklin County	6722	2	545	850	64.12%
390490068211	Franklin County	6821	1	1245	1545	80.58%
390490069211	Franklin County	6921	1	480	920	52.17%
390490069212	Franklin County	6921	2	540	970	55.67%
390490069213	Franklin County	6921	3	810	930	87.10%
390490069214	Franklin County	6921	4	535	920	58.15%
390490069232	Franklin County	6923	2	570	750	76.00%
390490069242	Franklin County	6924	2	1370	1725	79.42%
390490069311	Franklin County	6931	1	915	1125	81.33%
390490069312	Franklin County	6931	2	410	590	69.49%
390490069313	Franklin County	6931	3	1005	1615	62.23%
390490069314	Franklin County	6931	4	1175	1335	88.01%
390490069315	Franklin County	6931	5	660	815	80.98%
390490069316	Franklin County	6931	6	635	975	65.13%
390490069321	Franklin County	6932	1	805	1035	77.78%
390490069322	Franklin County	6932	2	595	1075	55.35%
390490069324	Franklin County	6932	4	850	1220	69.67%
390490069331	Franklin County	6933	1	1625	2040	79.66%
390490069332	Franklin County	6933	2	800	1365	58.61%
390490069333	Franklin County	6933	3	725	865	83.82%
390490069334	Franklin County	6933	4	1050	1145	91.70%
390490069432	Franklin County	6943	2	1060	1415	74.91%
390490069434	Franklin County	6943	4	525	925	56.76%
390490069451	Franklin County	6945	1	1145	1630	70.25%
390490069452	Franklin County	6945	2	1780	2330	76.39%
390490069453	Franklin County	6945	3	1290	2035	63.39%
390490069904	Franklin County	6990	4	460	650	70.77%
390490069905	Franklin County	6990	5	1215	1595	76.18%
390490070103	Franklin County	7010	3	425	750	56.67%
390490070431	Franklin County	7043	1	1920	3040	63.16%
390490070442	Franklin County	7044	2	925	1580	58.54%
390490070472	Franklin County	7047	2	1575	2565	61.40%
390490071121	Franklin County	7112	1	1540	2925	52.65%
390490071132	Franklin County	7113	2	680	1250	54.40%
390490071133	Franklin County	7113	3	1380	2690	51.30%
390490071142	Franklin County	7114	2	660	985	67.01%

390490071143	Franklin County	7114	3	1655	2495	66.33%
390490071152	Franklin County	7115	2	550	835	65.87%
390490071153	Franklin County	7115	3	710	1270	55.91%
390490071155	Franklin County	7115	5	960	1130	84.96%
390490071202	Franklin County	7120	2	915	1710	53.51%
390490072021	Franklin County	7202	1	480	695	69.06%
390490073933	Franklin County	7393	3	1015	1825	55.62%
390490073955	Franklin County	7395	5	775	1220	63.52%
390490073956	Franklin County	7395	6	785	930	84.41%
390490073961	Franklin County	7396	1	35	35	100.00%
390490074246	Franklin County	7424	6	545	1010	53.96%
390490074261	Franklin County	7426	1	1290	2200	58.64%
390490074273	Franklin County	7427	3	945	1810	52.21%
390490075111	Franklin County	7511	1	935	1060	88.21%
390490075112	Franklin County	7511	2	515	635	81.10%
390490075121	Franklin County	7512	1	470	790	59.49%
390490075122	Franklin County	7512	2	1105	1770	62.43%
390490075123	Franklin County	7512	3	1275	1555	81.99%
390490075201	Franklin County	7520	1	1120	1700	65.88%
390490075202	Franklin County	7520	2	540	600	90.00%
390490075203	Franklin County	7520	3	1105	1155	95.67%
390490075311	Franklin County	7531	1	1130	1685	67.06%
390490075312	Franklin County	7531	2	1110	1145	96.94%
390490075321	Franklin County	7532	1	1805	2245	80.40%
390490075331	Franklin County	7533	1	470	730	64.38%
390490075332	Franklin County	7533	2	840	1220	68.85%
390490075341	Franklin County	7534	1	1595	1770	90.11%
390490075342	Franklin County	7534	2	770	1285	59.92%
390490075501	Franklin County	7550	1	955	1780	53.65%
390490075502	Franklin County	7550	2	345	645	53.49%
390490075511	Franklin County	7551	1	4360	6985	62.42%
390490075512	Franklin County	7551	2	1665	1880	88.56%
390490077101	Franklin County	7710	1	935	1040	89.90%
390490077102	Franklin County	7710	2	760	1340	56.72%
390490077104	Franklin County	7710	4	935	1045	89.47%
390490077212	Franklin County	7721	2	810	900	90.00%
390490077213	Franklin County	7721	3	655	900	72.78%
390490077214	Franklin County	7721	4	1055	1505	70.10%
390490077215	Franklin County	7721	5	1360	1685	80.71%
390490077221	Franklin County	7722	1	260	490	53.06%
390490077222	Franklin County	7722	2	945	1320	71.59%
390490077301	Franklin County	7730	1	1275	1950	65.38%
390490077401	Franklin County	7740	1	930	1705	54.55%
390490078114	Franklin County	7811	4	680	970	70.10%

390490078121	Franklin County	7812	1	570	985	57.87%
390490078123	Franklin County	7812	3	1030	1600	64.38%
390490078201	Franklin County	7820	1	295	410	71.95%
390490078202	Franklin County	7820	2	935	1180	79.24%
390490078203	Franklin County	7820	3	890	1085	82.03%
390490078204	Franklin County	7820	4	845	905	93.37%
390490078301	Franklin County	7830	1	285	555	51.35%
390490078302	Franklin County	7830	2	590	735	80.27%
390490078303	Franklin County	7830	3	715	1230	58.13%
390490079312	Franklin County	7931	2	1215	2195	55.35%
390490079543	Franklin County	7954	3	2425	2995	80.97%
390490081101	Franklin County	8110	1	770	1255	61.35%
390490081102	Franklin County	8110	2	460	765	60.13%
390490081105	Franklin County	8110	5	400	705	56.74%
390490081201	Franklin County	8120	1	1040	1160	89.66%
390490081202	Franklin County	8120	2	765	1410	54.26%
390490081203	Franklin County	8120	3	620	1145	54.15%
390490081321	Franklin County	8132	1	775	1505	51.50%
390490081322	Franklin County	8132	2	1760	3090	56.96%
390490081324	Franklin County	8132	4	1240	1465	84.64%
390490081421	Franklin County	8142	1	1955	3535	55.30%
390490081611	Franklin County	8161	1	2770	3690	75.07%
390490081623	Franklin County	8162	3	1690	1750	96.57%
390490081624	Franklin County	8162	4	785	1315	59.70%
390490081631	Franklin County	8163	1	1735	1980	87.63%
390490081632	Franklin County	8163	2	1535	1675	91.64%
390490081641	Franklin County	8164	1	1610	2410	66.80%
390490081642	Franklin County	8164	2	1125	1900	59.21%
390490082101	Franklin County	8210	1	525	700	75.00%
390490082102	Franklin County	8210	2	1285	1515	84.82%
390490082301	Franklin County	8230	1	480	660	72.73%
390490082302	Franklin County	8230	2	1170	1205	97.10%
390490082411	Franklin County	8241	1	920	1190	77.31%
390490082412	Franklin County	8241	2	710	965	73.58%
390490082423	Franklin County	8242	3	1355	2055	65.94%
390490083111	Franklin County	8311	1	1905	2175	87.59%
390490083113	Franklin County	8311	3	1040	1155	90.04%
390490083121	Franklin County	8312	1	685	805	85.09%
390490083122	Franklin County	8312	2	1095	1130	96.90%
390490083123	Franklin County	8312	3	470	920	51.09%
390490083124	Franklin County	8312	4	865	995	86.93%
390490083125	Franklin County	8312	5	780	980	79.59%
390490083211	Franklin County	8321	1	630	970	64.95%
390490083212	Franklin County	8321	2	585	995	58.79%

