



# CDBG Program Year 2023 Housing & Community Development Subrecipient Workshop

June 21, 2023 | 1:00-2:30 pm | Microsoft Teams



# Welcome & Introductions

## City of Spokane CHHS – CDBG Program Administrators

- Kelly Burnett
- Christy Jeffers
- Tessa Jilot

## City of Spokane Finance Department

- Andrew Duffey

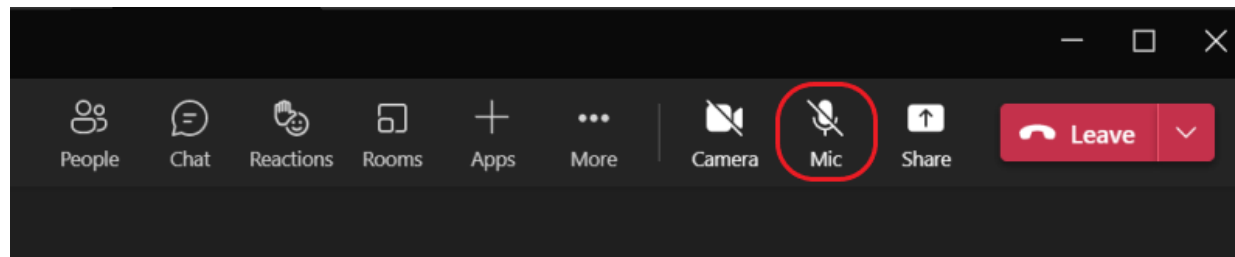


# Housekeeping

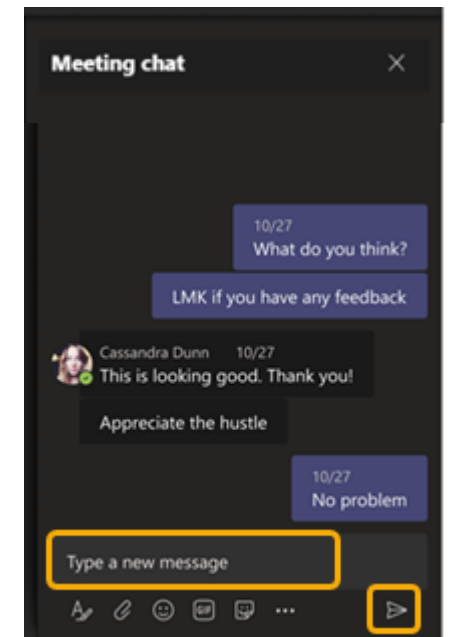
- Sign in (name & organization) in the chat box so we can track attendance



- Mute yourself during the presentation



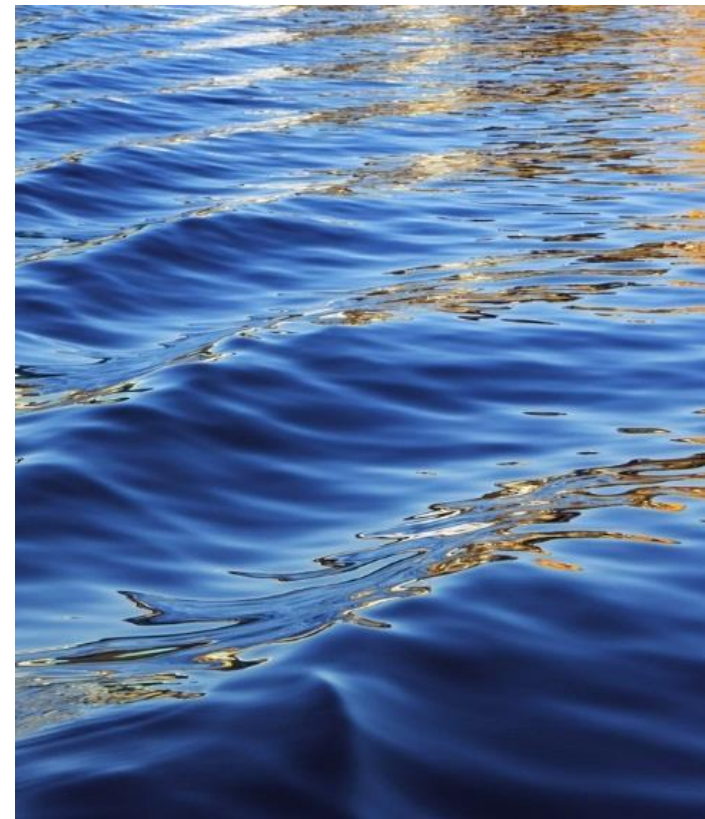
- Type questions into the chat box throughout the workshop
  - There will also be a Q&A session at the end





