

**CITY OF CAMDEN**



**DEPARTMENT OF FINANCE  
BUREAU OF GRANTS MANAGEMENT**

**PROCEDURAL & OPERATIONAL MANUAL**

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**BUREAU OF GRANTS MANAGEMENT  
PROCEDURAL & OPERATIONAL MANUAL**

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## **INTRODUCTION**

The purpose of this manual is to provide a procedure to facilitate the flow of grant information and accountability through a system of checks and balances that will allow for the best utilization of resources to meet the needs of the community.

The Bureau of Grants Management has established a procedure for tracking grants from the Notice of Funding Availability (NOFA) to the close-out of the implemented project or activity. Internally, this system requires all Departments, Divisions, Bureau's, etc. to submit to the Bureau of Grants Management all applications for funding in advance of their submission to the respective funding source. Applications will be reviewed for completeness and appropriateness, relative to the regulations from the funding source. Request for Proposals (RFP's) from subrecipients will also be required to be submitted to the Bureau of Grants Management in advance of public notification.

Additionally, the Bureau will be responsible for monitoring all grants awarded to the City and will require the timely submission of status, monthly, quarterly and annual reports, as required by the grantor. Relative to fiscal monitoring, all invoices, advice, requisitions and vouchers must be submitted for review to the Bureau of Grants Management prior to disbursement for payment. Additionally, all requests for reimbursement from the grantor must be submitted to the Bureau of Grants Management for review prior to release to the funder.

The Bureau of Grants Management is available to provide training and technical assistance internally, as well as, to non-profits, developers and emerging organizations to encourage the development and implementation of projects that promote the goals of the City of Camden.

## **MISSION STATEMENT**

The Bureau of Grants Management provides training and technical assistance internally, as well as, to non-profits, developers and emerging organizations to encourage the development and implementation of projects that promote the goals of the City of Camden.

## **FUNCTIONS**

The Bureau of Grants Management (BGM) responsibilities include, but are not limited to:

1. In conjunction with the Division of Planning, establish an Annual comprehensive Grants Development Plan, identifying and prioritizing the city's needs and priorities.
2. Set grants development and management policies and procedures.
3. Disseminate information on grant opportunities throughout the city.
4. Monitor legislation and appropriations that impact grant programs .
5. Provide technical assistance.
6. Review proposals to ensure technical merit and budgetary accuracy, as well as, compliance with city policies and grantor regulations.
7. Coordinate details of proposal submissions with other offices/units of the municipal government.
8. Review all applicants to insure that there is no debt owed to the City. Any applicant that has an outstanding tax, lien, fine or any other outstanding obligation to the City, the applicant will not be considered for funding.
9. Obtain approvals from top city officials.
10. Receive official notification of awards and review terms and conditions.
11. Coordinate all financial and business details of funded projects, including billing, purchasing audits, and agreements with subrecipients.
12. Insure that all proper invoices, receipts, payroll documentation is submitted to substantiate any requests for funds and/or any reimbursements for eligible expenditures in accordance with the grant agreement.

13. Insure that all subrecipients who requests funds for construction projects have registered with the New Jersey Department of Labor as a certified public works contractor. Further, insure that their subrecipients have registered with the New Jersey Department of Labor as a certified public works contractor.
14. Monitor project budgets to ensure that all projected funds are expended in accordance with grantors policies and regulations.
15. Supervise completion and submission of progress and financial reports on funded projects.
16. Evaluate the progress and impact of funded projects.
17. Maintain records on funded projects.
18. Monitor Entitlement Grant funded projects seven times per year (6) desk reviews (bi-monthly) and at a minimum one (1) site visit annually.
  - a. Quarterly submission of on-site reports to the Director of Finance and Treasurer.
19. Close out completed projects and prepare council resolutions to cancel out unexpended balances (where applicable).
20. Provide in-service training to city staff in all phases of grants development and management.
21. Notify Building Bureau when awarding rehabilitation or construction projects.
22. Monthly submission of IDIS Reports to the Director of Finance and Treasurer.
23. Draw down all on-line payments requests.
24. Responsible for maintaining the City's Integrated Disbursement and Information System (IDIS)
25. Responsible for maintaining the City's HMIS System.
26. Conduct Pre-Award meeting with departments and outside agencies on all grant awards.

27. Review the HUD Exchange on a monthly basis for updates on regulations and webinar trainings. Once webinars are completed, document the type of webinar and the program it covered. A copy must be submitted to the Director of Finance.

## **MANAGING THE PROPOSAL PROCESS NON-ENTITLEMENT GRANT APPLICATION PROCESS (Revenue Grants)**

The Camden Promise Zone Office, Bureau of Grants Management, in conjunction with the initiating department, is fully responsible for assisting in the facilitation of the Application Process:

STEP 1 – BGM will notify departments of grant application opportunities (NOFA's) or the department is apprised through another means and notifies the Camden Promise Zone Office of its intention to apply for a grant.

NOTE: If a "CASH MATCH" is required for application, prior approval of an appropriation must be given by the Business Administrator and Finance Director before application can be submitted to a funding source.

STEP 2 – Department writes the grant application and submits it to the Camden Promise Zone Office with a City Council Resolution to "Apply for Funding" for review and approval before submission to grantor agency.

STEP 3 – The Camden Promise Zone Office forwards the completed application and resolution to the Bureau of Grants Management.

STEP 3 – BGM reviews the application-for content relative to pertinent regulations, budgetary commitments and forwards it to the Finance Director with their recommendations.

STEP 4 –The Finance Director reviews the application, authorizes the resolution and forwards the request to the Business Administrator's (BA) Office for approval and placement on the City Council Agenda.

STEP 5 – The BA reviews application and approves the resolution for Council Action.

STEP 5 6 – City Council reviews and authorizes the submission of the application for grant funds

STEP-6 7– Respective department forwards the application to grantor agency.

## **MANAGING THE PROPOSAL PROCESS ENTITLEMENT GRANT AWARD PROCESS**

- STEP 1 – The City Departments and Agencies are awarded funding through the City’s Annual Consolidated Plan. The Departments are notified through e-mail by the Bureau of Grants Management of their funding. BGM notifies all agencies of their award by phone and email.
- STEP 2 – Pre-Award Meetings are scheduled with the Bureau of Grants Management, recipient department and/or awarded agency to discuss the grant award; to review the terms of the award; and to request any additional information required prior to city council action.
- STEP 3 – The Bureau of Grants Management prepares a Request for Council Action for a Contract Resolution. The contract data agreement (Schedule A), the budget (Schedule B), and a requisition encumbering the grant award for submission to the BA’s office for final approval. Special note: a requisition must accompany all contract resolutions.
- STEP 4 – BGM forwards the Request for Council Action to the Department of Finance for review, approval and placement on the City Council Agenda via the BA.
- STEP 5 – The BA reviews the application and approves the resolution for Council Action.
- STEP 6 – City Council approves the resolution to award the grant.