390490083213	Franklin County	8321	3	340	630	53.97%
390490083221	Franklin County	8322	1	500	600	83.33%
390490083222	Franklin County	8322	2	1240	1400	88.57%
390490083223	Franklin County	8322	3	590	1150	51.30%
390490083224	Franklin County	8322	4	805	935	86.10%
390490083301	Franklin County	8330	1	835	1125	74.22%
390490083302	Franklin County	8330	2	390	510	76.47%
390490083401	Franklin County	8340	1	1015	1250	81.20%
390490083403	Franklin County	8340	3	810	1030	78.64%
390490083501	Franklin County	8350	1	1645	2700	60.93%
390490083502	Franklin County	8350	2	2440	3000	81.33%
390490083503	Franklin County	8350	3	830	1480	56.08%
390490083603	Franklin County	8360	3	880	1430	61.54%
390490083701	Franklin County	8370	1	2100	3235	64.91%
390490083703	Franklin County	8370	3	1070	2080	51.44%
390490083802	Franklin County	8380	2	1650	2955	55.84%
390490087101	Franklin County	8710	1	780	1015	76.85%
390490087102	Franklin County	8710	2	280	495	56.57%
390490087103	Franklin County	8710	3	345	580	59.48%
390490087104	Franklin County	8710	4	460	805	57.14%
390490087201	Franklin County	8720	1	650	830	78.31%
390490087202	Franklin County	8720	2	375	400	93.75%
390490087203	Franklin County	8720	3	1065	1280	83.20%
390490087301	Franklin County	8730	1	750	895	83.80%
390490087302	Franklin County	8730	2	505	505	100.00%
390490088111	Franklin County	8811	1	785	1130	69.47%
390490088112	Franklin County	8811	2	595	805	73.91%
390490088121	Franklin County	8812	1	1120	2010	55.72%
390490088122	Franklin County	8812	2	685	1010	67.82%
390490088131	Franklin County	8813	1	735	1250	58.80%
390490088132	Franklin County	8813	2	405	685	59.12%
390490088133	Franklin County	8813	3	515	635	81.10%
390490088211	Franklin County	8821	1	595	950	62.63%
390490088212	Franklin County	8821	2	490	885	55.37%
390490088213	Franklin County	8821	3	435	795	54.72%
390490088221	Franklin County	8822	1	2000	2530	79.05%
390490088222	Franklin County	8822	2	1475	1945	75.84%
390490088251	Franklin County	8825	1	1120	1665	67.27%
390490088254	Franklin County	8825	4	755	850	88.82%
390490089004	Franklin County	8900	4	940	1285	73.15%
390490092101	Franklin County	9210	1	2170	2805	77.36%
390490092102	Franklin County	9210	2	1175	1380	85.14%
390490092103	Franklin County	9210	3	475	510	93.14%
390490092201	Franklin County	9220	1	695	995	69.85%

390490092202	Franklin County	9220	2	590	935	63.10%
390490092301	Franklin County	9230	1	1265	1355	93.36%
390490092302	Franklin County	9230	2	1335	1625	82.15%
390490092303	Franklin County	9230	3	695	945	73.54%
390490092304	Franklin County	9230	4	585	1035	56.52%
390490092401	Franklin County	9240	1	480	685	70.07%
390490092402	Franklin County	9240	2	830	1325	62.64%
390490092501	Franklin County	9250	1	265	440	60.23%
390490092503	Franklin County	9250	3	420	745	56.38%
390490093111	Franklin County	9311	1	605	920	65.76%
390490093112	Franklin County	9311	2	730	1120	65.18%
390490093113	Franklin County	9311	3	765	940	81.38%
390490093121	Franklin County	9312	1	795	955	83.25%
390490093122	Franklin County	9312	2	450	615	73.17%
390490093123	Franklin County	9312	3	760	1050	72.38%
390490093124	Franklin County	9312	4	325	325	100.00%
390490093211	Franklin County	9321	1	425	780	54.49%
390490093212	Franklin County	9321	2	590	740	79.73%
390490093213	Franklin County	9321	3	605	895	67.60%
390490093221	Franklin County	9322	1	450	790	56.96%
390490093222	Franklin County	9322	2	1160	2050	56.59%
390490093223	Franklin County	9322	3	905	1010	89.60%
390490093231	Franklin County	9323	1	575	860	66.86%
390490093232	Franklin County	9323	2	650	780	83.33%
390490093233	Franklin County	9323	3	1100	1255	87.65%
390490093234	Franklin County	9323	4	475	495	95.96%
390490093251	Franklin County	9325	1	755	810	93.21%
390490093252	Franklin County	9325	2	595	920	64.67%
390490093253	Franklin County	9325	3	1630	1885	86.47%
390490093261	Franklin County	9326	1	1500	1650	90.91%
390490093311	Franklin County	9331	1	845	980	86.22%
390490093321	Franklin County	9332	1	210	375	56.00%
390490093322	Franklin County	9332	2	305	580	52.59%
390490093323	Franklin County	9332	3	625	1140	54.82%
390490093331	Franklin County	9333	1	730	1290	56.59%
390490093332	Franklin County	9333	2	870	1060	82.08%
390490093341	Franklin County	9334	1	425	720	59.03%
390490093342	Franklin County	9334	2	445	735	60.54%
390490093343	Franklin County	9334	3	940	1395	67.38%
390490093361	Franklin County	9336	1	1305	1790	72.91%
390490093362	Franklin County	9336	2	660	1120	58.93%
390490093371	Franklin County	9337	1	960	1485	64.65%
390490093372	Franklin County	9337	2	880	1225	71.84%
390490093373	Franklin County	9337	3	335	630	53.17%