# Purpose of Workshop Roles & Responsibilities

Tessa Jilot



# Purpose of Workshop

- Meeting to comply with HUD Regulations
- Provide information
  - HUD Regulations
  - CDBG Program
  - City of Spokane processes
- Meet with CHHS HCD Staff
  - CDBG Program Administrators
  - Future improvements & positive changes



# Purpose of Workshop

- Roles & requirements for all projects/activities
- Available resources
- Grants management
- Fiscal compliance
- Technical Assistance
- Monitoring
- Looking ahead – Fall 2023
- Question & Answer Session

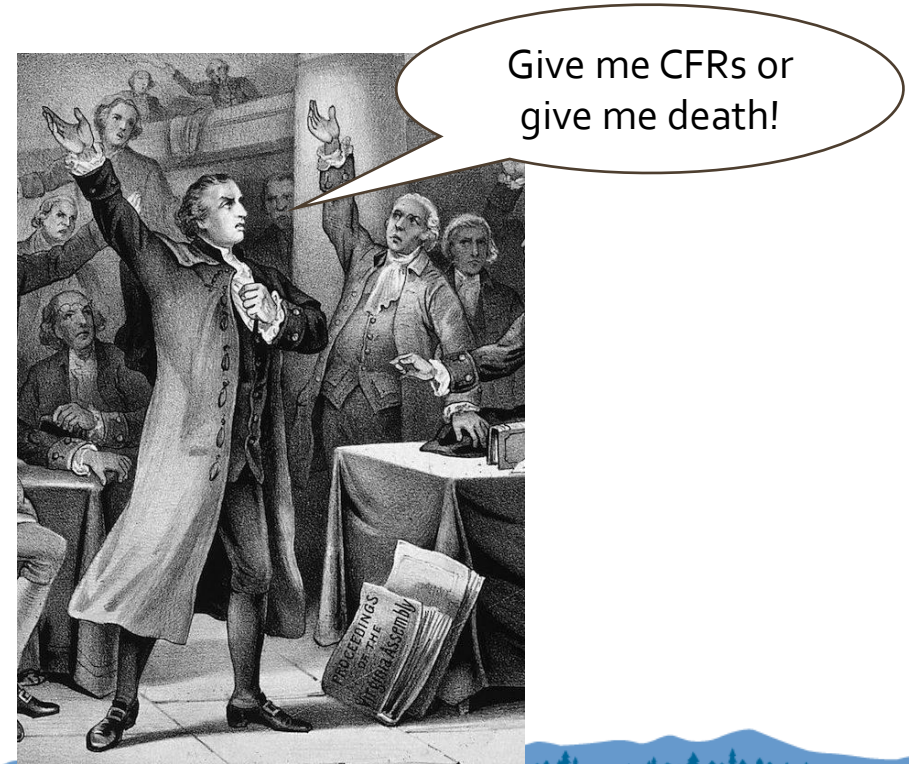


# CDBG National Objective

*The primary objective of the CDBG program is the development of viable communities by the provision of decent housing and a suitable living environment and expanding economic opportunities, principally for persons of low and moderate income (LMI).*

CDBG Activities must:

- Be eligible under 24 CFR 570 and
- Meet one of three **National Objectives** (§570.208)
  1. Provide a benefit to LMI persons
  2. Prevent or eliminate slums/blight
  3. Meet an urgent community need



# Roles

- US Department of HUD
  - CDBG Funding
  - CDBG Oversight
  - CDBG Monitoring
- City of Spokane – CHHS Department
  - CDBG Needs Assessment – Consolidated Plan
  - Environmental Review Record
  - Annual Action Plans
  - Consolidated Annual Performance Reports
  - Affirmatively Furthering Fair Housing
  - CDBG Labor Compliance
  - Monitored by HUD for compliance

## §570.500(c) **Subrecipient.**

*Subrecipient* means a public or private agency, authority, or organization, or a for-profit entity authorized under §570.201(o), receiving CDBG funds from the recipient or another subrecipient to undertake activities eligible for such assistance under subpart C of this part...

