



# **FY 2026 OPERATING MANUAL**

**ECONOMIC DEVELOPMENT DEPARTMENT  
COMMUNITY DEVELOPMENT DIVISION**

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## INTRODUCTION

The United States Department of Housing and Urban Development (HUD) provides the Community Development Block Grant Program (CDBG) to preserve and develop viable urban communities. The City of San Diego (City) Economic Development Department's (EDD) Community Development Division (CDD) directly administers the CDBG Program and has oversight responsibilities over the Emergency Solutions Grant (ESG) Program, and the HOME Investment Partnerships Program (HOME). The City is responsible for grant compliance of all three (3) HUD Entitlement programs.

The City of San Diego has utilized CDBG funds to improve community facilities and services, revitalize neighborhoods, expand affordable housing, and expand economic opportunities that benefit low/moderate-income persons.

ESG funds have been utilized to support shelters for homeless individuals and families and to rapidly re-house homeless San Diegans. The San Diego Housing Commission (SDHC) is the Subrecipient for ESG.

**This Operating Manual (Manual) applies to all CDBG and ESG funds awarded but may also apply to other funding sources for which the Community Development Division has direct administration or oversight responsibilities.** The purpose of this Manual is to provide details to all Subrecipients on applicable federal and City rules and requirements. It is designed as guidance to help Subrecipients understand the requirements that apply to the use of federal funds for the delivery of the CDBG and ESG Programs and its eligible activities. It is a **supplement** to applicable regulations, standards, and policies. The basic program regulations, government management, and financial systems for the CDBG Program and the ESG Program are contained in Title 24 of the Code of Federal Regulations (CFR), Part 200 of Title 2 of the CFR, and various Office of Management and Budget (OMB) Circulars referenced in this manual.

This Manual does not replace or amend any of the provisions included in the Agreement executed between the City and Subrecipient and should not be used in lieu of reading the Agreement. Should there be any disagreement between the executed Agreement and this Manual, the provisions contained within the Agreement shall take precedence. The Agreement refers to the executed contract, service level agreement, or memorandum of understanding between the City and the Subrecipient.

The procedures prescribed in this Manual represent minimum requirements and controls that must be embodied within the Subrecipient's accounting, internal controls, and financial reporting systems. They are not intended to replace existing procedures used by the Subrecipient that achieve the same results. The Manual is incorporated by reference in its entirety into the Agreements entered into by the City and Subrecipient for the operation of CDBG- and ESG-funded projects. Each Subrecipient must comply with the minimum requirements and procedures prescribed in this Manual to the maximum extent feasible. In addition, each Subrecipient must ensure that a copy of the Manual is accessible to all personnel responsible for compliance with requirements and procedures contained in the manual.

**The approval of the City's Community Development Division must be obtained for any deviation from the minimum requirements contained in this Manual. Any proposed deviations shall be considered by the Community Development Division upon receipt of a completed Agreement/Operating Manual Exemption Request Form (Attachment B) submitted by the Subrecipient.**

This Manual and any revisions that may be issued from time to time shall be effective until superseded or canceled by appropriate notice from the Community Development Division Office. Comments and suggestions for changes, modifications, or improvements are encouraged, and should be submitted in writing to the Community Development Division.

The Community Development Division's contact information is as follows:

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## SECTION I: BASIC REQUIREMENTS

Subrecipients shall comply, and require each of its subcontractors to comply, with the basic requirements (applicable laws, rules, regulations, ordinances, resolutions, permits, and policies of the federal, state, and local governments) of the Agreements entered into by the City and the Subrecipient. The provisions listed herein do not in any way abrogate or modify any of the terms or conditions of the executed CDBG Agreements and ESG Agreements.

### A. FEDERAL REGULATIONS

The key federal regulations that form the basic administrative requirements of the CDBG and ESG programs are summarized in this section to provide a framework for the standards referenced in this Manual. The regulations have been developed by HUD in order to carry out the federal statutes that established the CDBG program and ESG program. The regulations address the CDBG Program itself and other federal laws or policies relevant to the CDBG Program (e.g., National Environmental Policy Act, Americans with Disabilities Act, Davis-Bacon Act, etc.).

#### 1. CDBG Program Management Regulations

The basic program regulations governing management and financial systems for the CDBG program are disseminated by the federal government in 24 CFR Part 570, Subparts J and K. They are applicable both to grantees (i.e., the City) and to public or private sector Subrecipients (e.g., nonprofit organizations):

- a. Subpart J (24 CFR 570.500–570.513) covers the general responsibilities for grant administration, including uniform administrative requirements, provisions of Subrecipient agreements, program income, use of real property, recordkeeping and reporting, and closeout procedures.
- b. Subpart K (24 CFR 570.600–570.614) covers other CDBG program requirements, including civil rights, labor standards, environmental standards, flood insurance, relocation, displacement, acquisition, employment and contracting opportunities, lead-based paint, use of debarred, suspended or ineligible Subrecipients, uniform administrative requirements and cost principles, conflicts of interest, and the Americans with Disabilities Act.

#### 2. ESG Program Management Requirements

General guidelines for activities of the ESG Program are listed at 24 CFR Part 576. Subpart A (24 CFR 576.1–576.3) covers the general provisions. Subpart B (24 CFR 576.100–576.109) covers program components and eligible activities. Subpart E (24 CFR 576.400–576.408) covers the program requirements. Subpart F (24 CFR 576.500–576.501) covers grant administration.

#### 3. General Federal Requirements

In addition to the basic regulations of the CDBG Program and ESG program, there are three (3) other categories of requirements that affect the administrative

systems and procedures that Subrecipients must have in place in order to receive CDBG or ESG grant funds:

- Federal regulations governing administrative and audit requirements for grants and cooperative agreements (governmental Subrecipients) for which HUD has oversight responsibilities;
- Administrative circulars from the OMB and Department of the Treasury governing cost principles, administrative systems, fiscal procedures, and audit requirements for public and private grantees and Subrecipients; and
- Executive Orders from the Office of the President implementing various equal employment opportunity and environmental policies.

## B. GENERAL REQUIREMENTS

Subrecipients must constantly monitor their performance to ensure that time schedules are being met, projected milestones and tasks are being accomplished, and other performance goals are being achieved in accordance with the executed Agreement. In addition, all activities must be conducted in compliance with the applicable federal and City requirements.

Problems, delays, or adverse conditions that shall affect the Subrecipient's ability to meet its program objectives or its time schedules should be reported to the designated Community Development Project Manager as soon as determined or on the Subrecipient's Monthly Programmatic Report, as appropriate. The Community Development Division's emphasis is on preventing and correcting problems before they develop into serious obstacles to program implementation or completion.

Completion of program activities within the timeframes established in the approved application is extremely important. CDBG funds are subject to reprogramming by the City if an activity or project is no longer feasible or funds remain unexpended within the designated termination date listed in the CDBG Agreement.

## C. KEY PROVISIONS

Several of the following provisions are included in the executed Agreement. These provisions are included here for emphasis due to their importance. Each Subrecipient must comply with these provisions in order to meet the specific City and federal requirements.

### 1. Subcontractors/Consultants

Procurement of subcontractors and/or consultants that will be paid with CDBG funds must be completed in compliance with the requirements set forth in Section II of this Operating Manual (Page 18). No disbursements may be made to subcontractor or Consultant without a written contractual agreement that has been reviewed and approved by the designated Community Development Division Project Manager. In addition, any modifications or amendments to any subcontract or consultant agreement must be submitted to the designated Project Manager upon their execution. The subcontract or consultant agreement must include the following:



- a. A description of specific direct CDBG project services to be provided and/or CDBG project-related support to be provided. **NOTE: Subcontractor activities related to obtaining grants or other funding for the project or for general administration/planning studies/assessments may not be paid with CDBG funds. Also, activities that do not directly benefit/support the CDBG-funded project activities during the Agreement period may not be paid with CDBG funds.**
- b. A provision that states either party to the agreement may terminate the agreement upon receipt of written notice of not more than thirty (30) days.
- c. The total amount of compensation to be paid to the subcontractor or consultant. If there are multiple funding sources, the CDBG amount must be clearly identified.
- d. Requirement that the subcontractor or consultant submit an invoice or other supporting documentation to the Subrecipient that details the actual work completed and the total hours worked, prior to receiving compensation for services rendered.
- e. Terms and requirements mandated by the City or federal guidelines.

**NOTE:** Subcontractors or consultants that are independent (self-employed and not employees of the Subrecipient) and receive, or will receive, IRS Form 1099-MISC from the Subrecipient are required by the City's Municipal Code section 31.0301 to register for a Business Tax Certificate with the Office of the City Treasurer.

2. **Conflict of Interest**

The Subrecipient must comply with all federal, state, and local conflict of interest laws, regulations, and policies applicable to public contracts and procurement practices. Subrecipients shall ensure that no person shall be employed under the Agreement if that person or member of the person's immediate family serves on a board or committee that has the authority to make personnel decisions that could affect the person's job, and no person shall be employed if a member of the person's immediate family would have supervisory authority over that person. A member of the immediate family includes (whether by blood, marriage, or adoption) spouse, parent (including stepparent), child (including stepchild), sister (including stepsister), brother (including stepbrother), grandparent, grandchild, and the in-laws of any of these persons. In addition, subcontracts, consultant agreements, or lease agreements shall not be awarded to any person who is an employee, agent, consultant, officer, member of the Board of the Subrecipient, or to any member of the employee or Board member's immediate family, without prior approval by the City.

Members and Officers of the Subrecipient's Board of Directors may not participate in or influence discussions or decisions concerning the award of a grant or other financial benefits to organizations, firms, or sole proprietorships that the member or officer or their immediate family represents.

Additionally, no persons who exercise or have exercised any functions or responsibilities with respect to conducting CDBG activities, or who are in a

position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure for one year thereafter.

In the procurement of property (e.g. supplies, equipment), construction, or services, no Covered Persons may participate in the selection, award, or administration of a contract supported by a HUD Program award if they, any member of their immediate family, their partner, or an organization which employs or plans to employ any of the parties described, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The Covered Persons may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.

The conflict-of-interest rules in 2 CFR 200.317 and 2 CFR 200.318(c) shall apply to subrecipients' procurement of property or services.

Subrecipient shall ensure Covered Persons disclose all actual and potential conflicts of interest on a disclosure form. Whenever applicable, a potential conflict of interest must be disclosed to the designated Community Development Project Manager before it becomes an actual conflict of interest so that appropriate action may be taken to avoid an actual conflict of interest.

Subrecipient shall maintain documentation that verifies compliance with all federal, state, and local conflict of interest laws, regulations, and policies applicable to public contracts and procurement practices.

3. Client Confidentiality

The confidentiality of all clients (including the name of the client, services provided to a client, and the reason(s) for such services) must be maintained by Subrecipients at all times, except when disclosure of such information is authorized by provisions listed in the executed Agreement, prearranged agreement with the clients, or required by law or court order. Subrecipient shall maintain documentation that verifies compliance with this requirement.

4. Volunteers/Unpaid Workers

Subrecipients utilizing volunteers/unpaid workers to assist in accomplishing any appropriate portions of the service provisions in the executed Agreement shall maintain a record for each volunteer/unpaid worker containing the hours worked and activities performed on file. Subrecipients shall ensure that volunteers/unpaid workers adhere to all program requirements, including the requirements for client confidentiality.

5. Rights and Remedies Not Waived by Payment

In no event shall any payment by the City to the Subrecipient constitute or be construed to be a waiver by the City of any breach of the terms or conditions of the executed Agreement, or of any default on the part of the Agreement that may then exist, and any payment or payments by the City shall in no way impair or

prejudice any right or remedy available to the City with respect to such breach or default.

6. Grievance Policy & Process (Clients and Subcontractors/Vendors)

Subrecipients shall ensure that a written grievance policy and process is in place that stipulates how client grievances shall be resolved, including those served through subcontractors. There should also be a written grievance policy and process in place that stipulates how subcontractor/vendor grievances shall be resolved. At a minimum, the following elements shall be included in the Subrecipient's grievance policies:

- How the grievance shall be documented;
- Who (name and position title) shall be authorized to handle/look into the grievance;
- Appeal process if complainant is not satisfied with first level;
- Timeline for complaint resolution; and
- Tracking of complaints (how status and results shall be documented and reported).

Subrecipients shall ensure this policy and process are displayed in an area accessible to all clients at each project site. The Subrecipient shall also maintain the investigation results on file.

7. Availability of Records and Information

For the purpose of inspecting, auditing, monitoring, or evaluating the Subrecipient's performance, or that of its subcontractors, in meeting their contractual requirements/obligations and compliance with applicable laws, rules, and regulations, the Subrecipient must permit, and must require its subcontractors to permit, authorized City personnel, the U.S. Government, or their authorized agents to inspect and photocopy all books, accounting records, invoices, receipts, payroll records, personnel records, and any other project data or records pertaining to all matters covered in the Agreement. Such records and information must be made available during normal business hours at a reasonable location within the County of San Diego and as often as the aforementioned officials deem necessary. The City or U.S. Government officials must be permitted to make excerpts or copies of such records and data that are related in whole or in part to the executed Agreement. The City must keep any copies of the Subrecipient's data and records in the strictest confidence allowed by law. If the Subrecipient is unable to make all such data and records available for inspection within the County of San Diego, then the Subrecipient must pay all of the City's travel-related costs to inspect or audit the data and records at the location where the data and records are maintained.

8. Records Retention

Subrecipients shall ensure that a written records policy and process is in place that requires all project records to be maintained and stored for a period of not less than three (3) years after City approval of all required reports under the CDBG Agreement or ESG Agreement, three (3) years after the City and Subrecipient make all final payments, three (3) years after the project completion date listed in HUD's IDIS system, or until all pending matters (including audit findings) have been resolved, whichever is longest. After the applicable period has expired,

Subrecipient shall provide the City with thirty (30) calendar days' written notice of its intent to dispose of any project records.

9. Sectarian Control or Influence

Subrecipients must ensure that all programs and activities undertaken pursuant to the executed Agreement are free of sectarian control or influence, and that no monies, property, materials, or services that are provided under the Agreement are applied to religious establishment or purpose.

10. Political Activity Prohibited

Subrecipients must not use or permit to be used any federal funds, property, materials, or services that are directly or indirectly authorized by the executed Agreement for any partisan political purpose or activity, or to further the election or defeat of any candidate for public office.

11. Political Affairs or Activities

"Political affairs or activities" as used here means the expenditure of funds or use of personnel in a support or advocacy role concerning any matter currently pending or being proposed by a vote of the people or enactment by any legislative body of the City or County of San Diego, State of California, or the federal government.

12. Fair Housing

Subrecipients shall comply, and require its subcontractors to comply, with Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, which prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions based on race, color, national origin, religion, sex, disability, age, and familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18). - In addition, Subrecipients shall comply with the regulations issued following Title VI of the 1964 Civil Rights Act and Section 109 of the 1975 Housing and Community Development Act that prohibits discrimination in HUD programs based on sex, race, color, national origin, and religion and administer all programs and activities in a manner to affirmatively further the policies of the Fair Housing Act. Subrecipient shall post in a prominent place at its offices the Equal Housing Opportunity logo, available at <https://www.hud.gov/library/bookshelf11/hudgraphics> and any other fair housing materials provided by the City during the term. Subrecipient shall attend the City's annual mandatory fair housing workshop for HUD Subrecipients.

13. Section 504

Subrecipients shall comply with and require their Subcontractors to comply with any federal regulations issued pursuant to compliance with Section 504 of the Rehabilitation Act of 1973, which prohibits discrimination against persons with disabilities in any federally assisted program.

14. Build America, Buy America (BABA)

Pursuant to the Build America, Buy America Act (BABA), enacted as part of the Infrastructure Investment and Jobs Act (IIJA). Pub. L. 117-58, 41 U.S.C. § 8301 NOTE: the Federal Financial Assistance used to fund this infrastructure project is required to apply a domestic content procurement preference (the "Buy America

Preference” or “BAP”) for all construction, alteration, maintenance, or repair of infrastructure, including buildings and real property, unless application of the BAP has been waived by HUD. Additional details on fulfilling the BABA requirements can be found at <https://www.hud.gov/baba>.

#### D. EXEMPTION REQUESTS

Subrecipients may submit to the Community Development Division exemption requests regarding Operating Manual terms, as applicable. This submission is required for Subrecipients wanting to request consideration of alternative procedures for obtaining required documentation, completing required verification documentation, maintaining required documentation, or submitting required reports and supporting documentation. The submission of such requests does not result in guaranteed approval. A Fiscal Year 2026 Agreement/Operating Manual Exemption Request Form (see Attachment B) must be submitted for these considerations. The Community Development Division shall review the exemption requests and notify the Subrecipient regarding the determination of approval or denial of the request. **NOTE: An issuance of a Concern or Finding may result if alternative procedures to ensure compliance with the FY 2026 Agreement or FY 2026 Operating Manual requirements are conducted by Subrecipients without written approval from the Community Development Division.**

#### E. CDBG-FUNDED PROGRAM REQUIREMENTS

1. Identification Requirement

Subrecipients receiving CDBG funds from the City, and its subcontractors, shall ensure that all CDBG-funded programs and activities are clearly identified to participants and the public as those of the CDBG program, and that these programs and activities do not appear to be an extension of the programs and activities of any private organization or public institution. To comply with this requirement, a notification to be worded as follows shall be clearly posted or otherwise displayed: “This project is funded in whole or in part with Community Development Block Grant (CDBG) Program funds provided by the U.S. Department of Housing and Urban Development (HUD) to the City of San Diego.” Subrecipients shall indicate this on all reports, data, brochures, newsletters, advertising, Internet websites, fact sheets, news releases, and other materials, as applicable. In addition, Subrecipients conducting construction activities shall ensure the required funding source notification is prominently posted at the worksites.

2. Environmental Review

All projects and project activities undertaken with CDBG funds are subject to the provisions of the National Environmental Policy Act of 1969, as amended (NEPA), which established national policies, goals, and procedures for protecting, restoring, and enhancing environmental quality. In addition to NEPA requirements, CDBG-funded projects are also subject to other related laws and federal, state, and local authorities. Examples include the California Environmental Quality Act (CEQA), historic preservation, clean air, and flood management. CDBG regulations require the preparation of a project Environmental Review Record (ERR) and environmental clearance before funds



are expended or costs incurred. The two components of an ERR are the NEPA and the CEQA reviews. City staff shall prepare environmental review documentation required by HUD for projects and programs that are public services and improvements to existing facilities, including single-family home rehabilitation. Projects involving new construction or land use changes will require a detailed Environmental Assessment (EA) that will need to be prepared by a 3rd party Environmental Review consultant. The costs to prepare the EA are not eligible for reimbursement. However, Subrecipients may be asked to assist in the development of the ERR by providing additional information, maps, and site data. In some cases, Subrecipients may be asked to complete a biological assessment or gain project clearance from the state historic preservation office. Subrecipients shall comply with all terms and conditions and shall implement all required mitigation measures identified in the ERR completed for their project.

### 3. Labor Standards

The Davis-Bacon Act states that Agreements in excess of \$2,000 for construction, alterations, or repairs, including painting and decorating, that employ laborers or mechanics adhere to the federal fair labor and wage requirements as established by the Act. Davis-Bacon law applies to the entire project, no matter how small the CDBG contribution. The Federal Labor Standards Provisions ([HUD 4.010](#)) apply and must be attached to all construction solicitations and executed agreements. HUD has two (2) guidebooks that can further assist Subrecipients involved in construction projects. These guidebooks can be assessed at the following websites:

- <https://files.hudexchange.info/resources/documents/Davis-Bacon-and-Labor-Standards-Contractor-Guide-Addendum.pdf>
- <https://files.hudexchange.info/resources/documents/Davis-Bacon-and-Labor-Standards-Agency-and-Contractor-Guide.pdf>

Exceptions to the Davis-Bacon Act include:

- The prime construction contract funded in whole or in part with CDBG funds is less than \$2,000;
- The entire project consists solely of demolition;
- The entire project consists of rehabilitating property that was designed for fewer than eight (8) units;
- The project consists solely of delivery of goods or services (non-construction Agreement);
- There are no federal monies in the construction project; or
- The funds shall be used for acquisition ONLY, and there is no construction.

In addition, pursuant to [San Diego Municipal Code section 22.3019](#), construction, alteration, demolition, repair and maintenance work performed on the CDBG project is subject to state prevailing wage laws, and the Subrecipient shall ensure compliance with all applicable prevailing wage laws and requirements. For construction work performed on the CDBG project that cumulatively exceeds \$25,000 and for alteration, demolition, repair, and maintenance work performed on the CDBG project that cumulatively exceeds \$15,000, the Subrecipient shall ensure that any and all contractors and subcontractors performing work contemplated under the CDBG Agreement shall also comply with the State of California Department of Industrial Relations (DIR) state prevailing wage laws. More information regarding state prevailing wage laws can be assessed at:

<https://www.dir.ca.gov/public-works/publicworks.html>

4. Acquisition

Acquisition of real property is not regularly completed with CDBG funds. When it does occur, CDBG funds are used to acquire real property as a result of a voluntary proposal, which has been submitted by the owner in response to a public invitation or solicitation for offers. City staff may also identify property identified as available to purchase from public notification or advertisement. This is considered a voluntary acquisition. A statement is obtained from the property owner indicating their willingness to voluntarily offer the property being considered for sale. Relocation Procedures under the Uniform Relocation Assistance and Real Property Acquisition Act (URA) and Anti-displacement requirements under Section 104(d) of the Act apply to any acquisition of real property for programs and projects where there is CDBG or other Federal assistance provided in whole or in part (see next section).

The City's department that is responsible for real estate acquisitions and transactions provides complete services for the City of San Diego. If real property is proposed to be acquired in whole or part with CDBG funds, the City's EDD staff will coordinate with that department's staff to determine compliance with CDBG regulations and requirements. This includes ensuring a National Objective can be met and compliance with timeliness deadlines. However, that department's staff will coordinate with Economic Development staff for ensuring CDBG compliance as they complete acquisition activities (e.g., URA; Lead-Based Paint; Environmental Review).

Property to be acquired as a result of a voluntary offer must be appraised to determine fair market value as of a specific date. The purpose of the appraisal is to ensure that the City or Subrecipient does not pay an amount in excess of the fair market value of the property. The cost of the appraisal may be paid with CDBG funds. An independent appraisal of the property must be completed by a qualified appraiser. The City's department responsible for real estate transactions, as the Department completing a purchase of property on behalf of the City, would be responsible for the required documentation. Appraisals must meet 49 CFR 24.103 requirements. An appraisal scope of work shall be developed. Relocation requirements and impact on feasibility must be determined. As applicable, personal property/realty issues shall be identified and resolved through coordination of appraisers and relocation staff. After the appraiser estimates the property's Fair Market Value, the appraisal is evaluated and is then used as a basis for the Estimate of Just Compensation (a term defined by HUD). The Estimate of Just Compensation to be offered is established, which may not be less than the approved Fair Market Value.

A written purchase offer or Letter of Intent to Purchase shall be completed and given to the owner. The offer shall include the Just Compensation information and a Summary Statement with the following information: a) amount of offer; b) description and location; c) the interest acquiring (fee simple, easement); and d) list of buildings, improvements, and property (usually included in the appraisal). Applicable brochures regarding owner and/or tenant rights shall also be provided. Negotiations cannot begin until a written purchase offer is made. The owner shall be provided with a reasonable opportunity to consider the offer. The owner

should be given the opportunity to request modification if an item is not addressed in the appraisal. Reasonable expenses related to title transfer (e.g., recording fees; transfer taxes, mortgage penalty costs, etc.) and applicable relocation payments shall also be considered. Administrative settlements must be supportable and well documented. An administrative settlement may only be approved if reasonable, prudent and in the public interest.

A Purchase and Sale Agreement shall be prepared by that department and executed after written verification that the offer was accepted by the owner. The Purchase and Sale Agreement shall identify the agreed upon sale price and terms of the sale. The payment shall then be made to the owner, the applicable settlement costs (closing costs) paid, and the Title recorded and paid.

**NOTE:** Alternate procedures and documentation may be considered for CDBG funding awarded to external parties (e.g., Developers) to complete Acquisitions without the assistance of that department. Any alternate procedures and documentation would be determined by EDD staff on a case-by-case basis.

5. Relocation

All acquisition of real property, rehabilitation, demolition, conversions, permanent easements requiring relocation of families, individuals, businesses, nonprofits, or farms are to be conducted in accordance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (Uniform Act or URA). If CDBG funds are used for any part of the project, Subrecipients must comply with the URA, even if local or other non-CDBG funds are used to pay the acquisition costs. URA requirements apply to all phases of a planned or intended project. The purpose of the URA is to provide displaced persons with fair, equitable treatment and protection from disproportionate injury by projects designed to benefit the public as a whole. The URA applies to the following actions:

- Displacement of persons/businesses that must move permanently as a direct result of acquisition, demolition, or rehabilitation for CDBG-funded projects;
- Acquisition of real estate for CDBG-funded projects, whether publicly or privately undertaken; and
- Temporary relocation of persons/businesses who are required to move for a relatively short time because of a CDBG-funded project, but who may return to the building once the work is complete.

Subrecipient is responsible for providing rent rolls and relocation noticing per HUD's [Tenant Assistance, Relocation and Real Property Acquisition Handbook \(1378.0\)](#). Subrecipients shall identify the steps that will be taken to minimize relocation on federally assisted projects.

Tenants who need to be relocated temporarily (12 months or less) are to be treated equally as those defined as "displaced" persons. Temporarily relocated multi-family tenants are to be provided with a comparable unit, which can be either a unit on the property or one at an offsite location, while rehabilitation is being completed in their residential unit.



Subrecipients are required to develop and maintain a Relocation Plan, as applicable. Subrecipients shall not implement temporary relocation activities until its relocation plan has been reviewed and approved by the designated Community Development Project Manager. The Relocation Plan should include, but not be limited to, a description of advisory services that will be provided to tenants, required Subrecipient notices that will be issued to tenants that include timeframes, the types of anticipated temporary relocation expenses that will be covered and the documentation required for reimbursement, and how temporary relocation payments will be made. (See Section III, C., 2., q. of this Operating Manual, for a listing of required documents related to relocation activities.)

Housing rehabilitation programs offered to homeowners who participate voluntarily through an application process are not subject to URA or Section 104(d) requirements.

5. Section 3 Compliance

The requirements for Section 3 of the Housing and Urban Development Act of 1968, as amended (Section 3) applies to capital projects and housing development projects awarded an excess of \$200,000 in HUD funding. General Contractors and Subcontractors receiving an excess of \$200,000 will also be required to comply with Section 3 requirements. Section 3 requirements do not apply to material supply contracts (e.g., purchase of products and materials including, but not limited to, lumber, drywall, wiring, concrete, pipes, toilets, sinks, carpets, janitorial supplies, and office supplies). However, the removal and installation of materials, such as windows, would be covered due to the involvement of labor. Section 3 is intended to ensure that economic opportunities, most importantly, employment generated by certain HUD assistance shall, to the greatest extent feasible, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing or residents of the community that receives Federal assistance. Subrecipients that are not subject to Section 3 are encouraged to consider ways to support the purpose of Section 3.

New Section 3 regulations (24 CFR Part 75) became effective on November 30, 2020, with a compliance start date of July 1, 2021. The new regulations incorporated a change from tracking the number of Section 3 qualified new hires in public housing financial assistance and Section 3 projects, to tracking the total labor hours worked. The focus on labor hours will measure total actual employment and the proportion of the total employment performed by low and very low-income workers. HUD created the “Section 3 Worker” and the “Targeted Section 3 Worker” concepts so that HUD could track and set benchmarks to target selected categories of workers and to recognize the statutory requirements pertaining to contracting opportunities for business concerns employing low- and very-low-income persons.

In the final Section 3 rule, HUD defines a Section 3 Worker for Section 3 projects as a worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:

- The worker’s income for the previous or annualized calendar year is below the income limit established by HUD. HUD income limits are typically established at 80 percent and 50 percent of the area median individual

income. Subrecipients are notified of current HUD income limits by Community Development Division staff.

- The worker is employed by a Section 3 business concern. A Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:
  - a. At least 51 percent owned and controlled by low- or very-low income persons;
  - b. Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Workers; or
  - c. A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.
- The worker is a YouthBuild participant. YouthBuild is a community-based pre-apprenticeship program that provides job training and educational opportunities for at-risk youth ages 16–24 who have previously dropped out of high school. YouthBuild participants learn vocational skills in construction, as well as in other in-demand industries that include health care, information technology, and hospitality. Youth also provide community service through the required construction or rehabilitation of affordable housing for low-income or homeless families in their own neighborhoods. The Division of Youth Services within the Employment and Training Administration's Office of Workforce Investment at the U.S. Department of Labor administers the YouthBuild program. More information about the YouthBuild program can be found at the following website: <https://www.dol.gov/agencies/eta/youth/youthbuild>.

HUD defines a Targeted Section 3 Worker differently for public housing financial assistance and Section 3 projects. For Section 3 projects, a Targeted Section 3 Worker includes any worker who is employed by a Section 3 business concern or is a Section 3 Worker who is:

- Living within the service area or neighborhood of the project (defined as an area within one mile of the Section 3 project or a circle centered on the Section 3 project that is sufficient to encompass a population of 5,000 people according to the most recent U.S. Census); or
- A YouthBuild participant.

Subrecipients of Section 3 projects are required to report the following to the City's LCPtracker System:

- The total number of labor hours worked;
- The total number of labor hours worked by Section 3 workers; and
- The total number of labor hours worked by Targeted Section 3 workers.

For housing and community development financial assistance projects, the benchmark for Section 3 Workers is set at *25 percent* or more of the total number of labor hours worked by all workers on the Section 3 project.

$$\frac{\text{Section 3 Labor Hours}}{\text{Total Labor Hours}} = 25\%$$

The benchmark for Targeted Section 3 Workers is set at *5 percent* or more of the total number of labor hours worked by all workers on a Section 3 project. This means that the *5 percent* is included as part of the *25 percent* threshold.

$$\frac{\text{Targeted Section 3 Labor Hours}}{\text{Total Labor Hours}} = 5\%$$

If reporting indicates that the Subrecipient has not met the Section 3 benchmarks, the Subrecipient must report on the qualitative nature of its activities and those its Subcontractors (all tiers) pursued per 24 CFR § 75.15(b) and § 75.25(b). Such qualitative efforts may, for example, include but are not limited to the following:

- Engaged in outreach efforts to generate job applicants who are Targeted Section 3 Workers.
- Provided training or apprenticeship opportunities.
- Provided technical assistance to help Section 3 Workers compete for jobs (e.g., resume assistance, coaching).
- Provided or connected Section 3 Workers with assistance in seeking employment including: drafting resumes, preparing for interviews; and finding job opportunities connecting residents to job placement services.
- Held one or more job fairs.
- Provided or referred Section 3 Workers to services supporting work readiness and retention (e.g., work readiness activities, interview clothing, test fees, transportation, childcare).
- Provided assistance to apply for/or attend community college, a four-year educational institution, or vocational/technical training.
- Assisted Section 3 Workers to obtain financial literacy training and/or coaching.
- Engaged in outreach efforts to identify and secure bids from Section 3 business concerns.
- Provided technical assistance to help Section 3 business concerns understand and bid on contracts.
- Divided contracts into smaller jobs to facilitate participation by Section 3 business concerns.
- Provided bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns.
- Promoted use of business registries designed to create opportunities for disadvantaged and small businesses.
- Outreach, engagement, or referrals with the state one-stop system as defined in Section 121(e)(2) of the Workforce Innovations and Opportunity

Act. Information regarding the Workforce Innovation and Opportunity Act for California may be found here:

[https://edd.ca.gov/Jobs\\_and\\_Training/Workforce\\_Innovation\\_and\\_Opportunity\\_Act.htm](https://edd.ca.gov/Jobs_and_Training/Workforce_Innovation_and_Opportunity_Act.htm).

Subrecipients will be considered to have complied with Section 3 requirements, in the absence of evidence to the contrary, if they meet all benchmark goals and certify compliance with prioritization requirements found in 24 CFR § 75.9 or § 75.19. However, if subsequent HUD enforcement activities or City monitoring reviews reveal that the Subrecipient has failed to comply with the Subrecipient responsibilities set forth at 24CFR§75.13 or §75.23, this compliance determination may be rescinded.

For projects subject to Section 3 requirements, Section 3 certification forms will be required to be submitted by all General Contractors and subcontractors hired by the Subrecipient to complete project construction activities. In addition, [Section 3 requirements](#) must be included in all bid documents and executed agreements between Subrecipients and General Contractor and all tiered subcontractors. (See Section II, D. of this Operating Manual for additional detailed information.)

#### 6. [Income Eligibility Guidelines](#)

CDBG regulations specify income restrictions and records at 24 CFR 570.506. HUD has issued additional guidance to help grantees and Subrecipients utilize a standard approach to calculating income across several HUD Community Planning Development (CPD) Programs. Please see the CPD Income Eligibility Calculator (<https://www.hudexchange.info/incomecalculator/>) for step-by-step instructions on how to calculate income in accordance with HUD Program rules and the [Income Eligibility Calculator User Manual](#) for more information. Income eligibility determinations shall be based on the most current HUD Income Limits issued by HUD (<http://www.huduser.gov/portal/datasets/il.html>) on an annual basis, which are distributed by the Community Development Division.

The following sources of income should be considered when calculating the client's total household income utilizing the IRS 1040 income definition:

- Wages, salaries, tips, commissions, etc. (except full-time students);
- Self-employment income from a non-farm business, including proprietorships and partnerships (except full-time students);
- Interests, dividends, net rental income, or income from estates or trusts;
- Social Security or railroad retirement;
- Supplemental Security Income, Aid to Families with Dependent Children, or other public assistance or public welfare programs;
- Retirement, survivor, or disability pensions (except Veterans disability benefits); and
- Any other sources of income received regularly, including Veteran's (VA) payments, unemployment compensation, child support and alimony.

CDBG projects required to demonstrate Low/Moderate-Income Limited Clientele eligibility must ensure documentation is maintained to confirm at least 51 percent of the total clients served are low/moderate-income persons. Projects that

exclusively serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons of low/moderate income: abused children, battered spouses, elderly persons, adults meeting the Census' Current Population Reports definition of "severely disabled"; homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers. If Presumed Benefit is implemented to satisfy the Limited Clientele eligibility, income documentation is not required. Presumed Benefit determination does not apply to Microenterprise Assistance Activities or Housing Activities. For example, a housing rehabilitation activity that serves only senior citizens or the disabled cannot qualify under the limited clientele criteria. These types of activities are required to document that 100 percent of the clients or households served with CDBG funds are low/moderate-income persons. Subrecipients are required to maintain written guidelines/procedures on how compliance with limited clientele and other national objectives are determined and documented. The internal verification process described must include the identification of the position title(s) designated to be the reviewer and approver of the original source documentation obtained and maintained. The reviewer/approver cannot be the same position title responsible for obtaining required original documentation from the clients.

7. Timeliness

Entitlement jurisdictions that receive CDBG funds, such as the City, are required to use their funds in a timely manner, and the penalty for noncompliance can be the loss of future CDBG funding. As detailed in Council Policy 700-02, CDBG funds are subject to reprogramming by the City if an activity or project is no longer feasible, if a Subrecipient Agreement has not been executed within a reasonable amount of time after the start of the fiscal year, or the funds remain unexpended within twelve (12) months of the start of the fiscal year (July 1<sup>st</sup>) for non-capital improvement projects and within twenty-four (24) months of the start of the fiscal year (July 1<sup>st</sup>) for capital improvement projects. Capital improvement projects must implement a bid process within ninety (90) days of the start of the fiscal year. In addition, Subrecipients shall ensure Requests for Reimbursements are submitted to the Community Development Division on a monthly basis as described on page 44 (Section IV, A.), even when there are no expenses to claim.

NOTE: All Monthly Programmatic Reports (MPR) and Requests for Reimbursement (RFR) created in the Economic Development Grants System (ED Grants) must be completed with required details entered and required attachments uploaded. Failure to complete timely MPR/RFR entries/uploads or consistent reporting of delays in project progress will result in the issuance of a Non-Compliance Notification. Repeated failure to comply with submission deadlines may result in the termination of the CDBG Agreement by Notice to Subrecipient. Any failure to submit reimbursement requests may be deemed a waiver of the Subrecipient's right to reimbursement.

8. Performance Indicators

Performance will be evaluated based on FY 2026 programmatic and fiscal performance results and compliance with reporting requirements. FY 2026 performance scorecards will impact future NOFA processes.

F. ESG-FUNDED PROGRAM REQUIREMENTS
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1. The ESG program provides funding to (a) engage homeless individuals and families living on the street; (b) improve the number and quality of emergency shelters for homeless individuals and families; (c) help operate these shelters; (d) provide essential services to shelter residents; (e) rapidly re-house homeless individuals and families; and (f) prevent families/individuals from becoming homeless. The SDHC is the City's Subrecipient of ESG funds per the 2016 MOU, as amended.
2. ESG providers must ensure compliance with the criteria and recordkeeping requirements for defining homelessness, as well as all recordkeeping and reporting requirements. As such, the SDHC must comply with all applicable ESG standards and utilize ESG funds in accordance with the approved City of San Diego FY 2026 Annual Action Plan.

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## SECTION II: PROCUREMENT REQUIREMENTS

Subrecipients receiving CDBG or ESG funds from the City shall purchase goods and services or subcontract for same to the maximum extent possible from firms which employ a substantial percentage of target area residents, or are located within the target area, or are owned to a substantial degree by target area residents. Subrecipients shall follow a free and open competitive process in securing those goods and services.

Subrecipients shall also document the procurement activities and decisions, observe special rules for particular types of purchases (small purchases, competitive sealed bids, competitive proposals, and sole source procurement), properly bond and insure work involving large construction contracts or subcontracts. To support the cost reasonableness of contracts, Federal regulations require (1) independent cost estimates before receiving bids or proposals and (2) a cost or price analysis in connection with every procurement action. Awards must be made to the bidder whose bid is determined to be the lowest and most responsive to the solicitation, after price and other factors have been evaluated. In addition, awards must only be issued to responsible bidders that have been determined to have demonstrated their ability to perform successfully under the terms and conditions of the solicitation. Subrecipients must maintain records sufficient to detail the history of procurement. These records shall include the rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price. Subrecipients shall ensure that a current copy of their Procurement Policy complies with federal requirements and is submitted to the Community Development Division Office.

### A. ETHICAL REQUIREMENTS IN PROCUREMENT

It is important for the City and its citizens to have confidence in the integrity of Subrecipients that contract with the City to provide services, complete activities or administer programs as a result of receiving funding from or through the City. Officers, directors, members, committee members, staff, and volunteers of these nonprofit organizations shall avoid taking actions that give the appearance of being motivated by private gain. The appearance of a conflict of interest is created by the selection, recommendation, or specification of a product, supplier or subcontractor with whom the representative of the nonprofit has a direct or indirect financial, organizational or family interest or relationship. (Refer to the detailed Conflict of Interest descriptions in Section A.C.2 "Conflict of Interest")

Additionally, contractors involved in developing and drafting specifications, requirements, statements/scope of work, invitations for bids, or requests for proposals are prohibited from subsequently competing in associated procurement opportunities. Doing so may result in the appearance of an unfair competitive advantage to any potential bidder, as well as an appearance of improper selection of the lowest and most responsive bidder. Full efforts must be made to ensure all procurement processes completed do not result in, or give an appearance of, an unfair competitive advantage to any potential bidder.

This policy is not intended to supersede, negate, or otherwise invalidate any statute, ordinance or policy, but is intended to supplement existing authorities governing these subjects. Subrecipients receiving CDBG funds, ESG funds, or other funds from HUD, are subject to federal authorities governing the receipt of those funds.

## B. DEBARMENT AND SUSPENSION LIST VERIFICATION

Subrecipients are mandated to ensure bids are not accepted from bidders, and their subcontractors or consultants, identified on the Federal and State excluded parties list. As part of the selection process undertaken, Subrecipients must check both the Federal System for Award Management (SAM) web site (<http://www.sam.gov/>) and State of California web site (<https://www.dir.ca.gov/dlse/debar.html>) to verify that bidders are not on the debarment and suspension list. Subrecipients are required to maintain a print copy of the SAM web page and the DIR web page that states no record was found regarding the bidder, or any of their subcontractors, on file.

NOTE: If a “no search records” is returned, Subrecipients must ensure that a signed certification that the company and its principals are not debarred is obtained.

## C. PROCEDURES FOR PROCUREMENT OF GOODS AND SERVICES

All procurement of goods and services by nonprofit associations contracting with the City, which receive funding from or through the City pursuant to the CDBG Program shall, in addition to complying with the applicable federal authorities governing the procurement of goods and services (including, but not limited to, those set forth in 2 CFR 200.318 through 200.326) (Federal Procurement Provisions), comply with Divisions 30–36 of Article 2, Chapter 2, of the San Diego Municipal Code, and all other laws and policies applicable to the City’s procurement of such goods and services (City Procurement Provisions). To the extent that it is impossible to comply with both the City Procurement Provisions and the federal Procurement Provisions or if the City Procurement Provisions interpose an obstacle to the achievement of Congress’s discernible objectives for the CDBG Program, the nonprofit corporations shall comply with the Federal Procurement Provisions.

When a contract provides for an expenditure of \$25,000 or less, the nonprofit corporation shall comply with the applicable Federal Procurement Provisions governing the procurement of goods and services, but no additional competitive procurement process is required.

When a contract provides for an expenditure greater than \$25,000, but equal to or less than \$50,000, the nonprofit corporation shall comply with the applicable Federal Procurement Provisions governing the procurement of goods and services and may award the contract but shall seek competitive prices either orally or in writing, and shall:

- Present price proposal information to full board for approval of contract or transaction; and
- Record the action taken in the meeting minutes and keep the written price proposals on file.

When a contract provides for an expenditure greater than \$50,000 but equal to or less than \$150,000, the nonprofit corporation shall comply with the applicable Federal Procurement Provisions governing the procurement of goods and services and may award the contract but shall solicit written price quotations from at least five (5) potential sources, and shall:

- Present price proposal information to full board for approval of contract or transaction; and



- Record the action taken in the meeting minutes and keep the written price proposals on file.

When a contract provides for an expenditure greater than \$150,000 but equal to or less than \$1,000,000, the nonprofit corporation shall comply with the applicable Federal Procurement Provisions governing the procurement of goods and services and may award the contract only after advertising it for a minimum of five (5) day in the City Official Newspaper at least ten (10) days before bids or proposals are due, and shall:

- Draft a Request for Proposals (RFP) describing the services or goods required and requesting information from prospective contractors regarding relevant qualifications and a price proposal;
- Screen all submitted proposals and prepare a short list of finalists for consideration by the board for approval. Finalists for a contract or transaction involving expert or professional services shall be interviewed by a screening committee or by the board prior to a final selection being made;
- Record action taken by the board in meeting minutes and keep the proposals received on file; and
- After board approval, execute a contract in writing with the subcontractor or vendor, and submit a copy of the contract to the City.