390490093374	Franklin County	9337	4	725	840	86.31%
390490093401	Franklin County	9340	1	1305	1540	84.74%
390490093402	Franklin County	9340	2	1185	1605	73.83%
390490093501	Franklin County	9350	1	985	1705	57.77%
390490093611	Franklin County	9361	1	975	1440	67.71%
390490093612	Franklin County	9361	2	570	1095	52.05%
390490093614	Franklin County	9361	4	900	1060	84.91%
390490093622	Franklin County	9362	2	985	1350	72.96%
390490093711	Franklin County	9371	1	1085	1465	74.06%
390490093712	Franklin County	9371	2	1085	1140	95.18%
390490093713	Franklin County	9371	3	995	1395	71.33%
390490093714	Franklin County	9371	4	1205	1645	73.25%
390490093721	Franklin County	9372	1	375	625	60.00%
390490093722	Franklin County	9372	2	410	510	80.39%
390490093723	Franklin County	9372	3	890	1015	87.68%
390490093732	Franklin County	9373	2	700	1005	69.65%
390490093733	Franklin County	9373	3	880	1195	73.64%
390490093734	Franklin County	9373	4	740	995	74.37%
390490093741	Franklin County	9374	1	1200	1880	63.83%
390490093742	Franklin County	9374	2	2435	4560	53.40%
390490093814	Franklin County	9381	4	625	1175	53.19%
390490093821	Franklin County	9382	1	1050	1835	57.22%
390490093822	Franklin County	9382	2	575	1075	53.49%
390490093831	Franklin County	9383	1	605	1010	59.90%
390490093832	Franklin County	9383	2	880	1545	56.96%
390490093841	Franklin County	9384	1	735	1375	53.45%
390490093842	Franklin County	9384	2	515	835	61.68%
390490093861	Franklin County	9386	1	1695	3115	54.41%
390490094101	Franklin County	9410	1	695	1075	64.65%
390490094102	Franklin County	9410	2	975	1775	54.93%
390490094201	Franklin County	9420	1	370	700	52.86%
390490094203	Franklin County	9420	3	700	1245	56.22%
390490094204	Franklin County	9420	4	2215	3010	73.59%
390490094302	Franklin County	9430	2	510	955	53.40%
390490094305	Franklin County	9430	5	1095	1830	59.84%
390490094401	Franklin County	9440	1	820	1520	53.95%
390490094952	Franklin County	9495	2	1495	2825	52.92%
390490095201	Franklin County	9520	1	870	1680	51.79%
390490095202	Franklin County	9520	2	790	1265	62.45%
390490095203	Franklin County	9520	3	940	1420	66.20%
390490095901	Franklin County	9590	1	355	585	60.68%
390490095902	Franklin County	9590	2	795	1435	55.40%
390490095903	Franklin County	9590	3	1280	1845	69.38%
390490096001	Franklin County	9600	1	770	1015	75.86%

390490096003	Franklin County	9600	3	475	875	54.29%
390490097113	Franklin County	9711	3	580	665	87.22%
390490097114	Franklin County	9711	4	650	1100	59.09%
390490097123	Franklin County	9712	3	720	1235	58.30%
390490097201	Franklin County	9720	1	1005	1340	75.00%
390490097204	Franklin County	9720	4	1160	1890	61.38%
390490098001	Franklin County	9800	1	980	1870	52.41%
390490099001	Franklin County	9900	1	1270	1550	81.94%
390490102003	Franklin County	10200	3	1200	2215	54.18%
390490102004	Franklin County	10200	4	1855	2160	85.88%
390490103001	Franklin County	10300	1	2460	2985	82.41%
390490106021	Franklin County	10602	1	825	1390	59.35%
390490107001	Franklin County	10700	1	985	1530	64.38%

APPENDIX E

PROCEDURES FOR QUALIFYING A TARGET AREA AND SERVICE AREA WITH A CONFIDENTIAL HOUSEHOLD INCOME SURVEY

1. Local officials should distribute a copy of the memorandum and survey forms by mail or door to door.
2. Local officials tally results by household size and complete attached Income Survey Summary.
3. The minimum sample size required for the Income Survey to be valid is attached.
4. Local officials must submit all original surveys, a census map and plat map showing boundaries of area surveyed, and an Income Survey Summary to ED&P.
5. Target areas surveyed should correspond with Census Tracts and/or Block Groups as close as possible. Target areas must be contiguous and a minimum size of one street block.
6. An Income Survey will be good for three years.
7. When qualifying a target area with an Income Survey, the area must be a minimum 51 percent low- to moderate-income to be eligible for Community Development Block Grant (CDBG) assistance.
8. Surveying must be done randomly throughout the target area. It is recommended that every other house on each street in the target area be surveyed.

TABLE A
REQUIRED SAMPLE SIZES FOR A CONFIDENTIAL HOUSEHOLD INCOME SURVEY

NUMBER OF HOUSEHOLDS IN TARGET AREA		NUMBER OF COMPLETED SURVEYS REQUIRED
1 -	50	1 for each household
51 -	55	50
56 -	63	55
64 -	70	60
71 -	77	65
78 -	87	70
88 -	99	80
100 -	115	90
116 -	138	100
139 -	153	110
154 -	180	125
181 -	238	150
239 -	308	175
309 -	398	200
399 -	650	250
651 -	1,200	300
1,201 -	2,700	350
2,701 or more		400

SOURCE: U.S. HUD Income Survey Methodology Memo 7/11/88

Please Note:

The number of surveys required in Table A indicate the number of surveys that you need to complete, and not the number of households you need to contact.

In order for each survey to be considered a valid response, you must obtain complete and accurate information on the respondent's income level. If the respondent chooses not to respond, the survey does not count toward the required number of surveys. Table B suggest some of the usual rates of response to be expected by different survey methods.

TABLE B
EXPECTED RATES OF RESPONSE FOR DIFFERENT SURVEY METHODS

Survey Method	Expected Rate of Response
Mail	25 - 50%
Mail, with letter follow-up	50 - 60%
Mail, with telephone follow-up	50 - 80%
Telephone	75 - 90%
Door-to-Door	75 - 90%
SOURCE: U.S. HUD Income Survey Methodology Memo 7/11/88	

{THE LOCAL JURISDICTION DISTRIBUTES THE TWO PAGE LETTER (SURVEY) BELOW TO EACH HOUSEHOLD IN THE SURVEY AREA:}

(Local Letterhead)

MEMORANDUM

TO:

Residents of (Name of target Area)

FROM:

(Name of local official)

DATE:

RE:

**Eligibility of _____ for Franklin County Housing
(Name of Target Area)
Community Development Block Grant Program**

This memo is to inform you of and urge you to complete the attached confidential Household Income Survey. It is necessary to do so in order to qualify your neighborhood for public improvements and public service projects funded by the Franklin County Community Development Block Grant Program.

Let me assure you that all information will be confidential and will be used only for the purpose of qualifying your neighborhood for these funds.

Please return the Survey Form in the enclosed self-addressed, stamped envelope or deliver it to _____, by, 2022.

Thank you for your cooperation.