- Carry out projects & fulfill obligations
- Comply with contract, budget, & scope of work (e.g., reporting requirements)
- Comply with regulations & crosscutting requirements



# Roles

- CHHS Board
  - Provide opportunities to enhance the quality of life for Spokane's LMI populations
  - Foster partnerships that support services, affordable housing & economic opportunities for LMI populations
  - Approve planning documents & contracts
  - Make CDBG allocation recommendations
- Spokane City Council
  - Funding initiatives & priorities
  - Approve planning documents & contracts
- Performance-based measures
  - Reported to & required by HUD
  - Used in reporting to the CHHS Board & City Council
  - Used to show need for funding when requesting Council approval





# General Requirements for All Projects/Activities

- **Affirmatively Further Fair Housing**
- Use of appropriate **income limits** – effective June 15, 2023
- Protect **Personally Identifiable Information**
- Understand **rules & regulations**
  - CDBG
  - City of Spokane

# Affirmatively Further Fair Housing

- All Subrecipients are required to affirmatively further fair housing
- Subrecipients receiving HUD funds must display a [Fair Housing poster](#) in office location
  - Other resources available on HUD's Fair Housing & Equal Opportunity [website](#)
- Fair Housing poster and income limits must be visible to clients
  - *Monitoring requirement*
- All printed materials must contain the Equal Housing Opportunity logo
- Online training provided at [nwfairhouse.org](http://nwfairhouse.org)

U. S. Department of Housing and Urban Development 



**EQUAL HOUSING OPPORTUNITY**

**We Do Business in Accordance With the Federal Fair Housing Law**  
(The Fair Housing Amendments Act of 1988)

**It is illegal to Discriminate Against Any Person Because of Race, Color, Religion, Sex, Handicap, Familial Status, or National Origin**

<input type="checkbox"/> In the sale or rental of housing or residential lots	<input type="checkbox"/> In the provision of real estate brokerage services
<input type="checkbox"/> In advertising the sale or rental of housing	<input type="checkbox"/> In the appraisal of housing
<input type="checkbox"/> In the financing of housing	<input type="checkbox"/> Blockbusting is also illegal

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Anyone who feels he or she has been discriminated against may file a complaint of housing discrimination:  
1-800-669-9777 (Toll Free)  
1-800-927-9275 (TTY)  
[www.hud.gov/fairhousing](http://www.hud.gov/fairhousing)

U.S. Department of Housing and Urban Development  
Assistant Secretary for Fair Housing and Equal Opportunity  
Washington, D.C. 20410

Previous editions are obsolete form HUD-928.1 (6/2011)

# Current Income Limits for CDBG

- Effective June 15, 2023
- Available on CHHS website

**HUD MEDIAN FAMILY INCOME (MFI) LIMITS 2023 (use for City HHAA, 1406/1590, HOME, and CDBG)**  
(Effective 6/15/2023) Median Income for Spokane is \$89,000

HH Size	100% MFI			80% MFI (Moderate Income)			60% MFI (Low Income)			50% MFI (Very Low Income)			30% MFI (Extremely Low Income)		
	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly	Annual	Monthly	Hourly
1	\$62,300	\$5,192	\$29.95	\$49,850	\$4,154	\$23.97	\$37,380	\$3,115	\$17.97	\$31,150	\$2,596	\$14.98	\$18,700	\$1,558	\$8.99
2	\$71,200	\$5,933	\$34.23	\$57,000	\$4,750	\$27.40	\$42,720	\$3,560	\$20.54	\$35,600	\$2,967	\$17.12	\$21,400	\$1,783	\$10.29
3	\$80,100	\$6,675	\$38.51	\$64,100	\$5,342	\$30.82	\$48,060	\$4,005	\$23.11	\$40,050	\$3,338	\$19.25	\$24,050	\$2,004	\$11.56
4	\$89,000	\$7,417	\$42.79	\$71,200	\$5,933	\$34.23	\$53,400	\$4,450	\$25.67	\$44,500	\$3,708	\$21.39	\$26,700	\$2,225	\$12.84
5	\$96,200	\$8,017	\$46.25	\$76,900	\$6,408	\$36.97	\$57,720	\$4,810	\$27.75	\$48,100	\$4,008	\$23.13	\$28,850	\$2,404	\$13.87
6	\$103,300	\$8,608	\$49.66	\$82,600	\$6,883	\$39.71	\$61,980	\$5,165	\$29.80	\$51,650	\$4,304	\$24.83	\$31,000	\$2,583	\$14.90
7	\$110,400	\$9,200	\$53.08	\$88,300	\$7,358	\$42.45	\$66,240	\$5,520	\$31.85	\$55,200	\$4,600	\$26.54	\$33,150	\$2,763	\$15.94
8	\$117,500	\$9,792	\$56.49	\$94,000	\$7,833	\$45.19	\$70,500	\$5,875	\$33.89	\$58,750	\$4,896	\$28.25	\$35,250	\$2,938	\$16.95

# Protect Personally Identifiable Information

## Personally Identifiable Information (PII)

Information which can be used to distinguish or trace an individual's identity:

- Name
- Social Security Number
- Address or phone number
- Birth date or place

## Sensitive Personally Identifiable Information (SPII)

PII that when lost, compromised, or disclosed could substantially harm an individual:

- Social Security Number
- Driver's License Number
- Medical records
- Financial account numbers