Additional considerations are as follows:

- The advertisement shall include:
  - A brief, accurate description of the service wanted;
  - The full address of the place where complete sets of the responses may be obtained;
  - The deadline, if any, for obtaining the RFP documents; and
  - The date and time at which responses will be opened and evaluated and after which no responses will be accepted.
- The advertisement and RFP must be submitted to the designated Community Development Project Manager for review and approval prior to publication.
- The RFP shall include, but not be limited to, the following:
  - A clear and accurate description of the product or service needed in sufficient detail to permit potential proposers to judge whether they are qualified and interested;
  - No specification of “brand name” products shall be included in the solicitation, but rather an allowance for “equal” products;
  - A description of all the requirements that the bidders must fulfill in order for the Subrecipient to evaluate the RFP;
  - The relative importance of price in selecting a contractor;
  - Project location address;
  - Notification of federal and City requirements for the project (Equal Employment Opportunity, compliance with federal and local laws, insurance requirements, etc.);
  - Notification that parties involved in the development/drafting of the RFP description or materials are prohibited from competing in the RFP process;
  - The date, time and place of the pre-bid conference/meeting, and whether attendance is mandatory;

- The complete mailing address of the place to which responses must be delivered, as well as whether mail, in person or courier may be used in addition to hand delivery by the proposer;
  - Instructions for packaging the response and for labeling the package;
  - The name and title and phone number of the Subrecipient staff person who is in charge of the RFP and to whom any questions must be directed;
  - The date and time at which responses will be opened and evaluated and beyond which none will be accepted; and
  - The time frame or schedule by which the work must be completed, which may be expressed in stages.
- Subrecipient's selection criteria by which the responses will be evaluated should include factors such as:
  - Technical competence demonstrated through experience, examples of work, and references;
  - Evidence that the proposer has the financial and other resources needed to complete the work;
  - Stated ability and willingness to complete the work within the stated time frames;
  - Merit of specific proposed approaches to the work; and
  - Cost of proposed services.
- Each criterion selected by Subrecipient shall be given a maximum point value. While maximum point values adding to 100 are commonly used, a point total adding to more or less than 100 may be used.
- Subrecipient's evaluation committee shall evaluate the proposals received on the basis of the criteria stated in the RFP and the cost/price evaluation. NOTE: The RFP will be required to be re-advertised if adequate competition does not result from the RFP process completed.
- A proposal may be determined unacceptable on technical grounds, if the price is clearly excessive compared to other acceptable offers, or if the proposer does not respond to the RFP as intended. Those that are clearly not acceptable shall be notified by letter with an appropriate brief explanation for this decision.
- The RFP will be required to be re-advertised if adequate competition does not result from the RFP process completed.
- When one (1) proposal is clearly superior to all others, that proposer shall be notified of their tentative award of the contract, subject to negotiation of mutually acceptable terms.
- After the completion of the competitive RFP process, Subrecipient shall schedule a meeting with the designated Community Development Project Manager to discuss the process completed.
- Complete documentation of the evaluation process conducted, and the results must be maintained and reported to the designated Community Development Project Manager. Copies of the proposals received shall also be submitted to the designated Community Development Project Manager.

- A copy of the Agreement between Subrecipient and the subcontractor selected shall be submitted to the designated Community Development Project Manager for review and acceptance, prior to execution.

Procurement by sealed bids (formal advertising) shall be completed for all CDBG-funded construction projects expending more than \$100,000:

- The project should represent a comprehensive scope of improvement that are needed to improve the health, safety, and/or increased access to services. A phased scope of improvements is not allowed. Accessibility and code compliance improvements must be addressed first.
- No construction-related activities may be conducted at the project facility from the time of the CDBG Request for Proposal submission date to the construction implementation date resulting from the sealed bid process. If any construction-related activities occurred during those times, the designated Community Development Project Manager must be notified immediately regarding the construction-related activities completed.
- Construction-related activities not identified in the Scope of Work resulting from the sealed bid process may not be implemented until completion of the CDBG project.
- A Formal Bid Package must be developed by the Subrecipient. Competitive sealed bidding requires publicly solicited sealed bids and a firm-fixed-price lump sum or unit price contract that is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is lowest in price.
- Subrecipients must ensure that the Scope of Work that will be paid with CDBG funds, as referenced in the Formal Bid Package, must represent improvements to the project site areas utilized by City of San Diego residents. If any of the portion of the facility to be improved is regularly utilized by non-City of San Diego residents, Subrecipients shall expend leveraged funds representing the appropriate cost allocation for the non-City of San Diego residents that will benefit from the project improvements completed.
- Items that may not be included in the Formal Bid Package and/or paid with CDBG funds include, but may not be limited to, the following:
  - Facility improvements with a useful life of less than ten years;
  - Design and plan development NOTE: Budget amounts may be included to cover minor design and plan adjustments necessary to complete the permit application process with the City's Development Services Department;
  - Facility maintenance improvements;
  - Equipment;
  - Materials not installed permanently into the facility to be improved;
  - Landscaping improvements;
- If the Scope of work includes installation of solar panels, work must be awarded to and completed by a certified Solar company.
- A "Notice of Invitation for Bids" must be published in a newspaper of general circulation and industry media likely to reach qualified proposers. The scheduled

issuance date should be within one hundred eighty (180) calendar days after the execution date of the CDBG Agreement. The advertisement must be published for five (5) business days, and the submittal period of the bid must be for a period of thirty (30) days. The advertisement shall include:

- A brief, accurate description of the product wanted;
- A clear and accurate description of any materials required, with no specification of “brand name” products;
- A description of all the requirements that the bidders must fulfill in order for the Subrecipient to evaluate the bid;
- The full address of the place where complete sets of the bid documents may be obtained;
- The non-refundable cost of each set of bid documents;
- If a pre-bid conference is needed, the date, time, and place and whether attendance is mandatory;
- The full address of the place where the bids will be opened;
- Instructions on packaging, identification, and delivery of bids;
- The date and time of day of the bid opening, and an admonition that late bids will not be accepted;
- A brief statement of the bid bond, payment bond, and performance bond requirements and the wage requirements; and
- The Davis-Bacon Act General Wage Decision Number and State General Wage Determination Number applicable to the project.

**NOTE:** If a secondary or additional bid process is required to be completed, Subrecipients may submit a request to reduce the advertisement period and/or submittal period of the bid. The written request must be submitted to the designated Community Development Project Manager for consideration.

- Subrecipient may issue an amendment to the Notice of Invitation for Bids:
  - The amendment must be mailed or faxed to those potential bidders who purchased sets of the bid documents prior to the adoption of the amendment;
  - The amendment may be provided together with sets of the bid documents that are purchased after its adoption; and
  - If an amendment will significantly affect the task of preparing responsive bids or bid amounts and is made within seven (7) calendar days of the bid opening date, the Subrecipient must reschedule the bid opening date.
- Subrecipient may cancel the Notice of Invitation for Bids at any time:
  - Any potential bidders who have purchased sets of documents should be notified by phone or fax and their payment for the documents returned;
  - Potential bidders who have not purchased sets of bid documents can be informed of the cancellation when they seek to purchase the documents;
  - The reason for the cancellation must be supportable and documented in the bid file.
- The Invitation for Bids (IFB) must be part of a formal bid package.
- The advertisement and the IFB must be submitted to the designated Community Development Project Manager for review and approval prior to publication.

- Both the advertisement and the IFB must state that the project is subject to both State and federal prevailing wage laws and requirements. The following is recommended:
  - “The entire project is subject to State prevailing wage laws, pursuant to San Diego Municipal Code section 22.3019 and sections 1720 through 1861 and 3070–3098 of the California Labor Code, and all other City and State requirements that apply. In addition, since Project funding is being provided by federal Community Development Block Grant (CDBG), this project is also subject to Davis–Bacon federal prevailing wages, Section 3 of the Housing and Urban Development (HUD) Act [12 U.S.C. 1701u and CFR Part 75], and all other federal requirements that apply.”
- The IFB shall include, but not be limited to, the following:
  - Complete, adequate, and realistic detailed specifications and pertinent attachments, as well as clearly defined items, work, or services needed in order for the bidders to properly respond to the invitation;
  - The services, construction, repairs, maintenance, replacements, or improvements to be accomplished, or supplies, materials, or equipment to be delivered, and when they must be provided, accomplished, or delivered;
  - No specification of “brand name” products shall be included in the solicitation, but rather an allowance for “equal” products;
  - Requirements the contractor must fulfill and all factors to be used in evaluating bids;
  - Notification of federal and City requirements for the project (Equal Employment Opportunity, compliance with federal, state, and local laws, insurance requirements, etc.)
  - Special instructions and required documents/attachments (e.g., current Federal Wage Determination document; current State Wage Determination document; [HUD 4010 Form](#); [Section 3 Clause](#); Section 3 Summary Report Form; SAM.gov registration documentation; federal and state debarment documentation; City insurance documentation; City Business License documentation; Living Wage Ordinance certification; and Conflict of Interest certification) required to be included in the bid package;
  - Notification that parties involved in the development/drafting of the Bid description or materials are prohibited from competing in the Invitation for Bid process.
  - The complete mailing address of the place to which responses must be delivered, as well as whether mail, in person or courier may be used in addition to hand delivery by the proposer;
  - Instructions for packaging the response and for labeling the package;
  - A description of how addendums or addenda to bid documents will be handled;
  - A description of the award and selection of contractor process, which should include the selection criteria details and must allow for a minimum of ten (10) calendar days as the waiting period prior to notification of an intended contract award to allow for possible protests of the bid process (or as per the Subrecipient’s written Procurement Policy);
  - Provisions to explain the basis for rejecting bids and how bid errors will be handled;
  - A description of how bid protests will be handled;
  - The name, title, and phone number of the staff person who is in charge of the IFB and to whom any questions must be directed;

- The date and time of the bid opening; and
  - Admonition that late bids will not be accepted, and details on how late bids will be handled.
- The IFB shall also include notification of the requirement for contractor registration with the State of California Department of Industrial Relations (DIR), as required by California Labor Code section 1771.1(b). A bid shall not be accepted, nor any contract or subcontract entered into, without proof of the contractor or subcontractor's current registration in accordance with section 1725.5. An inadvertent error in listing a subcontractor that is not registered in a bid proposal shall not be grounds for filing a bid protest.
- Before the Bid Opening, Subrecipient shall ensure:
  - Bids are safeguarded; Subrecipient will receive bids from bidders, mark them with the date and time of receipt, and keep them together in a safe place;
  - A registry of bids received is kept/maintained; the form to be used to record the bid data at the opening may be used for this purpose;
  - Bids remain sealed, and no bid is opened for any reason before the time and date specified in the invitation for bids;
  - Before the opening of the bids, bidders may withdraw their bid for any reason; and
  - Ten (10) days before the bid opening, Subrecipient verifies that the Davis-Bacon Prevailing Wage Determination used in the advertisement remains valid and has not changed; if changed, written notification must be issued in the form of an addendum to the Notice of Invitation for Bid.
- At the Bid Opening:
  - In the place designated for the Bid Opening, on the date and prior to the time specified in the "Notice of Invitation for Bids," Subrecipient's authorized staff in charge of the Bid Opening should announce the Bid Opening and when it closes;
  - Bids received after the close of bidding shall be returned unopened to the bidders with a letter explaining the reason for the return;
  - The bid registry shall be passed out to those present, based on a previously prepared Bid Registry Form with the names of the vendors whose bids are on the table;
  - Bids shall be opened and recorded on the registry one at a time, in the order listed on the previously prepared Bid Registry Form;
  - Completeness of bids shall be noted, whereby any missing or unacceptable document, bond, or other requirement of the Notice and the Bid Package will be verbally noted for the benefit of all who are present, and such discrepancies will also be noted on the Bid Registry; and
  - When all bids have been opened, verbally noted, and entered on the Bid Registry, Subrecipient's authorized staff in charge of the Bid Opening shall make a statement such as:
    - "To conclude this bid opening, I note that the bids of \_\_\_\_\_ (names of bidders with no discrepancies) appear to be complete as submitted. The apparent low bidder is \_\_\_\_\_ (name of bidder with low, completed bid). The decision on an award will be announced within \_\_\_\_ days."



- Subrecipient's authorized staff in charge of the Bid Opening should be non-committal about any protests or appeals made at the bid opening and say they will be taken under advisement.
- The Bid Opening Date is established as the Federal Lock-In Date. The bid opening date "locks in" the federal wage decision, provided that the contract is awarded within ninety (90) days. If the contract is awarded more than ninety (90) days after bid opening, the contract award date "locks in" the federal wage decision.
- For State prevailing wage determinations, expiration dates are determined based on whether there is a single asterisk (\*) or double asterisks (\*\*) after the expiration date listed for the craft/classification of the worker. State prevailing wage determinations with a single asterisk (\*) are in effect on the date of the bid advertisement through the life of the project. State prevailing wage determinations with double asterisks (\*\*) indicate that the basic hourly wage rate, overtime, holiday pay rates and employers' payments for work performed after this date have been predetermined. If work is to extend past this date, the new rates must be paid and should be incorporated in the executed contracts.
- Withdrawal of a bid after bid opening will result in forfeiture of the 5 percent Bid Bond, if applicable, unless Subrecipient's authorized staff in charge of the Bid Opening confirms that a substantial involuntary error was committed, such as a major mathematical error or omission of an important item.
- Correction of omissions or discrepancies that would, if uncorrected, cause a bid to be rejected will be accepted within a specific period of time following the bid opening—only when such discrepancies are not related to the substance of the bid. Corrections may not include such items as price, amount, quality, or date of delivery.
- Complete documentation of the bidding process completed, including the results, are required to be maintained and reported to the designated Community Development Project Manager. Copies of the bids received shall also be submitted to the designated Community Development Project Manager.
- Subrecipients are required to register the CDBG project with DIR. The online Public Works Project Registration ([PWC-100](#)) must be completed within five (5) days of awarding the contract.
- A copy of the Agreement between the Subrecipient and the Prime Contractor selected shall be submitted to the designated Community Development Project Manager for review and acceptance, prior to execution.
- A Pre-Construction Meeting shall be scheduled and conducted by Subrecipient after execution of an agreement between the Subrecipient and the Prime Contractor selected, the execution of all agreements between the Prime Contractor and all tiered subcontractors, and submittal of all required documentation to the designated Community Development Project Manager. During this meeting, the following shall be discussed/confirmed in coordination with Community Development Division staff that will be present: Scope of Work; schedule of work; reporting requirements; prevailing wage requirements; required on-site postings; reimbursement process; and other pertinent instructions or requirements. The Pre-

Construction Meeting Form and the LCPtracker Authorization/Login Request Form are required to be completed by Subrecipient, Prime Contractor, and each subcontractor, as applicable. The designated Community Development Project Manager shall then issue a Notice to Proceed (NTP) after the Pre-Construction Meeting has been conducted and all required documentation has been submitted.

NOTE: No materials may be purchased, or demolition/construction started, prior to the issuance of the NTP.

- After execution of the Agreement between the Subrecipient and the Contractor, all project scope changes, and change orders must be approved by the City in advance of implementation. Requests for scope changes and change orders must be submitted in writing to the designated Community Development Project Manager for an official written response from the City. Any verbal agreements shall be unenforceable. The written request must, at minimum, include the following:
  - A clear and concise description of each scope change/change order;
  - The reason for each scope change/change order, including why it was not foreseeable and incorporated into the original IFB and winning bid response;
  - The budget for the scope change/change order;
  - The source of funding for the requested scope change/change order;
  - The percent of budget increase due to the requested scope change(s)/change order(s) relative to the original aggregate contract amount; and
  - The impact of the request, if approved, on the implementation schedule.

Significant scope changes are typically not allowed. It is the intent of the City to preclude: (1) abuse of the change order process by Contractors that purposely underbid to unfairly win contracts; and (2) gratuitous expansion of the originally approved Scope of Work simply because bids came in lower than expected cost-wise, and additions to it are being made merely to completely exhaust the CDBG funding allocation. Change order requests requiring additional CDBG funds may be submitted for consideration, but such requests are limited to those addressing unanticipated or unforeseeable conditions deemed critical to the successful completion of the approved Scope of Work. Approval of legitimate change order requests to be funded by CDBG is contingent upon the availability of remaining funds within the Subrecipient's set FY 2026 CDBG project budget allocation. Change order requests may not exceed 10 percent of the aggregate contract amount (i.e., CDBG portion plus non-CDBG portion). In addition, any changes to the use of Contractors and/or their Subcontractors, as set forth at the time of the Pre-Construction Meeting, must be approved in advance by the designated Community Development Project Manager. Changes that are implemented prior to required approvals shall not be reimbursed by the City.

#### D. BONDING REQUIREMENTS

Federal regulations (2 CFR 200.325) require that construction or facility improvement projects exceeding \$250,000 obtain bid, performance and payment bonds. At minimum, this includes the following:

- A **bid guarantee** from each bidder is equivalent to **5 percent of the bid price**. The "bid guarantee" must consist of a firm commitment such as a bid bond, certified check, or



other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of the bid, execute a contract within the time specified for the bid amount.

- A **performance bond** on the part of the contractor for **100 percent of the contract price**. A “performance bond” is one executed in connection with a contract to secure/assure the fulfillment of all the contractor’s obligations under the contract.
- A **payment bond** on the part of the contractor for **100 percent of the contract price**. A “payment bond” is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

**For nonprofit Subrecipients**, a Subrecipient may follow its own policies for bid guarantees, performance bonds, and payment bonds for contracts or subcontracts awarded for construction or facility improvement **equal to or less than \$250,000**.

- For both **nonprofit Subrecipients** and **governmental Subrecipients**, however, the Subrecipient Agreement may mandate compliance with the City’s bid guarantee, bonding, and insurance requirements in instances of contracts or subcontracts for construction or facility improvements with a value equal to or less than \$250,000.

#### E. SECTION 3 RESPONSIBILITIES

Subrecipients completing construction activities with \$200,000 or more in HUD funding must comply with the requirements of Section 3 (see page 10) to bring economic opportunities resulting from the expenditure of CDBG funds. General Contractors and Subcontractors receiving an excess of \$200,000 will also be required to comply with Section 3 requirements.

#### F. CONTRACTING WITH MINORITY FIRMS, WOMEN’S BUSINESS ENTERPRISES, AND LOCAL SURPLUS AREA FIRMS

Federal regulations require HUD-funded organizations to not discriminate against minority firms, women’s business enterprises, and labor surplus area firms

CDBG Subrecipients will be required to submit a Minority Business Enterprise Information Form for subcontracted construction activities of \$10,000 or more.

**NOTE:** This requirement applies to all CDBG-funded activities and not just construction projects.

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### SECTION III: PROGRAM PROCEDURES

Subrecipients are required to maintain a system that accurately accounts for or fully documents all program activities undertaken with CDBG or ESG funds. Subrecipients must comply with the following program procedures to the maximum extent feasible.

#### A. REPORTING REQUIREMENTS

Subrecipients shall submit the following documents and reports to the City at the times indicated and, in the format prescribed by the Community Development Division. Deviations from this requirement must be approved by the Community Development Division Office. Timeliness and accuracy will be factors in performance evaluations.

1. Administrative File Requirements  
Prior to the beginning of each fiscal year, Subrecipients shall submit via ED Grants to the City a copy of its insurance coverage, a list of additional funding sources, and other documents required by the City. Subrecipients were provided with a list of all the documents required to be submitted during the application process or agreement execution process. Subrecipients must retain the originals or copies in their offices for audit purposes. Subrecipients must also ensure the list of program and fiscal contacts in ED Grants pertaining to their projects is kept up to date at all times to facilitate contact by City staff. Instructions on how to keep the contact list current may be found under the 'Resources' tab of ED Grants.
2. Monthly Programmatic Reports  
Subrecipients shall maintain records on clients as specified in the Scope of Work included in the executed Agreement, as well as other records necessary to document all services provided or activities conducted. Using the primary and secondary records (defined in Section III, C.4.), Subrecipients shall submit a required Monthly Programmatic Report (MPR) for each applicable reporting period via the Economic Development Grants Management System (ED Grants) by the 15<sup>th</sup> day (for CDBG-funded projects) or the 30<sup>th</sup> (for ESG-funded projects) of each month after each reporting period (irrespective of the day when the 15<sup>th</sup> or 30<sup>th</sup> falls). The purpose of this report is to provide confirmation of project activities completed, status of project progress in meeting the objectives and goals identified in the Scope of Work, and to justify the reimbursement of funds.
  - a. The required MPR information is based on the approved activity category (e.g., Public Services, Public Facility Improvements, Microenterprise Assistance, etc.) and the Scope of Work included in the executed Agreement. Refer to Attachment G for a listing of MPR indicators by activity category and their descriptions. Subrecipients shall ensure that the status of progress for all CDBG project activities listed in the Scope of Work during the reporting period is described in the Narrative section of the MPR or provided as an attachment to the MPR. Explanations for low or no progress must also be described. Non-CDBG activities included in the Narrative must clearly be identified as not paid with CDBG funds. In addition, Subrecipients may also be required to report the following Client or Household Demographics information as applicable: a) total number of unduplicated new clients/households served; b) of the unduplicated new clients/households served, total number of new clients/households that are female head of

household as defined on page 87 (female head of household data is not reported for Public Service and CED projects); c) **both** ethnicity and race as defined on page 806; d) family income levels based on the most current HUD Income Limits; and e) identification of clients qualified as presumed low-income as defined on page 88.

- b. For construction projects, colored photos demonstrating the construction activities completed during the reporting period must also be included in the MPR submittal, as applicable.
- c. Subrecipients shall ensure that a detailed explanation is included in the narrative section of the Monthly Programmatic Reports whenever an MPR and/or a Request for Reimbursement (RFR) is submitted late (without prior project manager approval). The explanation should include a description of the actions undertaken to resolve the submission of issues encountered.
- d. **Subrecipients must ensure clients without complete demographic information on intake forms are not included in the totals reported under the Demographics tab of the MPR.** The details related to the total number of clients served with missing ethnicity, race, and/or income level information may be included under the Narrative tab of the MPR.
- e. All Monthly Programmatic Reports (MPR) created in the Economic Development Grants Management System (ED grants) must be completed with required details entered and required attachments uploaded. **Failure to complete timely MPR entries/uploads or consistent reporting of delays in project progress will result in the issuance of a Non-Compliance Notification.**
- f. All MPR submittals are subject to review, and acceptance of that information is tentative pending verification and approval by the Community Development Project Manager.
- g. On a monthly basis, the Community Development Project Manager will:
  - Determine if the reports are submitted on a timely basis (on or before the 15<sup>th</sup> or 30<sup>th</sup> day of each month);
  - Determine if reports are completed in a satisfactory manner (no issues with totals reported or missing information);
  - Determine if the Subrecipient is significantly behind in the completion of benchmark schedules or the provision of services listed in the executed Agreement; and
  - Determine whether technical assistance will need to be provided to Subrecipient staff based on consistent issues identified.
- h. The Community Development Project Manager shall reject the MPR submittal in ED Grants if there are insufficient or missing details in the Narrative section or if any non-compliance issues are identified during the review.
- i. ED Grants will not allow the approval of a Request for Reimbursement until the required MPR is submitted. The City reserves the right to hold the

processing of reimbursements, until the MPR is approved by the Community Development Project Manager.

3. Certified Payroll Reports (Construction Projects Only)

In addition to the MPRs, construction projects required to comply with federal and state labor standards must submit weekly certified payroll documents during the term of construction that comply with both federal and state requirements to the City.

CDD utilizes the LCPtracker web-based system for the certified submittals of the weekly Certified Payroll Report (CPR). CDD staff will coordinate with the Subrecipient and Prime Contractor staff to complete the setup and user authorizations required for the LCPtracker system. Authorized users are limited to the person that is authorized to review and accept the weekly CPR.

Required data entry in the LCPtracker system includes information regarding employee identification, labor classification, total hours worked on the project, wage and benefit rates paid, etc. The weekly submittals are required even when no construction activities have been completed on the project during the payroll period. Subrecipients are responsible for ensuring that the Prime Contractor, and each tier of subcontractor subject to prevailing wages, submit a weekly CPR electronically via LCPtracker within seven (7) working calendar days after the payroll ending date. Subrecipients are responsible for reviewing and approving the CPRs within three (3) working calendar days after the CPRs are submitted. Each individual, laborer, or craftsperson working on the CDBG project must appear on the payroll. This includes individuals working as apprentices in the apprenticeable trade. Owner-operators are to be reported by the contractor employing them. Rental equipment operators are to be reported by the company paying the workers' wages. Sole owners and partners who work on a contract must also submit a certified payroll record listing the days and hours worked, and the trade classification description of the work actually done. All contractors will be required to complete applicable eDocuments which are accessed, submitted, and approved through LCPtracker. The Prime Contractor and each tier of subcontractors are required to pay their laborers and mechanics employed under the CDBG project a wage not less than minimum wage classification as specified in both the Federal and State Wage decision. **The higher of the two applicable wage classifications, either Federal Prevailing Wage or State Prevailing Wage, must be paid.**

The LCPtracker system is set up to ensure appropriate wages and benefits are paid. However, the system validations are based on the Prime Contractor and subcontractor selection of job classifications for each employee included in the weekly CPR submittals. As such, the Prime Contractor and Subrecipient must review the CPR submittals to ensure correct job classifications have been entered, prior to Subrecipient approval in the LCPtracker system. The payrolls must always be tracked to ensure the correct wages are being properly applied. The Prime Contractor is responsible for the full compliance of all subcontractors on the project and will be held accountable for any wage restitution that may be necessary. This includes restitution for underpayments and, potentially, liquidated damages that may be assessed for overtime violations.

4. Section 3 Labor Hours Reports (Construction Projects Only)  
Subrecipients of Section 3 projects will be required to ensure that Section 3 employee information and project hours worked are tracked and reported in the City's LCPTracker System. Certified Payroll Reports may not be approved, unless all applicable Section 3 required details have been entered.
5. Year-End/Closeout Programmatic Reports  
Subrecipients shall submit year-end reports (or closeout reports for completed projects) via ED Grants at the close of each fiscal year, regardless of the start and end dates listed in the executed Agreement. These reports shall provide information covering each applicable fiscal year period (July 1<sup>st</sup> through June 30<sup>th</sup>). For FY 2026, the year-end or closeout reports shall be submitted by July 30, 2026. In the event of a termination date after fiscal year-end date of June 30<sup>th</sup>, the closeout reports shall also be submitted to the City within thirty (30) calendar days of such termination. Year-end/closeout reports shall be reviewed against the monthly reports submitted by the Subrecipient for accuracy and consistency.
  - Year-End/Closeout Programmatic Report: Subrecipients shall submit a narrative report that summarizes the CDBG/ESG activities conducted during the term of the executed Agreement and a complete description of the low/moderate-income client benefit that resulted from those activities. It shall also summarize any delays or challenges the Subrecipient experienced in conducting CDBG/ESG activities, whether or not the Subrecipient feels it attained all goals and objectives of the project and whether there are procedures or actions that will be undertaken in the future to increase the effectiveness of the project.
  - For Housing Rehabilitation projects (single-family and multi-family), documentation of independent inspections conducted by a third-party professional after completion of all housing rehabilitation activities shall be submitted.
  - Year-end/closeout project photos pre-authorized for publication in City publications, reports, and materials shall be submitted.
  - The Community Development Project Manager may also require additional information or confirmations, if deemed necessary, to ensure all reporting requirements have been met.
  - The Community Development Project Manager shall immediately notify Subrecipient staff of any non-compliance issues identified during the review of Year-End/Closeout Programmatic Reports.
6. As-Occurring Reports  
Changes to any of the documents submitted in the initial project report shall be submitted to the Community Development Project Manager at the time the changes occur. The Community Development Project Manager may also request for additional reports or documents as deemed necessary during the Agreement period.

## B. GENERAL RECORDS

Maintenance of adequate documentation for CDBG-funded or ESG-funded activities is critical to the effectiveness and overall performance of a program. Adequate documentation includes knowing: 1) what information needs to be collected and why; 2) when that information should be collected (and how often); 3) how the information should be acquired, organized, and stored; 4) how the information should be reported; and 5) the retention period for records.

Subrecipients shall maintain, and require its subcontractors to maintain, all administrative and program records required in connection with the provision of activities/services required by the Scope of Work of the executed Agreement.

Such records shall include but not limited to:

- Records providing a full description of each activity undertaken.
- Records demonstrating that each activity undertaken meets the National Objective of the CDBG Program that is listed in the executed Agreement, including secondary verifications completed by Subrecipient staff to confirm accuracy of program records maintained.
- Records required to determine the eligibility of activities (e.g., documented verification of City residency and annual family or household income certified by project clients), including secondary verifications completed by Subrecipient staff to confirm the accuracy of program reports maintained.
- Records required to ensure that a complete listing of the CDBG race and ethnicity categories is presented to project clients for selection during the project intake process, that a certified selection is completed by project clients, and is verified as completed by Subrecipient staff.
- Records required to document/verify all activities completed with CDBG or ESG funds, including secondary verifications completed by Subrecipient staff to confirm accuracy of program reports maintained.
- Records required to document the acquisition, improvement, use or disposition of real property acquired or improved with CDBG funds, including secondary verifications completed by Subrecipient staff to confirm accuracy of program reports maintained.
- Records documenting compliance with the fair housing, Section 504, and equal opportunity components of the CDBG Program.
- Other records necessary to document compliance with Subpart K of 24 CFR 570.

Subrecipients may maintain any additional records that it deems to be appropriate. However, such additional records should not replace any of the Community Development Division required records.



## C. PROGRAM RECORDS

Subrecipients shall maintain project data collection systems that clearly demonstrate the Subrecipient's capability of having project activities and services tracked and validated. Subrecipients are required to maintain verifiable records on clients and client services. Program records maintained must document compliance with the CDBG/ESG eligibility criteria specified by HUD guidelines. The City, HUD, or other duly authorized government officials shall have access to any Subrecipient documents or records that are pertinent to the CDBG/ESG Agreement. In most cases, electronic records are acceptable in place of hard copies. Hard copies must be maintained when required by law.

The following represents specific records to be maintained for various types of projects, which includes those that are not funded with CDBG/ESG funds:

### 1. Acquisition Projects

Land and building purchases require extensive documentation. CDBG funds are utilized for Voluntary Acquisition activities only. Acquisition project files shall include, but not be limited to, the following:

- a. Documentation of official decision to pursue an acquisition of real property;
- b. Identification of property and property owner(s);
- c. Evidence that property owner was informed on a timely basis about the acquisition and their rights (e.g., copy of letter and acknowledgement of receipt);
- d. Copy of each appraisal report or the explanation of the basis for the estimate of fair market value on which a determination of just compensation was based;
- e. Copy of the written purchase offer, the date of initiation of negotiations to acquire the property, and the date of delivery to the owner;
- f. Copy of the Purchase and Sale Agreement, Grant Deed, and document conveying the property including, but not limited to, evidence of liens to secure loans;
- g. Copy of closing statement identifying incidental expenses and evidence that owner received net proceeds due from sale including, but not limited to:
  - (1) Evidence of any owner contribution or private loan match; and/or
  - (2) Underwriting costs;
- h. Copy of any appeal or complaint filed and the response provided; and
- i. Relocation documents, if applicable:
  - (1) Identification of person, racial/ethnic group classification, age and sex of all members of household, and property;
  - (2) General Information Notice (Notice of Non-displacement or Notice of Eligibility for Relocation Assistance) and evidence of receipt;
  - (3) Description of why the relocation took place;
  - (4) Documentation of the replacement needs assessment;
  - (5) Documentation of comparable replacement dwellings (e.g., inspection document that includes the inspection date, description of a property, and its condition);
  - (6) Identification of referrals to replacement properties, date of referral, rent/utility costs, date of availability, reason(s) for declining referral (as applicable);
  - (7) Temporary Relocation Notice;
  - (8) Copy of 90-Day Notice to Vacate and evidence of receipt;



- (9) Copy of 30-Day Notice to Vacate and evidence of receipt;
- (10) Copy of each relocation claim and supporting documentation;
- (11) Evidence of verification of claim (e.g., determination of eligibility prior to relocation payment);
- (12) Type and amount of each relocation payment made, and copies of cancelled checks;
- (13) Evidence and dates of personal contacts and description of services provided;
- (14) Acknowledgement of payments and services rendered;
- (15) If filed, a copy of an appeal and an explanation of the action taken to resolve the appeal, and the final determination.

2. Construction Projects (Facility Improvements)

For construction projects, Subrecipient project files shall include, but not be limited to, the following:

- a. If leased property, documentation of owner's approval of the proposed improvements;
- b. An independent cost estimate and cost/price analysis completed that supports the project amount determined for the bid process, including the name, job title and date of the independent cost estimate and cost/price analysis was completed (should be no earlier than one month prior to issuance of bid);
- c. An updated cost/price analysis may need to be completed when proposed costs submitted by all bidders is insufficient to support the budget listed on the bid document;
- d. Bid documents, including documentation of contractor solicitation and basis for contractor selection and award cost;
- e. Evidence that contracts were not awarded to individuals or firms that have been suspended or debarred from participation in both federal and State programs;
- f. Documentation of the contractor having a valid Unique Entity Identification ([UEI](#)) number (unique 12-character identifier) from SAM.gov that has been successfully registered with an 'Active' status at the time of contract execution and throughout the duration of the project. On April 4, 2022, the unique entity identifier used across the federal government changed from the DUNS Number to the Unique Entity ID (generated by SAM.gov);
- g. Permits, as applicable;
- h. Compliance with Lead-Based Paint requirements, as applicable;
- i. Compliance documents with the City's [Living Wage Ordinance](#) (Municipal Code section 22.42) (LWO), as applicable; note applicability of, and compliance with, the LWO is determined on a project-by-project or

agreement-by-agreement basis and extends from Subrecipient down to its contractors and their subcontractors (if any);

- j. DOL and DIR wage determinations for the project, including an updated DOL wage determination when construction activities are not implemented within ninety (90) days of award;
- k. Certified payroll records for the project must be entered into the LCPtracker system and required documentation/records must also be uploaded to LCPtracker.
- l. Evidence that weekly certified payroll records were checked against the wage determination rates, employees' timecards, payroll records and that the employee received payment at the prevailing wage rate for all hours worked, including overtime;
- m. Records of construction worker interviews;
- n. Evidence of any violations with supporting documentation;
- o. Evidence of the resolution of any violations;
- p. Copies of lien releases;
- q. Completed volunteer certification forms, if applicable;
- r. Evidence that required posters were onsite;
- s. Progress and final inspections, including documentation of the Subrecipient's periodic on-site inspections and final inspection;
- t. Approved change orders NOTE: Change orders must be approved by the Community Development Project Manager prior to execution, as applicable to CDBG reimbursements;
- u. All correspondence related to construction;
- v. Records of disbursements made for completed and approved work (Subrecipient should ensure that data in the project file agrees with financial records);
- w. Documentation of compliance with Section 3 requirements, including verification of compliance obtained from all tiered subcontractors hired by the Subrecipient, as applicable.
- x. Documentation related to the Minority Business Enterprise Information Form, as applicable;
- y. Pre- and post-construction photos of CDBG-funded work completed;
- z. Notice to Proceed (original copy issued by the City to Subrecipient);
- aa. Notice of Completion (original copy issued by the City to Subrecipient);

- bb. Any real property restrictions recorded on the property as a result of CDBG-funded improvements; and
- cc. Annual documentation (for a minimum period of five (5) years after project closeout) demonstrating compliance with CDBG National Objectives requirements and that the use of the property (including the beneficiaries of such use) for which the improvement was made had not been changed.

3. Housing Rehabilitation Projects

For housing rehabilitation activities conducted, Subrecipient project files shall include, but not be limited to, the following:

- a. Procedures for determining the households to be assisted through the approved project, as applicable;
- b. Identification of property, property owner(s), and renter(s), as applicable;
- c. Intake date;
- d. Owner/Renter name, address, phone number;
- e. Owner/Renter family size, head of household status, race, and ethnicity (selected by client from a complete listing of designated CDBG ethnicity and race categories);
- f. Documentation of required low/moderate-income verification for households prior to assistance being approved and provided;
- g. Approved application for program;
- h. Agreement between Subrecipient and Owner (including a process for addressing grievances lodged by the beneficiary household, a homeowner-signed liability release, a materials and workmanship warranty, and a 5-year maintenance requirement);
- i. Any real property restrictions recorded on the property as a result of CDBG-funded improvements;
- j. If renter-occupied household, agreement between Subrecipient, program participant, and owner/landlord (with number of dwelling units in each multifamily structure and number of LMI units included, as well as evidence of owner approval of work to be completed);
- k. If renter-occupied household, documentation of rent charged before and after completion of work;
- l. Initial and final inspection reports;
- m. Work specification and cost estimates (detailed description of work to be completed with CDBG funds for each household served, including location of the work to be performed such as bedroom, kitchen, bathroom, etc.);

- n. Owner approval of payments, change orders, and work completed;
- o. Compliance with Lead-Based Paint requirements as applicable;
- p. Permits and other approvals as applicable;
- q. Relocation documentation as applicable:
  - (1) Identification of person, racial/ethnic group classification, age and sex of all members of household, and property;
  - (2) General Information Notice (Notice of Non-displacement or Notice of Eligibility for Relocation Assistance) and evidence of receipt;
  - (3) Description of why the relocation took place;
  - (4) Documentation of the replacement needs assessment;
  - (5) Documentation of comparable replacement dwellings (e.g., inspection document that includes the inspection date, description of a property, and its condition);
  - (6) Identification of referrals to replacement properties, date of referral, rent/utility costs, date of availability, reason(s) for declining referral (as applicable);
  - (7) Temporary Relocation Notice;
  - (8) Copy of 90-Day Notice to Vacate and evidence of receipt;
  - (9) Copy of 30-Day Notice to Vacate and evidence of receipt;
  - (10) Copy of each relocation claim and supporting documentation;
  - (11) Evidence of verification of claim (e.g., determination of eligibility prior to relocation payment);
  - (12) Type and amount of each relocation payment made, and copies of cancelled checks;
  - (13) Evidence and dates of personal contacts and description of services provided;
  - (14) Acknowledgement of payments and services rendered;
  - (15) If filed, a copy of an appeal and an explanation of the action taken to resolve the appeal, and the final determination;
- r. Completion certificates;
- s. Copy of contractor and equipment warranties provided to owner;
- t. If federal and State prevailing wage requirements apply:
  - (1) federal and State wage determinations;
  - (2) certified payroll records (see page 31);
  - (3) payroll deduction authorizations;
  - (4) employee field interviews;
- u. All correspondence related to construction;
- v. Documentation of all individuals completing the work, separating labor charged to the CDBG Agreement, and the labor not charged to the CDBG Agreement;

- w. Records of disbursements made for completed and approved work (Subrecipient should ensure that data in the project file agrees with financial records);
  - x. Documentation of compliance with Section 3 requirements, including verification of compliance obtained from all tiered subcontractors hired by the Subrecipient, as applicable;
  - y. Documentation related to the Minority Business Enterprise Information Form, as applicable;
  - z. Documentation of independent inspections conducted by a third-party professional after completion of all housing rehabilitation activities; and
  - aa. Pre- and post-construction photos of CDBG-funded work completed.
4. Direct Financial Assistance to Homebuyers Projects  
For direct financial assistance activities conducted as housing assistance, Subrecipient project files shall include, but not be limited to:
- a. Procedures for determining the households to be assisted through the approved project;
  - b. Documentation of required low/moderate-income verification for households prior to CDBG assistance being approved and provided;
  - c. Detailed description of the actual project activities conducted;
  - d. Date, type, and method of all client contacts and contacts made on behalf of the client;
  - e. Loan documents, as applicable; and
  - f. Information regarding the total number of grants or loans executed, including type of loan (amortized or deferred), loan amount, average interest rate, and amortization period as applicable.
5. Direct Client Services Projects  
Subrecipients that provide direct individual client services shall keep a record on each client served by the project under the Agreement. The actual design of the project data system is at the discretion of the Subrecipient. However, the project data system shall include the following at the minimum:
- a. Primary Records  
Records shall be maintained by the project to record services provided directly to, or on behalf of, the project client. Primary records are typically the client case files. All client case files maintained by the project shall be clearly identified as “CDBG Files” or “ESG Files” and must not be reported to any other funding source with regard to the services listed in the City Agreement. Each project client served shall have a designated/assigned unique identifier in Subrecipient’s records maintenance system. All projects providing direct client/household services shall have primary

records containing the following information on **all** clients receiving services:

- (1) Client's name and identification number assigned by project;
- (2) Client's intake date;
- (3) Referring Subrecipient, when applicable;
- (4) Client's parent's name, when applicable;
- (5) Client's address and phone number, including proof of City of San Diego residency NOTE: If a client is self-certifying in terms of income, proof of City of San Diego residency is not required so long as the self-certification used documents the client's address as being within the City of San Diego;
- (6) Client's household size and head of household status;
- (7) Client's age and date of birth;
- (8) Client's race and ethnicity (selected by client from a complete listing of designated CDBG race and ethnicity categories);
- (9) Client's family/household size and annual or monthly income with adequate supporting documentation; self-certification of income in lieu of supporting documentation may be accepted as a last resort and **only after consultation with and upon approval by the City.**
- (10) Income verification and documentation is required for Public Services, Housing Rehabilitation, Microenterprise Assistance, and Direct Financial Assistance to Homebuyers projects. Non-low/moderate-income households and clients are not eligible to be assisted by Housing Rehabilitation, Microenterprise Assistance, and Direct Financial Assistance to Homebuyers projects. Public Services projects may, however, serve non-low/moderate-income households and clients, provided that such households or clients do not constitute more than 49 percent of the total reported to the City. Nevertheless, Public Services projects targeting HUD-defined 'presumed low-income households or clients must document that 100 percent of the total reported to the City are presumed low-income households or clients;
- (11) Client's certification of COVID-19 hardship (Only for CARES Act CDBG-CV Subrecipients funded to administer activities and services that prevent, prepare for and/or respond to the spread of COVID-19 in accordance with CARES Act regulations.)
- (12) Needs assessment (reason for project intake);
- (13) Description, frequency and length of proposed services to be provided, as applicable;
- (14) Description of actual services provided (date, type, approximate length of each contact and method of all client contacts or contacts made on behalf of the client);
- (15) Reassessment of client needs (halfway through services) to determine how well client is responding to services when applicable;
- (16) Termination date;
- (17) Reason for termination;
- (18) Planned follow-up date(s); and



- (19) Actual follow-up date(s) and outcome of follow-up contact (should be attempted on all clients after termination of client services, unless otherwise stipulated in the Scope of Services).

b. Secondary Records

Examples are project logs, sign-in/attendance sheets, appointment book, distribution logs etc. Subrecipients who do not provide direct services to individual clients shall maintain secondary records to document the services provided to the targeted population. Subrecipients providing services in group settings shall also maintain secondary records. In addition, written records documenting project volunteer activities shall be maintained as secondary records.