FRANKLIN COUNTY
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

CONFIDENTIAL HOUSEHOLD INCOME SURVEY

(Name of Target Area)

ADDRESS OF HOUSEHOLD

DATE OF SURVEY: _____, 202_

NAME OF SURVEYOR: _____

DECLINE TO PARTICPATE _____

1) Please check the box your family's total household income falls within:

	Household Income Limits as of 5/31/21	Respondent's Household Income
From	To	(Check a box below)
\$0	\$ 46,950	
\$ 46,951	\$ 53,650	
\$ 53,651	\$ 60,350	
\$ 60,351	\$ 67,050	
\$ 67,051	\$ 72,450	
\$ 72,451	\$ 77,800	
\$ 77,801	\$ 83,150	
\$ 83,151	\$ 88,550	

2) How many individuals reside in your household (include yourself, your spouse if applicable and all dependent children residing there) _____

USING THE FAMILY INCOME AND HOUSEHOLD SIZE FROM EACH SURVEY RECEIVED, COMPLETE THE AGGREGATE SURVEY BELOW:

**FRANKLIN COUNTY
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
CONFIDENTIAL HOUSEHOLD INCOME SURVEY SUMMARY**

(Area & the Project the Survey is being Conducted for) _____

Number of Households of Each Size	Household Income Limits as of 5/31/2021	Column A	Column B
		# of Responses at or below income Limits	# of Responses above Income Limits
1	\$46,950		
2	\$53,650		
3	\$60,350		
4	\$67,050		
5	\$72,450		
6	\$77,800		
7	\$83,150		
8 or more	\$88,550		

Total _____

Total Number of responding Households (Add column A and Column B) _____

- A. Total number of persons in service/benefit area _____
- B. Total number of households responding to survey _____
- C. Total number of households identified as LMI (Total Column A) _____
- D. Percent LMI households (Divide total number of households Responding by Column A) _____

E. Survey methodology: (How was survey distributed i.e. every household; every other household; houses on one side of the street etc.) _____

F. Date of survey _____

I hereby certify that this tally sheet represents a true and accurate accounting of this Income Survey, which was distributed throughout the target area and compiled for the Franklin County Community Development Block Grant Program.

Signature of Local Official

Date

Printed Name of Local Official

Phone number

APPENDIX F

FRANKLIN COUNTY CITIZEN PARTICIPATION PLAN AND PROGRAM AMENDMENT PROCEDURES

for the Use of Funds from the U.S. Department of Housing and Urban Development

Franklin County's Citizen Participation Plan must provide citizens with information and the opportunity to comment upon the following documents and activities:

- 1) The Citizen Participation Plan
- 2) The amount of funds expected to be received
- 3) To discuss their housing and community development needs and proposed activities for meeting those needs
- 4) The draft Consolidated Plan
- 5) The Consolidated Annual Performance Report
- 6) Substantial amendments to the Consolidated Plan

PART 1

Franklin County Citizen Participation Plan for the
Consolidated Plan 2020-2024 includes the following activities:

- Target area citizen forums
- Survey (Community Development Needs) meetings
- Community Development Advisory Committee review and comment
- Technical Assistance

TARGET AREA CITIZEN FORUMS

Summer - Fall

Low and Moderate income target areas are determined by HUD using U.S. census data. Forums are held in a number of these target areas to

- Receive citizen comments on the Citizen Participation Plan;
- Identify local housing and community development needs;
- Announce the availability of funds, and
- Announce the availability of technical assistance.

COMMUNITY SURVEYS

September

An easy-to-read survey is distributed by local officials in targeted areas. It is also sent to a mailing list of interested individuals and community organizations.

This survey asks residents:

- To identify the most important need in their community.
- indicate the priority for the use of HUD funds.
- Identify the housing and community development needs of the low- income and very low income residents and areas in their communities, and;
- Determine the priorities for the use of CDBG, HOME and ESG funds.

FRANKLIN COUNTY COMMUNITY DEVELOPMENT
ADVISORY COMMITTEE

December

This committee advises the Franklin County Commissioners and reviews results of the surveys, community forums, service group and economic development focus group meetings. The committee also reviews and comments upon the regional themes, strategic goals and priorities and proposed activities, programs, and outcomes.

PUBLICATION OF THE PROPOSED CONSOLIDATED PLAN

December

A summary of the Plan will be placed in all suburban newspapers and informing the reader that a copy of the Plan may be obtained at the Mid-Ohio Regional Planning Commission. Copies will be placed in all suburban libraries.

PUBLIC HEARINGS

Franklin County holds two public hearings.

January

The public hearing are held to discuss and to receive public input on the proposed Annual action Plan.

PART 2

Franklin County Citizen Participation Plan for the **Annual Consolidated Action Plan**

Notices are sent to local officials and interested citizens and community organizations announcing the public hearing and the amount of funds expected to be received. A summary of the Consolidated Annual Performance Report for the previous year is made at the public hearing.

LOCAL PUBLIC HEARING

January

Local public hearing in communities proposing to submit applications for funds. Hearings must be held at council or board of trustees meeting. Local officials must distribute flyers in neighborhoods where activities are proposed and inviting citizens to comment.

FRANKLIN COUNTY COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

April

This committee reviews and comments on proposed activities for the Annual Consolidated Action Plan and amounts allocated for each activity.

30 DAY PUBLIC COMMENT

June

A summary of the proposed Annual Consolidated Action Plan is published in The Columbus Dispatch and in suburban newspapers in January of each year, updated to June for 2022 PY. A summary will also be mailed to local officials and interested citizens and community organizations.

PUBLIC HEARING

Franklin County Board of Commissioners holds a public hearing in January, (May for FY 2022) of each year to invite citizens to comment on the proposed Annual Consolidated Action Plan.

PART 3

Citizen Participation Plan for Making **Substantial Amendments** to the Consolidated Plan

SUBSTANTIAL AMENDMENT

A substantial amendment is made when the following occurs:

- a project is added to the program
- a project is dropped from the program
- location of the project is changed
- a major change in the scope of activities or who will benefit
- the cost of a project or activity goes up or down by 20% or more.

HOW PROGRAM AMENDMENTS ARE MADE

If a local government wishes to change or drop a project, it must hold a local public hearing and make a request to the Franklin County. The Franklin County Board of Commissioners also holds a public hearing. A public notice of a program amendment and available funds is published.

30 DAY COMMENT PERIOD

- During this period The Franklin County Community Development Advisory Committee will review and comment.
- The proposed amendment will be published in The Columbus Dispatch and press releases sent to suburban newspapers. A summary will be mailed to local officials, interested individuals and community organizations.

PART 4
Opportunity to comment on the **Consolidated Annual Performance Report (CAPR)**

A summary of the Consolidated Annual Performance & Evaluation Report (CAPER) will be sent to all local officials, interested citizens and community organizations.

A notice of the availability of the Report will be published in The Columbus Dispatch and a press release summary will be sent to suburban newspapers informing the public that copies may be obtained from the Franklin County Board of Commissioners. Copies will be placed in suburban public libraries.

PUBLIC HEARING

A summary of the Report will be provided at the ANNUAL GENERAL PUBLIC HEARING to identify housing and community development needs and inform citizens about the funds expected to be received.

PART 5

Records of Franklin County's use of funds for the last 5 years are available during normal business hours at the:
Franklin County Economic Development & Planning Department
150 S. Front Street, Suite 10
Columbus, OH 43215
Ms. Sierra Faris
(614) 525-4874

APPENDIX G
CONSOLIDATED PLAN PRIORITIES
FRANKLIN COUNTY STRATEGIC PLAN GOALS 2020-2024

Please select the theme and objective that best describes your project.

Theme 1: Affordable Housing Opportunity

1. Increase the supply of affordable rental housing units for very low- and extremely low-income families and individuals outside areas of poverty and near employment growth centers.

Objective 1a: Provide gap financing to for profit and non-profit developers rental apartments.

2. Increase the range of housing options and related services for special needs populations. (e.g. homeless, elderly, disabled)

Objective 2a: Help prevent homelessness and help families and individuals move out of emergency shelter into transitional or permanent housing.

Objective 2b: Contribute to operating support for emergency Shelters by Community Shelter Board. Add capacity for emergency housing for seniors.