# Protect Personally Identifiable Information

**PII may be shared only if:**

1. It is within the scope of your official duties
2. The recipient has a need to know
3. Sharing information is done in a secure manner



# Protect Personally Identifiable Information

## General Handling of PII

- Store PII on a secure network
- Store paper PII in locked desks or filing cabinets
- Remove visible PII from desks and office spaces when not in use
- Destroy PII by shredding
- Delete electronic PII by emptying computer “recycling bin”
- Only use organization-approved email addresses for conducting official business
- Encrypt PII on computers and other devices, especially when sending data outside your network



# Protect Personally Identifiable Information

## Distribution & Transmission of PII

- Secure File Transfer Protocol (FTP)
- Fax
  - Include a cover sheet with a statement about the contents
  - Notify recipient before and after transmission
- Mail
  - Use a secure envelope and send via First Class or Priority Mail
  - Do not mail hard drives, flash drives, etc. unless encrypted
- Email
  - Be sure message is encrypted
  - Never use a personal email address to send PII
- Hard Copy
  - Hand deliver if possible
  - Do not leave documents unattended



# Understand Rules & Regulations

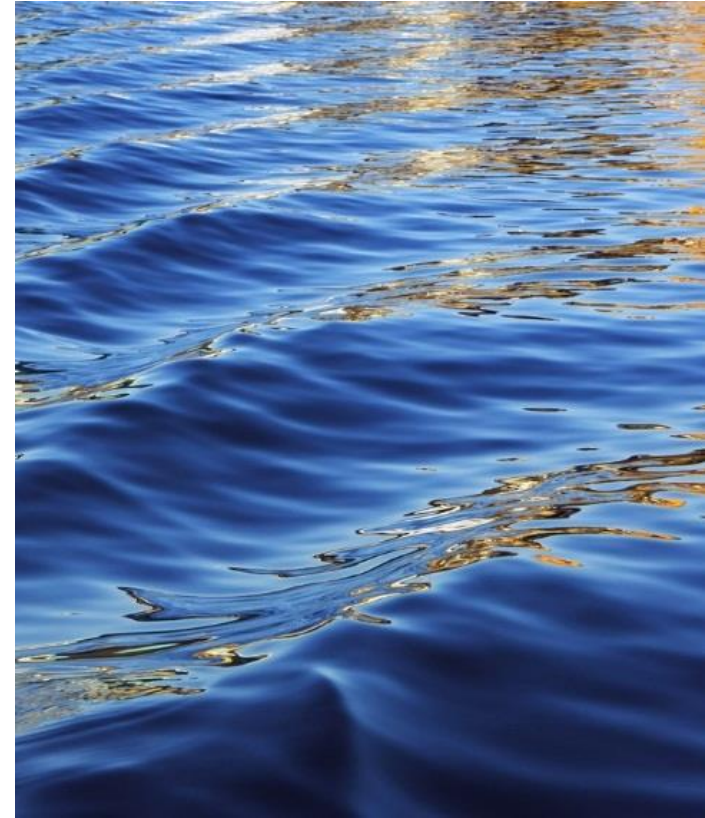
## Resources

- CHHS website: <https://my.spokanecity.org/chhs/>
  - Planning Documents
  - Subrecipient Resources
    - Playing By the Rules: A Handbook for Subrecipients
    - Fair Housing poster
    - HUD Median Family Income Limits
    - *More coming soon!*
- HUD Exchange: <https://www.hudexchange.info/>
- Request Technical Assistance
- Contact us



# PY2023 Contracts & Grants Management

Kelly Burnett



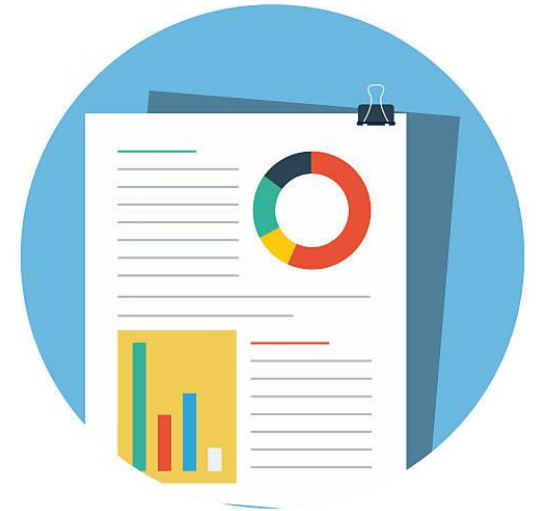
# PY2023 Contracts Timeline

- Program Year 2023 = July 1, 2023—June 30, 2024
- **This is the final year of 5-year funding**
- Program Year 2024 – Important Dates
  - Applicant Workshop/Notice of Funding: August 2023