6. Microenterprise Assistance Projects

In addition to the items listed in 5.a and 5.b above, Subrecipient project files for microenterprise assistance shall include, but not be limited to:

- a. Documentation of required low/moderate-income verification for clients receiving microenterprise technical assistance;
- b. Number new businesses assisted;
- c. Number of existing businesses assisted;
- d. Of the number of existing businesses assisted, number of businesses expanding;
- e. Name of business, number of employees of each microenterprise business assisted;
- f. Dates and attendees of workshops and one-on-one technical assistance sessions held;
- g. Annual status of businesses assisted for a minimum of five (5) years after termination of services;
- h. Copy of City of San Diego Business Tax Certificate for microenterprises established or expanded NOTE: a State of California daycare license may be accepted in lieu of a City of San Diego Business Tax Certificate for childcare provider microenterprises, so long as the childcare microenterprise operates in a home for eight or fewer children, including children under the age of 10; and

6. Special Economic Development Projects

Program record and data collection requirements for special economic development projects will be determined as needed in accordance with applicable regulations and Community Development Division oversight needs.

7. ESG Projects

Subrecipients utilizing ESG funds must have written policies and procedures that:

- Require intake staff to document:
  - The intake/screening for eligibility of ALL persons seeking assistance; and
  - The evidence relied upon to establish and verify 'Homeless' status;
  - Documentation that ESG-CV will be used to prevent, prepare for, and respond to the COVID-19 pandemic, in accordance with CARES Act regulations; and

- Are consistent with recordkeeping requirements.

Refer to 24 CFR 576.101 regarding specific requirements regarding the evaluation of program participant eligibility and needs. Re-evaluations are required for program participants receiving Rapid Re-Housing assistance at least once annually. 24 CFR 576.500 describes recordkeeping and reporting requirements regarding homeless status, 'at risk of homelessness' status, determinations of ineligibility, annual income, program participant records, centralized or coordinated assessment systems and procedures, rental assistance agreements and payments, utility allowance, shelter and housing standards, emergency shelter facilities, services and assistance provided, coordination with the Continuum of Care and other programs, HMIS, matching, conflicts of interest, homeless participation, faith-based activities, other federal requirements, financial records, Subrecipients and contractors, other records specified by HUD, and confidentiality. For Rapid Re-Housing programs, the documents required to be maintained include, but is not limited to, the following:

- Initial Eligibility
- Termination Policy and Appeal Process
- Termination and Appeals
- Program participant plans to assist them in retaining permanent housing after ESG assistance ceases
- Annual Income
- Compliance with Case management Requirements
- Compliance with Shelter and Housing Standards
- Rental Assistance Agreements and Payments — The records must include copies of all leases and rental assistance, documentation of payment made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants. Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the rental assistance is provided solely for rental arrears. The lease must be between the program participant and the owner, or their agent (such as a property manager). See 24 CFR 576.106 for specific requirements. Assistance may only be provided in cases where a rental assistance agreement is in place between the Subrecipient/Subcontractor and owner, **and** a lease agreement is in place between the program participant and owner.
- Utility Payments — Documentation of the program participant's (or a member of the same household) account in his or her name with a utility company or proof of responsibility to make utility (gas, electric, water, sewage) payments.

8. Other Projects

For other projects in which client records are not required, Subrecipients shall maintain documentation to support activities and services provided to the target population as specified/identified in the executed Agreement.

**All Program Records shall be subject to scheduled and unscheduled reviews by Community Development Division staff, and acceptance of information submitted in monthly reports is tentative pending verification by the review of project records.**

D. SUBRECIPIENT PROGRAM COMPLIANCE
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Subrecipients shall ensure that assessments/evaluations of program effectiveness, efficiency, internal control, and compliance with the terms of the executed Agreement (including CDBG Program, ESG Program, federal, and City requirements) are conducted with regard to CDBG or ESG project activities implemented and completed.

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## SECTION IV: FISCAL PROCEDURES

Subrecipients must constantly monitor their performance to ensure that HUD's timeliness ratio is met and budgeted expenditures are being effectively used to complete all projects. Performance is monitored by the Community Development Division (CDD) as workshops are conducted, Agreements are executed, and requests for reimbursement are processed. In addition, all activities must be conducted in compliance with applicable federal and City requirements.

### A. REQUEST FOR REIMBURSEMENT (RFR) PROCESS

All Subrecipients must attend the FY 2026 CDBG Reporting Requirements Workshop. Subrecipients are required to submit monthly RFRs regardless of whether or not expenses were incurred. Timeliness and accuracy will be factors considered during Subrecipient performance evaluations.

#### 1. Overview

- A. All Subrecipients must complete monthly RFR submittals in ED Grants by the 15<sup>th</sup> day (for CDBG-funded projects) or the 30<sup>th</sup> day (for ESG-funded projects) of the month immediately following each reporting period, irrespective of the day when the 15<sup>th</sup> or 30<sup>th</sup> falls. If there are no expenditures to report, Subrecipients will still be required to submit an RFR verifying that there is no claim for the reporting period and no retroactive claims for the reporting period will be submitted in future RFRs.
- B. Applicable mandatory attachments must also be uploaded to ED Grants to complete the monthly RFR submittals, even if there are no expenditures.
- C. All RFRs created in the Economic Development Grants Management System (ED Grants) must be completed with required details entered and required attachments uploaded. **Failure to complete timely RFR entries/uploads will result in the issuance of a Non-Compliance Notification.**
- D. There will not be an opportunity to resubmit disallowed amounts noted with the final June RFR. Final payment will be issued less any identified disallowed amounts. However, the submission deadline may be extended beyond July 15 (but no later than July 25 to accommodate the year-end or closeout report due on July 31) to allow for the reporting of personnel expenses covering the last pay period of June.
- E. If all supporting documentation is submitted properly in the RFR submittal, Community Development Division staff will attempt to complete the payment within thirty (30) calendar days of receipt.
- F. RFR submittals that are not submitted by the designated deadline may be subject to a longer processing time.
- G. Any delay in the approval of the MPR for that reporting period will result in payment being held, and future RFR submittals will be precluded, until approval is confirmed.

#### 2. Submittal Requirements

Only supporting documents for eligible expenditures should be uploaded into ED Grants. Refer to Attachment H for a step-by-step guide on how to submit an RFR.

- A. **Overview Tab:** Provide general information regarding the RFR, as well as Agency Approval. Select the 'Edit' button, enter the required data listed below, then select the 'Save' button.
- 1) **Vendor Invoice Number Field** — Enter the invoice number for the Request for Reimbursement. The Subrecipient must ensure that a unique identifier is used each month. For example: CDBGMar19, ESGApr19, GFMay19. The City's accounting system cannot process the same invoice number twice.
  - 2) **Is This a Final Payment?** — Select the appropriate response. Selecting "Yes" locks the project from submitting any future RFRs for the project's Agreement period. This is required to submit final payment and close out the project.
  - 3) **Includes Resubmission of Disallowed Amounts?** — Check the box if the RFR includes disallowed expenditures from the prior reporting period.
  - 4) **If Yes, Please Explain.** — Provide detailed explanation of the disallowed amounts included in the RFR submittal. **NOTE:** all required supporting documentation must be uploaded with payment request.
  - 5) **Agree** — Check box to indicate acceptance of the Agency Approval language.
- B. **Financials Tab:** Claim reimbursement of eligible expenditures. These expenditures must be based on the executed Agreement budget. The amounts requested must represent expenditures paid by the Subrecipient during the reporting period or for any disallowed amounts from the prior reporting period. **Expenditures must be claimed in the reporting period that they are paid by the Subrecipient.** For example, a payment of an April invoice dated 04/15/2026 that was made in May with a check dated 05/02/2026, should be reported in the May RFR, not April. The tab includes listing the following by budget category:
- 1) **Awarded Amount**
  - 2) **Remaining Amount**
  - 3) **Requested Amount**
  - 4) **Disallowed Amount**
  - 5) **Reason for Disallowance**
  - 6) **Actions** — Select this button to enter 'Requested Amount' for the budget category with 'Awarded Amount' and 'Remaining Amount.' ED Grants will only allow expenditures for budget categories with 'Awarded Amount' listed and sufficient 'Remaining Amount' available. Select 'Save' button.
- C. **Attachments Tab:** Attach required documents to support the eligibility of the expenditure for the reporting period, as well as supporting documents for any resubmission of previously City disallowed amounts. Invoices, payroll documents, and other supporting documents, such as copies of signed canceled checks or bank statements with highlights of cleared check numbers, are required to support all Personnel Expense (PE) and Non-Personnel Expense (NPE) claims. Scan supporting documentation in one (1)

PDF and attach it to the corresponding budget category. The tab includes the following listing:

- 1) **City Form Download** — is the City template that is required to be included in the attachment for each budget category claim.
- 2) **City Form Description** — provides the description of the documents required to be included in the attachment.
- 3) **City Form Required?** — details if the form is 'Mandatory' or 'Optional.'
- 4) **Subrecipient Document Attached?** — select appropriate option in 'Attach' window field.
- 5) **Subrecipient Comment** — displays description entered in 'Attach' window 'Comments' field.
- 6) **Subrecipient Document Link** — displays link attached.
- 7) **Actions** — select button to attach PDF, JPG, or PNG document from computer or workspace.

D. The final step of the RFR Process is that an email notification will be sent by ED Grants to the Subrecipient's ED Grants Primary Representative confirming the payment has been processed.

### 3. RFR Forms

Due to limited space, only supporting documents for eligible expenditures should be included in the packet.

A. **Personnel Expense Schedule (PES) Form** provides a listing of approved personnel expenditures paid by the Subrecipient for the approved project. The Personnel Expense Schedule should cover costs for employee compensation. **NOTE:** Salaries and Wage compensation must comply with California Fair Labor Standards Act Section 204. PES should include:

- 1) Subrecipient staff names and position titles that match the executed Agreement budget;
- 2) Pay periods, check/direct deposit payment date, check number or indicate direct deposit payment, total number of hours and total gross amount that match the payroll document for the appropriate reporting period;
- 3) The total number of hours and gross amount claimed to the funding source;
- 4) Total Salaries and Wages Calculation for all pay periods;
- 5) Any additional explanation of personnel expense in the 'Comments' section; as part of the Flexible Budget Rule, Subrecipient can add or change positions as needed; however, expenditures are still limited to the total PE budget; also, any changes to Subrecipient staff must be explained in the 'Comments' section of the PES;
- 6) Submittal of corresponding timesheets signed by Subrecipient staff and supervisor (Head of Subrecipient timecard should be signed by a Board Member); or online timecard printout (electronically approved by both Subrecipient staff and supervisor) and verification that number of hours worked match the payroll document;
- 7) If timesheets are approved electronically, a personnel activity report/general ledger verifying the hours worked by each claimed



- staff must be provided (Please reference page 64 Section 7) Payroll Records in this manual);
- 8) Timesheets must identify the number of hours charged to the grant and must be based on personnel activity reports verified by staff supervisors as documentation of the actual CDBG hours worked by staff to support the project activities listed in the approved CDBG Scope of Work. Submittal should include either general ledger report or time distribution records supporting the allocation of the hours charged for the CDBG grant.
  - 9) Payroll document that lists Subrecipient staff name, the number of hours worked (indicate if salary position), and total gross pay of each staff. The distribution of salaries and wages to various awards must be supported by personnel activity reports. These reports will be reviewed during fiscal on-site monitoring visits.
  - 10) Payroll Summary/Ledger that details the total amount of payroll expense per pay period, along with proof of payment through bank statement or line receipt. **NOTE:** payroll transaction on bank statement must correlate with the PES and occur in the appropriate reporting period.
  - 11) **NOTE:** Eligible personnel expenses are to be reimbursed when the payment is issued by the Subrecipient to the employee and not when the pay period ends. (For example, if a pay period is July 16–July 31 and payroll is paid on August 5<sup>th</sup>, the request for reimbursement should be made in the August RFR.) An exception to this rule is the hours worked during the *final month of a Subrecipient's contract term*. (For example, if a pay period is June 16–June 30 and the Subrecipient agreement terminates on June 30, the June RFR may include a reimbursement request for the pay period ending June 30<sup>th</sup>, even if payroll is not paid until July.)

**B. Fringe Benefit Payment Schedule (FBPS) Form** provides a listing of approved fringe benefit expenditures paid by the Subrecipient for the approved project. The Fringe Benefit Payment Schedule should cover costs of employer contributions or expenses for benefits, such as FICA, SUI, social security, workers' compensation insurance, LTD insurance, employee insurance (e.g., medical, vision, and life), and pension plan costs. Claims should be based on the Date Paid for the Fringe Benefit Payment, not time of coverage. The only exception is prepaid and prorated expenditures and only that portion of the expenditure that covers the reporting period.

- 1) Use the List of Expenditures Form as a cover sheet to list each fringe benefit amount claimed. This form should be used as the cover sheet of the Fringe Benefit Payment Schedule. Include an explanation of how amounts claimed were determined in the Comments section.
- 2) FBPS Payroll Taxes should include:
  - a. The name of the employer-portion of payroll tax claimed that matches the executed Agreement budget and amount paid and amount claimed for the appropriate reporting period that match payroll document submitted.
  - b. The payroll document page lists the payroll taxes and the check number/ACH/EFT and date paid.
  - c. Any additional explanation of payroll taxes should be included in the Explanatory Comments section.



- d. Submittal of copy of payroll document and/or invoice and proof of payment.
  - 3) FBPS Additional Fringe Benefit Payments should include:
    - a. The name of the type of employer-portion benefit, such as medical, dental, vision, that matches the executed contract budget and vendor name.
    - b. Indicate if payment is prepaid, date of coverage, prepaid prorated calculation and total amount paid for the month, check number and date paid.
    - c. Subrecipient staff name listed matches PES for fringe benefit claimed, total amount claimed and appropriate reporting period.
    - d. Any additional explanation of fringe benefit expenses should be included in the Explanatory Comments section.
    - e. Submittal of all pages of the invoice and verification of payment in full with a copy of canceled check or bank statement listing check number/ACH/EFT paid.
  - 4) The distribution of salaries and wages to various funding sources must be supported by personnel activity reports. These reports will be reviewed during fiscal on-site monitoring visits.
- C. **Administrative Indirect Overhead Calculation Form** provides calculation of the administrative indirect overhead being claimed for the reporting period. This form is applicable for Subrecipients that have Federally Approved Indirect Cost (FAIC) Rates, a Cost Allocation Plan, or choose to use the De Minimis allocation. All copies of the Administrative Indirect Overhead Calculation form submitted shall be subject to review, and acceptance of the documents shall be tentative pending verification by Community Development Division staff.
- a. The maximum allowable claim for FAIC shall not exceed the percentage amount listed in the FAIC document.
  - b. The form includes a formula calculation of the total direct costs of the month multiplied by the approved rate.
  - c. Changes to the FAIC rate are allowed with proof of approved rate change and when approved by the Project Manager; however, the total allocated amount for the executed contract period will remain the same.
  - d. The same costs that have been treated as indirect costs cannot be claimed as direct costs.
- D. **List of Expenditures Form** serves as a cover sheet for each group of invoices per line item claimed, except for Salaries and Wages. The following information shall be required for each invoice submitted by line-item title:
- 1) vendor name and description of item purchased matches executed contract budget,
  - 2) check number or ACH/EFT info,
  - 3) date paid,
  - 4) amount paid,
  - 5) amount claimed, and

- 6) any reasonably necessary adjustments should be explained in the section made available at the bottom of the List of Expenditures Form.
- 7) All original documentation should be maintained by the Subrecipient.
- 8) Supporting documentation should include, but not limited to the following:
  - a. Copy of the invoice should be legible and unaltered.
  - b. An invoice that is an annual or quarterly payment, should be prorated to be claimed on a monthly basis within the executed contract period. An explanation of this transaction should be included in the space provided on the List of Expenditures form.
  - c. Expenditures claimed should be limited to the appropriate reporting period when the expenditure was paid, unless eligible for resubmission of disallowance from the prior reporting period.
  - d. The Subrecipient shall not claim expenditures, until actual payment has been made, regardless of when the service or merchandise is received during the executed contract period. Exception is for supplies-client use category. Supplies distributed and retained by the client, should be claimed in the reporting period in which the supply was distributed.
  - e. Proof of payment is supported by: 1) a copy of the canceled check or 2) the check number highlighted in the bank statement or 3) check information listed on the Check Reconciliation form and the cleared checks provided within 2 months following the claim.
  - f. ACH/EFT payments must include the copy of the bank transfer or copy of the Subrecipient's bank statement with the transaction highlighted.
  - g. Petty cash transactions must include a copy of the petty cash voucher signed by the person receiving the petty cash and the authorized approver for petty cash, as well as copies of all corresponding receipts. Petty cash transactions should be paid and submitted for the reporting period in which the transaction occurred. Bundling and reimbursement of petty cash receipts is not allowed.

E. **Client-Generated Income Form** is for the Subrecipient to detail all transactions completed using client-generated income collected during the executed contract period. The following information should be provided:

- 1) The total amount of client generated income collected to date.
- 2) The total amount of client-generated income collected during the executed contract period.
- 3) The cumulative expenditures to date using client-generated income.
- 4) The line-item budget using client-generated income for the RFR submittal reporting period.

F. **Bank Statement and Check Reconciliation Form** is to submit proof of bank clearance by providing either: 1) all pages of the bank statement listing the

check numbers and/or ACH/EFT transactions that were reported in the current RFR submittal OR 2) a copy of the canceled check. In addition, the Subrecipient shall submit a Check Reconciliation form to identify all check numbers and/or ACH/EFT transactions reported to the City that have not been cleared for payment by the bank. The Check Reconciliation Form should include the following:

- 1) a listing of all line items,
- 2) check number/ACH/EFT,
- 3) check/transaction date, and
- 4) amount of the check/transaction for each invoice.
- 5) Submission should include:
  - a. Check numbers and/or ACH/EFT transactions from the prior RFR submittal's Check Reconciliation Form that still haven't cleared the bank, and
  - b. Check numbers and/or ACH/EFT transactions from current RFR submittal to be verified by the next month's bank statement.
- 6) Any payment transaction that hasn't been processed within two (2) months of the RFR submittal will be disallowed from future RFR submittals.

G. **Resubmission of Disallowed Amounts** allows the Subrecipient to resubmit a claim for expenditures that were disallowed by the City in the prior RFR submittal. For example, if an expenditure is disallowed in March, then all appropriate supporting documentation must be submitted in the April RFR submittal.

- 1) Disallowances claimed beyond the disallowance resubmission period of one (1) month will not be considered.
- 2) Disallowances made by the Subrecipient, for payments made to its subcontractors and/or consultants, and then later deemed allowable by the Subrecipient will not be considered.
- 3) "Found" expenditures not previously claimed by the Subrecipient will not be considered. For example, if a Subrecipient realizes they did not claim an expenditure until after the appropriate RFR is approved, they cannot claim it in the following month.
- 4) A Subrecipient cannot be reimbursed for more than the original amount disallowed.
- 5) Resubmission should include:
  - a. Expenditure claim that matches the RFR Disallowances from the prior reporting period.
  - b. Expenditure claim that is eligible to be reimbursed.
  - c. Supporting documentation for the disallowed amount.

H. **RFR Disallowance Entries** allows Community Development Division staff to notify the Subrecipient of disallowances made for the current RFR reporting period. This includes the following:

- 1) Budget category and expenditure amount disallowed.
- 2) Reasons for disallowances include, but are not limited to, the following:

- a. Ineligible Expenditure
  - b. Calculation Error
  - c. Missing Payment Clearance
  - d. Missing Documentation
  - e. Document Not Readable
  - f. Documentation Does Not Support RFR
  - g. Same Invoice Claimed More Than Once
  - h. Missing Signature
  - i. Signature Not on File
  - j. Expenditure More Than Two (2) Months Old
  - k. Incorrect Reporting Period
  - l. Exemption/Approval Not on File
- 3) Explanation of line items designated as eligible for resubmission are provided. Any resubmission of these amounts must be included in the next month's RFR submittal (e.g., if the RFR Disallowance Report is for the month of October Payment Period, any disallowed amount deemed eligible for resubmission must be added to the total amounts claimed for the month of November Payment Period).

4. Supporting Documentation

All RFR submittals and accounting records must be backed up by supporting documentation. The Subrecipient is responsible for maintaining all original supporting documentation and making it readily available for review by Community Development Division staff, HUD, or other authorized personnel at all times. The supporting documentation must explain the basis of the costs paid and show the actual dates and amounts of the expenditures. Subrecipients should ensure that only relevant supporting documentation is submitted. Examples of acceptable supporting documentation are listed below:

- A. Copy of dated timesheets (with the total number of actual CDBG hours worked identified) signed by the employee and supervisor or print out of online timecard approval or personnel activity report/general ledger that verifies staff time worked, including the identification of the total number of actual CDBG hours worked.
- B. Copy of payroll service document with date salary paid and total gross salary amount and employee-portion of fringe benefit payment.
- C. Copy of payroll service document with employer-portion of fringe benefit payment.
- D. Legible copy of all pages of invoices. A significant number of missing pages may result in a claim being disallowed.
- E. Mileage claims must include a copy of the mileage report with purpose of trip description, the Start/From address location, End/To address location, total number of trip miles, total number of CDBG reimbursable miles claimed, cost per mile and calculation for total amount claimed. If applicable, also include receipts and proof of payment information for gas purchases for Subrecipient vehicles. Mileage claims should be submitted in the reporting period in which they were incurred.

- F. Bus/trolley pass claims must include a copy of list of clients that received the bus/trolley pass. Expense cannot be claimed until passes have been disbursed to clients, not when passes were originally purchased. NOTE: passes purchased in a previous fiscal year or previous execution Agreement period but distributed in the current Agreement period will be reimbursed within a reasonable amount of time between the purchase and the distribution. The agency should not complete a bulk purchase that will not be distributed by the end of the fiscal year or within 2 to 3 months of purchase.
- G. Publications/printing charges should include copy of item published/printed with CDBG funding recognition language included on item. The reference shall be worded as follows: "This project is funded in whole or in part with Community Development Block Grant (CDBG) Program funds provided by the U.S. Department of Housing and Urban Development (HUD) to the City of San Diego."
- H. Invoices for professional consultants or subcontractors' claims must list the number of hours charged and an accurate specific description of the actual CDBG work completed during the reporting period. Sufficient details of the work performed must be provided to support the allowability of the cost.
- I. **Workshops/classes provided to clients must be documented utilizing a client list that includes the following: Workshop/class title, date, time, location, and client names. A copy of the agenda/syllabus and any materials distributed to clients must also be maintained at the project site.**
- J. Prepaid and prorated expenditures must include all pages of the invoice that includes the coverage period, proof of payment and calculation of prorated monthly expense included in the related comment section.
- K. Proof of payment must be provided with the check number listed on the bank statement OR a copy of the canceled check OR proof of electronic fund transfer.
- L. For purchases made online, proof of payment must be provided with the check number listed on the bank statement OR a copy of the canceled checked OR proof of electronic fund transfer; AND acknowledgement of receipt of ordered item(s), including the date received, must be provided.
- M. Supply purchases for individual client use and/or supplies that will be retained by the client after the termination of services (like bus passes or work tools) must include a client distribution list that includes the following information: client name, date of supply distribution and item description. Supply purchases for general client use during the term of the Subrecipient agreement (like hygiene kits for shelter participants, meals, or garden supplies for urban farms) do not require a client distribution list. (However, total number distributed, date and location of distribution should be tracked by the Subrecipient and maintained in project files.) In addition, food purchases, specifically for meal delivery programs and/or food banks, are not considered Supply budget items but are to be considered as Direct

Program Delivery expenses. If in doubt, please consult with your Project Manager for confirmation.

## B. GENERAL FISCAL POLICIES AND PROCEDURES

### 1. Fund Advances Prohibited

The Community Development Division cannot advance any funds to any Subrecipient approved for funding, because the Community Development Division cannot draw from the federal government, until there is eligible supportive documentation and statistical/programmatic reports supporting expenditures. Subrecipients may not charge expenditures to a credit card or borrow the funds and expect the Community Development Division to reimburse expenses based on the credit card statement or to the person/institute loaning the funds. The Community Development Division cannot pay any Subrecipient's approved vendor directly as the Agreement is executed with only the Subrecipient. Subrecipients are also prohibited from advancing or loaning funds received from the Community Development Division to any individual or organization for any purpose, project, or activity.

Exceptions may be made by the Community Development Division Program Manager based on project need.

### 2. Budget Increase Prohibited

Overall project budget increases are not allowed. Appropriations of funding and reprogramming of unused funding of prior years are conducted per the Community Development Division timeline each year. Each allocation of funding by City Council is considered a separate project with separate scope and budget. Banking of funds to create a larger funding amount for the project is not allowed due to federal timeliness rules and regulations.

### 3. Budget Amendments

Budget amendment requests, when applicable, are to be submitted through ED Grants. An amendment would apply when expenditures exceed the budget categories. The following should be noted:

- a. This amendment must not result in a change to the approved project Scope of Work.
- b. Subrecipient must be able to demonstrate how the proposed budget amendment is necessary to ensure completion of activities stated in the Scope of Services/Scope of Work.
- c. New budget line items are not allowed to be included in the budget amendment request, unless the Subrecipient can demonstrate that funds will not be fully expended without the new budget line item, contingent upon approval by the Project Manager.
- d. The total of the category PE and the category NPE cannot exceed the total budget for each category.
- e. The overages cannot cross the categories of PE, NPE, and Federally Approved Indirect Cost Rate (FAIC).
- f. Subrecipient can add or change positions within the PE category without a budget amendment. However, such changes must be noted when they occur in the Personnel Expenditure Schedule Comments section.



- g. Budget amendment requests must be submitted prior to the submission of the March RFR and by April 15<sup>th</sup>, 2026.

4. Eligible and Ineligible Expenditures

Subrecipients should review the [Playing by the Rules Handbook](#) (2022) and federal regulations for guidance and determination of eligible and ineligible expenditures. It is not possible for the Community Development Division Office to develop a detailed list of all eligible and ineligible expenditures for all CDBG-funded and ESG-funded projects. Due to the various rules and regulations adhered to by the Community Development Division Office, and the diversity of services that are funded, expenditures that may be eligible for one project may not be eligible for another. However, the following basic guidelines are applicable to all projects and shall serve to facilitate decisions in regard to the eligibility of expenditures. In the event of uncertainties, anticipated expenditures should be referred to the EDD Business Operations and Support Services for decisions before the expenditures are paid. Generally, an expenditure is allowable if it is necessary and reasonable; allocable to the grant; in accordance with GAAP (Generally Accepted Accounting Principles); not prohibited by federal, state, or local laws or regulations; and supported by adequate supporting documentation.

a) Eligible Expenditures

Project expenditures must meet the following requirements to be eligible for reimbursement:

1. They must be approved in detail as part of the executed Agreement, budget justification forms and HUD regulations.
2. They must be essential to the proper and efficient performance of the service as required by the executed Agreement.
3. The invoices, receipts and other supportive documents should be dated during the reporting period requested for reimbursement.
4. During fiscal monitoring or audits, original receipts/invoices must be reviewed for authenticity and funding sources that reimbursed the expense. All original, unmarked documents **MUST** be maintained at the local office address listed in the CDBG or ESG Agreement for immediate monitoring review and/or audits. Community Development Division staff will not travel to national offices for this purpose.
5. They must be reasonable and comparable to the expenditures paid by the Subrecipient or other Subrecipients providing similar services.
6. They must be expended against the authorized budget category contained in the executed Agreement budget that has been approved by the City.
7. They must be thoroughly documented, and the net expenditures must reflect all applicable credits to the Subrecipient, such as purchase discounts, rebates, and allowances, receipts from the sale of publications or materials, and any other types of income or credits.
8. They must comply with the written policies of the Subrecipient, as approved by its governing body, in regard to employment, salaries and wage rates, working hours, holidays, fringe benefits, vacation and sick leave privileges, military leave, jury duty, travel, overtime and other personnel matters as stated in the detailed budget forms in the executed Agreement. If a unique payment is made for an



employee, document and explain clearly how it relates to the project, how the Subrecipient policies support the payment and what funding source would normally pay this item. Example: Fringe Payment made to a Subrecipient other than an insurance company or other fringe provider.

b) Ineligible Expenditures

Anticipated expenditures that do not clearly meet the eligibility requirements stated above are ineligible for reimbursement. Any of these expenditures submitted for payment will be disallowed and cannot be resubmitted. Ineligible costs include, but are not limited to the following:

1. Bad Debts

Loss resulting from uncollectible accounts or claims.

2. Commingling of Funds

Expenditures related to services funded by sources other than CDBG or ESG funds are ineligible, if they are charged against the CDBG or ESG funds.

a. For Subrecipients who operate many programs or have more than one (1) funding source, the Subrecipient shall allocate expenditures to the various programs or funding sources according to an approved Cost Allocation Plan.

b. The costs should be allocated on the basis most appropriate and feasible under the circumstances. Examples: include number of hours spent, number of employees, or square footage utilized for the project.

c. The Subrecipient shall maintain proper documentation related to the allocation of expenses (e.g, timecards, time summaries, square footage measurements, etc.).

3. Contingency Funds

The transfer or contribution of funds to a contingency reserve, or similar provisions for meeting future unforeseen expenses.

4. Fundraising

Costs of organized fundraising, including financial campaigns, solicitation of gifts and bequests, and similar expenses paid to raise capital or obtain contributions for the project or Subrecipient, regardless of the purpose for which the funds shall be used. In addition, expenditures to solicit contributions or donations for the project or Subrecipient, including salary expenses.

5. Contributions and Donations

Cash or in-kind contributions or donations to any Subrecipient or cause.

6. Entertainment/Subrecipient Events

Expenditures for social activities, amusement, entertainment, and general Subrecipient events (e.g., space rentals, flyers/brochures, staff time/salaries, lodging, meals, refreshments, beverages, and gratuities). Examples of such events include, but are not limited to, Subrecipient fundraising events, groundbreaking events, open house events, Subrecipient staff meetings or staff development meeting/retreats, and staff/client birthday or other parties.

7. Fines and Penalties

Expenditures to pay fines or penalties resulting from violations or noncompliance with federal, State, or local laws, rules, or regulations.

8. Late Fees, Interest and Processing Fees

Late fees and interest charged by vendors for invoices paid after the due date, or fees associated with returned checks. Also, credit card interest and/or credit card processing fees cannot be paid using CDBG OR ESG funds.

9. Interest and Professional Fees

Interest on any type of loan, bond discounts, financing and refinancing fees, and legal/professional fees related thereto.

10. Membership Fees/Subscriptions

Fees for membership in any organization that is substantially involved in advocacy, lobbying, and other activities, which are intended to influence legislation at the federal, State, or local levels, as well as fees for membership for which the purpose does not support the scope of work/scope of services of the executed Agreement. Any memberships or subscriptions that are not directly associated with project clients or the provision of client services.

11. Meeting Attendance Fees

Fees or salaries claimed for attending meetings that are not open to attendees on a non-segregated basis. In addition, fees or salaries for attending workshops or training sessions that do not support the scope of work/scope of services of the executed Agreement, or are attended by personnel not budgeted under the executed Agreement.

12. Training/Conference Expenses

Training/conference expenses or salaries that do not clearly support the scope of services/scope of work of the executed Agreement.

13. Out-of-Area Training

Expenditures for travel outside the San Diego metropolitan area for administrative or project staff to attend training activities or conferences.

14. Credit Cards or Charge Accounts

Credit cards or charge accounts, whether business or personal, cannot be used to purchase materials or services to be reimbursed by CDBG or ESG. Many credit cards and charge accounts have points, mileage, percentage reductions on purchases, or other bonuses and rewards for use of the card or account. All of these benefits are considered program income and would have to be returned to CDBG or ESG. It would be difficult to measure and detail the program income received in relation to the CDBG or ESG eligible expenditure claimed, therefore, the use of credit cards is ineligible.

15. Gift Certificates/Gift Cards/Cash Awards

Gift Certificates, gift cards or cash awards given to clients or staff, including cash payments to staff for compensatory time earned or bonus payments to employees, subcontractors or consultants.

16. Deposits

Reimbursable deposits for rent, equipment, utilities or other Subrecipient expenditures are not eligible. Expenditures to pay for a past deposit for rent, equipment, or any other items are not eligible. Non-reimbursable deposits that go toward the overall payment of an item are eligible. NOTE: ESG Rapid Rehousing activity is exempt.

17. General Expenses  
General expenses for carrying out the non-project-related functions of the Subrecipient or expenses unrelated to the direct scope of work/scope of services.
18. Purchases Paid with Personal Accounts  
Expenses paid by Subrecipient personnel utilizing personal cash, personal checking accounts, or personal credit cards.
19. Services for Other City Departments/Agencies  
Expenses for performing services for any other City department, or governmental, nonprofit, or private agency during the current executed Agreement period or any previously executed Agreement period.
20. Costs for Goods or Services  
Costs for goods or services not incurred within the executed Agreement period. (Incurred expenses are defined as those expenses that have actually occurred and may or may not have been paid.) Expenditures incurred prior to the start date or after the end date listed in the executed Agreement between the City and the Subrecipient are not eligible.
21. Mortgage Payments and Property Taxes  
Mortgage payments and property taxes are not eligible expenditures. CDBG and ESG funds can only reimburse rent or lease payments to property owners. Funds cannot be used to pay for leases, licensing fees, and rent on property owned by the City of San Diego.
22. Automobile Purchase  
An automobile purchase is not an eligible expenditure.
23. Accrued Vacation and Sick Leave  
CDBG/ESG funds cannot be used as pay in lieu of vacation or as termination pay of an employee as the project is completed. Annual leave cannot be paid into a reserve and distributed after the project is completed. When an employee retires or terminates employment, during the executed Agreement period, the payment for unused vacation or sick leave should be allocated based on vacation and sick leave accrued during the executed Agreement period and other funding sources used for the project.
24. File Storage Fees  
Fees to store project files. Compliance with records retention requirements is an administrative responsibility of Subrecipients expending CDBG/ESG funds.
25. Monthly Parking Fees  
Monthly parking fees paid for/by Subrecipient staff for place of employment.
26. Cell Phone Data Package  
Cell phone data packages paid for/by Subrecipient staff.
27. Construction-Related Ineligible Expenses  
Regarding construction projects (NCIP), expenses related to the following are ineligible to be reimbursed by CDBG: profit/loss, overhead, temporary storage, administration (e.g., personnel, plan development, insurance, bonds), and any type of contingency or set-aside budgets.
28. Bundled Expenses (either by the Subrecipient, staff or vendors) saved to be submitted at a later date for reimbursement as one bundle, e.g.,

staff mileage reimbursement, parking reimbursement, travel reimbursement, etc.

29. Income payments. The general rule is that CDBG funds may not be used for income payments. For purposes of the CDBG program, “income payments” means a series of subsistence-type grant payments made to an individual or family for items such as food, clothing, housing (rent or mortgage), or utilities, but excludes emergency grant payments made over a period of up to three consecutive months to the provider of such items or services on behalf of an individual or family, or up to six consecutive months if using CARES Act funds to prepare, prevent or respond to the COVID pandemic

30. Any expenditure not approved as part of the executed Agreement and not clearly explained in the budget justification will be disallowed and the reimbursement amount will be reduced to reflect this disallowance.

5. Accelerated Spending

Excessive spending during the last ninety (90) days of the Agreement period is not allowed.

- a) Administrative-related supply or equipment must be purchased within the first six (6) months of the Agreement, so the supplies or equipment can be utilized for the project during the Agreement period. This includes items used by Subrecipient staff to facilitate project service delivery, such as general office supplies that include, but are not limited to, pens, paper, pencils, toner, file folders, staplers, binders, employee uniforms, employee badges, and computer software & hardware. NOTE: Office equipment rentals and accompanying software (e.g., copiers, postage machines, etc.) should be included in the Equipment Rental line item; Repairs/Maintenance supplies should be included in the Repairs/Maintenance line item.
- b) Client-related supply or equipment purchases are for direct client use are allowed throughout the Agreement period. This includes items used by clients for personal use or to become the client’s personal property. Items could include, but are not limited to, hygiene kits, bedding, bed frames, mattresses, cleaning supplies, house wares, clothing, tools, and meals. NOTE: RFRs for supply purchases for individual client use and/or supplies that will be retained by the client after the termination of services (like bus passes or work tools) must include a client distribution list that includes the following information: client name, date of supply distribution and item description. RFRs for supply purchases for general client use during the term of the Subrecipient agreement (like hygiene kits for shelter participants, meals, or garden supplies for urban farms) do not require a client distribution list. If in doubt, please consult with your Project Manager for confirmation.
- c) Only small purchases, as needed and approved by the assigned Project Manager, should be submitted in the last ninety (90) days of the Agreement period. The Subrecipient must demonstrate to the Project Manager that these expenditures: 1) are necessary, 2) are included in the executed Agreement, and 3) will be used within the Agreement period.

- d) Stockpiling of supplies or equipment to be used after the expiration of the executed Agreement is not allowed.

6. Year-End/Closeout Fiscal Reports

Year-end and closeout fiscal reports will be prepared, reviewed, and submitted via ED Grants by July 31, which is one month from the termination of the City's fiscal year on June 30. Closeout reports pertain to projects that have reached the end of their implementation period and have ceased all activities and expenditures. Year-end reports pertain to projects that are still active and have ongoing activities and expenses. Subrecipients will prepare either a year-end or closeout report for their projects in ED Grants, which will consist of the following items/activities:

- a) Overview: Subrecipients shall review the year-to-date totals of their MPRs and RFRs as recorded in ED Grants. Any corrections needed to the MPR totals will require revisions to the relevant MPRs.
- b) Narrative: Subrecipients shall provide a narrative summary of all CDBG-paid project activities conducted in the fiscal year (for year-end reports) or during the entire implementation period (for closeout reports) and a description of the client benefit that resulted from the services provided. For ongoing projects, Subrecipients shall outline the remaining activities, the schedule for accomplishing those activities (including any updates to the schedule), and any other issues identified and their anticipated resolutions.
- c) Attachments: Subrecipients may attach photos, success stories, press releases, client testimonials, or any other relevant information related to activities associated with the project. The following City-provided form that needs to be completed by the Subrecipients as part of the closeout report shall also be attached as a PDF to ED Grants:
  - 1. Property Records Report: As part of the closeout process only, Subrecipients shall complete and attach a property records report that identifies any real property acquired or improved in whole or in part with CDBG/ESG funds in excess of \$25,000 or personal property acquired or improved in whole or in part with CDBG/ESG funds in excess of \$5,000.
    - The report shall include a detailed description of the property serial/identification number, acquisition date, cost, use and condition.
    - The report shall include the CDBG/ESG-assigned tag number.
    - The report shall include property located at the project site(s) on the initial date of Subrecipient operations.
    - The report shall include property stored temporarily by Subrecipient off-site when not being utilized on-site.
    - For Subrecipients responsible for the operation of City Programs, a property record report detailing all property with a useful life of one (1) year or more purchased with CDBG/ESG funds, including those purchased in prior fiscal years, shall be maintained and included in the report submitted to the City.

2. Minority-Owned Business and Women-Owned Business Information Report: As part of the closeout process only, Subrecipients shall report on all contracts and subcontracts over \$10,000 paid with City of San Diego CDBG funds. For each contract/subcontract, Subrecipients shall indicate the award amount, the type of trade, the racial/ethnic code of the (sub)contractor business owner, whether or not the business was woman-owned, and the business's employer IRS number and address.
- d) Confirmation of All Project Funding Sources: As part of the closeout report only, Subrecipients shall provide confirmation of all funding sources utilized for the project funded with CDBG/ESG funds, including fees, donations and program income. The information shall be entered into HUD's IDIS database system.
- e) Program Income: As part of the closeout report only, Subrecipients shall confirm the total amount of program income generated by the project using CDBG/ESG funds. The information shall be entered into HUD's IDIS database system.
- f) 2 CFR 200 Subpart F-Audit Certificate of Compliance: As part of the closeout report only, Subrecipients shall complete an audit certificate of compliance to verify their understanding of federal audit requirements for non-federal entities that expends federal funds.
1. Audited Financial Statements and Single Audit: Non-federal entities that expend \$750,000 or more during the non-federal entity's fiscal year must have a Single or Program-Specific Audit conducted for that year in accordance with the provisions of 2 CFR Part 200 Subpart F—Audit Requirements. The calculation of the total federal awards expensed by the entire Subrecipient should include the parent company and any subsidiaries. For purposes of determining the amount of total federal awards expended, all federal awards should be included, such as those that were received directly from a federal Subrecipient, or passed through a state or local government, or through nonprofit organizations, or any combination of these sources.
  - i. The Subrecipient must submit the completed Single Audit to the Federal Audit Clearinghouse (FAC) within the earlier of thirty (30) calendar days after receipt of the auditor's report or nine (9) months after the end of the audit period. The Subrecipient shall indicate in ED Grants the anticipated date of availability of the Single Audit so that the City can follow up on its submission.
  - ii. Regardless of whether or not a Single Audit was required, the Subrecipient shall submit a copy of its audited financial statements prepared by an independent CPA within thirty (30) calendar days after completion by the independent CPA. The Subrecipient shall indicate in ED Grants the anticipated date of availability of the audited financial statements so that the City can follow up on its submission. Once the document is completed, it should be uploaded in ED Grants to the



'Attachments' tab of the corresponding Year-End Report or Closeout Report as required.

7. Audits During the Agreement Period

- a) Subrecipient audits conducted during the period of the executed Agreement from a source other than the City shall be provide to the City within thirty (30) calendar days of completion of the audit.
- b) The City, at its sole discretion, may conduct an annual review of any such third-party audit(s).
- c) Subrecipients shall fully cooperate with any such annual review by providing the City with any and all documentation associated with any such third-party audit(s) within fourteen (14) calendar days, unless otherwise specified by the City.

8. Reprogramming CDBG Funding

After termination date of Subrecipient's executed Agreement, if funding is not fully expended or statistical/accomplishment reports are not provided as required, the Community Development Division Office may choose to exercise its right to submit unexpended CDBG funds to the City Council for reprogramming to another activity.

9. Suspension or Termination of Agreement

- a) Besides reprogramming, the Community Development Division Office reserves the right to:
  1. cancel any grant award;
  2. temporarily suspend payments; or
  3. implement other actions in the event that a CDBG/ESG-funded Subrecipient materially fails to comply with any of the terms of the executed Agreement, or applicable federal, state or local laws, rules and regulations.
- b) Other reasons for these actions may include, but are not limited to:
  1. Not implementing project activities timely;
  2. Not meeting project goals and objectives timely;
  3. Not submitting the most recent audited financial statements;
  4. Not having an unqualified audit opinion on the financial statement;
  5. Most recent financial statement shows significant drop in cash and not enough cash to meet the three (3)-month rule;
  6. Expired insurance documents;
  7. Inactive/Expired/Ineligible UEI status with SAM.GOV;
  8. Any appearance of forgery of documents or indications of fraud in reports submitted;
  9. Non-compliance in the submission of programmatic or fiscal reports;
  10. Non-compliance resulting from on-site visits or monitoring reviews; or
  11. Excessive disallowances of RFR submittals.