**GRANT BUDGET INSERTION PROCESS/AWARD  
ACCEPTANCE  
(Creates the Spending Authority & Appropriation Code)**

- STEP 1 - A "Grant Approval Form" (Attachment G) shall be submitted to and approved by the Director of the Division of Local Government Services or his/her designee before the Municipality accepts or executes any grant agreement requiring current or long-term matching public funds, a commitment of municipal resources, or minimum staffing levels.
- STEP 2 – A determination is made between the Finance Director, Bureau of Grants Management and the Department submitting the request whether the following is necessary:
- 1) Insertion into temporary budget as a "temporary emergency appropriation";
  - 2) Insertion into the permanent budget (Chapter 159) – an amendment to the permanent budget if a budget has been previously adopted.
- STEP 2 – Based on determined option, the department prepares a Request for Council Action to "Accept and Insert" the award into the City budget. The resolutions are forwarded to BGM for review and approval. The requests should include a grant summary form and the award letter and/or approved application from the funder.
- STEP 3 – BGM and the Finance Director approve the Requests for Council Action and forwards them to the Business Administrator for placement on the council agenda.
- STEP 4 – The Business Administrator gives final review and approvals and places the Requests on the Council Agenda.
- STEP 5 – City Council approves the resolutions.
- STEP 6 – Once approved by council action, Finance post the funds to the to the Edmonds System and creates a budget appropriation and receivable account code.
- STEP 7 – Finance notifies the respective department by email (with a copy to BGM) of the budget appropriation and receivable account code.

## **PURCHASE REQUISITIONS INVOLVING GRANTS (Creates Purchase Order for Expenditures and Drawdowns)**

All grants are established as appropriation items. The statute, regulation or contract establishing the grant may contain requirements or restrictions that exceed those required by State law.

### **General Purchases**

When a purchase is to be funded by grant funds, all requisition forms must be submitted to the Bureau of Grants Management by the user agency prior to being sent to the Bureau of Purchasing. The Bureau of Grants Management will review the requisitions for compliance with all applicable grant requirements, including eligibility and whether the activity is allowable within the scope of the grant. Grants Management after completion of review will forward requisition to the Bureau of Purchasing for determination for receipt of bids, quotes, state contract, etc.

### **Sub-recipient Agreements**

Sub-recipient agreements are contractual arrangements with agencies, e.g., non-profits, which are to perform or administer federal, state or private grant funds to carry out programs on behalf of the City. Sub-recipient agreements shall be processed in accordance with all applicable regulations of the original funding source. Such agreements shall be awarded by resolution of the governing body, and are executed only by **formal contract**. The Bureau of Grants Management reviews all required documentation for sub-recipient agreements and prepares the necessary requisition(s). The requisition shall only be prepared after all request for proposals (RFP's), advertisements for bids if required, pre-award assessment(s) and ranking of proposals have been evaluated and approved by the Bureau. The Bureau of Grants Management then submits a fully completed and approved requisition, via the Business Administrator, to the Bureau of Purchasing for inclusion on the Council Agenda and subsequent award by the governing body by resolution. Copies of all documentation pertaining to the grant shall be maintained in the Bureau of Grants Management. Such documentation shall include, but not be limited to, advertisement for bids or Requests for Proposals (RFP's), formal bids, contracts, payment vouchers, etc. The originals of all contracts shall be forwarded to and maintained by the Municipal Clerk.

## **PURCHASE REQUISITIONS INVOLVING GRANTS (continued)**

### **Purchases Within Bid Threshold**

A Subrecipient Agreement, Vendor Purchase or Contract is determined by the dollar value of the requisition request. If this is a subrecipient agreement or contract, the requisition will be processed at the same time that a contract resolution is requested by council.

STEP 1 – Department prepares a purchase requisition to encumber funds. A purchase order (receiving report) will be generated once this document is fully processed. NOTE: All pertinent supporting documentation must be attached. Ex. check list, quotes, budget transaction form, etc.

STEP 2 – Requisitions less than the bid threshold are sent to the designated BGM Grant Monitor, with all pertinent supporting documentation (see note above).

STEP 3 – BGM pre-audits the requisition for grant compliance; authorizes (sign off) the requisition; and forwards the requisition to the Finance Director for approval.

STEP 4 – Finance authorizes (sign off) and forwards the requisition to Purchasing for processing and assigning of a Purchase Order number.

STEP 5 – Purchasing returns to Finance (Chief Financial Officer or his/her assigned designee) who will review the requisition and generate a hard copy of the purchase order. The Chief Financial Officer signs the purchase order and this completes the requisition purchase order encumbrance cycle. The purchase order is signed by the Purchasing Bureau and mailed to the department and the successful vendor or contractor.

## **PURCHASE REQUISITIONS INVOLVING GRANTS (continued)**

### **Purchases that Exceed the Bid Threshold**

A Subrecipient Agreement, Vendor Purchase or Contract is determined by the dollar value of the requisition request. If it is a subrecipient agreement or contract, the requisition will be processed at the same time that a contract resolution is requested by council.

- STEP 1 – Department prepares a purchase requisition to encumber funds. A purchase order (receiving report) will be generated once this document is fully processed obtaining budget appropriation code from Finance Department. NOTE: All pertinent supporting documentation must be attached. Ex. check list, quotes, budget transaction form, etc.
- STEP 2 – If a requisition is in excess of the bid threshold the requisition is sent to the designated BGM Grant Monitor, with all documentation and quote requirements.
- STEP 3 – The Bureau Of Grants Management pre-audits requisition for grant compliance; authorizes (sign off) the requisition; and forwards the requisition to the Finance Director for approval.
- STEP 4 – Finance authorizes (sign off) and forwards the requisition to the Purchasing Review Committee who reviews the request for appropriateness and forwards the requisition to Purchasing for further processing.
- STEP 5 – Purchasing assigns a purchase order number and forwards it to Finance for final processing.
- STEP 6 – Finance (Chief Financial Officer or his/her assigned designee) reviews the requisition and generates a hard copy of the purchase order. The Chief Financial Officer signs the purchase order and this completes the requisition purchase order encumbrance cycle. The purchase order is signed by the Purchasing Bureau and mailed to the department and the successful vendor or contractor.