# Reporting Requirements

- Subrecipients are required to submit Quarterly Reports
  - Quarter 1: July—September 2023
  - Quarter 2: October—December 2023
  - Quarter 3: January—March 2024
  - Quarter 4: April—June 2024
- Quarterly Reports are due on the 15<sup>th</sup> day of the month following the end of the reporting period
- Subrecipients who submit Monthly Reports may not need to submit Quarterly Reports
- Reports include unduplicated beneficiaries
- Reach out to your CDBG Program Administrator with reporting questions





## Quarterly Activity Report

	Community, Housing, and Human Services Department 808 W Spokane Falls Blvd., 6th Floor Spokane, WA 99201	Date rec'd - City use only		
Activity Reporting Period: (check box that applies) <input type="checkbox"/> July-Sept. 2023 <input type="checkbox"/> Oct.-Dec. 2023 <input type="checkbox"/> Jan.-Mar. 2023 <input type="checkbox"/> Apr.-June 2023				
<b>Instructions - Please review before completing the form.</b>				
All grantees are required to submit Activity Reports on a quarterly basis. The information collected enables the City of Spokane (City) to satisfy record keeping and reporting requirements. The City reserves the right to not process any request for funds for projects that do not have activity reports submitted to the City by the uniform due dates of October 15th, January 15th, April 15th, and July 15th.				
<u>Grantee Information</u>	<u>Report Submission</u>			
Project Name:	Preparer Name:			
Grantee:	Title:			
	Email Address:			
	Phone:			
Total Award (\$):	<b>Certification:</b> I certify to the best of my knowledge and belief that the information in this report is true and correct.			
Objective: Public Services				
Accomplishment Proposed:				
	Signature	Date		
<b>Beneficiary Information</b>				
<b>Race and Ethnicity:</b> Enter the total of NEW (unduplicated) persons served for this quarter into the appropriate race category for the project and enter the total unduplicated persons served for this project to date (including all reporting periods) in the grant-to-date (GTD) column. Also, enter the total persons (for both the quarter and GTD) that identify as Hispanic/Latino in the appropriate race category. For example, if a person identifies as White (race) and Hispanic/Latino (ethnicity) then that person would be added to the row corresponding to the white category in both columns. The HUD Definitions of Race Categories are provided on the Reference tab. If no new clients were served, please report 0 in the applicable box.				
<b>Race and Ethnicity</b>	<b>Quarter Total #</b>	<b>GTD Total #</b>	<b>Hispanic/Latino Quarter Total #</b>	<b>Hispanic/Latino GTD Total #</b>
1) White				
2) Black/African American				
3) Asian				
4) American Indian/Alaskan Native				
5) Native Hawaiian/Other Pacific Islander				
6) American Indian/Alaskan Native & White				
7) Asian & White				
8) Black/African American & White				
9) Amer. Indian/Alaskan Native & Black/African Amer.				
10) Other Multi-Racial				
<b>TOTAL</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>

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Revised 12/13/2016

## Quarterly Activity Report

**Income Levels:** Enter the total of NEW (unduplicated) persons served for this quarter into the appropriate income category for the project and enter the total new persons served for this project to date (including all reporting periods) in the grant-to-date (GTD) column. The HUD FY 2015 Income Limits are provided on the Reference tab.

Income Levels	Quarter Total #	GTD Total #
1) Extremely Low (< 30%)		
2) Low (> 30% to < 50%)		
3) Moderate (> 50% to < 80%)		
4) Non-Low/Moderate (> 80%)		
<b>TOTAL</b>	<b>0</b>	<b>0</b>

**Public Services:** Please read the category description and enter the total of NEW (unduplicated) persons served for this quarter in the appropriate category for the project and enter the total new persons served for this project to date (including all reporting periods) in the grant-to-date (GTD) column.

Public Services	Quarter Total #	GTD Total #
1) With New or Continuing Access to a Service or Benefit:		
2) With Improved Access to a Service or Benefit:		
3) Receive a Service or Benefit that is No Longer Substandard:		
<b>TOTAL</b>	<b>0</b>	<b>0</b>

PLEASE NOTE: The TOTAL for the quarter and GTD provided in the above three sections must match!

**Accomplishment Narrative**

Provide a brief narrative describing the progress of the activities that were undertaken during the reporting period. Please report on quarterly accomplishments and if the outcomes/outputs are based on the number of persons that have received a specific service, the numbers reported must be representative of NEW (unduplicated) persons for the reporting quarter. You may want to cite the percentage of the activity that has been completed, provide a timeframe for completing the activity and meeting a national objective, and/or explain why accomplishments have not yet been reported. Please also use this space to address any technical assistance needs. There is a section provided to explain barriers or delays in the implementation of the program.