10. Program Income

Program income is defined by federal 24 CFR 570.500(a) as any gross income received by the Subrecipient that was directly generated from the use of CDBG funds. This includes, but is not limited to the following:

- a) Proceeds from the sales or lease of property purchased or improved with federal funds;
- b) Proceeds from the sale or lease of equipment purchased with federal funds;
- c) Gross income from the use of real or personal property acquired, constructed or improved by the grantee (or a Subrecipient), less costs incidental to the generation of income;
- d) Payments of principal and interest on loans made using federal funds;
- e) Interest earned on program income pending its disposition NOTE: Interest earned on revolving loan funds, as described below, must be remitted to the U.S. Treasury at least annually;
- f) Funds collected through special assessments on properties not owned and occupied by low/moderate-income households in order to recover the CDBG portion of a public improvement; and
- g) Rewards, bonuses, cashback, points, credits, gift cards, discounts, etc. directly resulting from expenditures to be reimbursed by CDBG funds.

11. Program Income Reporting/Maintenance

- a) All CDBG-funded Subrecipients will report any program income.
  1. Program income funding under the \$25,000 limit can be used in the project it was earned. A report of the program income used this way must be documented in the RFR submittal.
  2. If the total for the year is estimated to exceed the \$25,000 limit, all of the program income will be sent to the Community Development Division Office for remittance to HUD or City Council-determined distribution to projects as part of the reprogramming required by federal regulations.
- b) Subrecipients shall also maintain documentation of any other project income received for the use of staff time or facilities where the related costs are charged to the City as an allowable expense (e.g., staff salaries and facility rent/lease charged to the City Agreement) totaling less than \$25,000. At minimum, this includes the following:
  1. A copy of the Subrecipient's Client Fee Schedule applied to the funded project shall be submitted to the City;
  2. Subrecipients shall track and document all fees collected from clients or other project income obtained;
  3. Documentation of all transactions (deposits, withdrawals, and actual usage) taking place shall be maintained by Subrecipients;
  4. Subrecipients shall submit to the Project Manager a written budget detailing how any generated income collected were utilized, along with the RFR submittal;
  5. Program income funds generated from the project may only be used to improve or support the services being rendered by Subrecipients through the CDBG/ESG Agreement; and
  6. As part of the project closeout process, a report of revenues unexpended shall be submitted to the City along with the Subrecipient's final Request for Reimbursement. All unexpended revenue in the Client Generated Income Account shall be reverted to

the City within thirty (30) days of termination of the Agreement. However, Subrecipients awarded funding in the subsequent fiscal year may retain the unexpended revenues and carry that amount over to be utilized during the subsequent Agreement time period.

12. Not Program Income

Program income does not include the following:

- a) Income earned on grant advances from the U.S. Treasury;
- b) Payments made by the Subrecipient of principal or interest on CDBG-funded loans received from grantees, if such payments are made using program income received by the Subrecipient:
  1. Any income received in a single program year by the Subrecipient and its subcontractors that does not exceed \$25,000; and
  2. Income generated by certain Section 108 activities (refer to 570.500 (a)(4)(ii));
  3. Proceeds from Subrecipient fundraising activities;
- c) Funds collected through special assessments to recover non-federal outlays of capital improvements; and
- d) Proceeds from the disposition of real property by a Subrecipient that was acquired or improved with CDBG funds five (5) years after the termination of the grant Agreement with the Subrecipient. Certain conditions apply. Refer to CFR 570.503(b)(8).

C. FINANCIAL SYSTEMS
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Subrecipients must comply with the following fiscal procedures as a means of maintaining sound control over project expenditures and CDBG/ESG funded assets to the maximum extent feasible. **Refer to 2 CFR Subpart D 200.302.**

1. Accounting System

Subrecipients are required to maintain an accounting system that controls and accounts for all funds, property, and other assets as a result of the contractual relationship with the City based on the Code of Federal Regulations (CFR). The system must also be secure for payroll and other sensitive documents used for the CDBG/ESG-funded project. Back up of the accounting system also needs to be addressed and performed regularly so documentation is not lost. All data should be retained for three (3) years following the completion of the project in the accounting system, as well as all supportive hard copies of original supporting documentation. Therefore, this system should be flexible enough to:

- a) implement internal controls;
- b) maintain accounting records;
- c) clearly record all costs so eligibility can be determined;
- d) reference transactions to supporting documentation and tracking notes;
- e) include a budget mechanism to assure funds are not over expended;
- f) maintain subsidiary records for accounts payable, accounts receivable and cash transactions;
- g) produce integrated reports that can be updated as needed to meet reporting requirements monthly or at monitoring visit; and

- h) maintain original reports with original supporting documents for funding expenditures and monitoring or audit purposes.

2. Tracking System Requirement

Subrecipients are required to have an integrated and secure accounting system in place to meet the requirements of HUD and the City of San Diego. These requirements include:

- a) Establish a system of tracking deposits and expenditures related to the CDBG/ESG funds received from the City.
- b) Maintain a separate set of records for each individually funded project awarded by the City.
- c) No commingling of funds received from sources other than the City, as well as with other non-CDBG/ESG funds received from other City divisions or departments.
- d) Maintain a Cost Allocation Plan to show how expenditures are broken out amongst other funding sources, if the project is not 100 percent funded with CDBG or ESG. This plan may be reviewed during monitoring visits.

3. Financial Records Maintenance

Subrecipients should maintain accounting records per the [\*Playing by the Rules Handbook \(2021\), Chapter 2\*](#), for the purpose of recording the financial transactions related to the project. Maintenance of adequate documentation for expenditure of CDBG/ESG-funded activities is critical to the effectiveness and overall performance of the program. Program income and receipt of CDBG/ESG revenue require adequate documentation.

- a) These records are essential to the maintenance of sound fiscal control, preparation and submission of reports to the City, processing of program income, and preparation for monitoring, and auditing functions.
- b) All documents for the CDBG/ESG project(s), including books of original entry, supporting documents, canceled checks and invoices should be maintained in an orderly manner, and must not be intermingled with the records of any other funding sources.
- c) These records and documents are required to be protected against loss, fire, or other damages.
- d) All documents must be kept for three (3) years after the completion of the project.
- e) To choose the method of accounting that best fits your Subrecipient's needs includes knowing:
  - 1. what information needs to be collected and why;
  - 2. when that information should be collected (and how often);
  - 3. how the information should be acquired, organized, and stored;
  - 4. how the information should be reported;
  - 5. how storage of documents is secured; and
  - 6. what maintenance and retention are used for past records.

4. Internal Control Procedures

Internal Controls should be established for each Subrecipient utilizing CDBG/ESG funding. The Subrecipient should use a combination of procedures, specified job responsibilities, qualified personnel, and records that create accountability in the

organizations' financial system to safeguard its cash, property and other assets. **Refer to 2 CFR Subpart D 200.303.**

The Board of Directors and Subrecipient management (CEO, CFO, or equivalent) are responsible for proper reporting and internal controls to protect against fraud, forgery or reports that are inaccurate. The following internal control procedures shall be utilized by the Subrecipient to the maximum extent feasible, as determined by the number of personnel employed and the size and complexity of the project:

- a) The Subrecipient's functional organization and personnel responsibilities shall be clearly established and closely observed using clearly defined job descriptions, written accounting procedures, organization charts, and periodic review of financial system by staff and annually by independent certified auditor, and personnel evaluations.
- b) Employees should be rotated through various assignments as feasible, and vacations taken at least once a year.
- c) Work should flow from one (1) employee to another, so that the work of the second shall provide a check upon the first, without duplicating the work of the first.
- d) Separation of duties where no employee shall have complete control over all phases of any significant transaction.
- e) The function of receiving cash should be centralized to one (1) employee, and the employee should not be involved in any way with processing vouchers, preparing deposits, making disbursements, or keeping accounting records. In this connection, only the employee who keeps the accounting records should have access to those records.
- f) Established formal system of authorization and supervision.
- g) Control over access to assets, blank forms, and confidential documents should be limited to only those individuals having record keeping or supervisory responsibility for them.
- h) All accounting systems must be secured when not in use, regularly backed up and stored securely by assigned staff, and not be available to any staff or volunteers without authorization.
- i) Record keeping and the handling and custody of assets should be separated from operational functions.
- j) Sensitive documents must be handled properly, secured in locked area, and not be available to anyone other than those authorized to work with the forms.
- k) All records must clearly identify the source and application of CDBG/ESG funds and have clear explanations for unusual accounting adjustments.
- l) All reports should be reviewed by management and presented to the Board.

#### D. ACCOUNTING RECORDS

Detailed accounting records are required for all transactions related to the project without commingling with other projects or funding. Reports must be generated as needed. Most Subrecipients are currently using some type of automated accounting system, PC software, or consultant accounting services to comply with the CDBG/ESG reporting requirements. No matter which type of accounting system is used, Subrecipients must keep all reports and supportive original documents safely secured and available for monitoring or audit upon notice.

The following is a description of the accounting records considered to be the minimum required for recording transactions relating to the City-funded project. Subrecipients may establish any additional accounting records they consider necessary to provide adequate financial control of its assets and liabilities and to account for project costs. Subrecipients shall maintain the following ledgers for the purposes indicated:

1. General Ledger

A General Ledger shall be used to record all transactions related to the project. Posting should be done at least weekly for in-house staff or monthly if a consultant or other accounting service is used. RFR submittal should be based on the monthly Cash Disbursements Register information posted each month to this ledger.

2. Cash Receipts Register

A Cash Receipts Register shall be maintained to record all funds (cash, checks, money orders, etc.) received in connection with the project. Deposit slips shall contain sufficient information so that the required entries may be made in the Cash Receipts Register or General Ledger. The Cash Receipts Register shall be balanced each month and posted to the General Ledger. NOTE: The Cash Receipts Register may be combined with the Cash Disbursements Register described in Section 3 below.

- a) Pre-printed and pre-numbered receipt forms shall be used for all types of funds received by the Subrecipient.
- b) All checks and other negotiable items received by the Subrecipient shall be immediately stamped with a restrictive endorsement and receipted. All cash received by the Subrecipient shall be receipted, with a duplicate copy of the receipt forwarded to the employee responsible for bank reconciliation reports.
- c) Each check, negotiable item, or cash receipt shall be individually recorded in sufficient detail in the Cash Receipts Register at the time of receipt and not combined with other receipts as a total amount.
- d) All checks, negotiable items, and cash receipts shall be deposited in the bank no later than the following business day.
- e) Cash balances shall be periodically checked by employees who do not handle or record cash receipts, and do not prepare signed checks.
- f) All receipts, checks, and other sensitive documents need to be secured during the day and overnight in secure locked locations determined by the Subrecipient.

3. Cash Disbursements Register

A Cash Disbursements Register shall be maintained to record all checks issued for the withdrawal of funds from the project's bank account. The Cash Disbursements Register shall be balanced each month and posted to the General Ledger. RFR submittal should be based on the monthly Cash Disbursements Register information posted monthly. NOTE: The Cash Disbursements Register may be combined with the Cash Receipts Register described in Section 2 above.

- a) All disbursements other than petty cash shall be made by pre-printed and pre-numbered checks, and if feasible, the amounts shall be imprinted by a check-writing machine.

- b) Each expenditure shall be carefully reviewed and approved, and if the expenditure is for items that have been purchased, disbursement shall be made only after the items have been received, inspected, and the quantities verified.
- c) Disbursements for travel shall be supported by detailed documentation that includes places visited, purpose, itinerary, mode of travel, and receipts for all eligible expenditures.
- d) Each disbursement check shall be approved and signed by an authorized official of the Subrecipient and countersigned by a second authorized official of the Subrecipient or its governing body.
- e) Each disbursement shall be individually recorded in sufficient detail in the Cash Disbursements Register at the time of disbursement and not combined with other disbursements as a total amount.
- f) Checks shall not be made payable to "Cash," "Bearer," or any other unidentifiable person or entity.

4. Petty Cash Records

The Subrecipient's Petty Cash process must be documented in the Subrecipient's Financial Management Procedures for Community Development Division staff's review and acceptance. Only Subrecipients with accepted Petty Cash processes will be allowed to claim reimbursement for Petty Cash expenses.

5. Cost Control Ledger and Subsidiary Ledger

A separate cost control (expenditure) ledger shall be maintained for each funding source (CDBG/ESG funds, In-Kind Subrecipient funds, Ineligible Costs, etc.). A Subsidiary Ledger shall be maintained for each cost control ledger, showing costs by budget category and object of expenditures to classify costs according to activity classifications shown in the latest approved budget. The Subsidiary Ledgers may be part of the automated accounting system, or it may be a Manual columnar ledger spreadsheet with a separate column for each subsidiary account.

6. General Journal

The General Journal shall be used to document and record transactions in the General Ledger or Subsidiary Cost Ledger that are not recorded from Cash Receipts and Disbursement Registers such as correcting entries, adjusting entries (accruals), and closing entries. Entries in the General Journal shall be consecutively numbered and the number shall be recorded as a part of the entry in the General Ledger or the Subsidiary Ledger. Each entry shall contain a complete explanation of the transaction being recorded and references to related documents if applicable. All General Journal entries shall be approved by an authorized official of the Subrecipient.

7. Payroll Records

Payroll records shall be used to record salaries and wages and employer/employee contributions and withholdings, as applicable, including check numbers or direct deposit information.

- a) Time and attendance reports shall be individually maintained for each employee. *Automated payroll system: If the payroll system in place is fully computerized with signatures on timecards being replaced with approval based on employee submission and supervisors review and approval in the system, reports generated by the system will be used in place of time cards and time sheets. The*



*automated payroll system process must be documented in the Subrecipient's Financial Management Procedures for Community Development Division staff's review and acceptance. Otherwise, the time and attendance report form shall include the following information:*

1. Pay period.
2. Employee name and/or employee number.
3. Employee title. (Employee positions shall conform to the Personnel Schedule of the executed Agreement budget.)
4. Number of hours worked each day.
5. Number of hours worked during the pay period. Fractional positions are those positions that are charged to two (2) or more funding sources. Documentation must show at a minimum the daily hours worked, and the funding sources charged. Documentation for fractionalized positions must reflect actual hours worked per funding source and not budgeted hours. Failure to maintain records of daily labor hours worked by funding source may result in disallowed salary expenditures.
6. Employee's signature.
7. Supervisor's signature attesting to verification and approval of the information entered on the time and attendance report form.
8. Time and attendance records or automated system report for the Executive Officer of the Subrecipient must have the signature of an appropriate designee of the Subrecipient's Governing Board of Directors.

b) Salary or wage payments to each employee shall be handled in the following manner:

1. Total gross pay is computed on the basis of the total time worked, as shown on the time and attendance reports and recorded in the Payroll Journal.
2. Payroll deductions are computed and recorded in the appropriate columns of the Payroll Journal. The net pay is then determined and recorded.
3. The amount of each payroll check and the check number are recorded in the Cash Disbursements Register.
4. Persons who keep the payroll records should not handle or distribute the related paychecks.

c) A U.S. Treasury Department, Internal Revenue Service, Form W-4 must be completed and signed by each employee for federal and state income tax and federal Social Security (FICA) tax withholding purposes.

d) Subrecipients and their employees are subject to a variety of contributions or income withholdings such a federal and State income taxes, federal Social Security (FICA) taxes, and state unemployment compensation taxes, disability insurance, and workers' compensation insurance. Each Subrecipient can determine its status and responsibilities in regard to these contributions and withholdings by obtaining federal and state publications that are available to employers for this purpose. In the event of uncertainties, Subrecipients shall obtain advice and assistance from representatives of the appropriate federal or state departments, or from a competent private source.



- e) All CDBG/ESG funding should be used for direct client or project expenditures.
- 8. Bank Reconciliation Records  
Bank statements shall be delivered unopened to an employee whose responsibilities do not include receiving or depositing cash receipts or authorizing, preparing, or signing checks. This employee shall prepare the bank reconciliation immediately after receiving the bank statement. All bank statements must be reconciled monthly to the cash account in the General Ledger and should include the signatures and dates of persons preparing, reviewing, and approving the reconciliation. Subrecipients shall maintain a copy of the monthly bank account reconciliation for review at monitoring or for audits. **NOTE:** A copy of the Treasurer's report to the Subrecipient's Board with the bank reconciliation and monthly financial statements need to be approved by the Board monthly and also be available for review at monitoring visits.
- 9. Property Acquisition  
When CDBG/ESG funds are used to acquire real property (e.g., land, buildings) or personal property (e.g., equipment, supplies intangible property), federal regulations require that the Subrecipient be responsible for ensuring that:
  - a) the property continues to be used for its intended (and approved) purpose;
  - b) the Subrecipient keeps track and maintains care of the property;
  - c) if the Subrecipient sells the property, the Subrecipient reimburses the City for the share of the property's value according to the contractual obligation;
  - d) the property is properly tagged;
  - e) the property has a value of \$5,000 or more;
  - f) the property has a useful life of one (1) year or more; and
  - g) the property has not been consumed or lost its identity by being incorporated into another item of property.
- 10. Property Records  
Property purchased with CDBG/ESG funds must be included in the executed Agreement budget. All property paid for with any CDBG/ESG funding will be tagged by the Project Manager when payment is complete. Subrecipients shall conduct a sight inventory of all such property at least once a year, record property status accordingly and submit this information annually as part of the year-end reporting requirements. Each property record shall include the following information:
  - a) A description of the item of equipment, a serial number or other identification number, the City property tag number, funding source, who holds title, federal share percentage, use and condition.
  - b) The date of acquisition and cost.
  - c) The location of the equipment.
  - d) If equipment is disposed: how was it disposed, date of disposal and sale price.
- 11. Property Maintenance/Disbursement  
A control system shall be developed to ensure adequate safeguards to prevent loss, damage, or theft of the equipment. Any loss, damage, or theft shall be investigated. Stolen or vandalized property shall be reported to the San Diego

Police Department and the Community Development Project Manager immediately. A copy of the police report shall be submitted to the City within fourteen (14) business days after filing. The system should include the following areas:

- a) Adequate maintenance procedures shall be developed to keep the property in good condition.
- b) Upon conclusion of the project, or earlier termination for any reason, all property purchased with City or federal funds and those belonging to the City shall revert to the City upon request.
- c) Property discovered to be missing shall be reported to the Community Development Project Manager, and a missing property report shall be completed and submitted to the City within five (5) business days after the date of discovery of the missing property.
- d) Property that is no longer needed or has been damaged to the extent that it is no longer usable must be reported to the Community Development Project Manager for a determination as to its disposition. Under no circumstance may the property be disposed of prior to obtaining City authorization.
- e) If the property is sold, proper sales procedures must be established to ensure the highest possible return or adherence to Program Income requirements as applicable.
- f) The total cost of all items of non-expendable property as shown in the property record report shall equal the balance in the account for equipment purchases. The annual inventory of non-expendable property shall be reconciled to the property record.

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## SECTION V: MONITORING

Projects and services that use funding derived from any of the City of San Diego's three (3) HUD entitlement programs (CDBG, HOME, and ESG) are performed on behalf of the City and are subject to all applicable regulations, both federal and local. HUD requires monitoring of Subrecipients to ensure compliance. Monitoring and compliance activities may take place throughout the life of the project, as well as post closeout for construction projects. Monitoring activities can begin from the time the Agreement is executed and may extend past the life of the original Agreement termination date based on the activity being performed. Monthly desk audits are performed prior to reimbursement (see Section IV). Deliverables and expenditures are recorded and compared to the Budget and Scope of Work included in the Agreement. Community Development Division staff may initiate fiscal or programmatic review at any time and meet with Subrecipient staff as needed.

### A. ON-SITE MONITORING

On-site monitoring visits may be performed by Community Development Division staff. These visits shall take place at the project site and/or the Subrecipient's administrative offices. Community Development Division staff may also make unannounced site visits. An unannounced site visit is based on a specific monitoring purpose, such as verification of project hours or Agreement compliance concerns. A record of all site visits, announced or unannounced, is prepared by Community Development Division staff. Any concerns or findings identified are discussed with Subrecipient staff at the close of the visit, along with recommendations or requirements for compliance with federal regulations and/or executed Agreement requirements. Although monitoring activities may be tailored to each project depending on identified needs and risks, on-site monitoring will generally take place through five (5) channels: 1) General Site Visits; 2) Worker Interviews; 3) On-Site Program Monitoring Review; 4) On-Site Fiscal Monitoring Review; and 5) Real Property Disposition Monitoring Reviews.

1. General Site Visits

General site visits shall be conducted at Subrecipient or subcontractor sites to observe project operations or construction status, provide technical assistance, review service delivery or construction processes, or review documentation to ensure compliance with Agreement terms and delivery of quality services. These visits are conducted regularly by Community Development Project Managers prior to, during, and after the Agreement period. The results of the visit, including concerns or required corrective actions identified, shall be completed in ED Grants and issued to the Subrecipient as applicable. Follow-up visits may be conducted, as needed, to verify whether compliance issues identified during a prior site visit were properly addressed.

2. Worker Interviews

For projects required to comply with federal and State labor standards, on-site worker interviews shall be conducted by Community Development Division and/or Subrecipient staff. Observation activities will include the work being performed, laborer and mechanic interviews, and a desk review of payroll documentation once the on-site interviews have been completed. The interviews conducted shall include a sufficient sample of job classifications represented on the job and shall be conducted privately. These interviews are confidential. Employees of both the prime contractor and subcontractors shall be interviewed.

If discrepancies are identified, Subrecipients are responsible for ensuring appropriate steps are taken to resolve the discrepancies. A description of the discrepancies identified, the necessary action completed, and the results of the actions completed shall be noted on the interview form.

3. On-Site Program Monitoring Review

In order to ensure that the project or service remains in compliance with HUD guidelines and requirements, an on-site program monitoring review will be conducted once during the Agreement period on non-construction projects, unless one was conducted in the last three (3) years with no concerns or findings identified. The purpose of conducting program monitoring reviews is to determine whether the Subrecipient has a program management system that sufficiently:

- a. Provides verification that Subrecipient services and activities are being delivered in accordance with Agreement specifications;
- b. Provides verification that the Subrecipient has systems in place that ensure project eligibility (e.g., National Objective), provision of services/activities, and compliance with any other Agreement requirements are adequately documented; and
- c. Addressed/implemented changes resulting from concerns or findings identified in the previous program monitoring review.

The review will be conducted by Community Development Division staff, either at the project site and/or at the Subrecipient's administrative office. Areas of review include but are not limited to: Subrecipient service delivery processes; organization policies and procedures; records maintenance systems; selected project participant files; and original source documentation used to complete program reports. At the conclusion of the visit, Community Development Division staff will discuss the monitoring results and answer any questions related to the monitoring process. Follow-up requirements, concerns identified, and/or findings identified will be included in that discussion.

**NOTE: Determination of impacts or actions required by Subrecipients related to late monthly report submissions and outcome goal accomplishments and/or completeness of reporting are resolved throughout the fiscal year directly by the Community Development Project Managers upon occurrence and are not reviewed as part of the On-site Program Monitoring Review process. The scheduling of a monitoring review may be postponed until issues with late monthly reporting are resolved.**

4. On-Site Fiscal Monitoring Review

The EDD's Business Operations & Support Services (BOSS) has the overall responsibility for ensuring that all HUD funds under its oversight are used in accordance with all financial management guidelines, fiscal policies, and reporting. Fiscal monitoring is performed to ensure the Subrecipient is performing the project according to 2 CFR Part 200 and 24 CFR Part 570, as applicable. An on-site fiscal monitoring review will be conducted once during the Agreement period for non-construction projects unless one was conducted in the last three (3) years with no concerns or findings identified. The purpose of conducting fiscal monitoring reviews is to determine whether the Subrecipient receiving federal funds has a financial management system that sufficiently:

- a. Provides effective control over and accountability for all funds, property and other assets;
- b. Identifies the source and application of funds for Federally sponsored activities assuring reasonableness, allowability, and allocability of costs;
- c. Verifies that the funds have not been used in violation of any of the restrictions or prohibitions that apply to this Federal assistance;
- d. Assures the accurate, complete, and timely disclosure of financial results is in accordance with the reporting requirements of the HUD and the City;
- e. Minimizes the time elapsing between the transfer of the funds from the City and disbursement by the Subrecipient; and
- f. Addressed/implemented changes resulting from findings identified in the previous fiscal monitoring review.

The review will be conducted at the Subrecipient's administrative office. Areas of review include but are not limited to: Subrecipient financial management; internal controls; payment reporting; program income; records retention; equipment management and disposition; Board financial oversight; and original source documentation used to complete fiscal reports. At the conclusion of the visit, Community Development Division staff will discuss the monitoring results and answer any questions. Follow-up requirements, concerns identified, and/or findings identified will be included in that discussion.

**NOTE: Determination of impacts or actions required by Subrecipients related to late monthly reporting submissions, low expenditure percentages, and/or completeness of reporting are resolved directly throughout the fiscal year by the Community Development Project Managers upon occurrence and are not reviewed as part of the On-site Fiscal Monitoring Review process. The scheduling of a monitoring review may be postponed until issues with late monthly report submissions are resolved.**

5. Real Property Disposition Monitoring Review

Funded projects that result in acquisition or improvement of property in whole or in part with HUD funds in excess of \$25,000 will be reviewed annually for a period of five (5) years from the project completion date recorded in HUD's Integrated Disbursement and Information System (IDIS). The purpose of conducting real property disposition monitoring reviews is to verify the following:

- a. Determine whether the ownership status of the property changed without notification to, and approval by, Community Development Division;
- b. Determine whether applicable Program Income is properly recorded and reported to CDD annually;
- c. Determine the current rent charges for improvements completed on multi-family housing properties;
- d. Determine whether the use of the property and/or beneficiaries changed without notification to, and approval by, Community Development Division;
- e. Determine whether CDBG improvements completed are being properly maintained; and

- f. Determine whether original documentation of National Objectives eligibility, including City residency and annual family/household income verifications, continue to be properly maintained.

## B. REMOTE MONITORING REVIEWS

Remote program and fiscal monitoring review procedures may be implemented when on-site monitoring reviews are not feasible to be completed. The same notification procedures used for the on-site monitoring reviews will be used to conduct remote monitoring reviews. Subrecipients will be instructed to complete a Program Monitoring Review Form or a Fiscal Monitoring Review Form, as applicable, for submission to the Community Development Division staff via email by a designated deadline. Supporting documents referenced in the Monitoring Review Forms will also be required to be submitted for review. If additional information or clarifications are needed regarding the responses provided and/or the supporting documents submitted, an additional Program Monitoring Review Supplemental Form may be required to be completed by the Subrecipient and/or a Microsoft Teams Virtual Meeting may be scheduled with appropriate Subrecipient staff. A Microsoft Teams Virtual Meeting may also be scheduled with appropriate Subrecipient staff to discuss the monitoring results and answer any questions.

## C. FOLLOW-UP ACTIONS

Any monitoring and compliance activity taken by Community Development Division staff will be documented and maintained on file electronically. Notification of program and fiscal monitoring review results will be sent to the Subrecipient. The written notification will provide confirmation of compliance or required corrective action(s) from the identification of a finding and/or include recommended action(s) resulting from the identification of a concern. Required written responses received from the Subrecipient will be reviewed by Community Development Division staff, who will, in turn, respond in writing to confirm that the concern and/or finding<sup>1</sup> has been appropriately resolved or identify additional actions required of the Subrecipient to meet compliance standards. Copies of all documents will be maintained by Community Development Division staff electronically. If a finding or concern is not addressed by the Subrecipient in writing within the designated deadline, the Community Development Division Office may suspend reimbursements until the required written response is received. Findings and Concerns will remain open until it has been appropriately addressed and cleared by Community Development Division staff. Findings and Concerns issued may also be noted in the Subrecipient's performance report prepared by the Community Development Division as part of the annual Notice of Funding Availability process.

**NOTE: The termination date of the executed Agreement does not necessarily close the monitoring reviews conducted. Correspondence shall continue until all concerns and findings are considered closed by the Community Development Division.**

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<sup>1</sup> A **concern** is a matter that, if not properly addressed, can become a finding and can result in a sanction. A **finding** is a violation of law or regulation that can result in a sanction.



D. APPEALS
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In the event that the Subrecipient and the Community Development Division staff cannot come to an Agreement on one (1) or more of the concerns or findings resulting from the on-site or remote monitoring review conducted, an appeal may be made in writing to the Community Development Division Assistant Deputy Director. The appeal should state clearly the finding being appealed, and the basis for the appeal. The Community Development Division Assistant Deputy Director, upon discussion and concurrence with the EDD Deputy Director, shall issue a written response that includes final determinations of compliance.

**NOTE: HUD does not accept appeals of decisions by the City regarding monitoring issues.**

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## SECTION VI: TECHNICAL ASSISTANCE

**T**echnical assistance is the transfer of expertise from the Community Development Division staff to Subrecipients for the development or improvement of program systems, fiscal systems, and service delivery systems. The purpose of technical assistance is to resolve general or specific concerns that the Community Development Division or Subrecipient has regarding the funded project. Subrecipients may request technical assistance from the Community Development Division staff at any time during the Agreement period. Community Development Division staff shall provide the technical assistance directly but may also ask other departmental personnel or other resources to provide the assistance if appropriate.

### A. ASSISTANCE TYPES

Technical assistance may include:

- Clarification and interpretation regarding policies and procedures;
- Assistance in completing required reporting forms;
- Assistance in developing systems;
- Referrals to appropriate resources; or
- Providing information.

Technical assistance does not include research, development, or preparation of applications, proposals, or concept papers.

### B. KEY SUBRECIPIENT STAFF CHANGES

Subrecipients shall notify the project's designated Project Manager of any key Subrecipient staff changes impacting the administration of the project funded with CDBG funds. It is highly recommended that Subrecipients request a technical assistance meeting with the Project Manager when new staff are given the responsibility of the oversight, administration, or the reporting of project activities/services or expenditures. The information that the Project Manager will discuss shall include, but not be limited to, the following:

1. Agreement terms;
2. Funding source requirements;
3. Operating Manual;
4. Reporting forms and timelines; and
5. Monitoring process.

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## SECTION VII: ACRONYMS, INITIALISMS & DEFINITIONS

The following lists of terms and definitions are provided here to facilitate the Subrecipients' understanding of the CDBG and ESG Agreements and the provisions therein.

### A. ACRONYMS & INITIALISMS

ADA	Americans with Disabilities Act
CAPER	Consolidated Annual Performance and Evaluation Report
CARES Act	Coronavirus Aid, Relief, and Economic Security (CARES) Act
CDBG	Community Development Block Grant
CDBG-CV	Community Development Block Grant - CARES
CDD	Community Development Division
CED	Community & Economic Development
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CPA	Certified Public Accountant
CPD	Office of Community Planning and Development
CPR	Certified Payroll Report
DIR	State of California Department of Industrial Relations
DOL	Department of Labor
DUNS	Data Universal Numbering System
ED Grants	Economic Development Grants Management System
EO	Executive Order
ERR	Environmental Review Record
ESG	Emergency Solutions Grant
ESG-CV	Emergency Solutions Grant - CARES
FAC	Federal Audit Clearinghouse
FAIC	Federally Approved Indirect Cost
FBS	Fringe Benefit Payment Schedule
FHEO	Fair Housing and Equal Opportunity
FICA	Federal Insurance Contribution Act
GAAP	Generally Accepted Accounting Principles
HR	Housing Rehabilitation
HUD	U.S. Department of Housing and Urban Development
IDIS	Integrated Disbursement and Information System
IFB	Invitation for Bids
LMI	Low to Moderate Income
MHR	Multifamily Housing Rehabilitation
MOU	Memorandum of Understanding
MPR	Monthly Programmatic Report
NCIP	Nonprofit Capital Improvement Project
NEPA	National Environmental Policy Act
NPE	Non-Personnel Expense
OIG	Office of Inspector General
OMB	Office of Management and Budget
PE	Personnel Expense
PES	Personnel Expense Schedule
PO	Purchase Order

PM	Project Manager
PR	Purchase Requisition
PS	Public Services
RFR	Request for Reimbursement
SAM	System for Award Management
SAP	Systems, Applications, Products (City of SD Accounting software)
SHR	Single-Family Housing Rehabilitation
SIT	State Income Tax
SSI	Supplemental Security Income
SUS	Sustainability
TANF	Temporary Aid to Needy Families
UEI	Unique Entity ID
URA	Uniform Relocation Assistance and Real Property Acquisition Act
USC	United States Code

## B. GENERAL TERMS & DEFINITIONS

**Area Benefit Activities:** An activity that benefits all residents in a particular area, where at least 51 percent of the residents are low to moderate income persons. Such an area need not be coterminous with census tracts or other officially recognized boundaries, but the entire area must be served by the activity. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion. CDBG regulations required documentation of area boundaries served.

**Budget Narrative:** Refers to the description in ED Grants for each budget line item to which CDBG funds have been allocated. Only expenditures reasonably captured within the scope of the narrative will be reimbursed by the City.

**City:** City of San Diego in the state of California in the United States of America

**City of San Diego Municipal Code:** Contains all ordinances for the City of San Diego.

**Consolidated Plan:** Prepared every three (3) to five (5) years with updates required annually. The purpose of the Consolidated Plan is: 1) To identify a city's or state's housing and community development (including neighborhood and economic development) needs, priorities, goals and strategies; and 2) To stipulate how funds will be allocated to housing and community development activities. The current approved Plan covers FY 2025 -FY 2029.

**Census Definition of "Severely Disabled":** Persons are classified as having a severe disability if they:

- a. Use a wheelchair or another special aid for six (6) months or longer;
- b. Are unable to perform one or more functional activities (seeing, hearing, one's speech understood, lifting and carrying, walking up a flight of stairs and walking);
- c. Need assistance with activities of daily living (getting around the home, getting in or out of bed or a chair, bathing, dressing, eating, and toileting) or instrumental activities or daily living (going outside the home, keeping track of money or bills, preparing meals, doing light housework and using the telephone);
- d. Are prevented from working at a job or doing housework;
- e. Have a selected condition including autism, cerebral palsy, Alzheimer's disease, senility or dementia, or developmental disability; or

- f. Are under sixty-five (65) years of age and are covered by Medicare or receive Supplemental Security Income (SSI).

**City Financial Analyst:** Refers to the City staff serving as your organization's financial contact regarding the CDBG budget, expenditures, and reimbursements.

**City Project Manager:** Refers to the City staff serving as the Subrecipient's primary contact regarding the CDBG or ESG Agreement. All communication from the Subrecipient should be directed to its assigned City project manager.

**City-Provided Form:** Refers to a form provided by the City and downloaded from ED Grants which, if applicable to the Subrecipient's project's type, must be completed by the Subrecipient and uploaded back to ED Grants as a PDF to the corresponding 'Agreement Checklist' item.

**ED Grants:** Refers to the customer relationship management (CRM) system used by the City's Community Development Division to manage the lifecycle of CDBG- and ESG-funded grants.

**Ethnic Categories/Racial Categories:** The two (2) ethnic categories as revised by the OMB are defined as follows:

1. Hispanic or Latino — A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The term, "Spanish Origin," can be used in addition to "Hispanic or Latino."
2. Not Hispanic or Latino — A person not of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

Definitions for the Ten (10) Racial Categories as revised by the OMB are as follows:

1. White — A person having origins in any of the original people of Europe, North Africa, or the Middle East.
2. Black/African American — A person having origins in any of the black racial groups of Africa.
3. Asian — A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
4. American Indian/Alaskan Native — A person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.
5. Native Hawaiian/Other Pacific Islander — A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
6. American Indian/Alaskan Native & White — A person having these multiple racial origins as defined in the previous page.
7. Asian & White — A person having these multiple racial origins as defined in the previous page.



8. Black/African American & White — A person having these multiple racial origins as defined in the previous page.
9. American Indian/Alaskan Native & Black/African American — A person having these multiple racial origins as defined in the previous page.
10. Other Multi-Racial — Category used for self-reporting individual responses that are not included in any of the categories listed in this section. This category cannot be used in lieu of no selection.

**Execution:** Refers to the process of getting all the necessary parties to approve the CDBG Agreement via ED Grants. A CDBG Agreement comes into full force after the Subrecipient, the City's EDD, and the City Attorney's Office have all approved it in ED Grants. No wet signatures or hard copy files are involved.

**Family:** One or more persons related by blood, marriage, or adoption.

**Household:** All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share a housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.

**Head of Household:** The adult member of the family who has been designated by the family as the head for purposes of determining income eligibility. The head of household is responsible for ensuring that the family fulfills all of its responsibilities under the CDBG program, alone or in conjunction with a co-head or spouse. The family may designate any qualified family member as the head of household. The head of household must have the legal capacity to enter into a lease under state and local law. A minor who is emancipated under state law may be designated as head of household. NOTE: the IRS definition of *head of household* differs from the HUD definition.

**Housing Activities:** An activity carried out for the purpose of providing or improving permanent residential structures occupied by low to moderate income households. A minimum of 51 percent of the units of multi-unit structures improved shall be occupied by low- or moderate-income households upon completion. CDBG regulations require the Subrecipient to document number of households served, number of units completed and demographics and income level of the household occupying the unit. Only low- or moderate-income households may be assisted with CDBG funds to complete housing activities.

**LMI Clientele Activities:** An activity which benefits a limited clientele, at least 51 percent of whom are low- or moderate-income persons or benefit a client presumed to be low- or moderate-income persons. CDBG regulations require the Subrecipient to document the demographics and income levels of clientele provided such activities.

**Microenterprise:** A business having five (5) or fewer employees, one of whom owns the business. Microenterprises assisted via CDBG funds are owned by documented LMI individuals.

**Negotiation:** Refers to the process of finalizing the scope of work, schedule, and the budget narratives and allocations in the CDBG agreement and the collection of all required supporting documents prior to the execution of the CDBG Agreement.

**OMB Circulars:** Instructions or information issued by the Office of Management and Budget.

**Presumed Low-Income Persons:** This includes the following: abused children, battered spouses, elderly persons (sixty-two [62] years or older), severely disabled adults (as defined by the Bureau of Census), homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers. This recognition only applies to projects reporting low- and moderate-income clientele. NOTE: The presumed category is not eligible to be utilized for economic development projects (microenterprise assistance projects) or projects providing assistance to households (Housing Rehabilitation Programs/Projects and Direct Financial Assistance to Homebuyers projects). Subrecipients shall utilize the following when reporting income levels for eligible presumed low/moderate income persons served:

PRESUMED CATEGORY	PRESUMED INCOME LEVEL
Abused Children	Extremely Low Income
Battered Spouses	Low Income
Severely Disabled Adults	Low Income
Homeless Persons	Extremely Low Income
Illiterate Adults	Low Income
Persons with AIDS	Low Income
Migrant Farm Workers	Low Income
Elderly	<p>If assistance is to construct, convert, or rehabilitate a senior center or pay for providing center-based senior services, report the elderly beneficiaries as Moderate Income</p> <p>If assistance is for other services (not center-based), report the elderly beneficiaries as Low Income</p>

**Primary Representative:** Refers to the person authorized by the Board of Directors of the Subrecipient to serve as the approver and submitter of documents and reports in ED Grants. Any action taken by the Primary Representative is binding upon the Subrecipient and constitutes an official act by its organization. Only the Primary Representative has the ability to “submit” reports and sign agreements in ED Grants. Board approval is required for any Primary Representative (Primary User in ED Grants) change.

**Project Closeout:** The Project Closeout is the process by which the CDBG program determines that all required work under the executed Agreement has been completed. This means that all financial, administrative and performance issues related to the activities undertaken by the Subrecipient must be resolved to the satisfaction of the Community Development Division and the Subrecipient.

**Scope of Work:** Refers to Exhibit B of the CDBG Agreement that describes the activities the Subrecipient will undertake to provide services to low/moderate-income (LMI) clients in the

City or rehabilitate a facility or housing unit(s) to serve or benefit LMI clients. Costs of activities falling outside of scope of work will not be reimbursed by the City.

**Schedule:** Refers to the project timeline entered into ED Grants during the negotiation phase that generally outlines the major tasks to be undertaken for completing the Subrecipient's project and the target dates of completion of each of those tasks or milestones. The City will hold the Subrecipient accountable to the schedule and may take adverse action if the Subrecipient significantly deviates from the schedule, up to recapture of CDBG funds already disbursed.

**Secondary Representative:** Refers to the person(s) with access to ED Grants and can function as the Primary Representative with the exception of being able to approve or submit documents and reports.

**Small Business:** A business having more than five (5) employees, including the owner. Small businesses assisted via CDBG funds must demonstrate benefit to LMI individuals or communities by either: creating or retaining jobs for LMI individuals; or providing a service to defined LMI communities.

**Subrecipient:** A public or private nonprofit agency, authority or organization, or an entity awarded with CDBG funding from the City and enters into an Agreement with the City, including City of San Diego departments, public agencies, and other government organizations.

**Subcontractor:** Any organization, Subrecipient, or firm that furnishes supplies or services (other than office space, standard commercial supplies, or printing services) to the Subrecipient in connection with the Subrecipient's Agreement with the City of San Diego. May also be referred to as a Consultant under Consultant Services.

**Supporting Document:** Refers to a document required by the City to be uploaded to ED Grants as a condition of executing the CDBG Agreement. Some supporting documents are applicable only to certain project types, and some must be uploaded only if they are available.

**Unduplicated Client:** A client refers to a person served by the funded project. Clients may receive multiple units of service per year from one (1) project. Regardless of the number of units of service per year received by the client, the client is tracked and reported as one (1) unduplicated client.