Objective 2c: Continue operating support for existing supportive housing.

Objective 2d: Through July 2013 implement the Rebuilding Lives by funding nonprofit organizations to develop working and operate permanent housing for disabled.

Objective 2e: Provide grants to enable disabled persons to live independently.

3. Expand the conversation and improvement of existing affordable owner and renter housing.

Objective 3a: Provide loans to make repairs or rehabilitate homes in conjunction with grants to make homes/apartments lead safe.

Objective 3b: Provide grants for urgent repairs to enable homeowners to stay in their homes.

Objective 3c: Find ways to retain Section 8 Projects in the affordable housing market.

4. Increase opportunities for low-income households to become and remain homeowners.

Objective 4a: Enable low income families buy their first home.

Objective 4b: Enable seniors and all very low income households in areas where public water & sewer is constructed to not be financially burdened.

5. Ensure the re-development of first ring suburbs and commercial areas in townships.

Objective 5a: Prepare a new Analysis of Impediments to Fair Housing.

Objective 5b: Prepare a Fair Housing Action Plan to address impediments.

Theme 2: Neighborhood Revitalization

1. Upgrade residential subdivisions and small villages to current standards by constructing sanitary sewer, water, storm sewers and/or streets with curbs & gutters.

Objective 1a: Redevelop/develop Water Quality Partnership Township target areas with wastewater and environmental problems.

2. Encourage the re-development of first ring suburbs and commercial areas in townships.

Objective 2a: Develop an incentive program for re-development in First Ring Suburbs (Bexley, Grandview Heights, Upper Arlington and Whitehall).

Objective 2b: Complete redevelopment plans for low income commercial areas in unincorporated county (Cleveland Avenue, Harrisburg Pike and West Broad)

3. Repair and replace deteriorated infrastructure in older city, townships and village centers.

Objective 3a: Replace streets, curbs & gutters, sidewalks, water and sewer lines and install or replace storm sewers to accommodate increased run-off from development.

Objective 3b: Provide incentive funds for townships to undertake nuisance abatement/code enforcement.

4. Address the low income neighborhood needs in growing suburban cities, villages and townships.

Objective 4a: Rebuild streets, curbs & gutters, waterlines, sanitary sewers and storm sewers to accommodate increased run-off from development.

Objective 4b: Provide incentives for construction of recreation facilities or programming for youth or seniors.

5. Provide technical and financial assistance to community based organizations in order to address neighborhood needs.

Objective 5a: Help low income communities improve their ability to help themselves, e.g. community, Nonprofits, CHDOs, or other community-based organizations.

Theme 3. Economic Development & Economic Opportunity

1. Promote workforce development through education, training and other linkages to high growth job markets.

Objective 1a: First Source Hiring Agreements link low income residents to high growth job markets.

Objective 1b: Assist TANF customers to obtain jobs through total case management and Job Opportunity Centers.

2. Help low-income residents obtain and keep jobs that match their interests and potential.

Objective 1a : Same as above.

3. Promote thriving small and emerging businesses.

Objective 3a: Implement the Small and Emerging Business procurement policy.

4. Create a competitive business environment in low income and targeted areas that generate employment, business growth and customer services.

Objective 4a: Promote the Rickenbacker Port Authority and the Franklin County Community Improvement Corporation

Objective 4b: See Neighborhood Revitalization Goal 2 for Older Suburbs and redevelopment of Low income commercial areas in townships.

5. Increase low-income individuals' access to regional job markets and locations.

Objective 5a: Support passage of the COTA levy.

Theme 4. Education & Supportive Service Linkages

1. Provide a coordinated system of childcare, education and development services for children and teens.

Objective 1a: Provide incentive funds for pilot programs

2. Provide and promote parental education and family development.

Objective 2a: Provide incentive funds for innovative programs to reduce substance abuse or child abuse.

3. Meet the comprehensive health needs of low and moderate-income residents. 3-year HUD CDBG and Lead-Based Paint Hazard Control grants implemented by MORPC and Franklin County Board of Health will address:

Objective 3a: Reduce the number of children with elevated blood levels of lead.

Objective 3b: Reduce number of homes and apartments with dangerous amounts of lead

Objective 3c: Hold immunization clinics for families and children

4. Eliminate barriers that keep students from graduating high school and being better prepared for advanced education and employment.

Objective 4a: Same as above

5. Assist families and individuals moving from poverty or public assistance to stability and self-sufficiency.

Objective 5a: Provide incentive funds for innovative programs such as transportation or ombudsman to access needed services.

APPENDIX H

COMMUNITY DEVELOPMENT BLOCK GRANT FRANKLIN COUNTY

ENVIRONMENTAL REVIEW

AT THE

COMMUNITY LEVEL

Project Name _____

- X Original
- ~ Revision Dated
- ~ Amendment Dated

LIST THE EXISTING ENVIRONMENTAL CONDITIONS SURROUNDING THE PROJECT:

PROJECT FUNDING/SOURCES:

Activity	Total Cost	CDBG	HOME	ESG	Other

STATUTORY CHECKLIST
Checklist of Applicable Statutes & Regulations
Part I

Project Name:
List Projects Activities:
PART I: PROJECT DATA
1. Purpose of Project:
2. Status of Project:
3. Project and Area Description:
4. Project and Area Maps and Plans:

STATUTORY CHECKLIST
Area of Statutory/Regulatory Compliance
Part II

Project Name:

Area of Statutory-Regulatory Compliance

KEY:

1. Not applicable to this project
2. Consultation required
3. Review required
4. Permits required
5. Determination of consistency, approvals, permits obtained
6. Conditions and/or mitigation actions required
7. Provide compliance documentation; additional material may be attached.

(See Key)	1	2	3	4	5	6	7
Historic Properties							
Floodplain Mgmt							
Wetlands Protection							
Noise							
Manmade Hazards Thermal/Explosive							
Airport Clear Zones							
Air Quality							
Water Quality Aquifers							
Coastal Areas-Coastal Zone Mgmt							
Coastal Barrier Resource							
Endangered Species							
Farmlands Protection							
Wild & Scenic Rivers							

STATUTORY CHECKLIST
Permits, Licenses, Forms of Compliances Under Other Laws
(Federal, State and Local Laws)
Part II

Project Name:

Other Areas of Statutory & Regulatory Compliance Applicable to Project

KEY:

1. Not applicable to this project
2. Consultation required
3. Review required
4. Permits required
5. Determination of consistency approvals, permits obtained
6. Conditions and/or mitigation actions required
7. Provide compliance documentation - additional material may be attached.