**PROGRESS OF ACTIVITIES:**

**BARRIERS/DELAYS:**

\*PLEASE ENSURE REPORT IS COMPLETE (BENEFICIARY INFO. & ACCOMPLISHMENT NARRATIVE) BEFORE SUBMISSION\*

# Contract Amendments

- **Amendments are changes to existing contracts**
  - May be requested by subrecipient, City of Spokane, or a funder
  - Some multi-year grants require an annual amendment at the time of renewal
- **Do not make changes to your contract or adjust budget amounts** - new forms will be distributed by your Program Administrator
- Amendment Process
  1. Amendment requested, in writing, using Amendment Request form
  2. Program Administrator determines if Amendment request is eligible/allowable
  3. Program Administrator works through Amendment process with grants staff (this process may take several weeks)
  4. Program Administrator & Subrecipient review & approve Amendment; routed for signatures
  5. If necessary, Amendment will be submitted for City Council approval (this process may take several weeks)
- Amendments take time – do not delay submitting your requests!
  - All Amendments must be submitted at least 90 days prior to the end date of your contract

# Helpful Resources

- Review your Contract for important compliance information
- Ask your CDBG Program Administrator for assistance
- 24 CFR Part 58: Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and Other Nonprofit Organizations

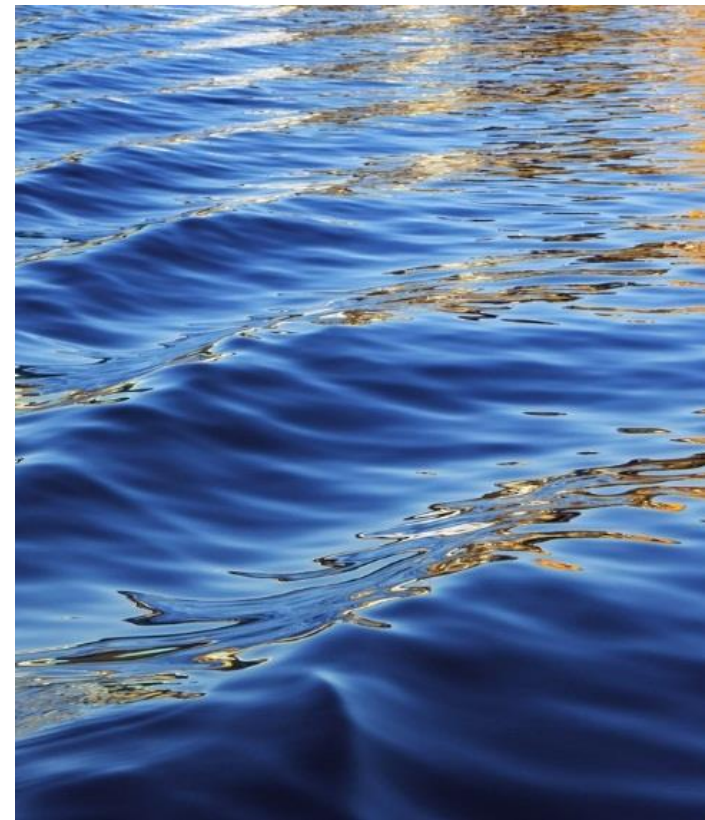
Link to PDF document here:

<https://www.hudexchange.info/resource/4/24-cfr-part-84-uniform-administrative-requirements-for-grants-and-agreements-with-institutions-of-higher-education-hospitals-and-other-nonprofit-organizations/>



# Fiscal Compliance

Andrew Duffey



# Invoice Processing

- The City shall reimburse the Subrecipient only for actual incurred costs upon presentation of accurate and complete reimbursement forms
  - Billing & Tracking forms are provided in your Contract
- Invoices are submitted once per month, on or before the 15<sup>th</sup> of each month, for the previous month's expenses
- Every invoice should include:
  - Contract Number
  - Dates
    - Expense Period
    - Date of Invoice
  - Signature of Certified Officer
  - General Ledger (for invoice period)
  - Supporting documentation for expenses
- Only eligible expenses will be reimbursed – when in doubt, ask!