## C. BUDGET LINE ITEMS & DEFINITIONS

**Salary & Wages:** Refers to labor costs incurred as a result of implementing your organization's project. Ordinarily, CDBG covers only direct labor costs associated with providing client services or supporting project activities (with indirect labor costs covered by other funding sources); however, indirect labor costs associated with implementing your organization's project may be covered by CDBG if: (a) your organization has budgeted for indirect costs under the Federally Approved Indirect Cost (FAIC) rate line item during the RFP phase (and have submitted an FAIC rate determination); or (b) your organization has budgeted for indirect costs among the different line items per a verified cost allocation methodology. If a cost allocation plan is used, the percentage determined must be consistent among all budget categories. For example, if the cost allocation plan calculates 20 percent for personnel costs, then 20 percent for non-personnel costs is required. Paid time off (e.g., sick leave, holiday, vacation) and/or premium pay (e.g., overtime, extra pay, multi-shift) may be covered by

CDBG, but only if they are specifically identified in the budget narratives (however, no cash-outs are allowed; paid time off is paid for time taken and will not be reimbursed on an accrual basis). **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE: Senior Counselor** à *This position will provide counseling services to youth targeted by the project undergoing familial crisis, as well as provide them with emotional support to minimize negative impacts on their schooling. The annual salary is \$80,000, of which 75 percent will be covered by CDBG and 25 percent by other grant funds. Paid time off (e.g., sick leave, holiday, and vacation) will be claimed for reimbursement.*
- **SAMPLE NARRATIVE: Intake Business Officer** à *This hourly position will work directly with LMI individuals seeking to establish a microenterprise in San Ysidro by assessing their situation and need, collecting income and demographic information, opening case files in our C-Star system, and setting up consulting appointments with our Business Counselors. The wage is \$23/hour, and the annual salary is \$47,840. CDBG will be covering 1,040 hours or \$23,920 during the project implementation period. Paid time off (e.g., sick leave, holiday, vacation) and premium pay (e.g., overtime) will be claimed for reimbursement.*
- **SAMPLE NARRATIVE: Accountant** à *This hourly position will provide indirect support to the project by tracking personnel and non-personnel expenses related to the implementation of the project and preparing the monthly requests for reimbursements. The wage is \$25/hour and the annual salary is \$52,000. CDBG will be covering a quarter of the position's annual wage (520 hours or \$13,000) during the project implementation period (the position supports four grant projects). No paid time off or premium pay will be claimed for reimbursement.*

**Fringe Benefits:** Refers to non-salary and non-wage compensation labor costs incurred as a result of implementing your organization's project. Examples include: medical, dental, and vision insurance; paid time-off (however, no cash-outs are allowed; paid time off is paid for time taken and will not be reimbursed on an accrual basis); overtime pay; and Social Security/retirement plan contribution. Each fringe benefit type must be its own subline item in the budget under the 'Fringe Benefits' line item (use the fringe benefit dropdown menu to indicate the type). The narrative must detail the positions receiving the fringe benefits. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE: Employer Social Security Tax** à *Positions covered: Counselor II, Intake Specialist, Executive Director*
- **SAMPLE NARRATIVE: State Unemployment Insurance (SUI)** à *Positions covered: Counselor II, Intake Specialist, Executive Director*
- **SAMPLE NARRATIVE: Health Insurance** à *Positions covered: Counselor II, Intake Specialist, Executive Director*
- **SAMPLE NARRATIVE: 401(k) Match** à *Positions covered: Counselor II, Intake Specialist, Executive Director*

**Direct Program Delivery Expenses:** Refers to direct costs incurred as a result of implementing your organization's project that cannot be placed in more specific budget categories. (If City staff determines that direct costs budgeted under this budget category should be under a more specific budget category, the organization will be directed to move the cost to the more appropriate budget category.) The narrative must detail the expenses and how they relate to the implementation of the project. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Training and certification courses (First Aid/AED/CPR) at the San Diego Red Cross for LMI youth being prepared to compete for jobs in the cruise industry. Each course is anticipated to cost \$60 per person; with a target of getting 100 LMI youth trained, the total budget is \$6,000.*
- **SAMPLE NARRATIVE:** *Budget to cover transportation costs for project staff (Business Counselor) to conduct site visits to LMI business owner clients for the provision of direct technical assistance. Mileage reports will be maintained, and a copy will be submitted when included in the Request for Reimbursement. The total budget is \$800.*
- **SAMPLE NARRATIVE:** *Budget to purchase prescription medicine according to the latest Medicare Part D Drug Formulary for LMI clients undergoing job training and substance abuse rehabilitation. The program anticipates assisting 30 unduplicated LMI clients, resulting in the need to budget \$50,000 (approximately \$1,600 per client).*

**Supplies–Administration Use:** Refers to the supplies purchased by your organization for staff use to directly support the implementation of the project. The narrative must detail the types of supplies to be purchased. Examples include but are not limited to: office supplies (e.g., paper, pens, toner, ink, clipboard), small equipment (e.g., computers, laptops, projectors, calculators), and protective gear (e.g., hard hats, steel-toe boots, safety vests). **NOTE: supplies must be purchased, and expenses incurred within the first six months of the project’s implementation period. Applicable project types: PS, CED–MTA.**

- **SAMPLE NARRATIVE:** *Purchase of office supplies (copy paper, writing utensils, notepads, folders, staplers/staples, stickers, toner, and other supply-related materials) to put together 75 to 90 client files of LMI clients assisted with homebuying counseling services.*
- **SAMPLE NARRATIVE:** *Purchase of 15 sets of protective gear (hard hats, steel-toe boots, safety vests, and safety goggles) to be used by our solar installation trainers, who will be working with LMI trainees in San Manuel. Each set is anticipated to cost \$130. Purchase of 3 durable tablets and associated software licenses to be used by our solar installation trainers to track training data while out in the field for direct uploading to our cloud-based database and payroll systems. Each table is anticipated to cost \$1,500, and each software license \$500, for a total budget of \$6,000.*

**Supplies–Client Use:** Refers to the supplies purchased by your organization to provide to clients for their use as part of directly supporting the implementation of the project. The narrative must detail the types of supplies to be purchased and how they relate to the implementation of the project. Past examples of client-use supplies include clean syringes, musical instruments, urban garden supplies and tools, computers and laptops, office supplies, course materials and books, packaged food, etc. **NOTE: Supply purchases for individual client use and or supplies that will be retained by the client after the termination of the services will require a client distribution list upon submission of a reimbursement request. Also note: Food purchases, specifically for meal delivery programs and/or food banks, are not considered “Supply” budget items and should be listed in the Direct Program Delivery expense budget line item. Stockpiling of supplies or equipment to be used after the expiration of the executed agreement is not permitted. Applicable project types: PS, CED–MTA.**

- **SAMPLE NARRATIVE:** *Purchase of 50 bamboo flutes at \$10 each to be used by our LMI students learning music in our afterschool tutoring program.*



- **SAMPLE NARRATIVE:** *Purchase of garden hoses, rakes, hoes, potting soil, seeds, trees, and fertilizer to support our community garden in Oak Heights that is maintained by LMI households that are being trained in business basics.*
- **SAMPLE NARRATIVE:** *Purchase of five workstations consisting of one monitor, one computer tower, and one printer each to be used by unemployed adults receiving job search training assistance. Each workstation is anticipated to cost \$2,000.*

**Publications/Printing:** Refers to costs related to paper-based materials produced by your organization or the publication of project/construction-related notices and advertisements in newspapers and other media. Past examples of publications/printing costs include collateral material design and printing (flyers, brochures, pamphlets), construction drawing printing for permit acquisition, construction bid document printing and publication, Invitation for Bids (IFB) notices in newspapers, course materials, program advertisements to attract clients, etc. (Please reference p. 48 Section G of this manual) **Applicable project types: All.**

- **SAMPLE NARRATIVE:** *Design and publication of flyers, brochures, pamphlets, and other collateral material to promote the microenterprise technical assistance program at local business resource fairs and online.*
- **SAMPLE NARRATIVE:** *Printing of revised construction documents to address comments from the City of San Diego Development Services Department prior to permit and approval issuance. Budget of \$2,000 anticipates three rounds of printing before documents are finalized. Publication of Invitation for Bids (IFB) notices in one newspaper of general circulation and three community newspapers targeting LMI contractors. Budget of \$1,000 anticipates at least two days of publication per newspaper.*
- **SAMPLE NARRATIVE:** *Printing of 350 copies of a 20-page colored college application writing course packet for LMI youth participating in our college preparedness program. Each copy is expected to cost \$2.50, totaling approximately \$875.*

**Rent/Lease:** Refers to costs related to the rent or lease of a site where direct services to clients will be provided. Your organization must have submitted a current rental or lease agreement outlining the rent or lease cost, along with a cost allocation plan or methodology that determines how much of the rent or lease is reasonably attributable to the implementation of the CDBG-funded project or program. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Per the attached agreement, the monthly lease for our office at 123 Main Street where LMI youth tutoring will be held is \$3,800. Per the attached cost allocation plan, 50 percent of our overhead costs is reasonably attributable to our youth tutoring program. With 75 percent of our youth tutoring program being covered by CDBG in FY 2026, we calculate the portion of the monthly lease to be covered by CDBG to be \$1,425 ( $\$3,800 \times 0.50 \times 0.75$ ), annualized at \$17,100 ( $\$1,425 \times 12$ ).*

**Maintenance/Repair:** Refers to costs related to the maintenance and repair of the site where direct services to clients will be provided. The narrative must detail the types of maintenance/repairs to be covered. Your organization must also submit a cost allocation plan or methodology that determines how much of the maintenance and repair is reasonably attributable to the implementation of the CDBG-funded project or program. **Applicable project types: PS, CED-MTA.**



- **SAMPLE NARRATIVE:** *Per the attached cost allocation plan, 50 percent of our overhead costs is reasonably attributable to our LMI youth tutoring program. We will need to repair our furnace to accommodate wintertime tutoring and replace the ripped carpeting in our office, which has become a safety hazard. The furnace and carpeting are anticipated to cost \$5,000 and \$12,000, respectively, based on calls to third-party businesses. With 75 percent of our youth tutoring program being covered by CDBG in FY 2026, we calculate the portion of the repair/maintenance to be covered by CDBG to be approximately \$6,375 ( $\$17,000 \times 0.50 \times 0.75$ ).*

**Utilities:** Refers to costs related to utilities (e.g., electricity, water, gas) used at the site where direct services to clients will be provided. The narrative must detail the types of utility service to be covered. Your organization must also submit a cost allocation plan or methodology that determines how much of the utility costs is reasonably attributable to the implementation of the CDBG-funded project or program. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Per the attached cost allocation plan, 50 percent of our overhead costs is reasonably attributable to our youth tutoring program. Our average monthly electric, water, and gas bills are \$200, \$150, and \$100, respectively. With 75 percent of our youth tutoring program being covered by CDBG in FY 2026, we calculate the portion of the monthly utility costs to be covered by CDBG to be approximately \$168.75 ( $\$450 \times 0.50 \times 0.75$ ), annualized at \$2,025 ( $\$168.75 \times 12$ ).*

**Communications:** Refers to costs related to telephone (including mobile) and Internet services needed to provide direct services to clients. The narrative must detail the types of services to be covered, the breakdown of the costs per type of service, and how the costs were calculated. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Per the attached cost allocation plan, 50 percent of our overhead costs is reasonably attributable to our youth tutoring program. Our average monthly telephone and Internet bills are \$300 and \$300, respectively. With 75 percent of our youth tutoring program being covered by CDBG in FY 2026, we calculate the portion of the monthly communications costs to be covered by CDBG to be approximately \$225 ( $\$600 \times 0.50 \times 0.75$ ), annualized at \$2,700 ( $\$225 \times 12$ ).*

**Equipment Rental:** Refers to costs related to equipment rented to provide direct services to clients or to rehabilitate public facilities or housing units. The narrative must detail the types of equipment to be rented and their proposed uses. Examples include, but are not limited to transportation vehicles (cars, trucks, vans), bulldozers, sound systems, medical equipment, portable stoves/ovens, dump trucks, portable chairs/tables, etc. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Rental of portable chairs, tables, and tent for on-site neighborhood outreach to conduct free basic medical screenings for LMI clients in Oak Heights. An anticipated 10 outreach events will be conducted. Each outreach will require a rental budget of \$750 or \$7,500 for the year ( $\$750 \times 10$ ). Rental of a mobile mammography van to provide mammography service to LMI clients in Oak Heights. The monthly rental is \$1,500, annualized at \$18,000.*
- **SAMPLE NARRATIVE:** *Rental of a backhoe for a month to prepare our community garden site for cultivation by LMI clients looking to supplement their food supply. Large boulders will need to be removed and the soil tilled. The monthly rental fee is \$1,200.*

**Insurance:** Refers to costs related to liability insurance premiums covering staff providing direct services to clients or the site where direct services to clients will be provided. The narrative must detail the types of liability insurance to be covered and why each type is needed. Examples include commercial general liability, automobile liability, and worker's compensation. Your organization must also submit a cost allocation plan or methodology that determines how much of the liability insurance costs is reasonably attributable to the implementation of the CDBG-funded project or program. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Per the attached cost allocation plan, 50 percent of our overhead costs is reasonably attributable to our youth tutoring program. Our annual liability insurance premium (CGL, auto, and WC) is \$3,500. With 75 percent of our youth tutoring program being covered by CDBG in FY 2026, we calculate the portion of the insurance costs to be covered by CDBG to be approximately \$1,312 ( $\$3,500 \times 0.50 \times 0.75$ ).*

**Administrative Indirect Cost Rate:** Refers to the total indirect cost amount to be covered by CDBG. This amount can be calculated based on: (a) Federally Approved Indirect Cost (FAIC) rate, or (b) your organization has budgeted for indirect costs among the different line items per a verified cost allocation methodology; or (c) de minimis rate [per CFR 200.414(f) at: [https://www.ecfr.gov/cgi-bin/text-idx?node=node%3Dse2.1.200\\_1414&rgn=div8](https://www.ecfr.gov/cgi-bin/text-idx?node=node%3Dse2.1.200_1414&rgn=div8)]. The amount is calculated by multiplying the stated overhead rate with the sum of all program delivery direct costs that will be covered by CDBG and identified in the budget. The narrative must detail if the FAIC rate or de minimis rate or cost allocation plan rate will be used in the calculation, the effective dates of the rate, and how the amount for this budget line item was calculated. If a cost allocation plan is used, the percentage determined must be consistent among all budget categories. For example, if the cost allocation plan calculates 20 percent for personnel costs, the 20 percent for non-personnel costs is required. NOTE: a current FAIC document is required or a copy of the agency's cost allocation plan upon submission of a reimbursement request. **Applicable project types: PS, CED-MTA.**

- **SAMPLE NARRATIVE:** *Per the attached FAIC rate letter received from the Department of Labor, our rate is 9 percent for FY 2026. The total amount of our program delivery direct costs to be covered by CDBG is \$85,000. Therefore, the indirect cost budget is \$7,650 ( $\$85,000 \times 0.09$ ).*

**Construction/Renovation:** Refers to CDBG-funded construction and renovation costs related to permits/approvals, materials, and labor, excluding construction management, the creation of construction plans, revisions to construction documents/drawings prior to the execution of the CDBG agreement, or large equipment not bolted/attached to the facility. The narrative must detail the costs to be incurred, a description of each cost, and the activities to be completed. **Applicable project types: NCIP-F.**

- **SAMPLE NARRATIVE:** *Costs to renovate an existing dilapidated warehouse into 10 classroom spaces for LMI clients seeking employment training in the electrical and plumbing trades: permits/approvals (\$5,000 to get plumbing and electrical permits from Development Services Department), materials (\$200,000 for windows, doors, drywall, pipes, lights, paint, insulation, carpet, and other related materials), and prevailing wage labor (\$150,000 for laborers in specialized trades). Construction/renovation activities include install windows, doors, light fixtures, and insulation; paint new interior walls; install necessary new and rerouted plumbing and electrical connections; demolish old storage units and dispose of debris; repave ADA pathway; and other construction/renovation-related activities.*

**Construction Management:** Refers to labor costs covering the on-site construction manager. The amount is limited to six percent (6%) of the 'Construction/Renovation' budget line-item amount. The narrative must detail how the amount was calculated and the services to be provided by the construction manager. Third-party construction managers must be procured in accordance with federal procurement requirements. In addition, conflict of interest verifications must be documented prior to the selection of third-party construction managers. **Applicable project types: NCIP-F.**

- **SAMPLE NARRATIVE:** *Costs to hire a third-party construction manager to oversee all phases of the project (preconstruction, construction, and postconstruction). Services include coordinate with all companies and agencies; prepare the specifications and construction contracts; manage the competitive bid process; coordinate all required permits; develop and implement the project schedule; prepare project reporting and compliance; monitor and report on labor compliance; and other construction management-related activities. The total budget is \$65,000 (or 6 percent of 'Construction/Renovation' budget line item).*

**Consultant Services:** Refers to costs related to third-party organizations hired by the Subrecipient to perform direct client services, support project activities, or prepare revisions to construction documents/drawings required by the City's Development Services Department as a condition of permit or approval issuance. Costs to complete revisions to construction documents/drawings completed prior to the execution of the CDBG agreement may not be budgeted with CDBG funds. Consultants must be procured in accordance with federal procurement requirements, as applicable. In addition, conflict of interest verifications must be documented prior to the selection of consultants. A contract agreement with the consultant and agency is required in order to request budget reimbursement for the CDBG contract. The narrative must detail what the third-party organization/consultant will be performing or preparing and how the costs were calculated. A current consultant agreement is required upon submission of a reimbursement request. **Applicable project types: PS, NCIP-F, CED-MTA.**

- **SAMPLE NARRATIVE:** *Budget to retain Oak Heights Community Services (OHCS) to provide mobile medical screening services to LMI clients in combination with our organization's nutrition outreach efforts. The agreement with OHCS will cover two Medical Assistants working two full days each month for one year plus medical supplies.*
- **SAMPLE NARRATIVE:** *Budget to retain DesignPros, Inc., to provide as-needed revisions to construction documents/drawings pertaining to the warehouse rehabilitation project. We anticipate up to three rounds of revisions before the issuance of permits and approvals by the Development Services Department. Each revision is anticipated to cost \$2,500 for a maximum amount of \$7,500.*

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## CDBG NATIONAL OBJECTIVE: LOW/MODERATE-INCOME PERSONS

Any CDBG project funded by the City of San Diego must meet the CDBG program's National Objective of benefiting Low/Moderate-Income Persons (LMI National Objective), which may be met by doing one of the following:

- A. Creating or improving housing for LMI households (LMH);
- B. Creating or retaining jobs for LMI individuals (LMJ);
- C. Providing a specific service to definite LMI individuals (LMC); or
- D. Providing a defined, primarily residential LMI area with access to an amenity (LMA).

Bullet C above is referred to as the **Low/Moderate-Income Limited Clientele** (LMC) category of the LMI National Objective. The United States Department of Housing and Urban Development (HUD) has defined two methods for meeting the LMI National Objective for projects falling under the LMC category: (1) Presumed Low-Income Clientele; and (2) Direct Benefit to Low-Income Persons.

### (1) **Presumed Low-Income Clientele**

To use the 'Presumed Low-Income Clientele' method, the Subrecipient must fully document how the activities of its CDBG-funded project serve a population from the following predefined list from HUD:

PRESUMED CATEGORY	PRESUMED INCOME LEVEL
Abused Children	Extremely Low Income
Battered Spouses	Low Income
Elderly Persons (62 and over)	Low Income <sup>1</sup>
Severely Disabled Adults	Low Income
Homeless Persons <sup>2</sup>	Extremely Low Income
Illiterate Adults	Low Income
Persons Living with AIDS	Low Income
Migrant Farm Workers	Low Income

Note the above Presumed Low-Income Clientele categories **CANNOT** be applied to economic development projects (e.g., microenterprise assistance projects) or projects providing assistance to households (e.g., single-family, or multifamily housing rehabilitation projects) to meet the LMI National Objective requirement. They can only apply to projects falling under the LMC category.

In addition, a project using the Presumed Low-Income Clientele method must ensure that 100 percent of the clients/persons benefitting from the activities of the project are documented members of the populations listed above.

<sup>1</sup> If assistance is to construct, convert, or rehabilitate a senior center or pay for providing center-based senior services, the elderly beneficiaries are considered Moderate Income.

<sup>2</sup> Persons are classified as having a severe disability if they meet at least one of the following conditions as defined by the United States Census Bureau:

- Use a wheelchair or another special aid for six (6) months or longer;
- Are unable to perform one or more functional activities (seeing, hearing, having one's speech understood, lifting and carrying, walking up a flight of stairs and walking);
- Need assistance with activities of daily living (getting around inside the home, getting in or out of bed or chair, bathing, dressing, eating and toileting) or instrumental activities of daily living (going outside the home, keeping track of money or bills, preparing meals, doing light housework and using the telephone);
- Are prevented from working at a job or doing housework;
- Have a selected condition including autism, cerebral palsy, Alzheimer's disease, senility or dementia or developmental disability; or
- Are under 65 years of age and are covered by Medicare or receive Supplemental Security Income (SSI).

**(2) Direct Benefit to Low-Income Persons**

To use the 'Direct Benefit to Low-Income Persons' method, the Subrecipient must verify and document the household income levels of the individual beneficiaries of the CDBG-funded project to ensure that at least 51 percent of the individuals served are persons whose household income is in compliance with the current HUD LMI income limits (that is, 80 percent or less of the Area Median Income) applicable to the City of San Diego. The HUD LMI income limits apply to activities that are restricted exclusively (100 percent) to LMI persons as well.

The following table outlines the current applicable household income limits for the City of San Diego's CDBG program:

**HUD INCOME LIMITS\***  
**FOR CITY OF SAN DIEGO**  
(Effective June 1, 2025 / Published June 2025 / Source: HUDEXchange.info)

HOUSEHOLD SIZE	EXTREMELY LOW INCOME LIMITS (0-30% of median)	VERY LOW INCOME LIMITS (31-50% of median)	LOW/MODERATE INCOME LIMITS (51-80% of median)
1	\$0 - \$34,750	\$34,751 - \$57,900	\$57,901 - \$92,700
2	\$0 - \$39,700	\$39,701 - \$66,150	\$66,151 - \$105,950
3	\$0 - \$44,650	\$44,651 - \$74,450	\$74,451 - \$119,200
4	\$0 - \$49,600	\$49,601 - \$82,700	\$82,701 - \$132,400
5	\$0 - \$53,600	\$53,601 - \$89,350	\$89,351 - \$143,000
6	\$0 - \$57,550	\$57,551 - \$95,950	\$95,951 - \$153,600
7	\$0 - \$61,550	\$61,551 - \$102,550	\$102,551 - \$164,200
8	\$0 - \$65,500	\$65,501 - \$109,200	\$109,201 - \$174,800

\*Income limits are set by HUD and are subject to change. The income limits listed above are the most current.



Economic Development Department  
Community Development Division

**FY 2026 AGREEMENT/OPERATING MANUAL  
EXEMPTION REQUEST**

*This form is being submitted to request and provide justification for an exemption to the FY 2026 Operating Manual for the Project listed below.*

**ORGANIZATION/SUBRECIPIENT NAME:** \_\_\_\_\_  
**PROJECT NAME/ID:** \_\_\_\_\_

**Executed Agreement and/or Operating Manual Reference:**

**Reason and Justification for Exemption Request:**

**Subrecipient Certification:** *I hereby certify that the above request has been authorized to be submitted to the City.*

\_\_\_\_\_  
**Prepared By** (Signature/Name/Title) **Date**

\_\_\_\_\_  
**Approved By** (Signature/Name/Title of Primary Representative) **Date**

**FOR CITY USE ONLY**

**Date Received:** \_\_\_\_\_ **Determination:** **Approved** ☐ **Denied** ☐

\_\_\_\_\_  
**City Project Manager Name/Signature** **Date** **Date Subrecipient Notified of Determination:** \_\_\_\_\_

\_\_\_\_\_  
**CDD Management Name/Signature** **Date** **Date This Form Uploaded to ED Grants:** \_\_\_\_\_

**General Comments/Reasons for Denying Request:**





**ECONOMIC DEVELOPMENT DEPARTMENT**

**1200 THIRD AVE, STE 1400, MS 56D**

**SAN DIEGO, CA 92101**

**PHONE 619-236-6700**

**Subrecipient understands and agrees that no future expenditures can be claimed for the reporting period listed below, unless approved by the Project Manager.**

**FROM:**

**SUBRECIPIENT/VENDOR NAME** \_\_\_\_\_

**SUBRECIPIENT/VENDOR ADDRESS** \_\_\_\_\_

**CITY** \_\_\_\_\_

**STATE** \_\_\_\_\_

**ZIP CODE** \_\_\_\_\_

**FISCAL YEAR** \_\_\_\_\_

**VENDOR NO.** \_\_\_\_\_

**PURCHASE ORDER NO.** \_\_\_\_\_

**FOR:**

**PROJECT NAME** \_\_\_\_\_

**FUNDING SOURCE** \_\_\_\_\_

**REPORTING PERIOD (MONTH/YEAR)** \_\_\_\_\_

**ENTER LINE ITEM NAME WITH NO CLAIM** \_\_\_\_\_

**TOTAL AMOUNT TO BE PAID** \_\_\_\_\_ **NO CLAIM FOR THIS REPORTING PERIOD** \_\_\_\_\_

**[Insert Subrecipient Name]**

**Fiscal Year 2026 Public Services CDBG Grantee**

*Personal information requested below is confidential and will remain internal. We collect information directly from you with your permission as required by those funding our programs. As such, this information is required as it allows us to provide services free of charge and better understand the needs of our clients.*

**Part I: Required Confidential Student / Youth HUD Demographic Data**

<b>STUDENT/YOUTH NAME:</b>		<b>YOUTH BIRTH MONTH &amp; YEAR:</b>		<b>CLIENT UNIQUE IDENTIFIER #:</b>	
<b>LEGAL GUARDIAN NAME:</b>				<b>RELATIONSHIP:</b>	
<b>CLIENT PHYSICAL ADDRESS:</b>		<b>CITY:</b>		<b>STATE:</b>	<b>ZIP:</b>
<b>TELEPHONE:</b>	(       )       —	<b>EMAIL:</b>			
<b>YOUTH ETHNIC BACKGROUND (REQUIRED TO CHECK ONE):</b>	<input type="checkbox"/> HISPANIC/LATINO <input type="checkbox"/> NOT HISPANIC/LATINO	<b>GENDER IDENTITY (OPTIONAL):</b>	<input type="checkbox"/> FEMALE <input type="checkbox"/> MALE <input type="checkbox"/> NON-BINARY	<b>IS CLIENT HEAD OF HOUSEHOLD?</b>	<input type="checkbox"/> YES <input type="checkbox"/> No
<b>YOUTH RACIAL BACKGROUND (REQUIRED TO CHECK ONE):</b>	<input type="checkbox"/> WHITE <input type="checkbox"/> BLACK/AFRICAN AMERICAN <input type="checkbox"/> ASIAN <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE <input type="checkbox"/> NATIVE HAWAIIAN/OTHER PACIFIC ISLANDER	<input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE & WHITE <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE & BLACK/AFRICAN AMERICAN <input type="checkbox"/> ASIAN & WHITE <input type="checkbox"/> BLACK/AFRICAN AMERICAN & WHITE <input type="checkbox"/> OTHER MULTI-RACIAL			

**Part II: Required Confidential Student / Youth Income Certification. Must be completed and signed prior to services.**

**1) Number of Family Members & Gross Income:**

Total family size consists of \_\_\_\_\_ members, and the total gross annual income\* for all adult members is \$\_\_\_\_\_.

\*Gross annual income must include all sources of income (wages, child support, SSI, unemployment, pension, income from assets, etc., but does not include the income of live-in aides, per 24 CFR 5.403).

*I certify that the information given on this form is complete and accurate to the best of my knowledge. I am aware that there are penalties for willfully and knowingly giving false information on an application for federal funds, which may include immediate repayment of all federal funds received and/or prosecution under the law. I understand that the information on this form is subject to review by City staff and federal personnel as part of compliance monitoring only.*

Youth/Student Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Legal Guardian Signature: \_\_\_\_\_ Date: \_\_\_\_\_

**[Insert Subrecipient Name]**

Fiscal Year 2026 Public Services CDBG Grantee

Youth / Student First and Last Name (Printed): \_\_\_\_\_

**Legal Guardian to Verify Income and Location Below:**

**Family Income and Household Size is (check one):**

HOUSEHOLD SIZE	EXTREMELY LOW INCOME LIMITS (0-30% OF MEDIAN)	VERY LOW INCOME LIMITS (31-50% OF MEDIAN)	LOW/MODERATE INCOME LIMITS (51-80% OF MEDIAN)	NON-LOW/MODERATE INCOME LIMITS (ABOVE 80% OF MEDIAN)
1	\$0 - \$34,750 <input type="checkbox"/>	\$34,751 - \$57,900 <input type="checkbox"/>	\$57,901 - \$92,700 <input type="checkbox"/>	ABOVE \$92,700 <input type="checkbox"/>
2	\$0 - \$39,700 <input type="checkbox"/>	\$39,701 - \$66,150 <input type="checkbox"/>	\$66,151 - \$105,950 <input type="checkbox"/>	ABOVE \$105,950 <input type="checkbox"/>
3	\$0 - \$44,650 <input type="checkbox"/>	\$44,651 - \$74,450 <input type="checkbox"/>	\$74,451 - \$119,200 <input type="checkbox"/>	ABOVE \$119,200 <input type="checkbox"/>
4	\$0 - \$49,600 <input type="checkbox"/>	\$49,601 - \$82,700 <input type="checkbox"/>	\$82,701 - \$132,400 <input type="checkbox"/>	ABOVE \$132,400 <input type="checkbox"/>
5	\$0 - \$53,600 <input type="checkbox"/>	\$53,601 - \$89,350 <input type="checkbox"/>	\$89,351 - \$143,000 <input type="checkbox"/>	ABOVE \$143,000 <input type="checkbox"/>
6	\$0 - \$57,550 <input type="checkbox"/>	\$57,551 - \$95,950 <input type="checkbox"/>	\$95,951 - \$153,600 <input type="checkbox"/>	ABOVE \$153,600 <input type="checkbox"/>
7	\$0 - \$61,550 <input type="checkbox"/>	\$61,551 - \$102,550 <input type="checkbox"/>	\$102,551 - \$164,200 <input type="checkbox"/>	ABOVE \$164,200 <input type="checkbox"/>
8	\$0 - \$65,500 <input type="checkbox"/>	\$65,501 - \$109,200 <input type="checkbox"/>	\$109,201 - \$174,800 <input type="checkbox"/>	ABOVE \$174,800 <input type="checkbox"/>

Source: U.S. Department of Housing and Urban Development, June 1, 2025.

By signing below, I hereby certify that my family size and income as selected above is correct, that my physical home address is within City of San Diego limits, and that the student or youth to be served by the program resides in the City of San Diego as well.

Legal Guardian First and Last Name Printed: \_\_\_\_\_

Legal Guardian Signature: \_\_\_\_\_

Date: \_\_\_\_\_

***Subrecipient Certification:*** I certify that the Client / Beneficiary demographic data provided is true and correct, to the best of my knowledge. I certify that comparison of the stated family size and gross income of the Client / Beneficiary with the current CPD annual income limits for the City of San Diego resulted in the income level indicated above. I certify that the residency of the Client/Beneficiary is true and correct per the requirements of 24 CFR 570.309.

**Note:** This completed certification must be maintained in the Confidential Program file for review at time of monitoring.

Program Staff First and Last Name (printed): \_\_\_\_\_ Job Title: \_\_\_\_\_

Program Staff Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Eligibility is valid until (one year after certification signed): \_\_\_\_\_ (list date)

**[Insert Subrecipient Name]**

**Fiscal Year 2026 Housing Rehabilitation CDBG Grantee – Low to Moderate Income Households**

*Personal information requested below is confidential and will remain internal. We collect information directly from you with your permission as required by those funding our programs. As such, this information is required as it allows us to provide services free of charge and better understand the needs of our clients.*

**Part I: Required Confidential Client / Beneficiary HUD Demographic Data**

<b>CLIENT NAME:</b>		<b>DATE OF BIRTH:</b>		<b>CLIENT UNIQUE IDENTIFIER #:</b>	
<b>CLIENT PHYSICAL ADDRESS:</b>		<b>CITY:</b>		<b>STATE:</b>	<b>ZIP:</b>
<b>TELEPHONE:</b>	(       )       —	<b>EMAIL:</b>			
<b>CLIENT ETHNIC BACKGROUND (REQUIRED TO CHECK ONE):</b>	<input type="checkbox"/> HISPANIC/LATINO <input type="checkbox"/> NOT HISPANIC/LATINO	<b>GENDER IDENTITY (OPTIONAL):</b>	<input type="checkbox"/> FEMALE <input type="checkbox"/> MALE <input type="checkbox"/> NON-BINARY	<b>IS CLIENT HEAD OF HOUSEHOLD?</b>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>CLIENT RACIAL BACKGROUND (REQUIRED TO CHECK ONE):</b>	<div> <input type="checkbox"/> WHITE           <input type="checkbox"/> BLACK/AFRICAN AMERICAN           <input type="checkbox"/> ASIAN           <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE           <input type="checkbox"/> NATIVE HAWAIIAN/OTHER PACIFIC ISLANDER         </div> <div> <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE &amp; WHITE           <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE &amp; BLACK/AFRICAN AMERICAN           <input type="checkbox"/> ASIAN &amp; WHITE           <input type="checkbox"/> BLACK/AFRICAN AMERICAN &amp; WHITE           <input type="checkbox"/> OTHER MULTI-RACIAL         </div>				

**Part II: Required Confidential Household / Beneficiary Income Certification. Must be completed and signed prior to services.**

**Number of Household Members & Gross Income:**

My total household size consists of \_\_\_\_\_ members, and the total gross annual income\* for all adult members is \$\_\_\_\_\_.

\*Gross annual income must include all sources of income (wages, child support, SSI, unemployment, pension, income from assets, etc., but does not include the income of live-in aids, per 24 CFR 5.403).

*I certify that the information given on this form is complete and accurate to the best of my knowledge. I certify that I am at least 18 years of age or older. I am aware that there are penalties for willfully and knowingly giving false information on an application for Federal funds, which may include immediate repayment of all Federal funds received and/or prosecution under the law. I understand that the information on this form is subject to review by City staff and federal personnel as part of compliance monitoring.*

Client / Beneficiary Signature: \_\_\_\_\_ Date: \_\_\_\_\_

[Insert Subrecipient Name]

**Fiscal Year 2026 Housing Rehabilitation CDBG Grantee – Low to Moderate Households**

*Information below is to be completed by Program Operator. **Self-Certification alone is not sufficient documentation for LMH clients. Documentation of income is required for housing rehabilitation assistance provided.***

**Type of Housing Units Verification**

- ☐ Single Family Units (Must be owner-occupied)  
☐ Multi-Family Units

**Client / Beneficiary First and Last Name (Printed):** \_\_\_\_\_

**Housing Rehabilitation Participant/Beneficiary Income Verification**

Effective Date of the HUD Income Limit Chart being used: \_\_\_\_\_

- Household is:** ☐ 0-30% of median (Extremely Low Income)  
☐ 31-50% of median (Very Low Income)  
☐ 51%- 80% of median (Low/Moderate Income)  
☐ Above 80% of median (Non-Low/Moderate Income) - **NOT ELIGIBLE for CDBG ASSISTANCE**

***Program Operator must:***

Refer to the current City of San Diego CDBG Income limits from <https://www.sandiego.gov/cdbg> to select the appropriate income category (i.e. Extremely Low Income to Low/Moderate Income)

***Program Operator Certification:*** *I certify that Client / Beneficiary demographic data provided is true and correct, to the best of my knowledge. I certify that, using the current CPD annual income limits for the City of San Diego compared to stated household size and gross income, resulted in the income level indicated above.*

**Note:** This completed certification must be maintained in the Confidential Program file for review at time of monitoring.

**Program Operator Name (printed):** \_\_\_\_\_ **Job Title:** \_\_\_\_\_

**Program Operator Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Eligibility is valid until (one year after certification signed) List Date:** \_\_\_\_\_

**[Insert Subrecipient Name]**

**Fiscal Year 2026 CARES Act Public Services CDBG Grantee**

Personal information requested below is confidential and will remain internal. We collect information directly from you with your permission as required by those funding our programs. As such, this information is required as it allows us to provide services free of charge and better understand the needs of our clients.

**Part I: Required Confidential Client / Beneficiary HUD Demographic Data**

<b>CLIENT NAME:</b>					<b>CLIENT UNIQUE IDENTIFIER #:</b>		
<b>CLIENT PHYSICAL ADDRESS:</b>				<b>CITY:</b>		<b>STATE:</b>	<b>ZIP:</b>
<b>TELEPHONE:</b>	( ) —			<b>EMAIL:</b>			
<b>CLIENT ETHNIC BACKGROUND (REQUIRED TO CHECK ONE):</b>	<input type="checkbox"/> HISPANIC/LATINO <input type="checkbox"/> NOT HISPANIC/LATINO		<b>GENDER IDENTITY (OPTIONAL):</b>	<input type="checkbox"/> FEMALE <input type="checkbox"/> MALE <input type="checkbox"/> NON-BINARY	<b>IS CLIENT HEAD OF HOUSEHOLD?</b>	<input type="checkbox"/> YES <input type="checkbox"/> NO	
<b>CLIENT RACIAL BACKGROUND (REQUIRED TO CHECK ONE):</b>	<input type="checkbox"/> WHITE <input type="checkbox"/> BLACK/AFRICAN AMERICAN <input type="checkbox"/> ASIAN <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE <input type="checkbox"/> NATIVE HAWAIIAN/OTHER PACIFIC ISLANDER			<input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE & WHITE <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE & BLACK/AFRICAN AMERICAN <input type="checkbox"/> ASIAN & WHITE <input type="checkbox"/> BLACK/AFRICAN AMERICAN & WHITE <input type="checkbox"/> OTHER MULTI-RACIAL			

**Part II: Required Confidential Client / Beneficiary Income Certification. Must be completed and signed prior to the provision of services.**

**1) Number of Family Members & Gross Income:**

My total family size consists of \_\_\_\_\_ members, and the total gross annual income\* for all adult members is \$\_\_\_\_\_.

\*Gross annual income must include all sources of income (wages, child support, SSI, unemployment, pension, income from assets, etc., but does not include the income of live-in aides, per 24 CFR 5.403). The IRS Stimulus payments are also not considered as income. However, certain types of COVID-19 unemployment insurance are considered as income. For help determining what types of unemployment insurance are considered income, please reach out to the assigned Project Manager.

**2) Certification of COVID-19 hardship:**

In order to be eligible, all clients receiving services must have been directly negatively impacted by the COVID-19 pandemic and are unable to access needed services provided by the Subrecipient CARES Act project. Please select at least one of the following (may select more than one as applicable):

- ☐ Tested positive for COVID-19 within the last month (If checked, this cannot be the only proof of hardship selected)
- ☐ Unemployed (Job loss due to being laid off or previous place of employment closed due to the COVID-19 pandemic)
- ☐ Loss of income (Reduced working hours/furloughed due to the COVID-19 pandemic)
- ☐ Food Insecurity (Unable to afford food as a direct result of the COVID-19 pandemic)
- ☐ Immunocompromised and unable to venture outside for daily necessities due to being in an at-risk population pool
- ☐ Lack of access to appropriate equipment for distance learning (Computers, laptop, high-speed internet, WiFi Hotspots)
- ☐ Lack of access to affordable childcare services
- ☐ Mental health impact (e.g. Increase in anxiety, depression or stress as a result of the COVID-19 pandemic)
- ☐ Other (Please specify by listing below):



*I certify that the information given on this form is complete and accurate to the best of my knowledge. I certify that I am at least 18 years of age or older. I am aware that there are penalties for willfully and knowingly giving false information on an application for federal funds, which may include immediate repayment of all Federal funds received and/or prosecution under the law. I understand that the information on this form is subject to review by City staff and federal personnel as part of compliance monitoring only.*

Client / Beneficiary Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Client / Beneficiary Name (print): \_\_\_\_\_

**[Insert Subrecipient Name]**

Fiscal Year 2026 CARES Act Public Services CDBG Grantee *Information below is to be completed by Program Operator.*

Client / Beneficiary First and Last Name (Printed): \_\_\_\_\_

**Participant/Beneficiary Income and Location Verification**

- Family is: ☐ 0-30% of median (Extremely Low Income)  
☐ 31-50% of median (Very Low Income)  
☐ 51%- 80% of median (Low/Moderate Income)  
☐ Above 80% of median (Non-Low/Moderate Income)

*(Total number of clients in the Non-Low/Moderate Income group cannot exceed 49% of total served.)*

**Subrecipient Must:**

- 1) Refer to the current City of San Diego CDBG Income limits from <https://www.sandiego.gov/cdbg> to select the appropriate income category (i.e. Extremely Low Income to Moderate Income)
- 2) Certify Client Physical Home Address Is: ☐ Within City of San Diego Limits ☐ Beyond City of San Diego Limits
- 3) Proof of City of San Diego Residency Provided and Copied with Address:  
☐ CA Driver License ☐ CA State ID ☐ Bank Statements ☐ Lease Agreement ☐ Utility Bill  
☐ Medical Insurance ☐ Vehicle Insurance or Registration ☐ IRS or CA Tax Return ☐ Employment Documents  
☐ Other, please list \_\_\_\_\_
- 4) Verify that client has certified COVID-19 hardship

**Subrecipient Certification:** *I certify that the Client/Beneficiary demographic data provided is accurate to the best of my knowledge. I certify that comparison of the stated family size and gross income of the Client / Beneficiary with the current CPD annual income limits for the City of San Diego resulted in the income level indicated above. I certify that the residency of the Participant/Beneficiary is true and correct per the requirements of 24 CFR 570.309.*

**Note:** This completed certification must be maintained in the Confidential Program file for review at time of monitoring.