## **PURCHASE REQUISITIONS INVOLVING GRANTS (continued)**

### **Subrecipient and Vendor Contracts**

When a Subrecipient Agreement or Vendor Contract is required the following procedure is utilized:

As part of the bid process, advertisements in the Public Notice section of an authorized newspaper must be published no less than ten (10) days prior to the receipt of bids. \*Further, an "independent cost analyst" must be performed prior to bids for costs exceeding the Simplified Threshold (\$150,000)

- STEP 1 - Department develops the Scope of Services and other documentation and forwards it to Law Department for preparation of specifications for bid advertisement.
- STEP 2 - The Bureau of Grants Management pre-audits requisition for grant compliance and authorizes (sign off) the requisition; and forwards the requisition to the Finance Director/Purchasing Department for approval/processing for advertising.
- STEP 3 - At the time and date of the advertised opening of bids, the Purchasing Bureau shall publicly open and read aloud the bids as to the name of the vendor and offered price.
- Step 4 - After reviewing the bids for compliance, the user agency; with input from the Purchasing Bureau, submits his/her recommendations(s) along with the request for council action documents.
- STEP 5 - The Bureau Of Grants Management pre-audits requisition for grant compliance; authorizes (sign off) the requisition; and forwards the requisition to the Finance Director for approval.
- STEP 6 - Finance authorizes (sign off) and forwards the requisition to The Purchasing Review Committee who reviews the request for appropriateness and forwards the requisition to Purchasing for further processing.
- STEP 7 - Purchasing prepares Request for Council Action (contract resolution) and sends the completed package to the Bureau of Grants Management for processing.

**PURCHASE REQUISITIONS INVOLVING GRANTS  
(continued)**

- STEP 8 – The Bureau Of Grants Management pre-audits requisition for grant compliance; reviews the council resolution for completeness; and authorizes (sign off) the requisition; and forwards the complete package to the Finance Director for approval.
- STEP 9 – Finance authorizes (sign off) and forwards the requisition to Purchasing for processing and assigning of a Purchase Order number.
- STEP 10 – Finance processes the purchase order and encumbers the funds (creates a purchase order). The Certification of Availability of Funds is attached and returned to Purchasing.
- STEP 11 – The Finance Director approves the Request for Council Action and forwards it to the Business Administrator for placement on the council agenda.
- STEP 12 – BA’s Office reviews, gives final approval and places the request on Council Agenda.
- STEP 13 – City Council approves Resolution awarding the contract.
- STEP 14 – The Law Department prepares the contract.
- STEP 15 – Purchasing receives the completed package from the Law Department and processes the contract request by assigning a purchase order number to the requisition and forwards contract and purchase order to the awarded agency. (A copy of the purchase order is forwarded to the department)
- STEP 16 – Once an executed contract is received by the Law Department, the Vendor/Subrecipient can commence with spending.

NOTE: Successful Vendor/Subrecipient must provide Affirmative Action Documentation prior to City Council approval of the contract.

Also, for all construction projects, successful vendor/subrecipients must be registered with the New Jersey Department of Labor as a certified public works contractor and registered with the New Jersey Department Labor as a certified public works contractor.

\*When an independent cost analyst is performed and the bids received exceed the cost estimate by up to 10%; the Cost Analyst shall review the bids to re-examine the cost estimate(s) and state whether the lowest, responsible bid is reasonable. If the Cost Analyst determines that the bids are unreasonable, the City will re-bid the job.

If the cost analyst exceeds the cost estimate by 11% or more, the City shall seek written approval from HUD Office pursuant to 2 Part 200.407.

## **THE GRANT REPORTING PROCESS**

Timelines for programmatic and fiscal reporting will be developed according to the funding sources regulatory requirements and adhere to the following process. Special Note: The Department of Finance's address should be included as the point of contact for all funds to be received.

Director of Finance  
500 Market Street - Room 213  
Camden NJ 08101-5120

- STEP 1 – The Department administering the grant will collect the programmatic and financial data relative to the project and complete the required grantor reporting forms.
- STEP 2 – This documentation will then be forwarded to the Bureau of Grants Management for review and compilation in accordance with the Grantor Agency's required reporting format. NOTE: reports will not be filed if programmatic, financial records do not match the Finance Department's records. Reconciliation will be done by the Department's Grant Administrator and audited by BGM.
- STEP 3 – The report is then forwarded to the Director of Finance or Treasurer for review and authorization (sign-off) and returned to Bureau of Grants Management.
- STEP 4 – The Bureau of Grants Management returns the authorized report to the administering department. The administering department submits the report to the Grantor.

### Additional Steps for all Financial Reporting

- STEP 5 – Finance notifies the Bureau of Grants Management once the funds are received.
- STEP 6 – The Bureau of Grants Management notifies the Department Administering the grant when the revenue is received.

Special note: If the amount received is different from the amount requested, the notified party must inform the Department of Finance and the Bureau of Grants Management of the new amount and the reason for the increase or reduction.

In cases where the funds must be drawn down by the City, the notified party must notify the Department of Finance and/or the designated BGM monitor with verification from the funder the amount of funding that must be drawn down. No other department is authorized to draw down funds on behalf of the City.

## **ON-LINE GRANT PROCEDURES**

All City Departments, Divisions, and Bureaus must notify the Camden Promise Zone and Bureau of Grants Management of all on-line applications for funding in advance of their submission to the respective funding source.

All grants acquired on-line must adhere to the same guidelines identified in the Managing the Proposal Process, Grant Award Process, Grant Budget Insertion, Purchase Requisitions Involving Grants and Grant Reporting Process sections of this Procedural Manual.

The reporting security code will be shared by our Finance Department for fiscal reporting purposes.

## **THE GRANT CLOSE OUT PROCEDURE**

Once all programmatic and financial reporting has been completed. The administering department and/or agency must notify the Bureau of Grants Management that the grant has been completed.

The Bureau of Grants Management assigned grant monitor will review the file to insure that all programmatic and financial reporting documentation has been received. The assigned monitor will also review the City's Edmunds System to ensure that all revenue has been received and all purchase orders have been closed out.

The assigned grant monitor will prepare a close out letter or email verifying that all documentation has been received and (where applicable) if there is a need to cancel any receivable or spending reserve balances.

**MANAGING THE PROPOSAL PROCESS**  
**APPLICATION PROCESS WITH COLLABORATIVE AGENCIES**  
**Applying for Funds on Behalf of the City**

The City, in conjunction with the initiating agency, is fully responsible for assisting in the facilitation of the Application Process:

STEP 1 – The agency will notify the Mayor’s Office and/or the Camden Promise Zone of their intention to apply for a grant.