(See Key)	1	2	3	4	5	6	7
Water Quality							
Solid Waste Disposal							
Fish and Wildlife							
State or Local Statutes (to be added by local community)							

ENVIRONMENTAL ASSESSMENT CHECKLIST

Project Name:

IMPACT CATEGORIES

KEY:

- 1. No impact anticipated
- 2. Potentially beneficial
- 3. Potentially adverse - requires documentation
- 4. Potentially adverse - requires more study
- 5. Needs mitigation
- 6. Requires project modification
- 7. For each area attach documentation

Land Development

See Key	1	2	3	4	5	6	7
Conformance with Comprehensive Plans & Zoning							
Compatibility and Urban Impact							
Slope							
Erosion							
Soil Suitability							
Hazards and Nuisances, including Site Safety							
Energy Consumption							
NOISE - Effects of Ambient Noise on Project and Contribution to Community Noise Levels							

ENVIRONEMNTAL ASESSMENT CHECKLIST

Project Name:

Impact Categories

KEY:

- 1. No impact anticipated
- 2. Potentially beneficial
- 3. Potentially adverse - requires documentation
- 4. Potentially adverse - requires more study
- 5. Needs mitigation
- 6. Requires project modification
- 7. For each area attach documentation

Air Quality	1	2	3	4	5	6	7
Effects of Ambient Air Quality & Contribution to Community Pollution Levels							
Environ. Design & Historic Values							
Visual Quality- Coherence, Diversity, Compatible Use, and Scale							
Historic, Cultural, And Archaeological Resources							
Socioeconomic							
Demographic/ Character Changes							
Displacement							
Employment and Income Patterns							
Comm.Facilities and Services							

Educational Facilities							
Commercial Fac.							
Health Care							

ENVIRONMENTAL ASSESSMENT CHECKLIST

Project Name:

Impact Categories (continued)

KEY:

- 1. No impact anticipated
- 2. Potentially beneficial
- 3. Potentially adverse - requires documentation
- 4. Potentially adverse - requires more study
- 5. Needs mitigation
- 6. Requires project modification
- 7. For each area attach documentation

	1	2	3	4	5	6	7
Community Facilities & Services (continued)							
Solid Waste							
Waste Water							
Storm Water							
Water Supply							
Public Safety Police							
Fire							
Emergency Medical							
Open Space & Recreation Open Space							
Recreation							
Cultural Facilities							
Transportation							

ENVIRONMENTAL ASSESSMENT CHECKLIST

Project Name:

Natural Features

KEY:

1. No impact anticipated
2. Potentially beneficial
3. Potentially adverse - requires documentation
4. Potentially adverse - requires more study
5. Needs Mitigation
6. Requires Project Modification
7. For each area attached documentation

IMPACT CATEGORIES

Natural Features	1	2	3	4	5	6	7
Water Resources							
Surface Water							
Floodplains							
Wetlands							
Coastal Zone							
Unique Natural Features and Agricultural Lands							
Vegetation and Wildlife							

STATUTORY CHECKLIST
Studies, Mitigation Measures, Summary, Project Alternatives or
Modification
Part III

Project Name:

Attach information on the following five items:

1. ADDITIONAL STUDIES PERFORMED:(Attach study or summary)

2. MITIGATION MEASURES NEEDED:

3. SUMMARY OF FINDINGS AND CONCLUSIONS:

4. SUMMARY OF ENVIRONMENTAL CONDITIONS:

5. PROJECT MODIFICATIONS AND ALTERNATIVES CONSIDERED:

An ENVIRONMENTAL ASSESSMENT CHECKLIST **is required/is not** required.

TIER TWO REVIEW **will/will not** be required on this activity (if it is required, please answer the questions below.)

Prepared by: _____

Title: _____ Date: _____

COMMUNITY DEVELOPMENT BLOCK GRANT FRANKLIN COUNTY

TIER TWO ENVIRONMENTAL REVIEW (If Applicable)

Project Name:

Grant #(s) - (to be completed by ED&P)

Activity # - (to be completed by ED&P)

Property Address

Property owner:

QUESTIONS

1. Is structure over 50 years old?

Yes

No

If yes, attach documentation of OHPO review.

2. Is structure in 100 year floodplain? Yes

No

If yes, please attach copy of flood insurance policy.

3. Is structure in Airport Clear Zone?

APPENDIX I

**FRANKLIN COUNTY BOARD OF COMMISSIONERS COMMUNITY AND ECONOMIC DEVELOPMENT
DEPARTMENT**

PROGRAM APPLICATION BUDGET

Service Program	
Contact Person	
Provider	
Address	
Phone	
Fax	
Email	

Budget Period From _____ To _____

Unit of Service	Total Program Units	Unit Cost	Unites Under Contract	Amount Under Contract

RECAP OF COST SUMMARY

PROGRAM ADMINISTRATION COSTS	Estimated Costs
a. Salaries	
b. Payroll Related Expenses	
c. Subcontractor Labor, Admin	
d. Travel	
e. Consumable Supplies	
f. Occupancy	
g. Insurance	
h. Indirect Costs	

i. Other Costs	
TOTAL ADMINISTRATION COSTS	
DIRECT UNIT COSTS	
a. Subcontracted Labor, Direct	
b. Labor	
c. Materials	
d. Equipment	
e. Travel	
f. Other	
g. TOTAL DIRECT COSTS	
TOTAL DIRECT UNIT COSTS	
TOTAL PROGRAM UNITS	
TOTAL DIRECT COSTS PER UNIT	
TOTAL ADMINISTRATIO COSTS	
TOTAL PROGRAM UNITS	
TOTAL ADMIN COST PER UNIT (should not exceed 20%)	

PROGRAM ADMINISTRATION COSTS

Position Title	Filled (F) or Vacant (V)	No. Full-time Equivalent Positions Required	Annual Salary	Salary Cost	Percent of Time to Program	Program Salary Expense
TOTAL SALARIES						\$

PAYROLL RELATED EXPENSES

Social Security	
PERS (if unit of government use most recent rate)	
Workman's Compensation	
Unemployment Insurance	
Hospitalization Insurance Premium	
Other(s)	
TOTAL PAYROLL EXPENSES	

SUBCONTRACT LABOR, ADMIN, AND CONSULTANT FEES

Type	Function to be Performed	Hourly Fee	No. of Hours	Subcontract Labor and Consultants Expense
TOTAL SUBCONTRACT LABOR				

TRAVEL

Mileage	
Other Costs	
TOTAL TRAVEL EXPENSES	

CONSUMABLE SUPPLIES

Office Supplies	
Other	
TOTAL CONSUMABLE SUPPLIES EXPENSES	

OCCUPANCY COSTS

Rents/Mortgage	_____ UNITS	@ \$ _____
Maintenance and Repairs		
Utilities (if not included in rent)	Heat & Light	
	Water	
	Telephone	
	Other	
TOTAL OCCUPANCY COSTS		

INSURANCE COSTS

Liability	
Property	
Accident	
Other:	
TOTAL INSURANCE COSTS	

INDIRECT COSTS

TOTAL INDIRECT COSTS		

OTHER – MISCELLANEOUS

Membership/Subscription		
Printing and Publications		
Advertising		
Mailing/Postage		
Other: _____		
TOTAL INDIRECT COSTS		

DIRECT UNIT COSTS

SUBCONTRACT LABOR, DIRECT AND SUBCONTRACT FEES

Type	Function to be Performed	Hourly Fee	No. of Hours	Subcontract Labor and Consultants Expense
TOTAL SUBCONTRACT LABOR				

LABOR

Position Title	Filled (F) or Vacant (V)	No. of Full-time Equivalent Positions Required	Annual Salary	Salary Costs	Percent of Time to Program	Program Salary Expense
TOTAL SUBCONTRACT LABOR						

MATERIALS

Materials Needed for Production	No. of Units	Cost per Unit
TOTAL MATERIALS RELATED EXPENSES		