Program Staff First and Last Name (printed): \_\_\_\_\_ Job Title: \_\_\_\_\_

Program Staff Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Eligibility is valid until (one year after certification signed): \_\_\_\_\_ (list date)

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Business Type - Drop Down Menu Options	Description	Examples
<b>Crop Production - 111</b>	<p>Industries in the Crop Production subsector grow crops mainly for food and fiber. The subsector comprises establishments, such as farms, orchards, groves, greenhouses, and nurseries, primarily engaged in growing crops, plants, vines, or trees and their seeds.</p> <p>The industries in this subsector are grouped by similarity of production activity, including biological and physiological characteristics and economic requirements, the length of growing season, degree of crop rotation, extent of input specialization, labor requirements, and capital demands. The production process is typically completed when the raw product or commodity grown reaches the "farm gate" for market, that is, at the point of first sale or price determination.</p>	Farming, Urban Farms, Farmers Market Vendors
<b>Construction - 23</b>	<p>The Construction sector comprises establishments primarily engaged in the construction of buildings or engineering projects (e.g., highways and utility systems). Establishments primarily engaged in the preparation of sites for new construction and establishments primarily engaged in subdividing land for sale as building sites also are included in this sector.</p> <p>Construction work done may include new work, additions, alterations, or maintenance and repairs. Activities of these establishments generally are managed at a fixed place of business, but they usually perform construction activities at multiple project sites. Production responsibilities for establishments in this sector are usually specified in (1) contracts with the owners of construction projects (prime contracts) or (2) contracts with other construction establishments (subcontracts).</p> <p>Establishments primarily engaged in contracts that include responsibility for all aspects of individual construction projects are commonly known as general contractors, but also may be known as design-builders, construction managers, turnkey contractors, or (in cases where two or more establishments jointly secure a general contract) joint-venture contractors. Construction managers that provide oversight and scheduling only (i.e., agency) as well as construction managers that are responsible for the entire project (i.e., at risk) are included.</p>	<p>Contractors, Construction of Buildings, Residential Construction, Highway, Street and Bridge Construction, Foundation, Structure and Building Exterior Contractors, Electrical Contractors, Wiring Installation, Plumbing, Heating and Air-Conditioning Contractors, Building Finishing Contractors</p>

## CED Business Types Dropdown Menu

<b>Food Manufacturing - 311</b>	<p>Industries in the Food Manufacturing subsector transform livestock and agricultural products into products for intermediate or final consumption. The industry groups are distinguished by the raw materials (generally of animal or vegetable origin) processed into food products.</p> <p>The food products manufactured in these establishments are typically sold to wholesalers or retailers for distribution to consumers, but establishments primarily engaged in retailing bakery and candy products made on the premises not for immediate consumption are included.</p>	Bakeries and Tortilla Manufacturing, Animal Food Manufacturing, Grain and Oilseed Milling, Sugar and Confectionery Product Manufacturing, Fruit and Vegetable Preserving and Specialty Food Manufacturing, Dairy Product Manufacturing, Animal Slaughtering and Processing, Seafood Product Preparation and Packaging, Other Food Manufacturing
<b>Beverage Manufacturing - 3121</b>	This industry group comprises establishments primarily engaged in manufacturing soft drinks and ice; purifying and bottling water; and manufacturing brewery, winery, and distillery products.	Soft Drink and Ice Manufacturing, Bottled Water, Ice, Breweries, Wineries, Distilleries
<b>Apparel Manufacturing - 315</b>	<p>Industries in the Apparel Manufacturing subsector group establishments with two distinct manufacturing processes: (1) cut and sew (i.e., purchasing fabric and cutting and sewing to make a garment) and (2) the manufacture of garments in establishments that first knit fabric and then cut and sew the fabric into a garment. The Apparel Manufacturing subsector includes a diverse range of establishments manufacturing full lines of ready-to-wear apparel and custom apparel: apparel contractors, performing cutting or sewing operations on materials owned by others; jobbers, performing entrepreneurial functions involved in apparel manufacturing; and tailors, manufacturing custom garments for individual clients.</p>	Apparel, Clothing, Custom Garments
<b>Other Miscellaneous Manufacturing - 3399</b>	This industry group comprises establishments primarily engaged in miscellaneous manufacturing, such as jewelry and silverware manufacturing, sporting and athletic goods manufacturing, doll, toy, and game manufacturing, office supplies (except paper) manufacturing, sign manufacturing, and all other miscellaneous manufacturing.	Jewelry, Silverware, Sporting Goods, etc.

<b>Wholesale Trade - 42</b>	<p>The Wholesale Trade sector comprises establishments engaged in wholesaling merchandise, generally without transformation, and rendering services incidental to the sale of merchandise. The merchandise described in this sector includes the outputs of agriculture, mining, manufacturing, and certain information industries, such as publishing.</p> <p>The wholesaling process is an intermediate step in the distribution of merchandise. Wholesalers are organized to sell or arrange the purchase or sale of (a) goods for resale (i.e., goods sold to other wholesalers or retailers), (b) capital or durable nonconsumer goods, and (c) raw and intermediate materials and supplies used in production.</p> <p>Wholesalers sell merchandise to other businesses and normally operate from a warehouse or office. These warehouses and offices are characterized by having little or no display of merchandise. In addition, neither the design nor the location of the premises is intended to solicit walk-in traffic. Wholesalers do not normally use advertising directed to the general public. Customers are generally reached initially via telephone, in-person marketing, or by specialized advertising that may include Internet and other electronic means. Follow-up orders are either vendor-initiated or client-initiated, generally based on previous sales, and typically exhibit strong ties between sellers and buyers. In fact, transactions are often conducted between wholesalers and clients that have long-standing business relationships.</p>	<p>Wholesale Merchants, Distributors, Jobbers, Drop Shippers, and Import/Export Merchants. Establishments arranging for the purchase or sale of goods owned by others or purchasing goods, generally on a commission basis are known as business-to-business electronic markets, agents and brokers, commission merchants, import/export agents and brokers, auction companies, group purchasing organizations (e.g., purchasing or arranging for the purchases of goods owned by others), and manufacturers' representatives. wholesaling normally denotes sales in large volumes, durable nonconsumer goods may be sold in single units. Sales of capital or durable nonconsumer goods used in the production of goods and services, such as farm machinery, medium- and heavy-duty trucks, and industrial machinery, are always included in wholesale trade.</p>
<b>Automobile Dealers - 4411</b>	<p>This industry group comprises establishments primarily engaged in retailing new and used automobiles and light trucks, such as sport utility vehicles, and passenger and cargo vans.</p>	<p>New Car Dealers, Used Car Dealers</p>
<b>Automotive Parts, Accessories and Tire Stores - 4413</b>	<p>This industry group comprises establishments primarily engaged in retailing new, used, and/or rebuilt automotive parts and accessories, including tires and tubes. Included in this industry group are establishments primarily engaged in retailing automotive parts and accessories in combination with automotive repair services.</p>	<p>See Description</p>



## CED Business Types Dropdown Menu

<b>Supermarkets, Food, Beverage and Other Grocery Stores - 445</b>	Industries in the Food and Beverage Stores subsector usually retail food and beverage merchandise from fixed point-of-sale locations. Establishments in this subsector have special equipment (e.g., freezers, refrigerated display cases, refrigerators) for displaying food and beverage goods. They have staff trained in the processing of food products to guarantee the proper storage and sanitary conditions required by regulatory authority.	Grocery Stores, Supermarkets, Convenience Stores, Specialty Food Stores, Beer, Wine and Liquor Stores,
<b>Health and Personal Care Stores - 446</b>	Industries in the Health and Personal Care Stores subsector retail health and personal care merchandise from fixed point-of-sale locations. Establishments in this subsector are characterized principally by the products they retail, and some health and personal care stores may have specialized staff trained in dealing with the products. Staff may include pharmacists, opticians, and other professionals engaged in retailing, advising customers, and/or fitting the product sold to the customer's needs.	Pharmacies and Drug Stores, Cosmetics, Beauty Supplies and Perfume Stores, Optical Goods Stores, Other Health and Personal Care Stores, Food Supplement Stores
<b>Clothing and Clothing Accessories Stores - 448</b>	Industries in the Clothing and Clothing Accessories Stores subsector retail new clothing and clothing accessories from fixed point-of-sale locations. Establishments in this subsector have similar display equipment and staff that is knowledgeable regarding fashion trends and the proper match of styles, colors, and combinations of clothing and accessories to the characteristics and tastes of the customer.	Clothing Stores, Men's, Women's. Infants, Other Clothing Stores
<b>Jewelry, Luggage, and Leather Goods Stores - 4483</b>	This industry group comprises establishments primarily engaged in retailing new jewelry (except costume jewelry); new sterling and plated silverware; new watches and clocks; and new luggage with or without a general line of new leather goods and accessories, such as hats, gloves, handbags, ties, and belts.	See Description
<b>Other Miscellaneous Store Retailers - 44-45</b>	Not captured in other options	Building Material and Garden Equipment and Supplies Dealers, Lawn and Garden Equipment and Supplies Stores, Gasoline Stations, Shoe Stores, Sporting Goods, Hobby, Musical Instrument, and Book Stores, General Merchandise Stores, including Warehouse Clubs and Supercenters, Office Supplies, Stationery, and Gift Stores, Florist, Used Merchandise Stores, Pet and Pet Supplies Stores

<b>Nonstore Retailers - 454</b>	Industries in the Nonstore Retailers subsector retail merchandise using methods, such as the broadcasting of infomercials, the broadcasting and publishing of direct-response advertising, the publishing of paper and electronic catalogs, door-to-door solicitation, in-home demonstration, selling from portable stalls, and distribution through vending machines. Establishments in this subsector include mail-order houses, vending machine operators, home delivery sales, door-to-door sales, party plan sales, electronic shopping, and sales through portable stalls (e.g., street vendors, except food). Establishments engaged in the direct sale (i.e., nonstore) of products, such as home heating oil dealers and newspaper delivery service providers, are included in this subsector.	<b>Not Food Based</b> - Home-based business other than Childcare, street merchants, mobile carts, pop-up vendors
<b>Ambulance Services - 621910</b>	This industry comprises establishments primarily engaged in providing transportation of patients by ground or air, along with medical care. These services are often provided during a medical emergency but are not restricted to emergencies. The vehicles are equipped with lifesaving equipment operated by medically trained personnel.	Non-Emergency Medical Transport, Ambulances
<b>Truck Transportation - 484</b>	Industries in the Truck Transportation subsector provide over-the-road transportation of cargo using motor vehicles, such as trucks and tractor trailers. The subsector is subdivided into general freight trucking and specialized freight trucking. This distinction reflects differences in equipment used, type of load carried, scheduling, terminal, and other networking services. General freight transportation establishments handle a wide variety of general commodities, generally palletized, and transported in a container or van trailer. Specialized freight transportation is the transportation of cargo that, because of size, weight, shape, or other inherent characteristics, requires specialized equipment for transportation.	Long and Short Distance Trucking, Moving Services, Cargo Transport, Freight Trucking
<b>Taxi, Rideshare and Limousine Service - 4853</b>	This industry group comprises establishments primarily engaged in providing passenger transportation by automobile or van including rideshare services or providing an array of specialty and luxury passenger transportation services via limousine or luxury sedan generally on a reserved basis. These establishments do not operate over regular routes and on regular schedules.	Uber, Lyft, Taxi, TCP, Limo, Carpool Van, Passenger Ground Transportation

<b>Motor Vehicle Towing - 48841</b>	This industry comprises establishments primarily engaged in towing light or heavy motor vehicles, both local and long-distance. These establishments may provide incidental services, such as storage and emergency road repair services.	Tow-Trucks, Road Side Assistance
<b>Furniture and Home Furnishings Stores - 442</b>	Industries in the Furniture and Home Furnishings Stores subsector retail new furniture and home furnishings from fixed point-of-sale locations. Establishments in this subsector usually operate from showrooms and have substantial areas for the presentation of their products. Many offer interior decorating services in addition to the sale of products.	Furniture Stores, Floor Covering Stores, Window Treatment Stores, All other Home Furnishing Stores
<b>Electronics and Appliance Stores - 443</b>	Industries in the Electronics and Appliance Stores subsector retail new electronics and appliances from point-of-sale locations. Establishments in this subsector often operate from locations that have special provisions for floor displays requiring special electrical capacity to accommodate the proper demonstration of the products. The staff includes sales personnel knowledgeable in the characteristics and warranties of the line of goods retailed and may also include trained repair persons to handle the maintenance and repair of the electronic equipment and appliances. The classifications within this subsector are made principally on the type of product and knowledge required to operate each type of store.	Retail electronics and appliances
<b>Information - 51</b>	<p>The Information sector comprises establishments engaged in the following processes: (a) producing and distributing information and cultural products, (b) providing the means to transmit or distribute these products as well as data or communications, and (c) processing data.</p> <p>The main components of this sector are the publishing industries, including software publishing, and both traditional publishing and publishing exclusively on the Internet; the motion picture and sound recording industries; the broadcasting industries, including traditional broadcasting and broadcasting exclusively over the Internet; the telecommunications industries; and Web search portals, data processing industries, and the information services industries.</p>	Publishing Industries, Newspaper, Periodical, Book, and Directory Publishers, Software Publishers, Motion Picture and Sound Recording, Broadcasting, Telecommunications, Satellite Telecommunications, Data Processing, Hosting and Related, Other Information Services

<b>Finance and Insurance - 52</b>	<p>The Finance and Insurance sector comprises establishments primarily engaged in financial transactions (transactions involving the creation, liquidation, or change in ownership of financial assets) and/or in facilitating financial transactions.</p>	<p>Banks, Credit Intermediation and Related Activities, Depository Credit, Nondepository Credit Intermediation, Activities Related to Credit Intermediation, Mortgage and Nonmortgage Loan Brokers, Financial Transactions Processing, Securities, Investment Banking, Portfolio Management, Insurance Carriers and Related Activities, Insurance Agencies and Brokerages</p>
<b>Real Estate and Rental and Leasing - 53</b>	<p>The Real Estate and Rental and Leasing sector comprises establishments primarily engaged in renting, leasing, or otherwise allowing the use of tangible or intangible assets, and establishments providing related services. The major portion of this sector comprises establishments that rent, lease, or otherwise allow the use of their own assets by others. The assets may be tangible, as is the case of real estate and equipment, or intangible, as is the case with patents and trademarks.</p> <p>This sector also includes establishments primarily engaged in managing real estate for others, selling, renting and/or buying real estate for others, and appraising real estate. These activities are closely related to this sector's main activity, and from a production basis they are included here. In addition, a substantial proportion of property management is self-performed by lessors.</p> <p>The main components of this sector are the real estate lessors industries (including equity real estate investment trusts (REITs)); equipment lessors industries (including motor vehicles, computers, and consumer goods); and lessors of nonfinancial intangible assets (except copyrighted works).</p> <p>Excluded from this sector are establishments primarily engaged in renting or leasing equipment with operators. Establishments renting or leasing equipment with operators are classified in various subsectors of NAICS depending on the nature of the services provided (e.g., transportation, construction, agriculture).</p>	<p>Real Estate, Lessors of Real Estate, Offices of Real Estate Agents and Brokers, Activities Related to Real Estate, Rental and Leasing Services, Automotive Equipment Rental and Leasing, Consumer Goods Rental, General Rental Centers, Commercial and Industrial Machinery and Equipment Rental and Leasing, Lessors of Nonfinancial Intangible Assets (except Copyrighted Works)</p>

<b>Professional, Scientific, and Technical Services - 54</b>	<p>The Professional, Scientific, and Technical Services sector comprises establishments that specialize in performing professional, scientific, and technical activities for others. These activities require a high degree of expertise and training. The establishments in this sector specialize according to expertise and provide these services to clients in a variety of industries and, in some cases, to households. Activities performed include: legal advice and representation; accounting, bookkeeping, and payroll services; architectural, engineering, and specialized design services; computer services; consulting services; research services; advertising services; photographic services; translation and interpretation services; veterinary services; and other professional, scientific, and technical services.</p> <p>This sector excludes establishments primarily engaged in providing a range of day-to-day office administrative services, such as financial planning, billing and recordkeeping, personnel supply, and physical distribution and logistics. These establishments are classified in Sector 56, Administrative and Support and Waste Management and Remediation Services.</p>	<p>Legal Services, Accounting, Tax Preparation, Bookkeeping, and Payroll Services, Architectural, Engineering, and Related Services, Specialized Design Services, Computer Systems Design and Related Services, Management, Scientific, and Technical Consulting Services, Scientific Research and Development Services, Advertising, Public Relations, and Related Services, Other Professional, Scientific, and Technical Services</p>
<b>Educational Services - 61</b>	<p>The Educational Services sector comprises establishments that provide instruction and training in a wide variety of subjects. This instruction and training is provided by specialized establishments, such as schools, colleges, universities, and training centers. These establishments may be privately owned and operated for profit or not for profit, or they may be publicly owned and operated. They may also offer food and/or accommodation services to their students.</p> <p>Educational services are usually delivered by teachers or instructors that explain, tell, demonstrate, supervise, and direct learning. Instruction is imparted in diverse settings, such as educational institutions, the workplace, or the home, and through diverse means, such as correspondence, television, the Internet, or other electronic and distance-learning methods. The training provided by these establishments may include the use of simulators and simulation methods. It can be adapted to the particular needs of the students, for example sign language can replace verbal language for teaching students with hearing impairments. All industries in the sector share this commonality of process, namely, labor inputs of instructors with the requisite subject matter expertise and teaching ability.</p>	<p>Educational Support Services, Language Schools, Sports and Recreation Instruction, Technical and Trade Schools</p>

<b>Health Care and Social Assistance - 62</b>	The Health Care and Social Assistance sector comprises establishments providing health care and social assistance for individuals. The sector includes both health care and social assistance because it is sometimes difficult to distinguish between the boundaries of these two activities. The industries in this sector are arranged on a continuum starting with establishments providing medical care exclusively, continuing with those providing health care and social assistance, and finally finishing with those providing only social assistance. Establishments in this sector deliver services by trained professionals. All industries in the sector share this commonality of process, namely, labor inputs of health practitioners or social workers with the requisite expertise. Many of the industries in the sector are defined based on the educational degree held by the practitioners included in the industry.	Offices of Physicians, Dentists, and Other Health Practitioners, Outpatient Care, Medial and Diagnostic Laboratories, Home Health Care Services, Hospitals, Substance Abuse, Specialty Care, Nursing and Residential Care Facilities, Retirement Communities, Residential Intellectual and Development Disability, Mental Health, Social Assistance, Youth centers, Community Food Services
<b>Child Day Care Services - 624410</b>	This industry comprises establishments primarily engaged in providing day care of infants or children. These establishments generally care for preschool children, but may care for older children when they are not in school and may also offer pre-kindergarten and/or kindergarten educational programs.	In-home childcare, babysitting services, nursery schools, child or infant day care centers, preschool centers
<b>Arts, Entertainment, and Recreation - 71</b>	The Arts, Entertainment, and Recreation sector includes a wide range of establishments that operate facilities or provide services to meet varied cultural, entertainment, and recreational interests of their patrons. This sector comprises (1) establishments that are involved in producing, promoting, or participating in live performances, events, or exhibits intended for public viewing; (2) establishments that preserve and exhibit objects and sites of historical, cultural, or educational interest; and (3) establishments that operate facilities or provide services that enable patrons to participate in recreational activities or pursue amusement, hobby, and leisure-time interests.	Performing Arts, Spectator Sports, and Related Industries, Promoters of Performing Arts, Sports, and Similar Events, independent Artists, Writers, and Performers, Amusement and Recreation Industries, Bowling Centers, Golf Courses, Marinas Fitness and Recreational Sports
<b>Caterers - 722320</b>	This industry comprises establishments primarily engaged in providing single event-based food services. These establishments generally have equipment and vehicles to transport meals and snacks to events and/or prepare food at an off-premise site. Banquet halls with catering staff are included in this industry. Examples of events catered by establishments in this industry are graduation parties, wedding receptions, business or retirement luncheons, and trade shows.	Caterers

<b>Mobile Food Services - 722330</b>	This industry comprises establishments primarily engaged in preparing and serving meals and snacks for immediate consumption from motorized vehicles or nonmotorized carts. The establishment is the central location from which the caterer route is serviced, not each vehicle or cart. Included in this industry are establishments primarily engaged in providing food services from vehicles, such as hot dog carts and ice cream trucks.	Ice cream truck vendors Mobile food concession stands Mobile canteens Mobile refreshment stands Mobile food carts Mobile snack stands
<b>Restaurants and Other Eating Places - 72251</b>	This industry comprises establishments primarily engaged in one of the following: (1) providing food services to patrons who order and are served while seated (i.e., waiter/waitress service) and pay after eating; (2) providing food services to patrons who generally order or select items (e.g., at a counter, in a buffet line) and pay before eating; or (3) preparing and/or serving a specialty snack (e.g., ice cream, frozen yogurt, cookies) and/or nonalcoholic beverages (e.g., coffee, juices, sodas) for consumption on or near the premises.	Full Service Restaurants, Take-out establishments, Coffee Shop,. Limited Service Restaurants, Cafeterias, Buffets, Snack and Beverage Bars
<b>Other Services (except Public Administration) - 81</b>	<p>The Other Services (except Public Administration) sector comprises establishments engaged in providing services not specifically provided for elsewhere in the classification system. Establishments in this sector are primarily engaged in activities such as equipment and machinery repairing, promoting or administering religious activities, grantmaking, advocacy, and providing dry-cleaning and laundry services, personal care services, death care services, pet care services, photofinishing services, temporary parking services, and dating services.</p> <p>Private households that engage in employing workers on or about the premises in activities primarily concerned with the operation of the household are included in this sector.</p>	General Repair and Maintenance, Commercial and Industrial Machinery and Equipment (Except Automotive and Electronic) Repair and Maintenance, Personal and Household Goods Repair and Maintenance, Appliance Repair and Maintenance, Reupholster and Furniture Repair, Footwear and Leather Goods Repair, Pet Care (except Veterinary) Services, Photofinishing, Parking Lots and Garages, Grantmaking and giving services, social advocacy organizations, civic and social organizations
<b>Automotive Repair and Maintenance - 8111</b>	This industry group comprises establishments involved in providing repair and maintenance services for automotive vehicles, such as passenger cars, trucks, and vans, and all trailers. Establishments in this industry group employ mechanics with specialized technical skills to diagnose and repair the mechanical and electrical systems for automotive vehicles, repair automotive interiors, and paint or repair automotive exteriors.	Mechanics, Car Interior and Exterior Maintenance



<b>Electronic and Precision Equipment Repair and Maintenance - 8112</b>	This industry comprises establishments primarily engaged in repairing and maintaining one or more of the following: (1) consumer electronic equipment; (2) computers; (3) office machines; (4) communication equipment; and (5) other electronic and precision equipment and instruments, without retailing these products as new. Establishments in this industry repair items, such as microscopes, radar and sonar equipment, televisions, stereos, video recorders, computers, fax machines, photocopying machines, two-way radios and other communications equipment, scientific instruments, and medical equipment.	Cell-phone repair, equipment maintenance, medical equipment, etc.
<b>Hair, Nail, and Skin Care Services - 81211</b>	This industry comprises establishments primarily engaged in one or more of the following: (1) providing hair care services; (2) providing nail care services; and (3) providing facials or applying makeup (except permanent makeup).	Barber shops Hair stylist shops Beauty salons Nail salons
<b>Dry-cleaning and Laundry Services - 8123</b>	This industry group comprises establishments primarily engaged in operating coin-operated or similar self-service laundries and drycleaners; providing dry-cleaning and laundry services (except coin-operated); and supplying, on a rental or contract basis, laundered items (e.g., uniforms, gowns, shop towels, etc.). Included in this industry group are establishments primarily engaged in supplying and servicing coin-operated laundry and dry-cleaning equipment in places of business operated by others, such as apartments and dormitories.	Coin-Operated and non-coin operated Laundries and Drycleaners, Linen and uniform supply, Industrial Launderers,
<b>Delivery Services - 492000</b>	Industries in the Couriers and Messengers subsector provide intercity, local, and/or international delivery of parcels and documents (including express delivery services) without operating under a universal service obligation. These articles may originate in the U.S. but be delivered to another country and can be described as those that may be handled by one person without using special equipment. This allows the collection, pick-up, and delivery operations to be done with limited labor costs and minimal equipment. Sorting and transportation activities, where necessary, are generally mechanized. The restriction to small parcels partly distinguishes these establishments from those in the transportation industries. The complete network of courier services establishments also distinguishes these transportation services from local messenger and delivery establishments in this subsector. This includes the establishments that perform intercity transportation as well as establishments that, under contract to them, perform local pick-up and delivery. Messengers, which usually deliver within a metropolitan or single urban area, may use bicycle, foot, small truck, or van.	Couriers and Messengers, Post Mates, Amazon Flex, Dolly

## CED Business Types Dropdown Menu

<b>Janitorial and Housekeeping Services - 561720</b>	This industry comprises establishments primarily engaged in cleaning building interiors, interiors of transportation equipment (e.g., aircraft, rail cars, ships), and/or windows.	Custodial services Service station cleaning and degreasing services Housekeeping (i.e., cleaning) services Washroom sanitation services Maid (i.e., cleaning) services
<b>Landscaping Services - 561730</b>	This industry comprises (1) establishments primarily engaged in providing landscape care and maintenance services and/or installing trees, shrubs, plants, lawns, or gardens and (2) establishments primarily engaged in providing these services along with the design of landscape plans and/or the construction (i.e., installation) of walkways, retaining walls, decks, fences, ponds, and similar structures	Gardners, Landscapers
<b>Other: Please identify business types listed as other within the MPR narrative</b>		

**[Insert Subrecipient Name]**

**Fiscal Year 2026 Community and Economic Development CDBG Grantee – Low to Moderate Income Clients**  
*Personal information requested below is confidential and will remain internal. We collect information directly from you with your permission as required by those funding our programs. As such, this information is required as it allows us to provide services free of charge and better understand the needs of our clients.*

Part I: Required Confidential Client / Beneficiary HUD Demographic Data

CLIENT NAME:		CLIENT BIRTH DATE:		CLIENT UNIQUE IDENTIFIER #:	
CLIENT PHYSICAL ADDRESS:		CITY:		STATE:	ZIP:
TELEPHONE:	( ) —	EMAIL:			
CLIENT ETHNIC BACKGROUND (REQUIRED TO CHECK ONE):	<input type="checkbox"/> HISPANIC/LATINO <input type="checkbox"/> NOT HISPANIC/LATINO	GENDER IDENTITY (OPTIONAL):	<input type="checkbox"/> FEMALE <input type="checkbox"/> MALE <input type="checkbox"/> NON-BINARY	IS CLIENT HEAD OF HOUSEHOLD <sup>1</sup> ?	<input type="checkbox"/> YES <input type="checkbox"/> No
CLIENT RACIAL BACKGROUND (REQUIRED TO CHECK ONE):	<div> <input type="checkbox"/> WHITE           <input type="checkbox"/> BLACK/AFRICAN AMERICAN           <input type="checkbox"/> ASIAN           <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE           <input type="checkbox"/> NATIVE HAWAIIAN/OTHER PACIFIC ISLANDER         </div> <div> <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE &amp; WHITE           <input type="checkbox"/> AMERICAN INDIAN/ALASKAN NATIVE &amp; BLACK/AFRICAN AMERICAN           <input type="checkbox"/> ASIAN &amp; WHITE           <input type="checkbox"/> BLACK/AFRICAN AMERICAN &amp; WHITE           <input type="checkbox"/> OTHER MULTI-RACIAL         </div>				

Part II: Required Confidential Client / Beneficiary Income Certification. Must be completed and signed prior to services.

**1) Number of Employees & Owners:**

The total number of employee(s) is: \_\_\_\_\_. The total number of Owner(s) is: \_\_\_\_\_. Combined Employee(s) and Owner(s) = \_\_\_\_\_.

**2) Number of Family Members & Gross Income:**

My total family size consists of \_\_\_\_\_ members, and the total gross annual income\* for all adult members is \$\_\_\_\_\_.

\*Gross annual income must include all sources of income (wages, child support, SSI, unemployment, pension, income from assets, etc., but does not include the income of live-in aids, per 24 CFR 5.403).

*I certify that the information given on this form is true and accurate to the best of my knowledge. I am aware that there are penalties for willfully and knowingly giving false information on an application for Federal funds, which may include immediate repayment of all Federal funds received and/or prosecution under the law. I understand that the information on this form is subject to verification by City and federal personnel as part of compliance monitoring.*

Client / Beneficiary Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Client / Beneficiary Name (print): \_\_\_\_\_

**[Insert Subrecipient Name]**

Fiscal Year 2026 Community and Economic Development CDBG Grantee – Low to Moderate Income Clients  
*Information below is to be completed by subrecipient staff. Self-Certification is only allowed for LMI clients assisted and business establishments (start-ups). Documentation of income is required for business expansions (existing business).*

**Microenterprise Business Size (# of Employees & Owners) Verification**

- Business has:** ☐ No employees, as the Participant does not have an operating business  
☐ Five or fewer employee positions with owners  
☐ More than five employee positions with owners **NOT ELIGIBLE for CDBG ASSISTANCE**

**Microenterprise Participant/Beneficiary Income and Location Verification**

Effective Date of the HUD Income Limit Chart being used: \_\_\_\_\_

- Family is:** ☐ 0-30% of median (Extremely Low Income)  
☐ 31-50% of median (Very Low Income)  
☐ 51%- 80% of median (Low/Moderate Income)  
☐ Above 80% of median (Non-Low/Moderate Income) - **NOT ELIGIBLE for CDBG ASSISTANCE**

***Program Operator must:***

**1)** Refer to the current City of San Diego CDBG Income limits from <https://www.sandiego.gov/cdbg> to select the appropriate income category (i.e. Extremely Low Income to Low/Moderate Income)

**Client / Beneficiary First and Last Name (Printed):** \_\_\_\_\_

**Client / Beneficiary Physical Home Address Is\*:**

☐ Within City of San Diego Limits ☐ Beyond City of San Diego Limits

**Business Physical Address\*:** \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ Zip \_\_\_\_\_

☐ Within City of San Diego Limits ☐ Beyond City of San Diego Limits

\*Please note both the client / beneficiary physical home and business address must be within the City of San Diego limits to be eligible for CDBG assistance for organizations working towards LMI client benefit.

***Program Operator Certification:*** *I certify that Client / Beneficiary demographic data provided is true and correct, to the best of my knowledge. I certify that, using the current CPD annual income limits for the City of San Diego compared to stated family size and gross income, resulted in the income level indicated above. I certify that the information regarding microenterprise business size is correctly indicated above. I certify that the residency of the Client / Beneficiary and business address is true and correct per the requirements of 24 CFR 570.309.*

**Note:** This completed certification must be maintained in the Confidential Program file for review at time of monitoring.

**Program Operator Name (printed):** \_\_\_\_\_ **Job Title:** \_\_\_\_\_

**Program Operator Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Eligibility is valid until (one year after certification signed) List Date:** \_\_\_\_\_

*This sheet is intended to supplement the Operating Manual and Subrecipient Agreements. As such, this document does not supersede the Operating Manual and agreement requirements, or procedures established therein.*

## Determining Participant Eligibility

Prior to the provision of services, subrecipients are required to screen potential program participants to determine CDBG eligibility by ensuring clients are both income eligible and City of San Diego residents intending to establish or expand a business within the City of San Diego. Subrecipients are required to maintain written procedures for the screening, intake process, and documentation utilized to ensure services are provided to eligible clients.

Subrecipients are required to utilize an intake or program enrollment form that verifies eligibility in line with the requirements described below. Subrecipients are required to maintain case files on each client or business assisted with CDBG funds; retaining required supporting documentation physically or electronically.

### Income Verification

Determination of Low-Moderate Income (LMI) Status in accordance with the most current HUD Income Limits issued by HUD (<http://www.huduser.org/portal/datasets/il.html>) supported by backup documentation is required for each client or business served on an annual basis. The most recently updated CDBG Income Limits are effective as of June 1, 2025; please see the <http://www.sandiego.gov/cdbg> website for additional details. Microenterprise Assistance projects are required to document that 100 percent of the clients or businesses served with CDBG funds are a member of a low to moderate-income family.

**Subrecipients are required to utilize the tiered system outlined below for income verification purposes:**

- Separate standards for LMI clients assisted and businesses established versus businesses expanded
  - Higher standard of documentation necessary for business expansions
  - Signed self-certification is only allowed for LMI clients assisted and Business Established; **self-certification is not allowed for Business Expansion**
- Please pay close attention to the documentation distinctions outlined below
- Organizations must incorporate these guidelines into their CDBG policies and intake/program enrollment forms
  - If an organization can demonstrate their current model meets the criterion established below and is approved by their project manager and monitoring staff no change is needed.

### Establishing LMI Status for LMI Clients Assisted and/or Businesses Established

**The only acceptable documents are listed below. CDBG case files are required to contain at least one of:**

- Completed and signed Self-Certification Form Provided by the City, please see Attachment.
- Most recent years tax return establishing annual income and number of household members
- Copy of the most recent paystubs for all employed household members, utilized to calculate an anticipated yearly income and statement on the current number of household members;
  - Signed certification by the client that household information provided is correct
- Monthly Profit and Loss statement supported by documentation of revenue stream (i.e. Business Bank Statements, PayPal/Square Accounts) calculated to show anticipated annual income
  - If other household members are employed, documentation and inclusion of their income is required within the anticipated annual income amount
  - Statement on the current number of household members; signed certification by the client that household information provided is correct

## Establishing LMI Status for Business Expansion

**The only acceptable documents are listed below. CDBG case files are required to contain at least one of:**

- Most recent years tax return establishing annual income and number of household members
- Monthly Profit and Loss statement supported by documentation of revenue stream (i.e. Business Bank Statements, PayPal/Square Accounts) calculated to show anticipated annual income.
  - If other household members are employed, documentation and inclusion of their income is required within the anticipated annual income amount
  - Statement on the current number of household members; signed certification by the client that household information provided on household is correct
- Copy of the most recent paystubs for all employed household members, utilized to calculate an anticipated yearly income and statement on the current number of household members:
  - Signed certification by the client that household information provided is correct

**Examples of documents that are insufficient to determine LMI Status include:**

- Documentation of public benefits receipt such as MediCal benefits, SNAP, etc.
- Bank statements alone

## City of San Diego Residency

Determination of City of San Diego Residency must be established with supporting documentation provided on an annual basis. **At least one of the following documents displaying a City of San Diego address is required:**

- State issued license or identification card
- Copy of lease or rental agreement
- Utility bill (including cellular phone) or bank account statements
- Insurance Documents including medical, dental, vision, life, home, rental, and vehicle
- Mail received from a government agency
- Deed or title to residential real property
- Medical documents and Employment documents
- Internal Revenue Service or California Franchise Tax Board tax return
- California Certificate of Vehicle or Vessel Title or Registration
- Change of Address Confirmation by the U.S. Postal Service (Form CNL 107)
- An acceptable No Fee Identification Card Eligibility Verification (DL 933)
- Voter registration confirmation letter or postcard issued by the California Secretary of State or the San Diego County Registrar of Voters
- Court documents that list the applicant as a resident of the City of San Diego

If an individual is experiencing homelessness and is unable to provide documentation of City of San Diego residency, documentation certifying their status from HMIS or a homeless service provider is required.

## Demographic Information

Determination of a client's demographic background is required by HUD to be collected on all CDBG beneficiaries. As such, Subrecipients are required to collect, document and report on relevant demographics. Race and ethnicity are required while gender identity is optional. A 'client' is defined as a City of San Diego LMI resident desiring to establish or expand a microenterprise within the City of San Diego.

Please see the Self-Certification and Intake Attachment for additional information and an example form utilized to collect the required demographics.

## Avoiding Duplication

Subrecipients are expected to practice due diligence in avoiding duplications of businesses assisted with establishment or expansion within the same program year. Please note:

- Subrecipients are required to only count a microenterprise as either being assisted with establishment or expansion once per program year (not both)
- Subrecipients may count expansions that occur across different program years
- If a client establishes separate and distinct businesses, Subrecipients may count each different business establishment or expansion service

## Monthly Programmatic Reports

Unduplicated LMI clients assisted through technical assistance or workshops are only allowed to be counted once per program year by each Subrecipient. Please note:

- On monthly programmatic reports (MPR), please ensure completion of all relevant tabs including indicators, demographics, and the business tab (utilized to record business details once a business is stated to have been established or expanded)
- Subrecipients are required only to report unique LMI clients assisted through one-on-one Technical Assistance (TA) or Business Assistance (Establishment or Expansion)
- 'New Unduplicated' refers to unique clients and business that are assisted over the course of the program year. As such, the 'Year to Date' figure should represent unique clients and businesses assisted, and no duplication (double counting) should occur with indicators containing 'New Unduplicated' language

### Example 1:

- If a client is enrolled in October and attends two different workshops, one in October and another in November, the Subrecipient should only record the initial October entry on their MPR to avoid duplication over the course of the year.

### Example 2:

- If a client is enrolled in October and attends a workshop in October as well, and later in December receives one-on-one technical assistance to complete a business plan the Subrecipient should record this distinct LMI client assisted outcomes two times. Once in October, under Workshops and another in December under one-on-one TA.

## CED Indicators Tracked (See page 6 for additional details)

- Total Number of New Unduplicated Businesses Assisted (Established or Expanded)
  - Total Number of New Unduplicated Businesses Assisted (Established)
  - Total Number of New Unduplicated Existing Businesses Assisted (Expanded)
- Total Number of New Unduplicated Minority-Owned Businesses Assisted
- Total Number of New Unduplicated Woman-Owned Businesses Assisted
- Total Number of New Unduplicated Veteran-Owned Businesses Assisted
- Total Number of Group Technical Assistance Sessions Conducted (Workshops)
- Total Number of Clients that Attended Group Technical Assistance Sessions (Workshops)
- Total Number of One-on-One Technical Assistance Sessions Conducted
- Total Number of New Unduplicated Clients Receiving One-on-One Technical Assistance
- Total Number of Unduplicated Businesses Receiving Direct Financial Assistance (Grant or Loan Capital) – *Neighborhood Business Improvement Program and CDC Small Business Loan Fund Only*
  - Monthly Total Amount of Direct Financial Assistance Disbursed
- Total Dollar Amount of Non-CDBG Loans Accessed with Organizational Support
- Number of Business Bank Accounts Opened with Organizational Support
- Total Number of New Unduplicated Clients Receiving Financial Literacy Education and TA
- Number of Credit Scores Established or Improved with Organizational Support
- Number of Business Bank Accounts Opened with Organizational Support



## Delivery and Documentation of Services

Subrecipients are required to maintain individual client records and supporting documentation on each of the following indicators; LMI clients assisted, businesses established, businesses expanded, and grant or loan capital provided. This is **in addition to documentation of LMI status, demographic information, and City of San Diego residency.**

### LMI Client Assisted

Documentation Required:

- Program Enrollment / Intake Form plus at least one of the following:
  - Record of workshop attendance
    - i. Sign-in sheets are required for each workshop held
  - Record of one-on-one technical assistance provided

### Business Established (Start-Up)

Documentation Required:

- Program Enrollment / Intake Form
- Recent Business Plan, Containing at a minimum the following elements:
  - Business Description
    - i. i.e., Business ideas, experience, anticipated challenges or strengths, etc.
  - Market Review
    - i. i.e., Competitors, target market, advertising intentions, etc.
  - Anticipated Start-up Steps and Costs
    - i. i.e., Identification of items needed or already acquired, estimated expenses and revenue, securing of capital or savings to be utilized
- City of San Diego Business Certificate/License – *Required for all businesses except in-home childcare providers*
- Fictitious Business Name (Optional) - *Required for all businesses except in-home childcare providers*

### Business Expanded (Existing)

Documentation Required:

- Program Enrollment / Intake Form
- \*Recent Business Plan, if a business was assisted in their establishment, an updated plan is required to indicate the intent of expansion. Containing at a minimum the following elements:
  - Business Description
    - i. i.e., Business ideas, experience, anticipated challenges or strengths, etc.
  - Market Review
    - i. i.e., Competitors, target market, advertising intentions, etc.
  - Anticipated Start-up Steps and Costs
    - i. i.e., Identification of items needed or already acquired, estimated expenses and revenue, securing of capital or savings to be utilized
  - Current rates for service or product
  - Identification of any acquired business equipment, tools, vehicles, property/storefronts
  - Revenue and expenses for prior two months
- Overview of Expansion Plan
  - Steps and actions required to expand business
  - Provision of a narrative of how these actions will lead to expansion, i.e., expand service capacity or lead to the hiring of staff
- City of San Diego Business Certificate/License - *Required for all businesses except in-home childcare providers*



## Monthly Reporting Details

Subrecipients are required to submit monthly programmatic reports (MPRs) that outlines services provided within the indicators tab and details on the businesses assisted on the businesses tab. Please note businesses should only be listed on the business tab once all of steps and documentation necessary as outlined above are completed. All indicators should be supported with documentation.

Indicator Label	Indicator Description
1. Total Number of New Unduplicated Businesses Assisted (Established or Expanded)	This is an auto-calculated number from the sum of 1a and 1b.
1a. Total Number of New Unduplicated Businesses Assisted (Established)	Enter the number of businesses established during the month being reported as a direct result of your organization's assistance. Count each business only once even if it received assistance on more than one occasion from your organization. Businesses reported in previous months of the current grant cycle/fiscal year must be excluded. Each business reported must have a case file including items such as the business plan (in-home childcare excluded), copy of the business tax certificate, loan or grant underwriting documentation (if applicable), proof of DUNS registration (if applicable), demographic data of the owner, etc.
1b. Total Number of New Unduplicated Existing Businesses Assisted (Expanded)	Enter the number of businesses expanded during the month being reported as a direct result of your organization's assistance. Count each business only once even if it received assistance in more than one occasion from your organization. Businesses reported in previous months of the current grant cycle must be excluded. Each business reported must have a case file including items such as the business plan, copy of the business tax certificate (in-home childcare excluded), loan or grant underwriting documentation (if applicable), proof of DUNS registration (if applicable), demographic data of the owner, etc. In addition, the case file must document the expansion (e.g., new equipment purchased increasing output capacity, additional employee hired, new product or service launched, new branch location opened, etc.).
2. Total Number of New Unduplicated Minority-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a minority owner. Each business reported must have a case file with demographic data to support the designation of minority owned. Indicators 2, 3, and 4 are not mutually exclusive.
3. Total Number of New Unduplicated Woman-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a woman. Each business reported must have a case file with demographic data to support the designation of woman owned. Indicators 2, 3, and 4 are not mutually exclusive.
4. Total Number of New Unduplicated Veteran-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a veteran. Each business reported must have a case file with demographic data to support the designation of veteran owned. Indicators 2, 3, and 4 are not mutually exclusive.
5. Total Number of Group Technical Assistance Sessions Conducted (Workshops)	Enter the number of group technical assistance sessions conducted by your organization during the month being reported targeting CDBG-supported individuals, microenterprises, and microentrepreneurs. For each session, ensure that attendance records are maintained, tracking each attendee.
6. Total Number of New Unduplicated Clients that Attended Group Technical Assistance Sessions (Workshops)	Enter the number of individual clients that attended the group technical assistance sessions conducted during the month being reported. Count each client only once even if he or she attended more than one session during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client.