STEP 2 – The Agency writes the grant application and submits it to the Camden Promise Zone Office for review and approval.

NOTE: If a “CASH MATCH” is required for an application, the agency must indicate the source of the match to the City before the application can be submitted to a funding source.

STEP 3 - The Camden Promise Zone and/or the Designated Department overseeing the grant will prepare a City Council Resolution to “Apply for Funding.”

STEP 4 – The Camden Promise Zone Office and/or the Designated Department overseeing the grant forwards the completed application and resolution to the Bureau of Grants Management (BGM).

STEP 5 – The BGM reviews the application for content relative to pertinent regulations, budgetary commitments and forwards it to the Finance Director with their assessment and recommendation.

STEP 6 – The Finance Director reviews, approves the application, authorizes the resolution and forwards the request to the Business Administrator’s (BA) Office for approval and placement on the City Council Agenda.

STEP 7 – The BA reviews and approves the application for placement on the council agenda.

STEP 8 – City Council reviews and authorizes the submission of the application for grant funds

STEP 9 – The Camden Promise Zone and/or the Designated Department forwards the approved resolution (where applicable) to grantor agency.

**MANAGING THE PROPOSAL PROCESS**  
**GRANT AWARD PROCESS WITH COLLABORATIVE AGENCIES**  
**Funds Awarded on behalf of the City to Agencies**

- STEP 1 - A "Grant Approval Form" (Attachment G) shall be submitted to and approved by the Director of the Division of Local Government Services or his/her designee before the Municipality accepts or executes any grant agreement requiring current or long-term matching public funds, a commitment of municipal resources, or minimum staffing levels.
- STEP 2 - Once the agency is awarded the grant funds, the letter of award and the approved application must be sent to the Camden Promise Zone and/or the Designated Department to prepare a resolution to "Accept and Insert" the grant funds into the budget.
- STEP 3 - Upon Council Approval, the Department of Finance – Treasurer's Office assigns the name, appropriation and revenue account.
- STEP 4 - The Department of Finance notifies the Camden Promise Zone and/or the Designated Department of the assigned codes and the designated name.
- STEP 5 - The Camden Promise Zone and/or the Designated Department prepares a "Contract Resolution" for council approval and a requisition encumbering the awarded funds to the agency.
- STEP 6 - The resolution, requisition and all supporting documentation is forwarded to the Bureau of Grants Management designated program monitor for processing and review.
- STEP 7 - The Bureau of Grants Management pre-audits the requisition for grant compliance; reviews the council resolution for completeness; and authorizes (sign off) the requisition; and forwards the complete package to the Finance Director for approval.
- STEP 8 - The Finance Director authorizes (sign off) and forwards the requisition to the Purchasing Review Committee.
- STEP 9 - The Purchasing Review Committee reviews/approves the requisition and forwards the document to Purchasing.
- STEP 10 - The Finance Director approves the Request for Council Action, attaches the Certification of Availability of Funds and forwards it to the Business Administrator (BA) for placement on the council agenda.

**MANAGING THE PROPOSAL PROCESS  
GRANT AWARD PROCESS WITH COLLABORATIVE AGENCIES  
Funds Awarded on behalf of the City to Agencies  
(Continued)**

STEP 11 – BA’s Office reviews, gives final approval and places the request on Council Agenda.

STEP 12 – City Council approves the Resolution awarding the contract.

STEP 13 – The Law Department prepares the contract and sends the contract to the awarded agency.

STEP 14 – Once the Law Department receives the signed contract from the awarded agency and the Mayor’s authorization on the contract; a fully executed agreement is sent to the agency and forwarded to Purchasing.

STEP 15 – Purchasing receives the completed package from the Law Department and processes the contract request by assigning a purchase order number to the requisition and forwards it to Finance for further processing.

STEP 16 – Finance processes the purchase requisition and encumbers the funds (creates a purchase order).

STEP 17 – Purchasing forwards the purchase order to the awarded agency.

STEP 18 – The agency returns the signed purchase order to the Department of Finance.

Once the agency has a fully executed contract and has returned the signed purchase order; spending/drawdowns can occur in accordance with the regulations governing the grant agreement.

## **THE GRANT PAYMENT PROCESS**

Expenditures incurred utilizing grant funds must be a part of the approved budget from the funder and be in accordance with all applicable regulations governing the grant agreement and required by 2CFR Part 200. Further, an "independent cost analyst" must be performed prior to bids for costs exceeding \$100,000.

STEP 1 – The agency will submit all invoices, payroll, receipts and/or any other applicable supporting documentation to the designated department for review and payment.

STEP 2 – The designated department will review and approve the payment request and forwarded it to the assigned BGM program monitor with the following information:

Copy of the "receiving report" with the requested amount of the payment request (draw down amount where applicable); Edmunds System Budget Account Status Report, and all supporting documentation which verifies the amount of the payment request.

STEP 3 - BGM reviews payment request, checks the availability of funding, certifies the amount requested, the term of the agreement and any other statutory regulations required before authorizing payment. Once reviewed, BGM approves the payment in accordance with the grant regulations and forwards it to the Department of Finance for processing. Special Note: If all applicable documentation is not attached, or if the payment exceeds availability and/or the requests is not eligible in accordance with the grant agreement; the payment request will be rejected sent back to the authorizing department.

STEP 4 - The Finance Director reviews, authorizes the payment and forwards it to Accounts and Controls.

STEP 5 - Accounts and Controls reviews the payment request and inputs the information into the system.

STEP 6 - On Friday of any given week, all requests are approved and checks are processed.

STEP 7 - The payment request is mailed to the agency.

## **THE GRANT REPORTING PROCESS COLLABORATIVE AGENCIES**

Timelines for programmatic and fiscal reporting will be developed according to the funding sources regulatory requirements and adhere to the following process. Special Note: The Department of Finance's address should be included as the point of contact for all funds to be received.

Director of Finance  
500 Market Street - Room 213  
Camden NJ 08101-5120

STEP 1 – The Agency administering the grant will collect the programmatic and financial data relative to the project and complete the required grantor reporting forms.

STEP 2 – This documentation will then be forwarded to the assigned Department Designee.

STEP 3 - This documentation is then forwarded to the Bureau of Grants Management for review and compilation in accordance with the Grantor Agency's required reporting format. NOTE: reports will not be filed if programmatic, financial records do not match the Finance Department's records. Reconciliation will be done by the Department's Grant Administrator and audited by BGM.