DIRECT EQUIPMENT COSTS

Equipment	Direct Costs
Maintenance and Repairs	
TOTAL DIRECT EQUIPMENT EXPENSES	

DIRECT TRAVEL COSTS

	Direct Costs
TOTAL DIRECT TRAVEL EXPENSES	

OTHER DIRECT COSTS

	Direct Costs
TOTAL OTHER DIRECT EXPENSES	

FUNDS LEVERAGED BY PROGRAM

1. Fees from Private Consumers	
2. Federal Funds (Grants or Contracts)	
3. State, County, or Municipal Allocations	
4. Contributions	
5. Miscellaneous	
TOTAL INCOME FROM PROGRAM UNDER CONTRACT	

FRANKLIN COUNTY

J. SUBRECIPIENT GUIDELINES

ALLOWABLE COSTS, UNALLOWABLE COSTS, PROCUREMENT

These guidelines are to be used in the implementation and monitoring of contracts funded with Community Development Block Grant (CDBG) funds. Reimbursements to Subrecipients will only be made for actual costs incurred and paid for by the Subrecipient.

ALLOWABLE COSTS

Accounting - Establishing and maintaining accounting and other information systems specifically required for the management of CDBG programs.*

Advertising - Media including newspapers, magazines, radio and television, which address the scope of services for which the CDBG monies were provided.

Auditing - Audits necessary for the administration and management functions related to CDBG programs.*

Consultant Services - Consultants to perform specific duties as described in the CDBG scope of services. The use of consultants must be pre-approved by the County.

Educational Programs and Exhibits - Programs and exhibits directly related to the CDBG activity.

Employee Fringe Benefits - Benefits including insurance, sick leave, vacation, pensions and workers' compensation provided such benefits are charged proportionately to the employee's percentage of CDBG related work as reflected in their wages.*

Field Trips – Field trips within Franklin and contiguous counties that are educational in nature or relate directly to program goals.

Insurance Costs - Insurance payments on property or persons directly and solely involved in the implementation of the CDBG activity.*

Legal Expenses - Legal expenses necessary for the administration of CDBG programs. Legal expenses for the prosecution of claims against the Federal Government and Franklin, County are unallowable.

Management Studies - Studies which enable the accomplishment of the CDBG scope of services. Management studies must be pre-approved by the County.

Materials and Office Supplies - Materials and office supplies necessary to carry out the CDBG program. Computer software is allowable.*

Meetings and Conferences - Costs are allowable only when the primary purpose of the meeting is dissemination of technical information directly related to CDBG activities and attendance is consistent with regular practices followed for other activities of the Sub-recipient.

Parking Charges - Parking charges are allowable only for employees performing CDBG related activities away from their primary workplace. Monthly parking costs are unallowable.

Payroll Preparation - Preparation of payrolls and maintaining necessary related wage records.*

Personal Service Contracts • Personal service contracts that enable the accomplishment of the CDBG scope of services, and reasonably reflect, in cost, the level of service provided.

Postage - Postage for mailings directly related to the implementation of CDBG activities.

Printing and Document Reproduction - Printing and reproduction of documents directly related to the implementation of CDBG activities.

Professional Services - Professional services that enable the accomplishment of the CDBG scope of services, and reasonably reflect, in cost, the level of service provided.

Rent • Rent may be paid on facilities based upon the percentage of CDBG related work performed at that location. Additional rent may be paid with prior approval by the County if other activities performed at the facility are eligible under federal guidelines.*

Salaries - Compensation must not exceed the amount paid for similar work in County government. In cases where a similar rate is not available, a comparable private sector rate may be acceptable. In no case should the annual rate of salary increase on multi-year projects exceed the Consumer Price Index rate of inflation by more than two points.*

Subscriptions - Books and subscriptions to civic, business, professional and technical periodicals when related to the CDBG program.

Training and Education - In-service training customarily provided for employee development which directly benefits the CDBG program. Out of service training of more than one day is allowable only upon prior approval by the County.

Transportation - Transportation necessary for the successful implementation of the CDBG program such as the short-term rental of vans or buses. The purchase and lease of vehicles is not an allowable expense.

Travel - Travel costs for expenses of transportation, lodging, meals and related costs incurred by employees who are on official business incident to a CDBG program. Per diem expenses should not exceed those utilized by County employees. Contact the County for current per diem rates. The County may disallow lodging and transportation costs deemed excessive by comparison with standard rates.

Utilities - Utilities paid on facilities based upon the percentage of CDBG related work performed at that location. Additional utilities may be paid with prior approval by the County if other activities performed at the facility are eligible under federal guidelines.*

*These costs may be considered indirect costs. Please see Unallowable Costs- Indirect Costs for further information.

UNALLOWABLE COSTS

Bad Debts - Any costs arising from uncorrectable accounts and other claims, and related costs are unallowable.

Computer Equipment - Purchase of computer equipment is not an allowable cost.

Contingencies - Contributions to a contingency reserve or any similar provision for unforeseen events in unallowable.

Contributions and Donations - Any contributions or donations to other agencies, institutions or organizations are unallowable.

Entertainment • Costs of amusements, social activities, and incidental costs relating thereto, such as meals, beverages, lodgings, rentals, transportation, and gratuities are unallowable.

Equipment - Equipment is not an allowable cost. Equipment includes items such as the purchase of computers, fax machine, copier, file cabinets, and telephones. The lease of these items is allowable.

Fines and Penalties - Costs resulting from violations or failure to comply with federal, state or local laws and regulations are unallowable.

Food - Food is an unallowable cost unless it is specifically necessary as an element of the funded activity. Examples of allowable use include snacks and meals for school age day care/after school programs. *These cases must be pre-approved by the implementing department.* Unallowable examples include food for parties, trainings, meetings, conferences and as gifts or prizes. Food purchased for general office use such as coffee, soft drinks, and snacks is not allowable. See travel for food exceptions.

Fundraising • Fundraising is not an allowable cost.

Furniture - Furniture is not an allowable cost. Furniture includes office furnishings such as desks, lamps, chairs, etc....

Indirect Costs - Indirect costs are unallowable unless the Sub-recipient completes an indirect cost allocation plan, and it is approved by the County.

Interests and Other Financial Costs - Interest on borrowings, bond discounts, costs of financing or refinancing operations, finance/bank charges, and legal or professional fees paid in connection therewith, are unallowable except when authorized by Federal legislation.

Memberships - Memberships for individuals in any civic, business, technical or professional organization is prohibited. Upon prior approval by the County, agency memberships are allowable if the cost is reasonable relative to the benefit and the activity is specifically related to

the CDBG activity.

***Exceptions to unallowable costs may be made on a very limited basis with prior approval by both the Directors of the implementing Department and Department of Finance. This will be done on a case by case method.

PROCUREMENT GUIDELINES FOR CDBG SUBRECIPIENTS

The following procurement guidelines should assist CDBG Sub-recipients in the development of a policy for the procurement of professional services, materials, and supplies. For equipment, a documented analysis of the economic feasibility of purchasing versus leasing must be performed. For on-going professional services and equipment leasing, procurement is to be completed at least every two years. These guidelines are *minimum* thresholds for the Sub-recipient's procurement policy.