## Monthly Reporting Details

Indicator Label	Indicator Description
7. Total Number of One-on-One Technical Assistance Sessions Conducted	Enter the number of one-on-one technical assistance (TA) sessions conducted by your organization as part of the CDBG-funded project during the month being reported. "Session" is defined as an instance of one-on-one assistance between your organization and the individual client. For example, if ten individual clients attended two TA sessions each, then the figure to report would be 20 (10 x 2) total one-on-one TA sessions. Each session must be documented in the corresponding client file.
8. Total Number of New Unduplicated Clients Receiving One-on-One Technical Assistance	Enter the number of individual clients assisted via one-on-one technical assistance (TA) by your organization during the month being reported. The number of unduplicated clients assisted through one-on-one TA is the primary indicator to determine the number of individual clients served throughout a fiscal year/grant cycle. Count each client only once even if he or she attended two or more one-on-one TA sessions during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client assisted with TA reported must have a case file documenting the household income determination, the demographic data of the client, and the TA provided (where, when, topics, and results). The demographic data reported by your organization for the month must equal the total number entered here.
9. Total Number of New Unduplicated Businesses Receiving Direct CDBG Financial Assistance (Grant or Loan Capital)	Enter the number of businesses that received a grant or loan from your organization using CDBG funds during the month being reported. Your organization must report a valid DUNS number for each business that received a CDBG-funded grant or loan. Businesses that received a grant or loan from other sources (non-CDBG) must be excluded; however, businesses that received a grant or loan funded in part by CDBG may be counted. For each business reported, documentation must be maintained as to the underwriting that occurred leading to the grant or loan, as well as uses for the funds. The number entered here must equal the number of businesses entered in the 'Businesses' tab. <i>Please note this item only applies for LISC and CDC Small Business Finance.</i>
10. Monthly Total Amount of Direct CDBG Financial Assistance Disbursed	Enter the total amount of direct financial assistance actually issued to businesses during the month being reported in the form of CDBG-funded loans and/or grants. Do not include CDBG funds received from the City for loans or grants but not yet actually issued to businesses. Do not include loans or grants made with other funding sources (non-CDBG). <i>Please note this item only applies for LISC and CDC Small Business Finance.</i>
11. Total Dollar Amount of Non-CDBG Loans Accessed with Organizational Support	Enter the total amount of direct financial assistance actually issued to businesses during the month being reported in the form of loan capital that is non-CDBG. This indicator is intended to capture the amount of non-CDBG loan capital that is received by businesses assisted. The source of the loan capital may either be internal, i.e., a loan fund within your organization if you are a CDFI, or external, i.e., you assisted a business in securing a loan from an outside agency, credit union, or bank. Do not include loan funds made with CDBG capital.
12. Total Number of New Unduplicated Clients Receiving Financial Literacy Education and TA	Enter the total number of new unduplicated clients who received or attended financial literacy courses or received technical assistance directly related to financial literacy at your organization. This can include both one-on-one or workshop sessions provided by staff.
13. Number of Credit Scores Established or Improved with Organizational Support	Enter the total number of new unduplicated clients whose credit score was either established or improved as a direct result of work with your organization. For example, if a client enrolled with a score of 570 and was able to leverage knowledge gained during a financial literacy course to pay down debt and their score is documented to have improved to 640 (screenshot of Credit Karma and Credit Bureau reports are examples of documentation) you would capture that change here.
14. Number of Business Bank Accounts Opened with Organizational Support	Enter the total number of new unduplicated clients who opened a business bank account that was a direct result of work with your organization.

Subrecipients awarded CDBG funds to implement construction projects must adhere to a variety of procedural, regulatory, and policy requirements. Use the checklist below as a guide through the construction process and regularly consult with your assigned City project manager for questions regarding compliance.

- ☐ Pre-Design Construction Plans Drafted
- ☐ Review if Permits Are Needed/Schedule Inspection with Development Services Department
- ☐ Implement a bid process within ninety (90) days of the start of the fiscal year
- ☐ Review Advertisement for Project with Project Manager
- ☐ Review Invitation to Bid Announcement with Project Manager
- ☐ Publish Bid Advertisement Process (San Diego Daily Journal Corporation)
- ☐ Pre-Bid site walk-through with Potential Contractors (Invite the Project Manager)
- ☐ Bid Opening/Federal and State Labor Law Requirements
- ☐ Contractor Selection and Notification of Award
- ☐ Send Letters to Contractors Not Selected for Project
- ☐ General Contractor Contract Draft Agreement Reviewed by Project Manager
- ☐ Subcontractor Contract Draft Agreement Reviewed by Project Manager
- ☐ Pre-Construction Meeting with General Contractor/Subcontractor Selection
- ☐ Notice to Proceed Issued by Project Manager for Construction to Start
- ☐ Reporting Requirements/ED Grants
- ☐ Construction Site Visit from Project Manager
- ☐ Review Submitted Reports in ED Grants System
- ☐ Complete Closeout Reports and Submit to Project Manager

Contractors working on publicly funded projects with the City of San Diego must adhere to the following Labor Law Requirements (in accordance with CA Labor Code §1771.5 and CCR §16421):

1. **Payment of Prevailing Wage.** The contractor's duty to pay prevailing wages under Labor Code Section 1770 et seq., should the project exceed the exemption amounts;
2. **Apprentices.** The contractor's duty to employ registered apprentices on the public works project under Labor Code Section 1777.5;
3. **Penalties.** The penalties for failure to pay prevailing wages (for non-exempt projects) and employ apprentices including forfeitures and debarment under Labor Code Sections 1775 and 1777.7;
4. **Certified Payroll Records.** The requirement to keep and submit copies upon request of certified payroll records under Labor Code Section 1776; and penalties for failure to do so under Labor Code Section 1776(g);
5. **Nondiscrimination in Employment.** The prohibition against employment discrimination under Labor Code Section 1777.6, the Government Code, and Title VII of the Civil Rights Act of 1964;
6. **Kickback Prohibition.** The prohibition against accepting or extracting kickbacks from employee wages under Labor Code Section 1778;
7. **Acceptance of Fees Prohibition.** The prohibition against accepting fees for registering any person for public work under Labor Code Section 1779; or for filing work orders on public works under Labor Code Section 1780;
8. **Listing of Subcontractors.** The requirement to list all subcontractors under Public Contract Code Section 4100 et seq.;
9. **Proper Licensing.** The requirement to be properly licensed and to require all subcontractors to be properly licensed and the penalty for employing workers while unlicensed under Labor Code Section 1021 and under the California Contractors License Law, found at Business and Professions Code Section 7000 et seq.;
10. **Unfair Competition Prohibited.** The prohibition against unfair competition under Business and Professions Code Sections 17200–17208;
11. **Workers' Compensation Insurance.** The requirement that the contractor be properly insured for Workers Compensation under Labor Code Section 1861;
12. **OSHA.** The requirement that the contractor abide by the Occupational, Safety and Health laws and regulations that apply to the particular construction project;
13. **Undocumented Workers.** The federal prohibition against hiring undocumented workers, and the requirement to secure proof of eligibility/citizenship from all workers;
14. **Itemized Wage Statements.** The requirement to provide itemized wage statements to employees under Labor Code section 226.



The descriptions below are provided to assist you with completing the Monthly Programmatic Reports (MPRs) in ED Grants. Indicators are arranged according to the project types listed below. Consult with ED Grants or your organization's assigned City project manager if you do not know the project type pertaining to your agreement. [Note: Not all project types listed below are available each fiscal year.]

- **PS&CG:** Public Services
- **CED-MTA:** Community & Economic Development/Microenterprise Technical Assistance
- **HR&SUS-Single:** Single-Family Housing Rehabilitation & Sustainability
- **HR&SUS-Multi:** Multifamily Housing Rehabilitation & Sustainability
- **NCIP-F&SUS:** Nonprofit Capital Improvement Projects/Public Facility Improvements
- **MOU-Homelessness CDBG/GF:** Homeless Activities Funded by CDBG or General Fund
- **MOU-Homelessness ESG-Shelter:** Homeless Shelters Funded by ESG
- **MOU-Homelessness ESG-RRH:** Rapid Re-Housing Activities Funded by ESG
- **MOU-FH:** Fair Housing Activities
- **ED:** Special Economic Development Activities

Indicator	Description
<b>PS</b>	
Total Number of Unduplicated Individual Clients Assisted	Enter the number of individual clients assisted by your organization during the month being reported. Count each client only once even if he or she received assistance more than once during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client.
<b>CED-MTA</b>	
1. Total Number of New Unduplicated Businesses Assisted (Established or Expanded)	This is an auto-calculated number from the sum of 1a and 1b.
1a. Total Number of New Unduplicated Businesses Assisted (Established)	Enter the number of businesses established during the month being reported as a direct result of your organization's assistance. Count each business only once even if it received assistance on more than one occasion from your organization. Businesses reported in previous months of the current grant cycle/fiscal year must be excluded. Each business reported must have a case file including items such as the business plan, copy of the business tax certificate, loan or grant underwriting documentation (if applicable), proof of DUNS registration (if applicable), demographic data of the owner, etc.
1b. Total Number of New Unduplicated Existing Businesses Assisted (Expanded)	Enter the number of businesses expanded during the month being reported as a direct result of your organization's assistance. Count each business only once even if it received assistance in more than one occasion from your organization. Businesses reported in previous months of the current grant cycle must be excluded. Each business reported must have a case file including items such as the business plan, copy of the business tax certificate, loan or grant underwriting documentation (if applicable), proof of DUNS registration (if applicable), demographic data of the owner, etc. In addition, the case file must document the expansion (e.g., new equipment purchased increasing output capacity, additional employee hired, new product or service launched, new branch location opened, etc.).
2. Total Number of New Unduplicated Minority-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a minority owner. Each business reported must have a case file with demographic data to support the designation of minority-owned. Indicators 2, 3, and 4 are not mutually exclusive.
3. Total Number of New Unduplicated Woman-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a woman. Each business reported must have a case file with demographic data to support the designation of woman-owned. Indicators 2, 3, and 4 are not mutually exclusive.
4. Total Number of New Unduplicated Veteran-Owned Businesses Assisted	Of the total number of new unduplicated businesses assisted (established or expanded) reported for the month, enter the number of those owned by a veteran. Each business reported must have a case file with demographic data to support the designation of veteran-owned. Indicators 2, 3, and 4 are not mutually exclusive.



Indicator	Description
5. Total Number of Group Technical Assistance Sessions Conducted (Workshops)	Enter the number of group technical assistance sessions conducted by your organization during the month being reported targeting CDBG-supported individuals, microenterprises, and microentrepreneurs. For each session, ensure that attendance records are maintained, tracking each attendee.
6. Total Number of New Unduplicated Clients that Attended Group Technical Assistance Sessions (Workshops)	Enter the number of individual clients that attended the group technical assistance sessions conducted during the month being reported. Count each client only once even if he or she attended more than one session during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client.
7. Total Number of One-on-One Technical Assistance Sessions Conducted	Enter the number of one-on-one technical assistance (TA) sessions conducted by your organization as part of the CDBG-funded project during the month being reported. "Session" is defined as an instance of one-on-one assistance between your organization and the individual client. For example, if ten individual clients attended two TA sessions each, then the figure to report would be 20 (10 x 2) total one-on-one TA sessions. Each session must be documented in the corresponding client file.
8. Total Number of New Unduplicated Clients Receiving One-on-One Technical Assistance	Enter the number of individual clients assisted via one-on-one technical assistance (TA) by your organization during the month being reported. The number of unduplicated clients assisted through one-on-one TA is the primary indicator to determine the number of individual clients served throughout a fiscal year/grant cycle. Count each client only once even if he or she attended two or more one-on-one TA sessions during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client assisted with TA reported must have a case file documenting the household income determination, the demographic data of the client, and the TA provided (where, when, topics, and results). The demographic data reported by your organization for the month must equal the total number entered here.
9. Total Number of New Unduplicated Businesses Receiving Direct Financial Assistance (Grant or Loan Capital)	Enter the number of businesses that received a grant or loan from your organization using CDBG funds during the month being reported. Your organization must report a valid DUNS number for each business that received a CDBG-funded grant or loan. Businesses that received a grant or loan from other sources (non-CDBG) must be excluded; however, businesses that received a grant or loan funded in part by CDBG may be counted. For each business reported, documentation must be maintained as to the underwriting that occurred leading to the grant or loan, as well as uses for the funds. The number entered here must equal the number of businesses entered in the 'Businesses' tab.
10. Monthly Total Amount of Direct Financial Assistance Disbursed	Enter the total amount of direct financial assistance actually issued to businesses during the month being reported in the form of CDBG-funded loans and/or grants. Do not include CDBG funds received from the City for loans or grants but not yet actually issued to businesses. Do not include loans or grants made with other funding sources (non-CDBG).
11. Total Dollar Amount of Non-CDBG Loans Accessed with Organizational Support	Enter the total amount of direct financial assistance actually issued to businesses during the month being reported in the form of loan capital that is non-CDBG. This indicator is intended to capture the amount of non-CDBG loan capital that is received by businesses assisted. The source of the loan capital may either be internal, i.e., a loan fund within your organization if you are a CDFI, or external, i.e., you assisted a business in securing a loan from an outside agency, credit union, or bank. Do not include loan funds made with CDBG capital.
12. Total Number of New Unduplicated Clients Receiving Financial Literacy Education and TA	Enter the total number of new unduplicated clients who received or attended financial literacy courses or received technical assistance directly related to financial literacy at your organization. This can include both one-on-one or workshop sessions provided by staff.
13. Number of Credit Scores Established or Improved with Organizational Support	Enter the total number of new unduplicated clients whose credit score was either established or improved as a direct result of work with your organization. For example, if a client enrolled with a score of 570 and was able to leverage knowledge gained during a financial literacy course to pay down debt and their score is documented to have improved to 640 (screenshot of Credit Karma and Credit Bureau reports are examples of documentation) you would capture that change here.
14. Number of Business Bank Accounts Opened with Organizational Support	Enter the total number of new unduplicated clients who opened a business bank account that was a direct result of work with your organization.

Indicator	Description
<b>HR&amp;SUS-Single</b>	
1. Total Number of Unduplicated Housing Units Improved	Enter the number of housing units improved during the month being reported. Count each housing unit only once. Housing units reported in previous months of the current grant cycle must be excluded.
1a. Total Number of Housing Units Occupied by Elderly (62 Years or Older)	Of the total number of unduplicated housing units improved, enter the number that are occupied by persons 62 years of age or older. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1b. Total Number of Housing Units Brought from Substandard to Standard Condition (HQS or Local Code) Based on Substandard Code Violations Identified	Of the total number of unduplicated housing units improved, enter the number that were brought from substandard condition to standard condition. These housing units should now be free of code violations. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1c. Total Number of Section 504 Accessible Housing Units	Of the total number of unduplicated housing units improved, enter the number that are accessible to persons with disabilities per Section 504 of the 1973 Rehabilitation Act. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1d. Total Number of Housing Units Qualified as Energy Star (i.e., Certified Energy Audit Obtained)	Of the total number of unduplicated housing units improved, enter the number that have successfully undergone an Energy Audit and received an Energy Star certification. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1e. Total Number of Housing Units Brought into Compliance with Lead Safety Rules (24 CFR Part 35)	Of the total number of unduplicated housing units improved, enter the number that have successfully been brought into compliance with lead safety rules per 24 CFR Part 35 and no longer pose lead-based paint hazards to young children and other at-risk populations. These housing units built before January 1, 1978, should have had lead-based paint hazards addressed and subsequently cleared by a certified professional as safe for occupancy. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
<b>HR&amp;SUS-Multi</b>	
1. Total Number of Unduplicated Housing Units Improved	Enter the number of housing units improved during the month being reported. Count each housing unit only once. Include both affordable units and market-rate units. Housing units reported in previous months of the current grant cycle must be excluded.
1a. Total Number of Section 504 Accessible Housing Units (i.e., Unit Is 100% Accessible as Applicable and No Additional ADA Barriers Exist)	Of the total number of unduplicated housing units improved, enter the number that are accessible to persons with disabilities per Section 504 of the 1973 Rehabilitation Act and the Americans with Disabilities Act. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1b. Total Number of Housing Units Brought from Substandard to Standard Condition (HQS or Local Code) Based on Substandard Code Violations Identified	Of the total number of unduplicated housing units improved, enter the number that were brought from substandard condition to standard condition. These housing units should now be free of code violations. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1c. Total Number of Housing Units Qualified as Energy Star (i.e., Certified Energy Audit Obtained)	Of the total number of unduplicated housing units improved, enter the number that have successfully undergone an Energy Audit and received an Energy Star certification. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1d. Total Number of Housing Units Brought into Compliance with Lead Safety Rules (24 CFR Part 35)	Of the total number of unduplicated housing units improved, enter the number that have successfully been brought into compliance with lead safety rules per 24 CFR Part 35 and no longer pose lead-based paint hazards to young children and other at-risk populations. These housing units built before January 1, 1978, should have had lead-based paint hazards addressed and subsequently cleared by a certified professional as safe for occupancy. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
1e. Total Number of Housing Units Created through Conversion of Non-Residential to Residential Buildings	Of the total number of unduplicated housing units improved, enter the number that resulted from the conversion of non-residential buildings to residential buildings. The number reported here must not exceed the total number of unduplicated housing units improved for the month being reported.
2. Total Number of Affordable Housing Units	Enter the number of housing units improved that are affordable.
2a. Total Number of Housing Units Occupied by Elderly (62 Years or Older) [Affordable Units Only]	Of the total number of affordable housing units improved, enter the number that are occupied by persons 62 years of age or older. The number reported here must not exceed the total number of affordable housing units improved for the month being reported.
2b. Number of Years of Affordability Guaranteed [Affordable Units Only]	Enter the number of years the affordability status of the units will be kept in place.

Indicator	Description
2c. Total Number of Housing Units Subsidized with Project-Based Rental Assistance by Another Federal, State, or Local Program [Affordable Units Only]	Of the total number of affordable housing units improved, enter the number that are subsidized with project-based rental assistance. The number reported here must not exceed the total number of affordable housing units improved for the month being reported.
2d. Total Number of Housing Units Designated for Persons with HIV/AIDS Including Units Receiving Assistance for Operations [Affordable Units Only]	Of the total number of affordable housing units improved, enter the number that are designated for persons living with HIV/AIDS. The number reported here must not exceed the total number of affordable housing units improved for the month being reported.
2e. Total Number of Housing Units Designated for Persons with HIV/AIDS, Specifically for the Chronically Homeless [Affordable Units Only]	Of the total number of affordable housing units designated for persons living with HIV/AIDS, enter the number that are designated for the chronically homeless. The number reported here must not exceed the total number of affordable housing units improved for the month being reported and entered in 2d. "Chronically homeless" is defined as: (1) An individual who is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and has been in this state continuously for at least one year or on at least four separate occasions in the last three years, where each homeless occasion was at least 15 days; and can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
2f. Total Number of Permanent Housing Units Designated for Homeless Persons and Families, Including Units Receiving Assistance for Operations [Affordable Units Only]	Of the total number of affordable housing units improved, enter the number that are designated for homeless persons and families. The number reported here must not exceed the total number of affordable housing units improved for the month being reported. "Homeless" is defined in four broad categories: literally homeless; imminent risk of homelessness; homeless under other federal statutes; or fleeing/attempting to flee domestic violence.
2g. Total Number of Permanent Housing Units Designated for Homeless Persons and Families, Specifically for the Chronically Homeless [Affordable Units Only]	Of the total number of affordable housing units designated for homeless persons and families, enter the number that are designated for the chronically homeless. The number reported here must not exceed the total number of affordable housing units improved for the month being reported and entered in 2f. "Chronically homeless" is defined as: (1) An individual who is homeless and lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and has been in this state continuously for at least one year or on at least four separate occasions in the last three years, where each homeless occasion was at least 15 days; and can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability; (2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or (3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.
<b>NCIP-F&amp;SUS</b>	
1. Total Number of Unduplicated Clients Served	Enter the number of individual clients assisted by your organization during the month being reported. Count each client only once even if he or she received assistance more than once during the month. Clients reported in previous months of the grant cycle must be excluded. Each client reported must have a case file documenting the household income determination (or status as a homeless individual, if applicable) and demographic data of the client.

Indicator	Description
1a. Total Number of Unduplicated Clients Served with New Access to This Type of Public Facility Improvement	Of the total number of unduplicated clients assisted, enter the number that benefited from access to a new facility/improvement. "New facility/improvement" means that grant funds resulted in a space for providing services that did not exist prior to the completion of the project. Count each client only once even if he or she received assistance more than once during the month at the new facility/improvement. Clients reported in previous months of the grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client. The number entered here cannot exceed the total number of unduplicated clients served and should not overlap with the numbers reported for those served with improved access or access to a public facility that is no longer substandard.
1b. Total Number of Unduplicated Clients Served with Improved Access to This Type of Public Facility Improvement	Of the total number of unduplicated clients assisted, enter the number that benefited from improved access to an existing facility/improvement. "Improved access" means that grant funds resulted in a space for providing services that existed prior to the completion of the project but is now expanded, renovated, easier to get to, can serve more clients, can serve more diverse clients, etc. Count each client only once even if he or she received assistance more than once during the month at the improved facility. Clients reported in previous months of the grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client. The number entered here cannot exceed the total number of unduplicated clients served and should not overlap with the numbers reported for those served with new access or access to a public facility that is no longer substandard.
1c. Total Number of Unduplicated Clients Served with Access to Public Facility that is No Longer Substandard	Of the total number of unduplicated clients assisted, enter the number that benefited from access to a facility that is no longer substandard. "No longer substandard" means the space that used to suffer from building code violations prior to the completion of the project is now up to code and no longer poses a threat to the health and safety of clients. Count each client only once even if he or she received assistance more than once during the month at the rehabilitated facility. Clients reported in previous months of the grant cycle must be excluded. Each client reported must have a case file documenting the household income determination and demographic data of the client. The number entered here cannot exceed the total number of unduplicated clients served and should not overlap with the numbers reported for those served with new access or improved access to a public facility.
2. Total Number of Homeless Persons Given Overnight Shelter [Homeless Facilities Only]	If the facility improved serves homeless clients only (that is, it is a homeless shelter), enter the number of homeless individuals served during the month being reported. Count each client only once even if he or she received assistance more than once during the month at the improved facility. Clients reported in previous months of the grant cycle must be excluded. Each client reported must have a case file verifying the homeless status and documenting the demographic data of the client. The number entered here cannot exceed the earlier reported total number of unduplicated clients served.
3. Total Number of Beds Created in Overnight Shelter or Other Emergency Housing [Homeless Facilities Only]	If the facility improved serves homeless clients only (that is, it is a homeless shelter), enter the number of unduplicated beds made available to homeless individuals as a result of the facility improvement during the month being reported. Count each bed only once even if it was used by multiple individuals during the month. Beds reported in previous months of the grant cycle must be excluded. Do not report on "bed-nights" here.
<b>MOU-Homelessness CDBG/GF</b>	
1. Total Number of Unduplicated Individual Clients Assisted	Enter the number of individual homeless clients assisted by your organization during the month being reported. Count each client only once even if he or she received assistance more than once during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file verifying the homeless status and documenting the income and demographic data of the client.
2. Total Number of Unduplicated Clients that Were Served in Prior Years through This Project	Enter the number of individual homeless clients assisted by your organization during the month being reported who were also assisted in years prior to the current year. Count each "returnee" client only once even if he or she received assistance more than once during the month. "Returnee" clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file verifying the homeless status and documenting the income and demographic data of the client.



Indicator	Description
3. Total Number of Unduplicated Single Adult Households (without Children) Moved into Permanent Housing	Enter the number of homeless households without children assisted by your organization that moved into permanent housing during the month being reported. Count each household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the homeless status of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household. Households with children should not be counted here.
4. Total Number of Unduplicated Family Households Moved into Permanent Housing	Enter the number of homeless households with children assisted by your organization that moved into permanent housing during the month being reported. Count each household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the homeless status of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household. Households without children should not be counted here.
<b>MOU-Homelessness ESG-Shelter</b>	
1. Total Number of Unduplicated Individuals Served	Enter the number of individual homeless clients assisted by your organization during the month being reported. Count each client only once even if he or she received assistance more than once during the month. Clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file verifying the homeless status and documenting the demographic data of the client.
2. Total Number of Unduplicated Households Served	Enter the number of homeless households assisted by your organization during the month being reported. Count each household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the homeless status of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household.
3. Total Number of Households that Exited from the Project	Enter the number of homeless households assisted by your organization that left the shelter during the month being reported. Count each household only once even if it returned and exited the shelter more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the homeless status of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household.
3a. Total Number of Households that Moved to Transitional Housing	Of the number of households that exited the shelter during the month being reported, enter the total number that moved to transitional housing. The number reported here combined with the number reported for 3b and 3c must not exceed the total number of households that exited the shelter for the month being reported. "Transitional housing" is defined by HUD as a project that has as its purpose facilitating the movement of homeless individuals and families to permanent housing within a reasonable amount of time (usually 24 months). Transitional housing includes housing primarily designed to serve deinstitutionalized homeless individuals and other homeless individuals with mental or physical disabilities and homeless families with children.

Indicator	Description
3b. Total Number of Households that Moved to Permanent Housing	Of the number of households that exited the shelter during the month being reported, enter the total number that moved to transitional housing. The number reported here combined with the number reported for 3a and 3c must not exceed the total number of households that exited the shelter for the month being reported. "Permanent housing" is defined as housing with indefinite leasing, rental, or ownership arrangements and may or may not include supportive services to assist formerly homeless persons or households with achieving housing stability.
3c. Total Number of Other Households that Exited the Project	Of the number of households that exited the shelter during the month being reported, enter the total number that did not move into transitional or permanent housing. The number reported here combined with the number reported for 3a and 3b must not exceed the total number of households that exited the shelter for the month being reported.
4. Total Number of Households that Exited from the Project that Stayed Over Program Length of Stay	Enter the number of homeless households assisted by your organization that left the shelter during the month being reported but had overstayed the shelter program's standard assistance period. For example, if the shelter program's standard assistance period is six months and the household left the program after a stay of eight months, then that household must be included in the count. Each household reported must have a case file verifying the homeless status of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household.
5. Total Number of Bed Nights Provided	Enter the number of bed nights provided by your organization's shelter during the month being reported. Calculate the number of bed nights by multiplying the total number of beds available by the number of nights each bed was available during the reporting period (e.g., 30 days if the beds were available throughout April). Make sure to account for the availability of each bed. For example, if the shelter normally has 50 beds, but 10 of them were unavailable during April for 15 days because of facility repairs, then the number of bed nights to report is 1,350 (40 beds x 30 nights + 10 beds x 15 nights).
6. Total Number of Unduplicated Clients that Were Served in Prior Years through this Project	Enter the number of individual homeless clients assisted by your organization during the month being reported who were also assisted in years prior to the current year. Count each "returnee" client only once even if he or she received assistance more than once during the month. "Returnee" clients reported in previous months of the current grant cycle must be excluded. Each client reported must have a case file verifying the homeless status and documenting the income and demographic data of the client.
<b>MOU-Homelessness ESG-RRH</b>	
1. Total Number of Unduplicated Households Served	Enter the number of households assisted by your organization during the month being reported. Count each household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the income of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who would share the housing unit. A person who would live alone in a housing unit, or a group of unrelated people who would share a housing unit such as partners or roomers, is also counted as a household.
1a. Total Number of Unduplicated Single Adult Households (without Children) Served	Of the total number of households assisted by your organization during the month being reported, enter the number composed of only one single adult. Count each single-adult household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the income of the household and documenting the demographic data of the designated head of the household. Two or more single adults living in the same housing unit but not sharing expenses except rent are each considered a separate household. The number entered here cannot exceed the total number of unduplicated households served and should not overlap with the numbers reported for unduplicated family households.

Indicator	Description
1b. Total Number of Unduplicated Family Households Served	Of the total number of households assisted by your organization during the month being reported, enter the number composed of one adult and at least one related child. Count each family household only once even if it received assistance more than once during the month. Households reported in previous months of the current grant cycle must be excluded. Each household reported must have a case file verifying the income of the household and documenting the demographic data of the designated head of the household. The number entered here cannot exceed the total number of unduplicated households served and should not overlap with the numbers reported for unduplicated single adult (without children) households.
2a. Total Number of Households Provided with Rental Assistance: Market-Rate Rent for a Studio	Enter the total number of households (both single-adult and family) assisted by your organization with market-rate studio rental assistance during the month being reported. Rental assistance must have been paid to the housing provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
2b. Market Rate Rent for a Studio	Enter the market-rate rent for a studio during the month being reported.
3a. Total Number of Households Provided with Rental Assistance: Market Rate-Rent for a One-Bedroom	Enter the total number of households (both single-adult and family) assisted by your organization with market-rate one-bedroom rental assistance during the month being reported. Rental assistance must have been paid to the housing provider for the month being reported. Households reported in previous months of the current grant cycle may be included.
3b. Market-Rate Rent for a One-Bedroom	Enter the market-rate rent for a one-bedroom unit during the month being reported.
4a. Total Number of Provided with Rental Assistance: Market-Rate Rent for a Two-Bedroom	Enter the total number of households (both single-adult and family) assisted by your organization with market-rate two-bedroom rental assistance during the month being reported. Rental assistance must have been paid to the housing provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
4b. Market-Rate Rent for a Two-Bedroom	Enter the market-rate rent for a two-bedroom unit during the month being reported.
5. Total Number of Households Provided with Rental Assistance: Short-Term Rental Assistance (0-3 months)	Enter the total number of households (both single-adult and family) initially provided with rental assistance by your organization during the month being reported. Count only those households whose assistance will last up to three months only. Count households only once. Households already reported in previous months of the current agreement cycle must be excluded. Each household reported must have a case file verifying the income of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.
6. Total Number of Households Provided with Rental Assistance: Short-Term Rental Assistance (4-24 months)	Enter the total number of households (both single-adult and family) initially provided with rental assistance by your organization during the month being reported. Count only those households whose assistance will last more than three months but not more than 24 months. Count households only once. Households already reported in previous months of the current agreement cycle must be excluded. Each household reported must have a case file verifying the income of the household and documenting the demographic data of the designated head of the household. "Household" is defined by HUD as all the people who would share a housing unit. A "household" includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.
7. Total Number of Households Provided with Rental Application Fees	Enter the total number of households (both single-adult and family) assisted by your organization with meeting rental application fees. Assistance must have been paid to the housing provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
8. Total Number of Households Provided with Security Deposits	Enter the total number of households (both single-adult and family) assisted by your organization with meeting security deposit requirements. Assistance must have been paid to the housing provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.



Indicator	Description
9. Total Number of Households Provided with Last Month's Rent	Enter the total number of households (both single-adult and family) assisted by your organization with the previous month's rent. Assistance must have been paid to the housing provider for the month just prior to the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
10. Total Number of Households Provided with Utility Deposits	Enter the total number of households (both single-adult and family) assisted by your organization with meeting utility deposit requirements (gas, electric, water, sewage). Assistance must have been paid to the utility provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
11. Total Number of Households Provided with Utility Payments: Gas/Electric Service	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for gas and electric service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet current bills (not past due or in arrears). Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
12. Total Number of Households Provided with Utility Payments: Gas/Electric Arrear Payments	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for gas and electric service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet past due or in arrears bills. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
13. Total Number of Households Provided with Utility Payments: Water Service Payments	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for water service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet current bills (not past due or in arrears). Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
14. Total Number of Households Provided with Utility Payments: Water Arrear Payments	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for water service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet past due or in arrears bills. Households reported in previous months of the current grant cycle may be included.
15. Total Number of Households Provided with Utility Payments: Sewage Service Payments	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for sewage service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet current bills (not past due or in arrears). Households reported in previous months of the current grant cycle may be included.
16. Total Number of Households Provided with Utility Payments: Sewage Arrear Payments	Enter the total number of households (both single-adult and family) assisted by your organization with utility payments specifically for sewage service. Assistance must have been paid to the utility provider for the month being reported. Count only payments made to meet past due or in arrears bills. Households reported in previous months of the current grant cycle may be included.
17. Total Number of Households Provided with Moving Costs: Truck Rental	Enter the total number of households (both single-adult and family) assisted with renting a truck for moving. Assistance must have been paid to the truck provider for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
18. Total Number of Households Provided with Moving Costs: Moving Company	Enter the total number of households (both single-adult and family) assisted with hiring a moving company. Assistance must have been paid to the moving company for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
19. Total Number of Households Provided with Moving Costs: Storage Fee	Enter the total number of households (both single-adult and family) assisted with paying storage fees. Assistance must have been paid to the storage company for the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
20. Total Number of Households Provided with Housing Search and Placement	Enter the total number of households (both single-adult and family) assisted with housing navigation services during the month being reported. Include households provided housing search assistance even though they may not have been placed. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.

Indicator	Description
21. Total Number of Households Provided with Housing Stability Case Management	Enter the total number of households (both single-adult and family) assisted with housing stability case management services during the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
22. Total Number of Households Provided with Credit Repair	Enter the total number of households (both single-adult and family) assisted with housing stability case management services during the month being reported. Households reported in previous months of the current grant cycle may be included so long as continued assistance was provided.
23. Total Number of Households that Exited from the Program	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance during the month being reported.
24. Total Number of Households with Higher Income at Program Exit	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance during the month being reported and whose income is higher relative to when they first started receiving rapid re-housing assistance.
25. Total Number of Households with More Non-Cash Benefits at Program Exit	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance during the month being reported and are receiving more non-cash benefits relative to when they first started receiving rapid re-housing assistance.
26. Total Number of Households that Moved to Permanent Housing	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance during the month being reported and are settled in permanent housing. "Permanent housing" is defined as housing with indefinite leasing, rental, or ownership arrangements and may or may not include supportive services to assist formerly homeless persons or households with achieving housing stability.
27. Total Number of Households that Moved to Permanent Housing and Maintained Their Permanent Housing for 3 Months	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance and have completed their third consecutive month living in permanent housing during the month being reported. "Permanent housing" is defined as housing with indefinite leasing, rental, or ownership arrangements and may or may not include supportive services to assist formerly homeless persons or households with achieving housing stability.
28. Total Number of Households that Moved to Permanent Housing and Were Provided with Case Management While Living in Permanent Housing	Enter the total number of households (both single-adult and family) that stopped receiving rapid re-housing assistance during the month being reported and are settled in permanent housing with case management services. "Permanent housing" is defined as housing with indefinite leasing, rental, or ownership arrangements and may or may not include supportive services to assist formerly homeless persons or households with achieving housing stability.
<b>MOU-FH</b>	
1. Total Number of Unduplicated Individual Clients Assisted	Enter the total number of individual clients assisted from the City of San Diego by your organization during the month being reported. Count each client only once even if he or she received assistance more than once during the month. Clients reported in previous months of the current agreement cycle must be excluded.
2. Total Number of Unduplicated Random, Paired Fair Housing Tests Conducted with Fair Housing Initiative Program (FHIP) Grant Funds	Enter the total number of random, paired fair housing tests conducted by your organization for the City of San Diego during the month being reported using FHIP grant funds only.
3. Total Number of Unduplicated Random, Paired Fair Housing Tests Conducted with CDBG Grant Funds	Enter the total number of random, paired fair housing tests conducted by your organization for the City of San Diego during the month being reported using CDBG grant funds only.
4. Total Number of Complaint-Based Tests Conducted	Enter the total number of complaint-based fair housing tests conducted by your organization for the City of San Diego during the month being reported.
5. Total Number of Follow-Up Tests Conducted	Enter the total number of follow-up fair housing tests conducted by your organization for the City of San Diego during the month being reported.
6. Total Number of Unduplicated Housing Discrimination Complaints Received	Enter the total number of housing discrimination complaints received by your organization from City of San Diego individuals during the month being reported. Count complaints received by whatever means (telephone, email, online, referral, letter, in person, etc.). However, count each complaint only once though it may have been reported multiple times through various means. Complaints already received in previous months of the current agreement cycle (and dealing with essentially the same issue) must be excluded.
7. Total Number of Fair Housing Intakes Assisted By Referral to Internal or External Resource (Non-Fair Housing Referrals)	Enter the total number of fair housing intakes processed by your organization for the City of San Diego during the month being reported that resulted in referrals to another resource. The intake and the referral do not necessarily have to have happened within the same month, but count each intake only once during the current agreement cycle.

Indicator	Description
8. Total Number of Unduplicated Investigations Implemented	Enter the total number of investigations initiated by your organization for the City of San Diego during the month being reported. Count each investigation only once during the current agreement cycle.
9. Total Number of Unduplicated Investigations Resolved	Enter the total number of investigations resolved by your organization for the City of San Diego during the month being reported. Count each investigation only once during the current agreement cycle.
10. Total Number of Presentations or Workshops Conducted for Home Seekers, Homebuyers, and Tenants on Fair Housing Rights	Enter the total number of presentations or workshops on fair housing rights conducted by your organization within the City of San Diego during the month being reported and targeting home seekers, homebuyers, and tenants. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
11. Total Number of Attendees Educated at Workshops Conducted for Home Seekers, Homebuyers, and Tenants on Fair Housing Rights	Enter the total number of persons who attended the presentations and/or workshops within the City of San Diego being reported by your organization for the month. Count the attendees for each session only once. Sign-in sheets must be on file to back up the numbers reported. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
12. Total Number of Fair Housing Brochures Distributed Throughout the City Limits	Enter the total number of fair housing brochures distributed within the City of San Diego during the month being reported.
13. Total Number of Attendees Educated at Outreach and Educational Workshops Conducted for Unduplicated Groups	Enter the total number of presentations or workshops on fair housing rights conducted by your organization within the City of San Diego during the month being reported and targeting home seekers, homebuyers, and tenants. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session.
14. Total Number of Public/Community Events Attended	Enter the total number of public/community events attended within the City of San Diego during the month being reported to disseminate fair housing information. Count each event only once for each month. Events counted in prior months during the current agreement cycle may be counted again.
15. Total Number of Articles Published	Enter the total number of unduplicated articles published by your organization for the City of San Diego during the month being reported. Count each article once even if it was published more than once or in multiple publications during the month. Articles reported in previous months of the current grant cycle must be excluded.
16. Total Number of Fair Housing Training Sessions Conducted for Property Managers and Landlords	Enter the total number of training sessions on fair housing conducted by your organization within the City of San Diego during the month being reported and targeting property managers and landlords within the City of San Diego. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
17. Total Number of Attendees Educated at Training Sessions Conducted for Property Managers and Landlords	Enter the total number of City of San Diego persons who attended the training sessions targeting property managers and landlords within the City of San Diego and being reported by your organization for the month. Count the attendees for each session only once. Sign-in sheets must be on file to back up the numbers reported. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
18. Total Number of Fair Housing Training Sessions Conducted for Non-Profit Agencies and CDBG Program Staff	Enter the total number of training sessions on fair housing conducted by your organization targeting nonprofit organizations and City of San Diego CDBG program staff during the month being reported. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
19. Total Number of Attendees Educated at Training Sessions Conducted for Nonprofit Agencies and CDBG Program Staff	Enter the total number of persons who attended the training sessions targeting nonprofit organizations and City of San Diego CDBG program staff and being reported by your organization for the month. Count the attendees for each session only once. Sign-in sheets must be on file to back up the numbers reported. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.

Indicator	Description
<b>ED</b>	
1. Total Number of Unduplicated Jobs Created	Enter the total number of jobs created by your organization during the month being reported. To count, jobs must be permanent. At least 51 percent of them must be either held by or made available to low/moderate-income persons. The number of jobs created is calculated on a full-time equivalent basis (add all the hours of all jobs created and divide them by 2,080 hours). Seasonal jobs count only if the season is long enough for the employee to consider it their principal occupation. Job indirectly created ("spin off" jobs) do not count. Count each job only once during the current agreement cycle. Each job reported must be documented by your organization.
1a. Total Number of Unduplicated Jobs Created with Employer-Sponsored Health Care Benefits	Of the total number of jobs created during the month being reported, enter the number of jobs with healthcare benefits sponsored by the employer. The number reported here must not exceed the total number of unduplicated jobs created for the month being reported.
1b. Total Number of New Unduplicated Individuals Employed in Created Jobs	Of the total number of jobs created during the month being reported, enter the number of jobs filled with persons who were either employed or unemployed before filling the jobs created. Count each person only once. Each person reported must have a case file documenting the household income determination and demographic data of the person.
1c. Number of Persons Unemployed Prior to Taking Jobs Created	Of the total number of jobs created during the month being reported, enter the number of jobs filled with persons who were unemployed before filling the jobs created. The number reported here must not exceed the total number of unduplicated jobs created for the month being reported. Count each person only once. Each person reported must have a case file documenting the household income determination and demographic data of the person.
2. Total Number of Unduplicated Jobs Retained	Enter the total number of jobs retained by your organization during the month being reported. To count, jobs must be permanent. At least 51 percent of them must be either held by or made available to low/moderate-income persons. The number of jobs retained is calculated on a full-time equivalent basis (add all the hours of all jobs created and divide them by 2,080 hours). Seasonal jobs count only if the season is long enough for the employee to consider it their principal occupation. Job indirectly retained ("spin off" jobs) do not count. Count each job only once during the current agreement cycle. Each job reported must be documented by your organization.
2a. Total Number of Unduplicated Jobs Retained with Employer-Sponsored Health Care Benefits	Of the total number of jobs retained during the month being reported, enter the number of jobs with healthcare benefits sponsored by the employer. The number reported here must not exceed the total number of unduplicated jobs retained for the month being reported.
2b. Total Number of New Unduplicated Individuals Employed in Retained Jobs	Of the total number of jobs retained during the month being reported, enter the number of jobs filled with persons who were either employed or unemployed before filling the jobs retained. Count each person only once. Each person reported must have a case file documenting the household income determination and demographic data of the person.
3. Total Number of Unduplicated Businesses/Enterprises Created	Enter the number of businesses established during the month being reported as a direct result of your organization's assistance. Count each business only once even if it received assistance on more than one occasion from your organization. Businesses reported in previous months of the current grant cycle must be excluded. Businesses reported by other subrecipients to the City within the current grant cycle must be excluded (i.e., the same business cannot be reported to the City by more than one subrecipient within the current grant cycle). Each business reported must have a case file including items such as the business plan, copy of the business tax certificate, loan or grant underwriting documentation (if applicable), proof of DUNS registration (if applicable), demographic data of the owner, etc.
4. Total Number of Trainings Conducted	Enter the total number of training sessions on entrepreneurship, startups, and business expansion/establishment conducted by your organization during the month being reported. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
5. Total Number of Unduplicated Educational Programs/Activities with SDUSD, Community Colleges, Four-Year Universities	Enter the total number of educational programs and activities conducted by your organization during the month being reported in partnership with educational institutions and organizations, such as SDUSD, community colleges, and four-year universities. Count each session or instance only once. The audience or attendees of one session/instance should be different from the audience or attendees of another session/instance unless the topics covered from session/instance to session/instance are different.