STEP 3 – The report is then forwarded to the Director of Finance or Treasurer for review and authorization (sign-off) and returned to BGM.

STEP 4 – BGM returns the authorized report to the Department Designee and/or the Administering Agency. The Administering Agency submits the report to the Grantor.

STEP 5 – Finance notifies BGM once the funds are received.

STEP 6 – BGM notifies the Department Designee and/or Agency administering the grant when the revenue is received.

Special note: If the amount received is different from the amount requested, the notified party must inform the Department of Finance and the Bureau of Grants Management of the new amount and the reason for the increase or reduction.

**THE GRANT REPORTING PROCESS  
COLLABORATIVE AGENCIES  
(continued)**

In cases where the funds must be drawn down by the City, the notified party must notify the Department of Finance and/or the designated BGM monitor with verification from the funder the amount of funding that must be drawn down. No outside agency is authorized to draw down funds on behalf of the City.

## **THE GRANT CLOSE OUT PROCEDURE COLLABORATIVE AGENCIES**

Once all programmatic and financial reporting has been completed. The administering department and/or agency must notify the Bureau of Grants Management that the grant has been completed.

The Bureau of Grants Management assigned grant monitor will review the file to insure that all programmatic and financial reporting documentation has been received. The assigned monitor will also review the City's Edmunds System to insure that all revenue has been received and all purchase orders have been closed out.

The assigned grant monitor will prepare a close out letter or email verifying that all documentation has been received and (where applicable) if there is a need to cancel any receivable or spending reserve balances.

**STATE OF NEW JERSEY  
DEPARTMENT OF COMMUNITY AFFAIRS**

**DIVISION OF LOCAL GOVERNMENT SERVICES  
GRANT APPROVAL FORM**

**This form must be filled out in its entirety and is intended to provide the Division with appropriate information to determine whether to approve a new or extended service. Please provide any additional information you believe will help the Division make an informed decision.**

**PLEASE EXPLAIN THE JUSTIFICATION FOR THE GRANT. PLEASE FULLY EXPLAIN COSTS ASSOCIATED WITH THE AWARD OF THE GRANT AS WELL AS ANY MATCHING FUNDS OR EMPLOYMENT OBLIGATIONS AS A TERM OF THE GRANT. PLEASE EXPLAIN THE BENEFITS OF THE GRANT FOR THE MUNICIPALITY AND THE RESIDENTS. ATTACH THE GRANT APPLICATION AND GRANT AWARD LETTER.**

**Information of key municipal employee or agent applying for grant and responsible for its use:**

<b>Name</b>	
<b>Title</b>	
<b>Telephone Number</b>	
<b>Email</b>	

**If the grant is received and fully expended, what will the continuing financial obligations of the municipality be with respect to staffing, insurance, liability, operations, and/or maintenance?**

**What will the source of funds be for the staffing, insurance, liability, operations, and/or maintenance?**

\_\_\_\_\_  
**Mayor's Signature**

**Date** \_\_\_\_\_

\_\_\_\_\_  
**Business Administrator/Manager Signature**

**Date** \_\_\_\_\_

**Name, email and fax of contact person for this form:**

\_\_\_\_\_

***For LGS use only:***

**Approved**

**Denied**

\_\_\_\_\_ **Date** \_\_\_\_\_  
**Director or Designee, Division of Local Government Services**

**Number Assigned** \_\_\_\_\_

## COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) ACTIVITIES NATIONAL OBJECTIVE

The authorizing statute of the CDBG program requires that each activity funded except for program administration and planning activities must meet one of three national objectives. The three national objectives are:

- Benefit to low- and moderate- income (LMI) persons;
- Aid in the prevention or elimination of slums or blight; and
- Urgent Need

### **Benefit to Low and Moderate Income Persons or Households**

The LMI national objective statute requires that recipients expend 70 percent of their CDBG funds to meet the LMI national objective. In addition to meeting the 70 percent test, applicants must ensure that the activities proposed, when taken as a whole, will not benefit moderate-income persons to the exclusion of low-income persons.

The following four categories that can be used to meet the LMI national objective:

- **Area Benefit Activities:** an area benefit activity is one that benefits all residents in a particular area, where at least 51 percent of the residents are LMI persons.
- **Limited Clientele Activities:** under this category, 51 percent of the beneficiaries of an activity have to be LMI persons. With respect to determining the beneficiaries of activities as LMI and qualifying under the limited clientele category, activities must meet one of the following tests:
  - Benefit a clientele that is generally presumed to be principally LMI. This presumption covers abused children, battered spouses, elderly persons, severely disabled adults, homeless persons, illiterate adults, persons living with AIDS and migrant farm workers.
  - Require documentation on family size and income in order to show that at least 51 percent of the clientele are LMI; or Have income eligibility requirements limiting the activity to LMI persons only.
- **Housing Activities:** The housing category of LMI benefit national objective qualifies activities that are undertaken for the purpose of providing or improving permanent residential structures which, upon completion, will be occupied by LMI households. In order to meet the housing LMI national objective, structures with one unit must be occupied by a LMI household. If the structure contains two units, at least one unit must be LMI occupied. Structures with three or more units must have at least 51percent occupied by LMI households

- **Job Creation or Retention Activities:** The job creation and retention LMI benefit national objective addresses activities designed to create or retain permanent jobs, at least 51 percent of which (computed on a full-time equivalent basis) will be made available to or held by LMI persons.

The following requirements must be met for jobs to be considered created or retained.

- If grantees fund activities that create jobs, there must be documentation indicating that at least 51 percent of the jobs will be held by, or made available to, LMI persons.
- For funded activities that retain jobs, there must be sufficient information documenting that the jobs would have been lost without the CDBG assistance and that one or both of the following applies to at least 51 percent of the jobs:
  - The job is held by a LMI person; or
  - The job can reasonably be expected to turn over within the following two years and steps will be taken to ensure that the job will be filled by, or made available to, a LMI person.

### **Elimination of Slums and Blight**

Activities under this national objective are carried out to address one or more of the conditions which have contributed to the deterioration of an area designated as a slum or blighted area. The focus of activities under this national objectives is a change in the physical environment of a deteriorating area.