Under \$5,000 (professional services, materials, and supplies)

The sub-recipient must obtain at least three (3) verbal bids and document each bid. If the lowest bid is not taken, the sub-recipient must document why and justify the bid that was chosen.

Over \$5,000 (professional services)

The sub-recipient must go through a Request for Proposal (RFP) process, which includes the criteria listed below. Evaluation of these criteria for each proposal must be documented.

1. Competence of offerer and personnel to complete the job
2. Quality and feasibility of technical proposal
3. Ability of offerer to complete job given physical resources and workload
4. Past performance
5. Cost

Over \$5,000 (materials and supplies)

This requires a competitive bidding process of at least three separate businesses. Documentation required.

Minority Business Enterprise Procurement

It is the policy of Franklin County to foster and promote Minority Business Enterprise (MBE) participation in its procurement program, to the extent permitted by law and consistent with the identification of the "best and lowest bidder." A "minority business enterprise" is a business which is at least 51 percent owned by one or more minority group members (including women owned enterprises); or, in the case of a publicly-owned business, one in which at least 51 percent of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. For this purpose, minority group members are those groups of U.S. citizens found to be disadvantaged by the Small Business Administration pursuant to Section S(d) of the Small Business Act.

Franklin County has implemented a procurement goal of 25.3% for the participation of minority and women based businesses in the contracting out of County

CDBG/HOME projects.

The process the County utilizes to ensure such a selection process is employed is by reviewing the following items:

- o Bid advertisements
- o Bid specifications
- o List of all bidders
- o All submitted bids
- o Accepted bids

And by ensuring that each of the County's subrecipients incorporates the following practices into their selection processes:

- o Identifying area minority businesses
- o Soliciting those businesses whenever they can be a potential source for supplies or services
- o Dividing total requirements into smaller tasks or quantities so as to permit maximum minority business participation
- o Using the services of the area's Minority Business Development Agency, the Small Business Administration and the State of Ohio's Office of Minority Business Development
- o And requiring that prime contractors take these same affirmative steps with respect to subcontracting.

The County's commitment to ensuring MBE/FFE participation in its HOME and CDBG infrastructure contracts is reiterated in the County's Construction Manual. A manual which emphasizes the importance the County places on equal opportunity, affirmative action, monitoring and assuring that the best and lowest bidder is awarded County contracts.

In addition to the above guidelines, all procurement procedures must adhere to the stipulations described in Federal Regulation 24 CFR 84 *Procurement Standards** (also called OMB Circular A-110). Briefly, these regulations ensure that sub-recipient procurement procedures preclude conflict of interest, ensure that all bids and RFPs submitted are for identical items or services, and assure sub-recipients are providing for free and open competition for all procurement transactions. For sub-recipients who already have procurement policies in place please make sure that the above requirements are consistent with already established policies including dollar thresholds.

* Also, see "A Handbook for CDBG Sub-recipients on Administrative Systems" for general procurement guidelines.

RELOCATION REQUIREMENTS AND GUIDELINES

The Department of Economic Development and Planning, administers all acquisition and relocation activities for HUD-assisted projects and programs.

The Uniform Relocation and Real Property Acquisition Policies Act of 1970, as amended

(Uniform Act), and the HUD Handbook 1378, dated October 15, 1990, require private individuals receiving HUD assistance under HUD Programs to comply with certain acquisition and relocation requirements when the private individual acquires real property for a HUD assisted project, causes the permanent and involuntary displacement of persons as the direct result of acquisition, rehabilitation or demolition, and/or involves a residential tenant that will not be required to permanently move off-site.

Project planning for a HUD-assisted project will require an acquisition/ relocation project evaluation to assist in establishing a budget, ensure technical staff capacity, and to develop the procedures necessary to comply with the Uniform Act acquisition and relocation requirements. The results of the project evaluation will greatly influence the manner, which a private individual will select, acquire and/or rehabilitate sites for a HUD-assisted project. In addition, for each project that involves tenant units, the project evaluation will identify those occupants that will be displaced and those that will be considered nondisplaced. To ensure compliance with current Uniform Act requirements, we have prepared the following brief discussion of the acquisition and relocation requirements for HUD-assisted projects.

REAL PROPERTY ACQUISITION PROCEDURES

The Uniform Act acquisition requirements are found in Chapter 5 of the HUD Handbook 1378, and must be considered if real property is to be acquired for a HUD assisted project. Chapter 5, paragraph 5-1, exempts persons without the power of eminent domain from complying with the full Uniform Act acquisition procedures, providing two conditions are met during the acquisition process. Given private individuals nominally fall within this category, completion of the following two actions when acquiring a site for the project will constitute substantial compliance with the Uniform Act acquisition requirement:

1. Prior to entering into the contract for the sale to purchase the real property being considered, the purchaser must clearly advise the property owner, in writing, that he/she does not have the power of eminent domain under state law, and, therefore, will be unable to acquire the property in the event that negotiations fail to result in an amicable agreement.
2. In addition, the property owner must be informed, in writing, of the estimated Fair Market Value of the property. An appraisal is not required by the Uniform Act procedures (but one may be required by specific program regulations); however, the project acquisition files must include an explanation, with reasonable evidence, of the basis for the determination of "fair market value" of the site.

As noted, both these actions must be done in writing to document a project's compliance. In those cases where there is an existing option or contract to purchase when the application is submitted, the seller of the real property must be provided the opportunity to withdraw from the agreement after the above noted information is provided.

GENERAL RELOCATION REQUIREMENTS

The Uniform Act relocation requirements are found in Chapter 2 of the HUD Handbook 1378, and will basically be a consideration for a HUD-assisted project only if it will involve tenant occupied

units.

Non-displaced persons

Under the Uniform Act relocation requirements, residential tenant occupants who are offered the reasonable opportunity to remain on-site after the completion of the project (generally only rehabilitation or acquisition/rehabilitation projects) are not considered to be displaced. However, there is still a significant relocation obligation involved with these persons. The failure to properly follow the relocation guidelines results in the tenant occupants who move being considered "displaced person" and eligible for full Uniform Act benefits, even if it was not intended for them to move.

Given the significant costs that can be incurred with the relocation process, we strongly suggest that a private individual look for sites that will not involve tenant occupied units. This would include owner occupied sites and sites with vacant structures (but not sites vacated as the result of the project). The attached "Owners Certification of No Displacement" can be used to document that displacement from a vacant rental unit has not occurred as a direct result of a HUD-assisted project.

If you wish to discuss acquisition and/or relocation obligations please contact the County Grants Administrator at the County's Department of Economic Development & Planning, 150 S. Front Street, Columbus, OH 43215.

Section 3 Clause

A. The work to be performed under any construction contract is subject to the requirements of section 3 of the Housing and Urban Development Act of 1968, as amended, 12 U.S.C. 1701 (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.

B. The parties to the contract agree to comply with HUD's regulations in 24 CFR part 135, which implement section 3. As evidenced by their execution of the 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.

C. 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.

D. 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 contract 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.

E. 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.

F. Noncompliance with HUD's regulations in 24 CFR part 135 may result in sanctions, nullification of this contract for default, and debarment or suspension from future HUD assisted contracts.

G. 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 (25U.S.C. 450e) also applies to the work to be performed under the 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).