# Fiscal Policies & Procedures

The Subrecipient shall develop and adopt fiscal policies and procedures that cover – at minimum – the following topics:

- Internal Controls
- Financial Planning & Reporting
- Revenue & Accounts Receivable
- Expenses & Accounts Payable
- Procurement
- Asset Management
- Records Retention & Destruction
- Fraud, Waste, & Abuse

## **Helpful Resource for Subrecipients:**

*Playing by the Rules: A Handbook for Subrecipients on Administrative Systems*

Download here:

<https://my.spokanecity.org/chhs/documents/>

**Questions?** Ask your Program Administrator!



# Financial Records

## Eligible Costs

- Subrecipient needs to be aware of cost eligibility as defined in 2 CFR Part 200
  - Guidance can also be found in Chapter 2 of *Playing by the Rules* (linked on CHHS website)
- Subrecipient Agreement – your management & fiscal staff need to review in its entirety

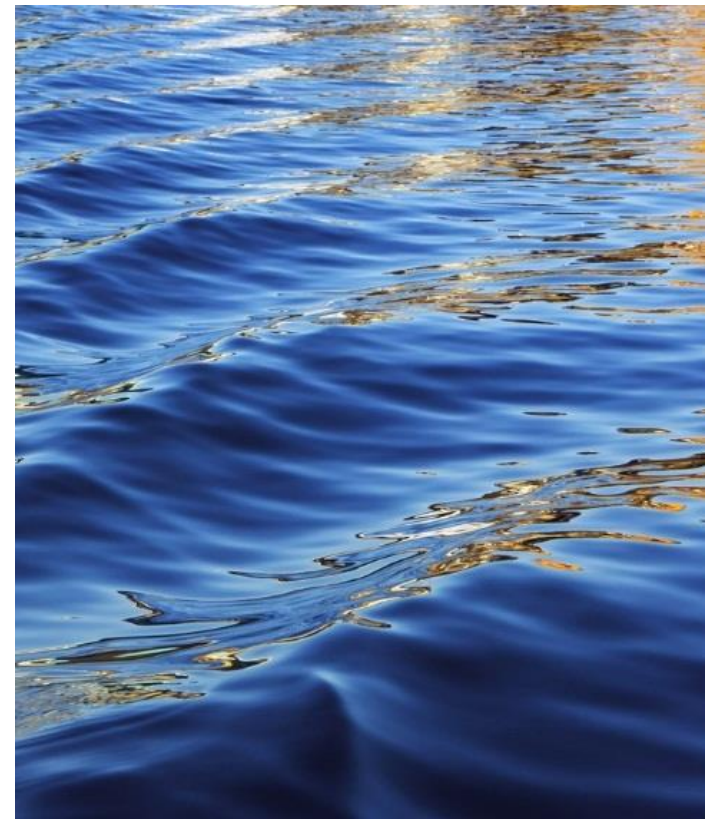
## Financial Management System

- Include source documentation from this system



# Technical Assistance Monitoring

Tessa Jilot



# Technical Assistance

- CDBG Program Administrators provide technical assistance to all Subrecipients
  - To ensure compliance with contracts
  - To ensure compliance with federal, state, and local regulations
- Contact your designated Program Administrator for assistance



# Monitoring

- Subrecipient's transactions and other significant events are to be clearly documented
  - Documentation should be readily available for monitoring
- Monitoring includes
  - Desk monitoring of invoices and other financial records
  - File review
  - Site visits
- CDBG Program Administrators will monitor subrecipients annually, as needed, based on Subrecipient's risk assessment
  - *Attending Subrecipient Workshops lowers your risk score!*
- Results of monitoring efforts will be summarized in written reports
  - If needed, reports will include evidence of follow-up actions taken to correct areas of noncompliance

# Records Retention

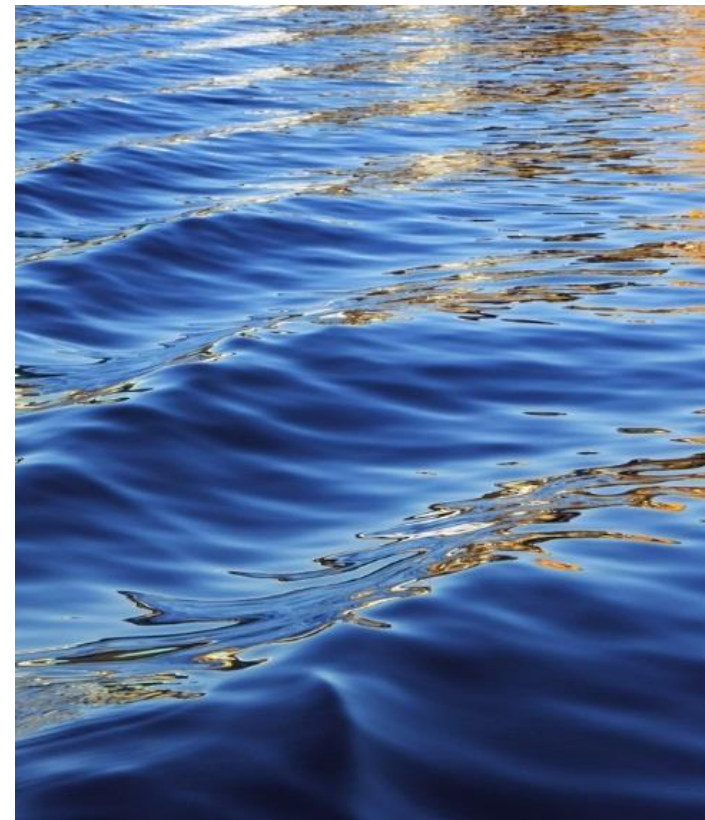
- Subrecipient must maintain all records required by the Federal regulations specified in 2 CFR 200 Subpart D, that are pertinent to funded activities
- **Subrecipient should retain all CDBG records for 7 years**