There are three categories that can be used to qualify activities under this national objective:

- **Prevent or eliminate slums and blight on an area basis:** This category covers activities that aid in the prevention or elimination of slums or blight in a designated area. To qualify under this category, the area in which the activity occurs must be designated as slum or blighted. The following tests apply: The designated area in which the activity occurs must meet the definition of a slum, blighted, deteriorated or deteriorating area under state or local law. Additionally, the area must meet either one of the two conditions specified below:
  - Public improvements throughout the area are in a general state of deterioration; or
  - At least 25 percent of the properties throughout the area exhibit one or more of the following:
    - Physical deterioration of buildings/improvements;
    - Abandonment of properties;
    - Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings;

- Significant declines in property values or abnormally low property values relative to other areas in the community; or
- Known or suspected environmental contamination.

Documentation must be maintained by the grantee on the boundaries of the area and the conditions that qualified the area at the time of its designation. The designation of an area as slum or blighted must be re-determined every 10 years for continued qualifications.

- **Prevent or eliminate slum and blight on a spot basis:** These are activities that eliminate specific conditions of blight or physical decay on a spot basis and are not located in a slum or blighted area. Activities under this category are limited to acquisition, clearance, relocation, historic preservation, remediation of environmentally contaminated properties, and building rehabilitation activities. Furthermore, rehabilitation is limited to the extent necessary to eliminate a specific condition detrimental to public health and safety.
- **Prevent or eliminate slum and blight in an urban renewal area:** These are activities located within an Urban Renewal project area or Neighborhood Development Program (NDP) action area that are necessary to complete an Urban Renewal Plan. A copy of the Urban Renewal Plan in effect at the time the CDBG activity is carried out, including maps and supporting documentation, must be maintained for record keeping purposes.

### **Urgent Need**

Use of the urgent need national objective category is designed only for activities that alleviate emergency conditions. Examples include:

- Acquisition of property located in a flood plain that was severely damaged by a recent flood;
- Public facility improvements like the reconstruction of a publicly-owned hospital that was severely damaged by a tornado;
- Demolition structures that are severely damaged by a major earthquake;
- Public services like additional police protection to prevent looting in an area damaged by a recent hurricane;
- Interim assistance such as emergency treatment of health problems cause by a flood; and
- Special economic development assistance to a grocery store that was damaged by a recent hurricane;
- Interim assistance such as emergency treatment of health problems cause by a flood; and
- Special economic development assistance to a grocery store that was damaged by an earthquake.

Urgent need qualified activities must meet the following criteria:

- 1.The existing conditions must pose a serious and immediate threat to the health or welfare of the community;
- 2.The existing conditions are of recent origin or recently became urgent (generally, within the past 18 months);
- 3.The grantee is unable to finance the activity on its own; and
- 4.Other sources of funding are **not** available.

See the "Records to be Maintained – National Objective Determination" Section of the manual for the required documentation to be maintained on file to demonstrate compliance with the national objective.

## **RECORDS TO BE MAINTAINED NATIONAL OBJECTIVE DETERMINATION**

In accordance with 24CFR 570.506 Records to be maintained (see full regulation below) each departmental awardee, subrecipient or awarding agency shall establish and maintain sufficient records to support the national objective determination. At a minimum, the following records are needed:

**(a)** Records providing a full description of each activity assisted (or being assisted) with CDBG funds, including its location (if the activity has a geographical locus), the amount of CDBG funds budgeted, obligated and expended for the activity, and the provision in subpart C under which it is eligible.

**(b)** Records demonstrating that each activity undertaken meets one of the Criteria for national objectives. Such records shall include the following information:

**(1)** For each activity determined to benefit low and moderate income persons, the income limits applied and the point in time when the benefit was determined.

**(2)** For each activity determined to benefit low and moderate income persons based on the area served by the activity and:

**(i)** The boundaries of the service area;

**(ii)** The income characteristics of families and unrelated individuals in the service area; and

**(iii)** If the percent of low and moderate income persons in the service area is less than 51 percent, data showing that the area qualifies under the exception criteria set forth at § 570.208(a)(1)(ii); and

**(iv)** maintain records to demonstrate that the service area is primarily residential in nature.

**(3)** For each activity determined to benefit low and moderate income persons because the activity involves a facility or service designed for use by a limited clientele consisting exclusively or predominantly of low and moderate income persons:

**(i)** Documentation establishing that the facility or service is designed for the particular needs of or used exclusively by senior citizens, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers, for which the regulations provide a presumption concerning the extent to which low- and moderate-income persons benefit; or

**(ii)** Documentation describing how the nature and, if applicable, the location of the facility or service establishes that it is used predominantly by low and moderate income persons; or

**(iii)** Data showing the size and annual income of the family of each person receiving the benefit.

**(4)** For each activity carried out for the purpose of providing or improving housing which is determined to benefit low and moderate income persons:

**(i)** A copy of a written agreement with each landlord or developer receiving CDBG assistance indicating the total number of dwelling units in each multifamily structure assisted and the number of those units which will be occupied by low and moderate income households after assistance;

**(ii)** The total cost of the activity, including both CDBG and non-CDBG funds.

**(iii)** For each unit occupied by a low and moderate income household, the size and income of the household;

**(iv)** For rental housing only:

**(A)** The rent charged (or to be charged) after assistance for each dwelling unit in each structure assisted; and

**(B)** Such information as necessary to show the affordability of units occupied (or to be occupied) by low and moderate income households pursuant to criteria established and made public by the recipient;

**(v)** For each property acquired on which there are no structures, evidence of commitments ensuring that the criteria in § 570.208(a)(3) will be met when the structures are built;

**(vi)** Where applicable, records demonstrating that the activity qualifies under the special conditions at § 570.208(a)(3)(i);

**(vii)** For any homebuyer assistance activity qualifying under § 570.201(e), 570.201(n), or 570.204, identification of the applicable eligibility paragraph and evidence that the activity meets the eligibility criteria for that provision; for any such activity qualifying under § 570.208(a), the size and income of each homebuyer's household; and

**(viii)** For a § 570.201(k) housing services activity, identification of the HOME project(s) or assistance that the housing services activity supports, and evidence that project(s) or assistance meet the HOME program income targeting requirements at 24 CFR 92.252 or 92.254.

**(5)** For each activity determined to benefit low and moderate income persons based on the creation of jobs, the recipient shall provide the documentation described in either paragraph (b)(5)(i) or (ii) of this section.

