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
Current Income Limits for CDBG

- Effective June 15, 2023
- Available on CHHS website

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<th>HH Size</th>
<th>100% MFI Annual</th>
<th>100% MFI Monthly</th>
<th>100% MFI Hourly</th>
<th>80% MFI (Moderate Income) Annual</th>
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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 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\textsuperscript{th} 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

**Activity Reporting Period:** Check box that applies:
- [ ] Jul-Sep 2023
- [ ] Oct-Dec 2023
- [ ] Jan-Mar 2023
- [ ] Apr-Jun 2023

**Spokane, WA 99201**

**Date received/ city only**

### Instructions:
- Please ensure before completing the form:
  - All grantees are required to submit Activity Reports on a quarterly basis.
  - The information collected enables the City of Spokane (City) to satisfy the grantkeeping and reporting requirements.
  - The City reserves the right not to 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.

### Grantee Information

**Project Name:**

**Preparer Name:**

**Grantor:**

**Title:**

**Email Address:**

**Phone:**

**Total Award ($)**: 0

### Objective: Public Services

**Accomplishment Proposed:**

### Beneficiary Information

**Race and Ethnicity:**

- [ ] White
- [ ] Black/African American
- [ ] Asian
- [ ] American Indian/Alaska Native
- [ ] Native Hawaiian/Other Pacific Islander
- [ ] Hispanic/Latino
- [ ] Other Multi-Racial

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<th>GTD Total #</th>
<th>Hispanic/Latino Quarter Total #</th>
<th>Hispanic/Latino GTD Total #</th>
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<td>Other Multi-Racial</td>
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</table>

**TOTAL:** 0

### Public Services

- [ ] With New or Continuing Access to a Service or Benefit
- [ ] With Improved Access to a Service or Benefit
- [ ] Receive a Service or Benefit that is No Longer Substantial

**Total:** 0

**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/outcomes are based on the number of persons that have resolved a specific issue, the number 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 timeline for completing the activity and meeting a national objective, and explain any accomplishments that have not 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:

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 15th 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/](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

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

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