Records include, but are not limited to:

- Description of activities
- Records demonstrating each activity meets a CDBG National Objective
- Records required to determine eligibility of activities
- Records required to document acquisition, improvement, use, or disposition of real property using CDBG assistance
- Records documenting compliance with fair housing & equal opportunity requirements
- Financial records
- Other records as specified in Subpart K of 24 CFR Part 570



Looking ahead...  
Consolidated Planning  
Neighborly Software  
Christy Jeffers



# Consolidated Plan

- Helps assess **affordable housing** and **community development needs** and **market conditions**
- Allows City to make **data-driven, place-based investment decisions**
- Serves as the framework for **community-wide dialogue** to identify **housing and community development priorities**
- Consolidated Plan is developed every 5 years
  - City of Spokane will release its next Consolidated Plan in 2025 (2025—2029)
  - Carried out through Annual Action Plans
- 2020—2024 Consolidated Plan can be found on CHHS website

## Consolidated Plan Timeline

- June 2023: Consultations & plan reviews
- November 2023: Develop work plan





# Important Upcoming Dates

Month	Date	Activity
July	7.5.2023	CHHS Board opens public comment period for 2024 PY CDBG Citizen Participation Plan, Policies and Procedures, and Request for Proposals
July	7.16.2023	Public notice in Spokesman Review
July	7.17.2023	Public comment period opens
July	7.31.2023	Public comment period ends
August	8.2.2023	Public Hearing before the CHHS Board
August	8.16.2023	Applicant Workshop / Applications made available
September	9.14.2023	Application due date for the 2024 CDBG Program Year
November	11.1.2023	CHHS Board reviews applications and provides scoring
March	3.6.2024	CHHS Board opens public comment on 2024 Annual Action Plan with recommended projects/activities
April	4.1.2024	Public notice in Spokesman Review (when CDBG allocation is published by HUD) Begin date of public comment 4.1.2024
April	4.30.2024	Close of public comment period on 2024 Annual Action Plan
May	5.1.2024	Public Hearing before the CHHS Board
May	5.2.2024	Submit Annual Action Plan to HUD for approval



# Neighborly

- Coming Fall 2023!
- **Neighborly will be used for most grant management functions**
  - Reports
  - Accomplishments
  - Draw Requests (Invoices)
  - Applications
  - Documents
- Training will be available during our Applicant Workshop – August 2023
- Technical assistance is available – ask your Program Administrator

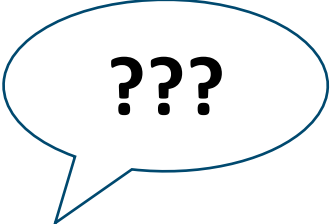
The screenshot displays the Neighborly Software interface for 'HOUSEHOLD INCOME VERIFICATION'. It includes a search bar, a user profile for 'Sally Neighborly', and a list of household members. The current member has a total income of \$30,000. Below this, the AMI (CALCLUATED) is shown as 75.38% and the total annual household income is \$30,000. A table provides AMI percentages for household sizes of 1 to 5 persons.

HOUSEHOLD SIZE	1 person	2 person	3 person	4 person	5 person
AMI 100%	\$39,800	\$45,450	\$51,150	\$56,800	\$61,350
AMI 80%	\$31,840	\$36,360	\$40,920	\$45,440	\$49,080

# Workshop Wrap-up

- Roles & requirements for all projects/activities
- Available resources
- Grants management
- Fiscal compliance
- Technical Assistance
- Monitoring
- Looking ahead – Fall 2023
- Question & Answer Session

# Questions



???

# THANK YOU

Please reach out to City of  
Spokane CHHS HCD Staff with  
questions or concerns

Kelly Burnett

[kburnett@spokanecity.org](mailto:kburnett@spokanecity.org)

Christy Jeffers

[cjeffers@spokanecity.org](mailto:cjeffers@spokanecity.org)

Tessa Jilot

[tjilot@spokanecity.org](mailto:tjilot@spokanecity.org)

<https://my.spokanecity.org/chhs/documents/>