**(i)** Where the recipient chooses to document that at least 51 percent of the jobs will be available to low and moderate income persons, documentation for each assisted business shall include:

**(A)** A copy of a written agreement containing:

(1) A commitment by the business that it will make at least 51 percent of the jobs available to low and moderate income persons and will provide training

for any of those jobs requiring special skills or education;

(2) A listing by job title of the permanent jobs to be created indicating which jobs will be available to low and moderate income persons, which jobs require special skills or education, and which jobs are part-time, if any; and

(3) A description of actions to be taken by the recipient and business to ensure that low and moderate income persons receive first consideration for those jobs; and

**(B)** A listing by job title of the permanent jobs filled, and which jobs of those were available to low and moderate income persons, and a description of how first consideration was given to such persons for those jobs. The description shall include what hiring process was used; which low and moderate income persons were interviewed for a particular job; and which low and moderate income persons were hired.

**(ii)** Where the recipient chooses to document that at least 51 percent of the jobs will be held by low and moderate income persons, documentation for each assisted business shall include:

**(A)** A copy of a written agreement containing:

(1) A commitment by the business that at least 51 percent of the jobs, on a full-time equivalent basis, will be held by low and moderate income persons; and

(2) A listing by job title of the permanent jobs to be created, identifying which are part-time, if any;

**(B)** A listing by job title of the permanent jobs filled and which jobs were initially held by low and moderate income persons; and

**(C)** For each such low and moderate income person hired, the size and annual income of the person's family prior to the person being hired for the job.

**(6)** For each activity determined to benefit low and moderate income persons based on the retention of jobs:

**(i)** Evidence that in the absence of CDBG assistance jobs would be lost;

**(ii)** For each business assisted, a listing by job title of permanent jobs retained, indicating which of those jobs are part-time and (where it is known) which are held by low and moderate income persons at the time the CDBG assistance is provided. Where applicable, identification of any of the retained jobs (other than those known to be held by low and moderate income persons) which are projected to become available to low and moderate income persons through job turnover within two

years of the time CDBG assistance is provided. Information upon which the job turnover projections were based shall also be included in the record;

**(iii)** For each retained job claimed to be held by a low and moderate income person, information on the size and annual income of the person's family;

**(iv)** For jobs claimed to be available to low and moderate income persons based on job turnover, a description covering the items required for "available to" jobs in paragraph (b)(5) of this section; and

**(v)** Where jobs were claimed to be available to low and moderate income persons through turnover, a listing of each job which has turned over to date, indicating which of those jobs were either taken by, or available to, low and moderate income persons. For jobs made available, a description of how first consideration was given to such persons for those jobs shall also be included in the record.

**(7)** For purposes of documenting, pursuant to paragraph (b)(5)(i)(B), (b)(5)(ii)(C), (b)(6)(iii) or (b)(6)(v) of this section, that the person for whom a job was either filled by or made available to a low- or moderate-income person based upon the census tract where the person resides or in which the business is located, the recipient, in lieu of maintaining records showing the person's family size and income, may substitute records showing either the person's address at the time the determination of income status was made or the address of the business providing the job, as applicable, the census tract in which that address was located, the percent of persons residing in that tract who either are in poverty or who are low- and moderate-income, as applicable, the data source used for determining the percentage, and a description of the pervasive poverty and general distress in the census tract in sufficient detail to demonstrate how the census tract met the criteria in § 570.208(a)(4)(v), as applicable.

**(8)** For each activity determined to aid in the prevention or elimination of slums or blight based on addressing one or more of the conditions which qualified an area as a slum or blighted area:

**(i)** The boundaries of the area; and

**(ii)** A description of the conditions which qualified the area at the time of its designation in sufficient detail to demonstrate how the area met the criteria in § 570.208(b)(1).

**(9)** For each residential rehabilitation activity determined to aid in the prevention or elimination of slums or blight in a slum or blighted area:

**(i)** The local definition of "substandard";

**(ii)** A pre-rehabilitation inspection report describing the deficiencies in each structure to be rehabilitated; and

**(iii)** Details and scope of CDBG assisted rehabilitation, by structure.

**(10)** For each activity determined to aid in the prevention or elimination of slums or blight based on the elimination of specific conditions of blight or physical decay not located in a slum or blighted area:

**(i)** A description of the specific condition of blight or physical decay treated; and

**(ii)** For rehabilitation carried out under this category, a description of the specific conditions detrimental to public health and safety which were identified and the details and scope of the CDBG assisted rehabilitation by structure.

**(11)** For each activity determined to aid in the prevention or elimination of slums or blight based on addressing slums or blight in an urban renewal area, a copy of the Urban Renewal Plan, as in effect at the time the activity is carried out, including maps and supporting documentation.

**(12)** For each activity determined to meet a community development need having a particular urgency:

**(i)** Documentation concerning the nature and degree of seriousness of the condition requiring assistance;

**(ii)** Evidence that the recipient certified that the CDBG activity was designed to address the urgent need;

**(iii)** Information on the timing of the development of the serious condition; and

**(iv)** Evidence confirming that other financial resources to alleviate the need were not available.

**(c)** Records that demonstrate that the recipient has made the determinations required as a condition of eligibility of certain activities, as prescribed in §§ 570.201(f), 570.201(i)(2), 570.201(p), 570.201(q), 570.202(b)(3), 570.206(f), 570.209, 570.210, and 570.309.

**(d)** Records which demonstrate compliance with § 570.505 regarding any change of use of real property acquired or improved with CDBG assistance.

**(e)** Records that demonstrate compliance with the citizen participation requirements prescribed in 24 CFR part 91, subpart B, for entitlement recipients, or in 24 CFR part 91, subpart C, for HUD-administered small cities recipients.

**(f)** Records which demonstrate compliance with the requirements in § 570.606 regarding acquisition, displacement, relocation, and replacement housing.

**(g)** Fair housing and equal opportunity records containing:

**(1)** Documentation of the analysis of impediments and the actions the recipient has carried out with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice in the recipient's community.

**(2)** Data on the extent to which each racial and ethnic group and single-headed households (by gender of household head) have applied for, participated in, or benefited from, any program or activity funded

in whole or in part with CDBG funds. Such information shall be used only as a basis for further investigation as to compliance with nondiscrimination requirements. No recipient is required to attain or maintain any particular statistical measure by race, ethnicity, or gender in covered programs.

**(3)** Data on employment in each of the recipient's operating units funded in whole or in part with CDBG funds, with such data maintained in the categories prescribed on the Equal Employment Opportunity Commission's EEO-4 form; and documentation of any actions undertaken to assure equal employment opportunities to all persons regardless of race, color, national origin, sex or handicap in operating units funded in whole or in part under this part.

**(4)** Data indicating the race and ethnicity of households (and gender of single heads of households) displaced as a result of CDBG funded activities, together with the address and census tract of the housing units to which each displaced household relocated. Such information shall be used only as a basis for further investigation as to compliance with nondiscrimination requirements. No recipient is required to attain or maintain any particular statistical measure by race, ethnicity, or gender in covered programs.

**(5)** Documentation of actions undertaken to meet the requirements of § 570.607(b) which implements section 3 of the Housing Development Act of 1968, as amended (12 U.S.C. 1701U) relative to the hiring and training of low and moderate income persons and the use of local businesses.

**(6)** Data indicating the racial/ethnic character of each business entity receiving a contract or subcontract of \$25,000 or more paid, or to be paid, with CDBG funds, data indicating which of those entities are women's business enterprises as defined in Executive Order 12138, the amount of the contract or subcontract, and documentation of recipient's affirmative steps to assure that minority business and women's business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction and services. Such affirmative steps may include, but are not limited to, technical assistance open to all businesses but designed to enhance opportunities for these enterprises and special outreach efforts to inform them of contract opportunities. Such steps shall not include preferring any business in the award of any contract or subcontract solely or in part on the basis of race or gender.

**(7)** Documentation of the affirmative action measures the recipient has taken to overcome prior discrimination, where the courts or HUD have found that the recipient has previously discriminated against persons on the ground of race, color, national origin or sex in administering a program or activity funded in whole or in part with CDBG funds.

- (h)** Financial records, in accordance with the applicable requirements listed in § 570.502, including source documentation for entities not subject to parts 84 and 85 of this title. Grantees shall maintain evidence to support how the CDBG funds provided to such entities are expended. Such documentation must include, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity.
- (i)** Agreements and other records related to lump sum disbursements to private financial institutions for financing rehabilitation as prescribed in § 570.513; and
- (j)** Records required to be maintained in accordance with other applicable laws and regulations set forth in subpart K of this part.

## Environmental and Historic Review

When applicable, projects that require an Environmental and Historic Review will not be awarded until our Environmental/Historic Review Officer reviews the project for significant impact pursuant to 24 CFR 58.22 and initiates the 106 process in accordance with 36 CFR 800.3. Once reviewed; and no significant impact is identified and approval has been received from the State Historic Preservation Office (SHPO) for historic structures, the City will submit the finding of no significant impact to HUD and commit funds upon receipt of HUD 7015.16 "Authority to Use Grant Funds."

### Environmental Review Process

The City will initiate the environmental review as soon as the proposed activities are identified. The Environmental Review Officer (ERO) will review the area affected by the proposed project and determine the level of review required. The ERO will determine the level of review by looking at where the project activity falls in accordance with the requirements of 24 CFR Part 58.

Activities are classified as one of the following:

- Exempt (24 CFR 58.34(a)(1-11))  
Activities that by their very nature will have no physical impact upon the environment. Some examples of activities exempt from NEPA requirements include:
  - Technical assistance;
  - Administrative and management activities;
  - Public service activities;
  - Information and financial services; and
  - purchase of tools.
- Categorically excluded from NEPA requirements (24 CFR 58.35(a))  
Activities that are categorically excluded from NEPA review (environmental assessment or environmental impact statement) requirements receive this designation because they do not individually or collectively have a significant impact on the environment. However, compliance with other applicable federal environmental laws listed in § 58.5 is required for activities designated under this part. Examples of activities categorically excluded from NEPA is the acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements when the facilities and improvements are in-place and will be retained in the same use without change in size or capacity of more than 20 percent.
- Categorically excluded, not subject to § 58.5 (24 CFR 58.35(b))  
Activities in this section are categorically excluded from the requirements at § 58.5, due to HUD's determination that such activities will not alter any conditions that would require a NEPA review or a compliance determination under § 58.5. An example of an activity categorically excluded from § 58.5, but not NEPA would be an activity to assist homebuyers with purchasing existing dwelling units or

dwelling units under construction, including closing costs and down payment assistance, and similar activities that result in the transfer of title. NOTE: The ERO will; however, file a statement in the Environmental Review Record that the activity was determined to be Categorically Excluded, Not Subject to § 58.5.

- Categorically excluded, but may be converted to an exempt activity (24 CFR 58.34(a)(12)) Any of the categorically excluded activities in § 58.35(a) are exempt from NEPA, provided that there are no circumstances that require compliance with any other federal law and authorities cited in § 58.5. Using the statutory checklist, and after consulting with applicable agencies and organizations, the ERO will designate an activity as exempt after it is verified that none of the federal laws and authorities are triggered through funding this activity (historic and wildlife preservation rules and water quality standards.)
- Subject to an environmental assessment (24 CFR 58.36)  
If a project is not exempt or categorically excluded under the above sections, the ERO will prepare an Environmental Assessment (EA) documenting all the evidence and analysis supporting the City's decision as to whether an environmental impact statement is warranted, or if an activity will result in no significant impact to the environment.
- Subject to an environmental impact statement (24 CFR 58.37)  
If a project is subject to a full EA and is determined to have a potentially significant impact on the human environment, then an Environmental Impact Statement (EIS) will be prepared. Samples of projects that meet this criteria include:
  - it would provide a site or sites for, or result in the construction of, hospitals or nursing homes containing a total of 2,500 or more beds;
  - it would remove, demolish, convert or substantially rehabilitate 2,500 or more existing housing units (not including rehab projects categorically excluded under § 58.35) or would result in the construction or installation of 2,500 or more housing units, or would provide sites for 2,500 more housing units; or
  - it would provide enough additional water and sewer capacity to support 2,500 or more additional housing units. See Section 58.37 for further information about when an EIS is necessary and when it may be able to be avoided.

## **CONSOLIDATED PLAN AMENDMENT PROCESS**

A substantial amendment is defined as an activity deletion from or addition to the final statement; change in category of beneficiaries; change in purpose of the activity; significant change of location; or a change that results in HUD activity/project category change. In addition, any fifty (50) percent increase or decrease in the dollar amount of a funded activity or project will be defined as a substantial amendment.

For any substantial amendment to the Consolidated Plan, a public hearing will be held. The date of the hearing will be published in a newspaper of general circulation two weeks prior. After the hearing, a minimum of thirty (30) days will be provided for written public comment. The City will respond to any written comment and insert both the comment and response in the Consolidated Plan. If no comments are received, the City will proceed with the adoption of the amendment without further notification.

Changes that do not constitute a substantial amendment (i.e., changes that do not exceed the fifty (50) percent threshold); will be addressed through public notification. A minimum of thirty (30) days will be provided for public comment in writing. If no comments are received, the City will proceed with the adoption of the amendment without further notification.

# BUREAU OF GRANTS MANAGEMENT ORGANIZATIONAL CHART