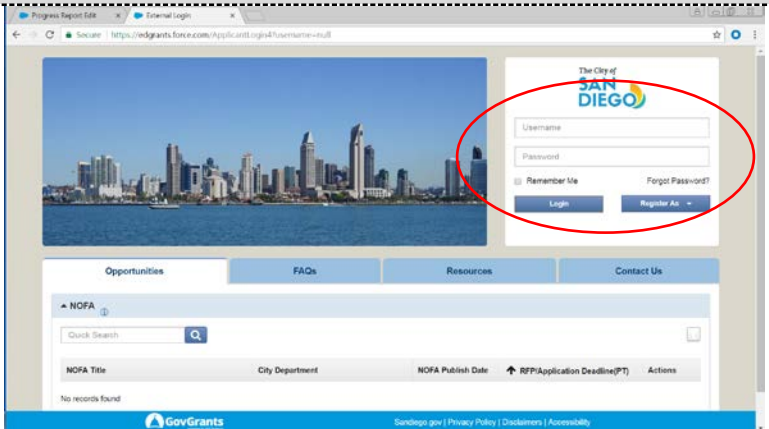
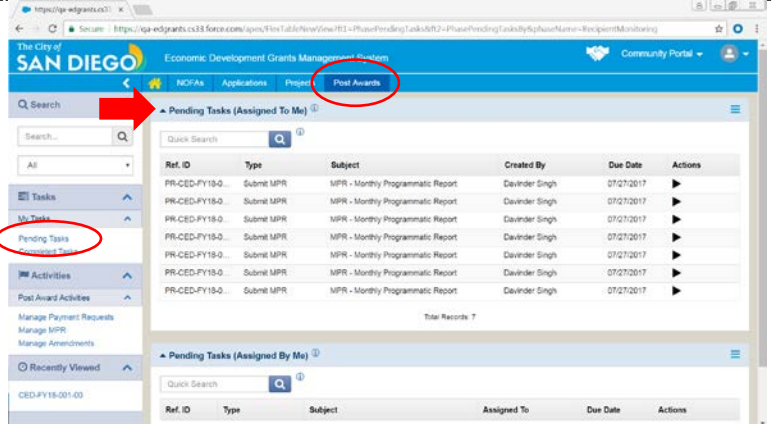
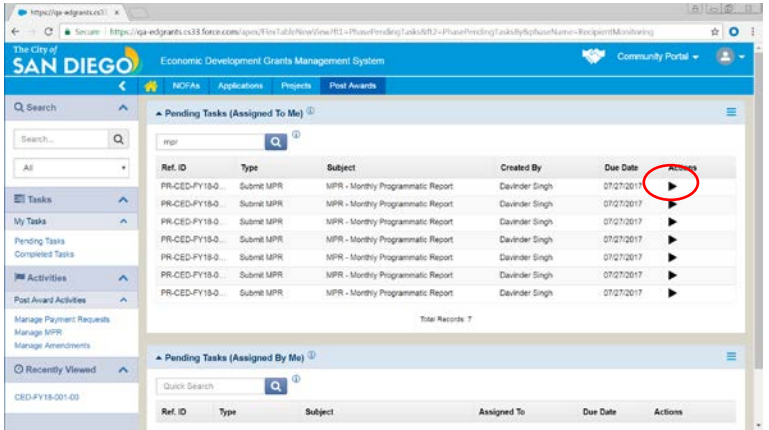
Indicator	Description
6. Total Number of Unduplicated Products Brought to Market/Services Provided/Patents (Pending & Awarded)	Enter the total number of products brought to market, services provided, and patents pending or awarded during the month being reported. Count each product, service, or patent only once. Those reported in previous months of the current agreement cycle must be excluded.
7. Economic Impacts Created By Accelerator Sponsored Enterprises	From the drop-down menu, select the predominant type of economic impact created by the enterprises sponsored by your organization's accelerator program during the month being reported.
8. Total Number of Loans Issued	Enter the total number of CDBG-funded loans issued by your organization during the month being reported. Count each loan only once. Loans reported in previous months of the current agreement cycle must be excluded. Each loan reported must be backed up with a case file containing the underwriting documents, uses, and other information required by the City.
9. Total Number of Businesses Financed	Enter the total number of businesses provided financing assistance using CDBG funds by your organization during the month being reported. Count each business only once even if the business enjoyed more than one instance of financing assistance. Businesses reported in previous months of the current agreement cycle must be excluded. Each business reported must be backed up with a case file containing the underwriting documents, uses, and other information required by the City.
10. Total Number of Disadvantaged/Women's Business Enterprises Financed	Enter the total number of disadvantaged/women-owned business enterprises provided financing assistance using CDBG funds by your organization during the month being reported. Count each enterprise only once even if it enjoyed more than one instance of financing assistance. Enterprises reported in previous months of the current agreement cycle must be excluded. Each enterprise reported must be backed up with a case file containing the underwriting documents, uses, and other information required by the City.
11. Total Number of Financial Literacy/Financial Advisory Trainings/Seminars Conducted within LMI Communities	Enter the total number of training sessions on financial literacy/advice conducted by your organization during the month being reported targeting low/moderate-income communities. Count each session only once. The audience or attendees of one session should be different from the audience or attendees of another session unless the topics covered from session to session are different.
12. Total Number of Enterprises/Businesses that Received Support Services	Enter the total number of enterprises/businesses that received support services from your organization during the month being reported. Count each enterprise/business only once even if it enjoyed more than one instance of support services. Enterprises/businesses reported in previous months of the current agreement cycle must be excluded. Each enterprise/business reported must be backed up with a case file documenting the household income determination and demographic data of the owner.
13. Total Number of Collaborative Programs with Organizations Serving Immigrant/Refugee Clients	Enter the total number of collaborative programs your organization engaged in during the month being reported targeting immigrant/refugee clients. Count each engagement only once. The number of individual sessions is not what should be reported here but rather the number of different programs engaged in during the month being reported.



# MPR Submission

## You will learn:

- How to complete and submit a Monthly Programmatic Report (MPR) in ED Grants
- How to revise and submit a previously approved MPR in ED Grants

Step	Description	Screenshot
1	Log into <a href="http://edgrants.force.com">http://edgrants.force.com</a> using the credentials for either the Primary Representative or Secondary Representative of your organization.	
2	Go to the 'Post Awards' tab and then click on 'Pending Tasks' along the left side. Look at the 'Assigned to Me' section.	
3	Find the MPR you would like to complete and submit. Click on the 'Start' icon (right-pointing arrow) to open it. <b>NOTE:</b> The system automatically generates a 'Pending Task' for each MPR. MPRs must be completed in order from oldest to newest. For example, your organization's July MPR must be submitted and approved by the City before the system will allow you to submit the August MPR. Each MPR is due on the 15 <sup>th</sup> of every month for the previous month's activities. The system will track late submissions, and the City will use this data to evaluate your organization's performance.	





# MPR Submission

Step	Description	Screenshot
4	You should now see the MPR form with the 'Cancel' and 'Save' buttons along with other basic information. Verify that this is the MPR you would like to complete by checking the reporting period under 'Reporting Period.'	
5	Enter text into the 'Narrative' field. Refer to the instructions just above this field for directions. You are limited to 750 characters, including spaces. After you are finished, click on the 'Save' button.	
6	After saving, you should now have access to the following tabs: 'Overview,' 'Indicators,' 'Demographics,' 'Attachments,' and 'History.' You should also see the following buttons: 'Submit for Approval,' 'Edit,' and 'Validate.' <b>NOTE:</b> Based on your organization's project type, there may be an additional tab (e.g., 'Businesses,' 'Lead,' etc.) that you may have to populate.	



# MPR Submission

Step	Description	Screenshot
7	Click on the <b>'Overview'</b> tab to view the narrative you had entered earlier. Click on the <b>'Edit'</b> button if you wish to make changes and then hit the <b>'Save'</b> button. Click on the <b>'Cancel'</b> button if you wish to discard your edits.	
8	Click on the <b>'Indicators'</b> tab. Click on the plus icons (+) to display the project indicators you are required to enter. Click on the minus icons (-) to hide them. <b>NOTE: The indicators vary according to project type and funding source.</b>	
9	Click on the pencil icon in the <b>'Actions'</b> column to enter a number for each project indicator in the <b>'Reporting Month Total'</b> column. <b>NOTE: Depending on the project type, you may also need to enter information by individual home or business assisted. Use the pencil icon per line of home or business to open the fields you would need to populate.</b>	



# MPR Submission

Step	Description	Screenshot
10	You may click on the counterclockwise arrow in the 'Actions' column to reset the fields.	
11	After you have entered the numbers, click on the 'Save' button to preserve your work.	
12	Click on the 'Demographics' tab. Click on the plus icons (+) to display the demographic indicators you are required to enter. There are three sets of demographic indicators: 'Client Info,' 'Ethnicity/Race,' and 'Income Level.'	



# MPR Submission

Step	Description	Screenshot
13	Click on the pencil icon in the 'Actions' column to enter a number for each demographic indicator in the 'Total' column and, if applicable, 'Hispanic/Latino' column.	
14	After you have entered the numbers, click on the 'Validate' button. The system will check to see that the sum of the 'Total' column for 'Income Level' matches the sum of the 'Total' column for 'Ethnicity/Race' and that both sums match the 'Total Unduplicated Beneficiaries' entered for 'Client Info' (whether that is defined as clients or individuals, households, homebuyers, businesses, or housing units). The system will not allow the MPR to be submitted if the numbers do not match.	
15	Click on the 'Attachments' tab. This is where you can upload documents relevant to the activities you are reporting for this MPR.	





# MPR Submission

Step	Description	Screenshot
16	Click on the 'Add' button to open the 'Add Attachments' popup window with the 'Upload File from Computer' tab and 'Upload File from Workspace' tab. Click on the 'Upload File from Computer' tab.	
17	Indicate the 'Type' of document you would like to upload by selecting from the drop-down menu 'Program Artifacts.'	
18	Click on the 'Choose File' button to navigate to the file you would like to upload from your local computer. Click on the 'Open' button to upload the file to the system. <b>NOTE: The system will only accept the following file types: PDF, JPEG, and PNG.</b>	



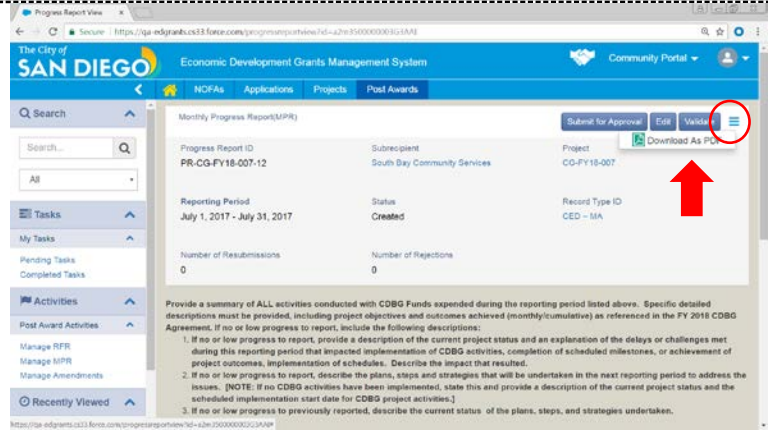
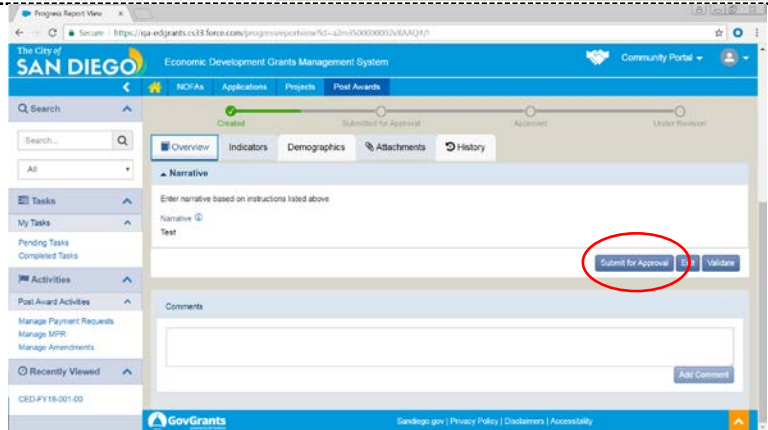
# MPR Submission

Step	Description	Screenshot
19	Enter a required short description of the file in the 'Description' field. Click on the 'Save' button. You should now see the file listed under the 'Attachments' tab.	
20	Before submitting the MPR to the City, click on the 'Validate' button and check the top of the page for any errors identified. Correct the errors if needed.	
21	<b>OPTIONAL:</b> If you have any comments or questions for City staff, use the 'Comment' field to enter those. <i>NOTE: Comments cannot be deleted or edited once entered.</i>	

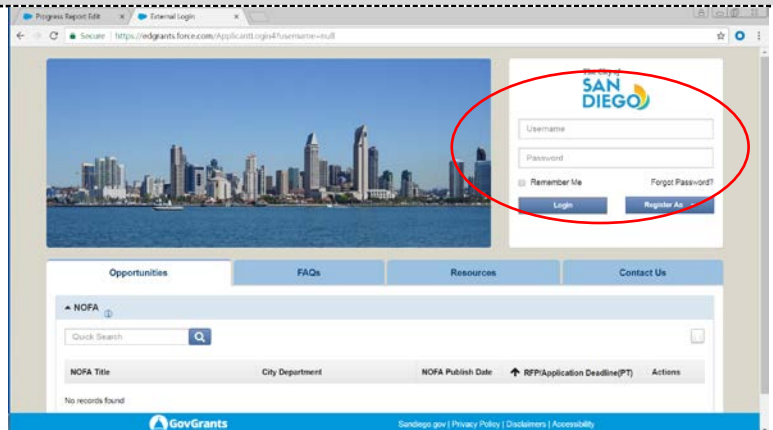




# MPR Submission

Step	Description	Screenshot
22	<b>OPTIONAL:</b> Click on the 3-bar icon to download the MPR as a PDF with all the data and text you have entered. The PDF may be useful in saving versions of the MPR prior to and after submission in your local hard drive or to send to someone via email for review or reference.	
23	Click on the 'Submit for Approval' button to officially submit the MPR to the City for review and approval. <b>NOTE:</b> Only your organization's Primary Representative will have access to the 'Submit for Approval' button. If you are working as the Secondary Representative, coordinate with the Primary Representative to officially submit the MPR to the City.	
24	If City staff rejects the MPR for some reason, follow steps 1–23 above to edit the MPR and resubmit to the City.	End

## How to Revise and Submit a Previously Approved MPR:

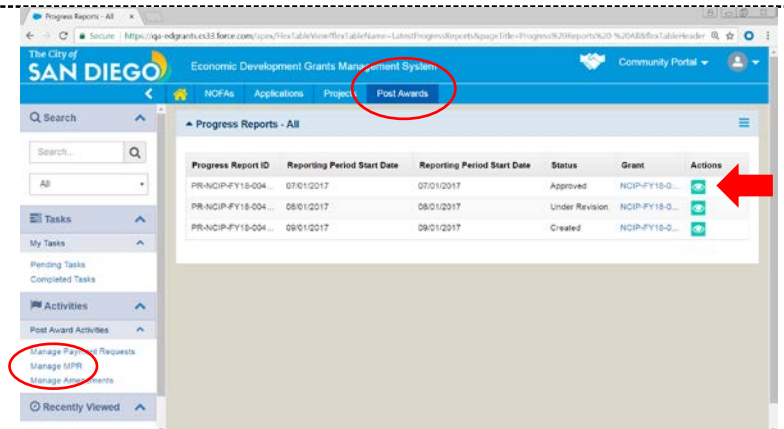
Step	Description	Screenshot
1	Log into <a href="http://edgrants.force.com">http://edgrants.force.com</a> using the credentials for either the Primary Representative or Secondary Representative of your organization.	



# MPR Submission

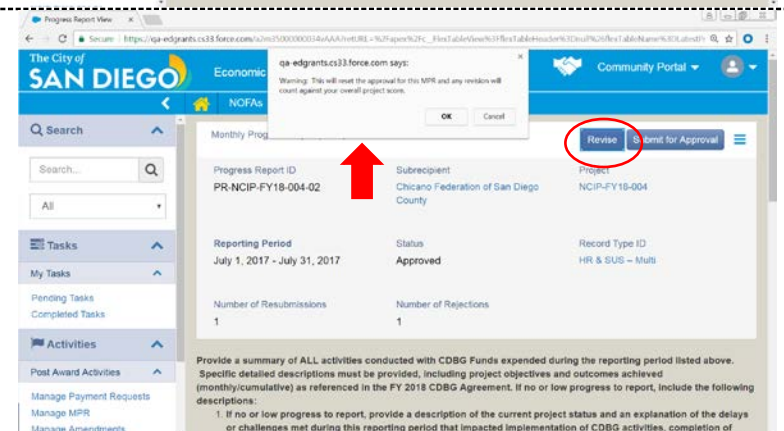
2

Go to the **'Post Awards'** tab and then click on **'Manage MPR'** along the left side. Look for the previously approved MPR you would like to revise (the word **'Approved'** should be in the **'Status'** column for that MPR). Click on the eyeball icon to open the MPR.



3

Click on the **'Revise'** button to edit the MPR. **NOTE:** Clicking on the **'Revise'** button will reset the approval status for this MPR, and any revisions will be tracked and may be factored into your organization's performance report card. Confirming your desire to revise the MPR by clicking on the **'OK'** button cannot be reversed.



4

Refer to steps 6–24 above for completing and submitting an MPR to continue with the MPR revision process.

**End**

For additional support, email [CDBG@sandiego.gov](mailto:CDBG@sandiego.gov) or visit the **'Resources'** tab at [edgrants.force.com](http://edgrants.force.com).

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# RFR Submission

## You will learn:

- How to complete and submit a Request for Reimbursement (RFR) in ED Grants

Step	Description	Screenshot
1	Log into <a href="http://edgrants.force.com">http://edgrants.force.com</a> using the credentials for either the Primary Representative or Secondary Representative of your organization.	
2	Go to the 'Post Awards' tab and then click on 'Pending Tasks' along the left side. Look at the 'Assigned to Me' section.	
3	Find the RFR you would like to complete and submit. Click on the 'Start' icon (right-pointing arrow) to open it. <b>NOTE:</b> The system automatically generates a 'Pending Task' for each RFR. RFRs must be completed in order from oldest to newest. For example, your organization's July RFR must be submitted and approved by the City before the system will allow you to submit the August RFR. Each RFR is due on the 15 <sup>th</sup> of every month for the previous month's activities. The system will track late submissions, and the City will use this data to evaluate your organization's performance.	



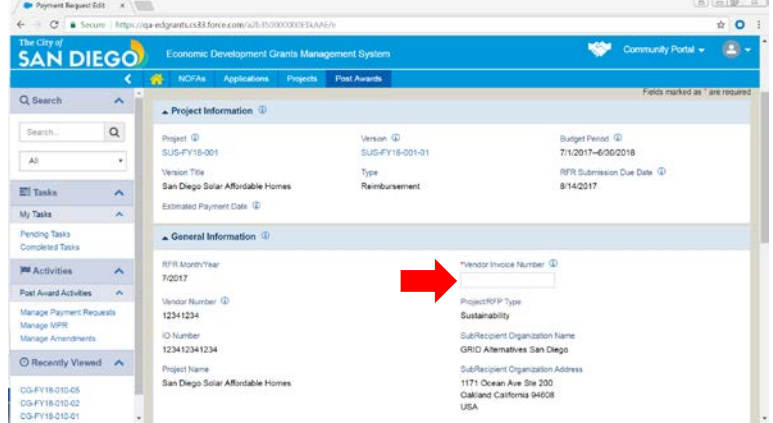
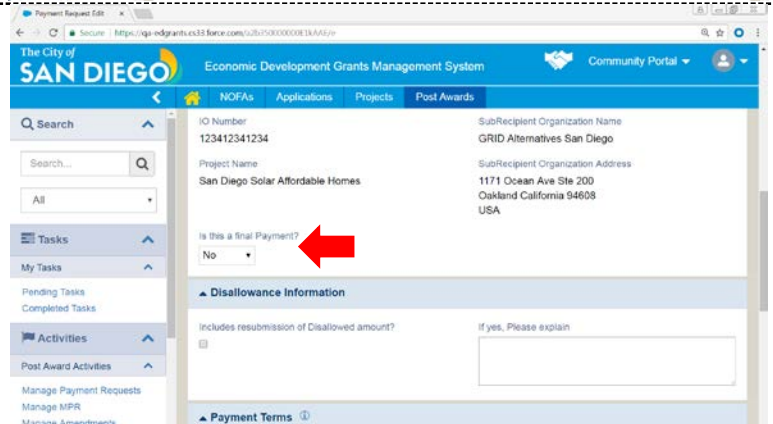
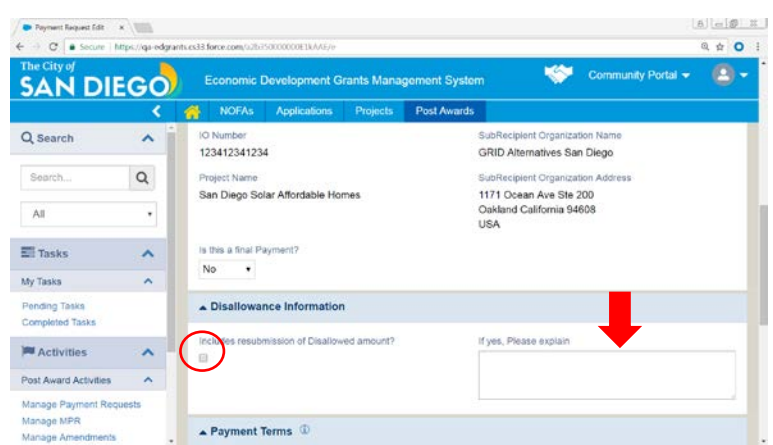
# RFR Submission

Step	Description	Screenshot
4	You should now see the RFR form with the 'Submit to Grantor,' 'Validate,' and 'Edit' buttons along with the 'Overview,' 'Financials,' 'Attachments' and 'History' tabs. <b>NOTE:</b> Verify that this is the RFR you would like to complete by checking the reporting period in the 'General Information' section under 'RFR Month/Year.'	
5	Click on the 'Overview' tab. Click on the 'Edit' button to edit this tab.	
6	Once the 'Overview' tab is in edit mode, you should see the 'Cancel' and 'Save' buttons.	





# RFR Submission

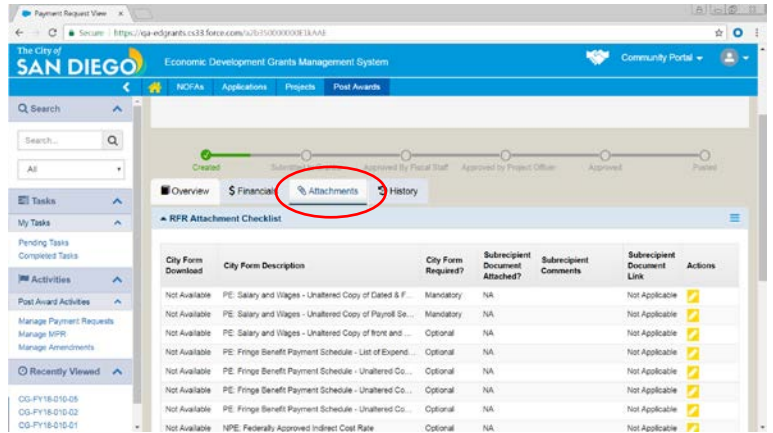
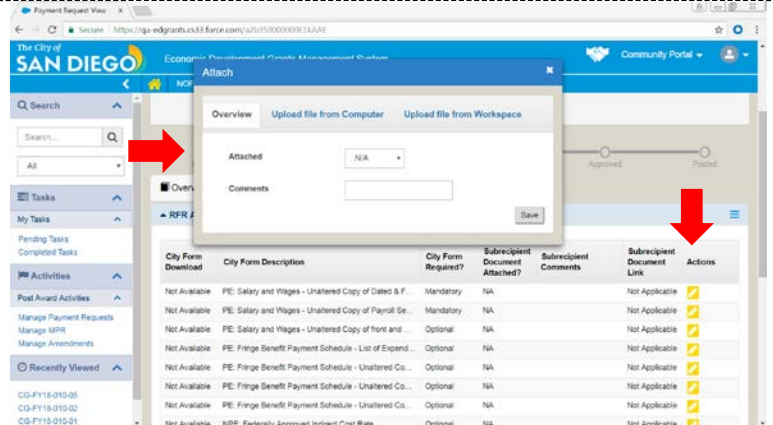
Step	Description	Screenshot
7	Populate the 'Vendor Invoice Number' field using a unique alphanumeric identifier assigned by your organization to this particular RFR. <b>NOTE:</b> Each RFR must have a unique 'Vendor Invoice Number' from month to month. Your organization cannot use the same number more than once for the duration of this project. The City's accounting system cannot process the same invoice number twice for a project.	
8	Select 'Yes' or 'No' from the dropdown menu under the 'Is this a final payment?' field. Do not select 'Yes' unless you are absolutely sure your organization will no longer submit another RFR. Selecting 'Yes' locks the project from submitting any future RFRs for the remainder of the project's Agreement period in the system.	
9	<b>OPTIONAL:</b> Select the checkbox under the 'Includes resubmission of disallowed amount?' field if this RFR includes amounts previously disallowed by the City, but eligible for resubmission. If the checkbox is marked, you must enter an explanation in the narrative field to describe the details of the resubmission. In the explanation, include the budget line item name, the dollar amount, the reason for the initial disallowance, and the reason why the resubmission should be approved. <b>NOTE:</b> Your organization has only until the following month to resubmit disallowed amounts. For example, if you had disallowed amounts in October 2017, you must resubmit in November 2017 (as long as the amount is eligible for resubmission).	





# RFR Submission

Step	Description	Screenshot
10	Read the 'Payment Terms' paragraph and select the checkbox under 'Agree' to indicate you have read it and subscribe to it. The system will not allow your organization to submit the RFR unless it agrees to the terms.	
11	Once you have completed the 'Overview' tab, click on the 'Save' button to preserve your work.	
12	Click on the 'Financials' tab. Use the form here to enter the amounts for which you are requesting reimbursement by budget category item. To enter an amount for a budget category item, click on the pencil icon in the 'Actions' column that corresponds to that item. The field in the 'Requested Amount' column will become editable. Enter the desired amount. (You may click on the counterclockwise arrow icon to undo your entry if needed.) Repeat this step for all relevant budget category items. After you are finished, click on the 'Save' button. <b>NOTE: The system will not allow a 'Requested Amount' that exceeds the 'Remaining Amount' available in any budget category item. A Budget Amendment Request must be submitted and approved by the City to increase the 'Remaining Amount' available to cover the 'Requested Amount.'</b>	

Step	Description	Screenshot
13	<p>Click on the <b>'Attachments'</b> tab. This is where you will upload supporting documents for the amounts being requested to be reimbursed. You will be required to fill out and upload a City-produced form as the cover page of the supporting documentation to be reimbursed for expenses. Use the 'City Form Download' column to access the City-produced form relevant to the corresponding budget category item. Convert the entire packet as a single PDF that includes the: (1) completed City Form, (2) supporting documentation for the current month, and (3) supporting documentation for any disallowances from the prior month. Upload the packet to the corresponding budget category item. For each budget category item without an expense, upload a completed 'No Claim Form' to indicate that there is no expenditures for the corresponding budget category item. <b>NOTE: The City will disallow reimbursement requests without corresponding supporting documents, which will negatively impact your organization's performance report card.</b></p>	 <p>The screenshot shows the 'RFR Attachment Checklist' page. A red circle highlights the 'Attachments' tab in the top navigation bar. Below the navigation bar is a table with columns: City Form Download, City Form Description, City Form Required?, Subrecipient Document Attached?, Subrecipient Comments, Subrecipient Document Link, and Actions. The table lists various budget categories and their corresponding forms, with checkboxes in the 'Actions' column for each item.</p>
14	<p>To upload a supporting document for a specific budget category item, click on the pencil icon in the 'Actions' column that corresponds to that item to open the 'Attach' popup window with the 'Overview,' 'Upload File from Computer,' and 'Upload File from Workspace' tabs.</p>	 <p>The screenshot shows the 'Attach' popup window. A red arrow points to the 'Upload File from Computer' tab. Another red arrow points to the 'Actions' column in the table below, where a pencil icon is visible next to a row.</p>



# RFR Submission

Step	Description	Screenshot
15	Select 'Yes' from the dropdown menu to indicate you are attaching a document for the 'Attached?' field. Enter a short narrative in the 'Comments' field to describe the document.	
16	Click on the 'Upload File from Computer' tab. Click on the 'Choose File' button to navigate to the file you would like to upload from your local computer. Click on the 'Open' button to upload the file to the system. Click on the 'Save' button to complete the upload. Repeat steps 14–16 until you have addressed each budget category item.	
17	<b>OPTIONAL:</b> Alternatively, instead of uploading a file from your local computer, you may attach a file already uploaded into the system. To do so, click on the 'Upload File from Workspace' tab and choose the desired file by clicking on the checkbox to the left of the file name. Click on the 'Attach' button to complete the action.	





# RFR Submission

Step	Description	Screenshot
18	Your attached supporting documents should now appear listed with the 'Subrecipient Document Attached?' and 'Subrecipient Comments' columns populated. The link to the document will be in the 'Subrecipient Document Link' column (replacing 'Not Applicable'). Should you decide to undo or edit the attachment, click on the corresponding pencil icon and refer to steps 14–17 above.	
19	Before submitting the RFR to the City, click on the 'Validate' button and check the top of the page for any errors identified. Correct the errors if needed. Otherwise, the system will prevent the RFR from being submitted.	
20	Click on the 'Submit to Grantor' button to officially submit the RFR to the City for review and approval. <b>NOTE:</b> Only your organization's Primary Representative will have access to the 'Submit to Grantor' button. If you are working as the Secondary Representative, coordinate with the Primary Representative to officially submit the RFR to the City.	

For additional support, email [CDBG@sandiego.gov](mailto:CDBG@sandiego.gov) or visit the 'Resources' tab at [edgrants.force.com](http://edgrants.force.com).

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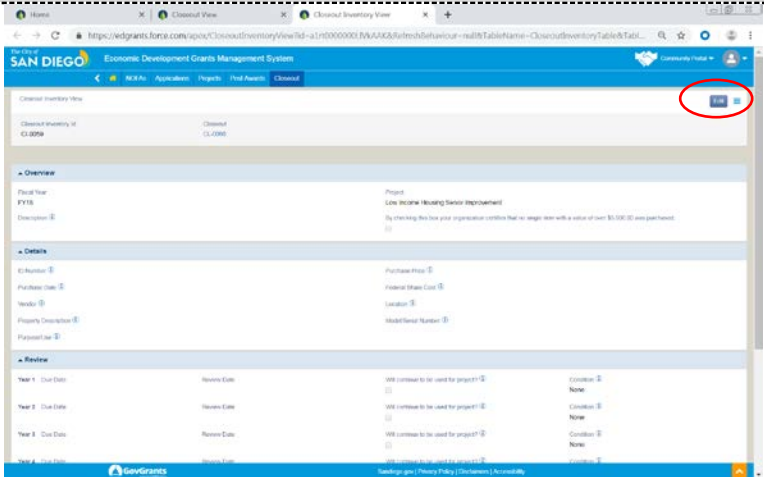
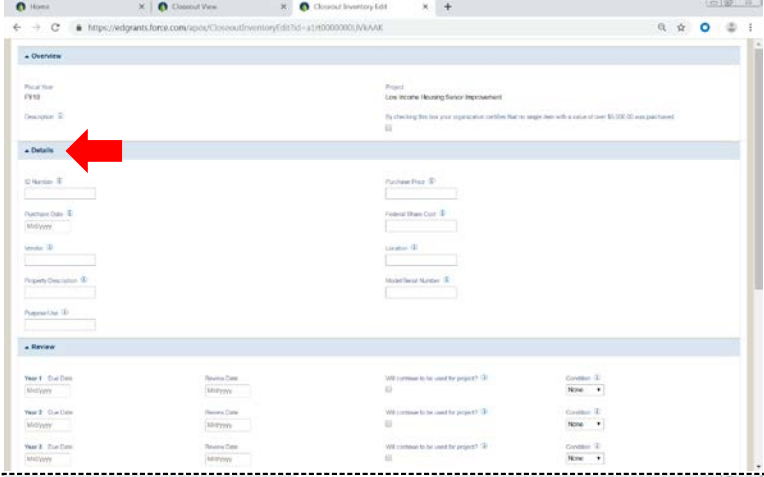
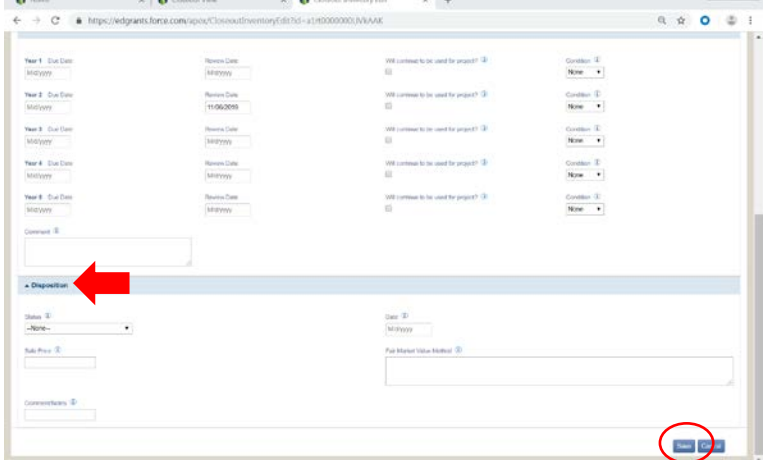
**You will learn:**

- How to close out a project in ED Grants
- How to complete and submit a year-end report in ED Grants

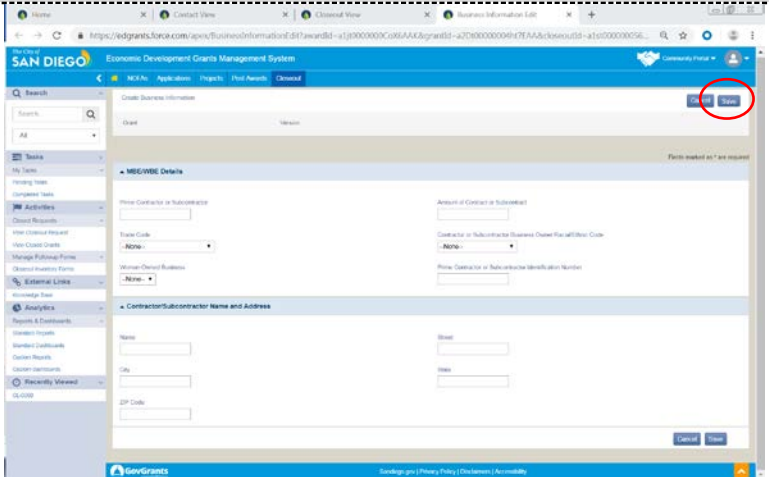
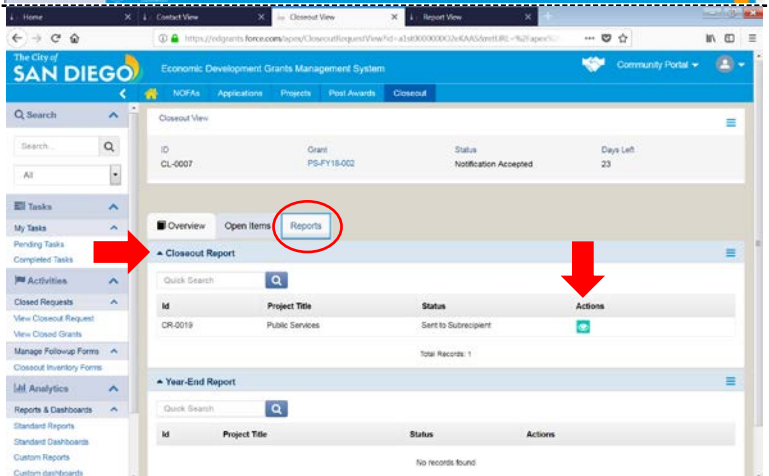
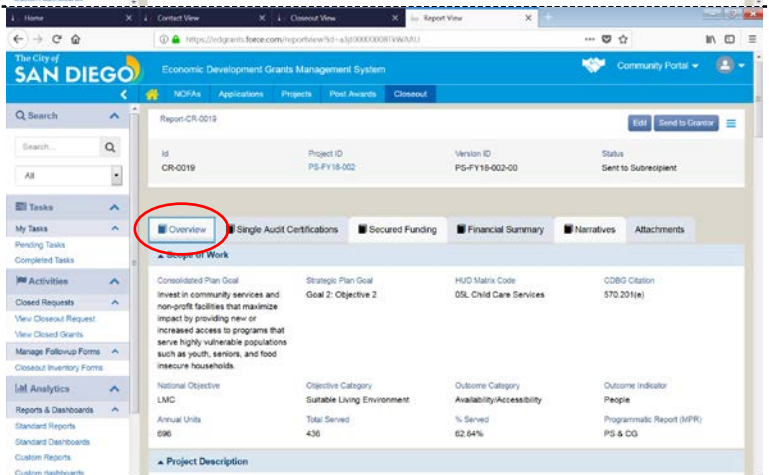
Step	Description	Screenshot
1	Log into <a href="http://edgrants.force.com">http://edgrants.force.com</a> using the credentials for either the Primary Representative or Secondary Representative of your organization. <b>NOTE:</b> While both the Primary Representative and Secondary Representative are able to work on closeout-related requirements, only the Primary Representative will be able to officially submit it to the City.	
2	Go to the 'Closeout' tab and then click on 'View Closeout Request' along the left side. Find the closeout request associated with the project you would like to work on and click on the eyeball icon to open it.	
3	Click on the 'Accept Closeout' button to acknowledge that you are aware of the need to close the project. <b>NOTE:</b> This screen is known as the 'Closeout View' or the 'Closeout Request' (CL) view.	



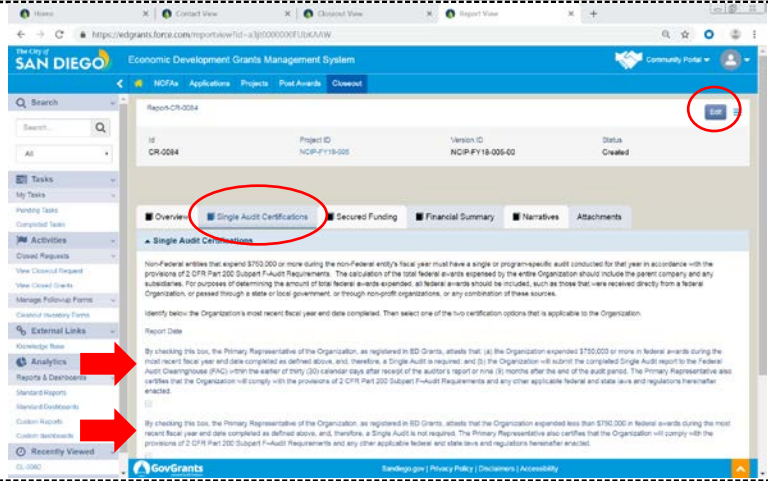
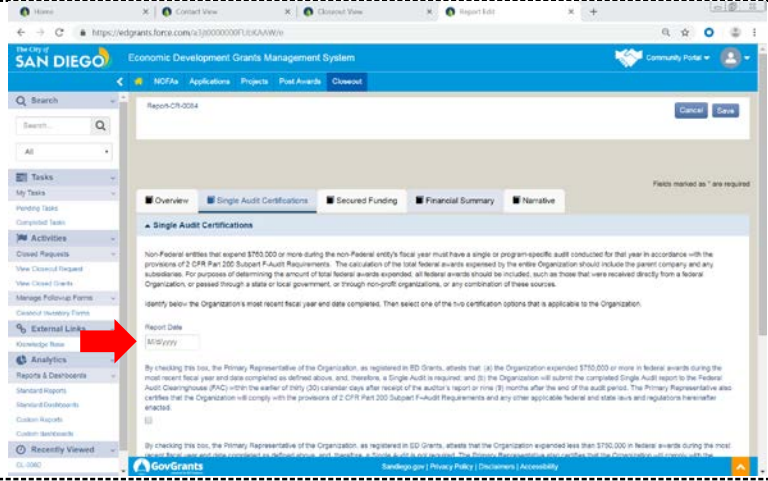
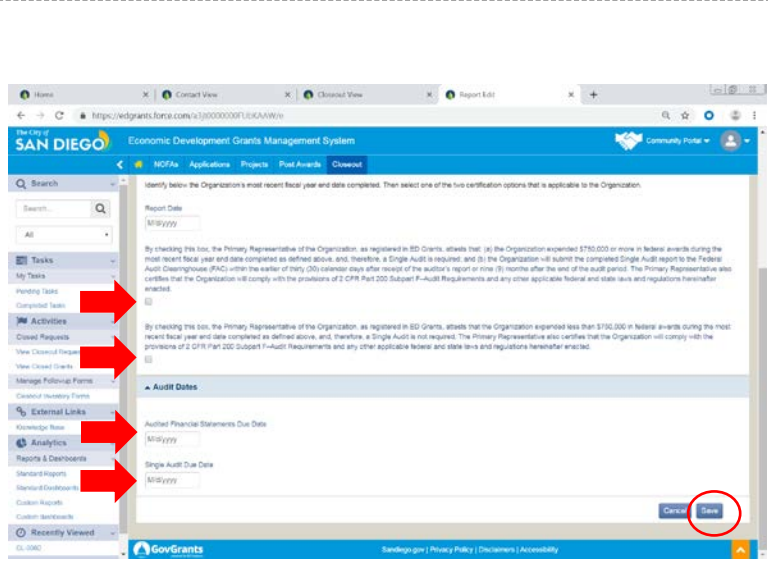
Step	Description	Screenshot
4	Click on the <b>'Overview'</b> tab of the Closeout Request and review the information presented for accuracy. Pay particular attention to the <b>'Due Date'</b> field (which is when the closeout process should be completed) and the <b>'Remaining Balance'</b> field (which tells you how much CDBG funding, if any, is left in the project's budget). Press F5 to refresh the page. If anything needs to be corrected or updated, contact your assigned City project manager for next steps.	
5	Click on the <b>'Open Items'</b> tab of the Closeout Request and review the information presented for completeness and accuracy. Here you will find a collection of the following items: <b>Site Visit Follow-Up Forms; Amendment Requests; Closeout Inventory; Contractor/Subcontractor Information</b> (if NCIP project); <b>Monthly Programmatic Reports</b> (MPRs); and <b>Requests for Reimbursements</b> (RFRs). Review each item for accuracy. If anything needs to be corrected or updated, contact you assigned City project manager for next steps.	
6	Scroll to the <b>'Closeout Inventory'</b> section. Here you will need to list each item purchased during the implementation period using CDBG funds with a value of more than \$5,000. Click on the eyeball icon to open the form to enter the first item.	

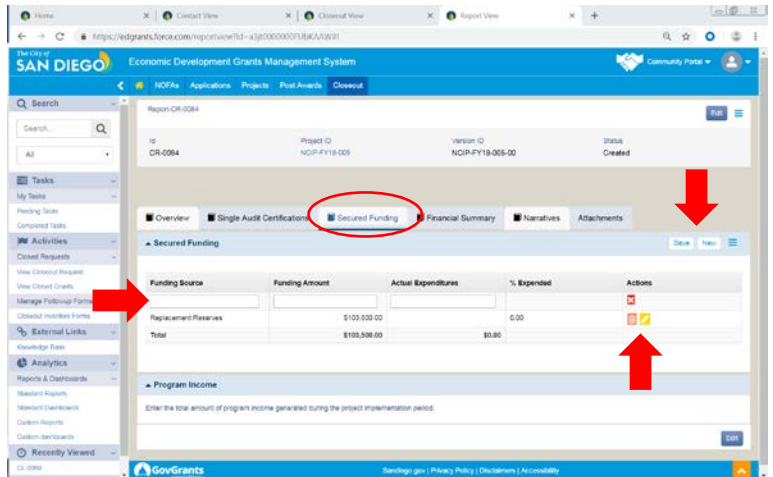
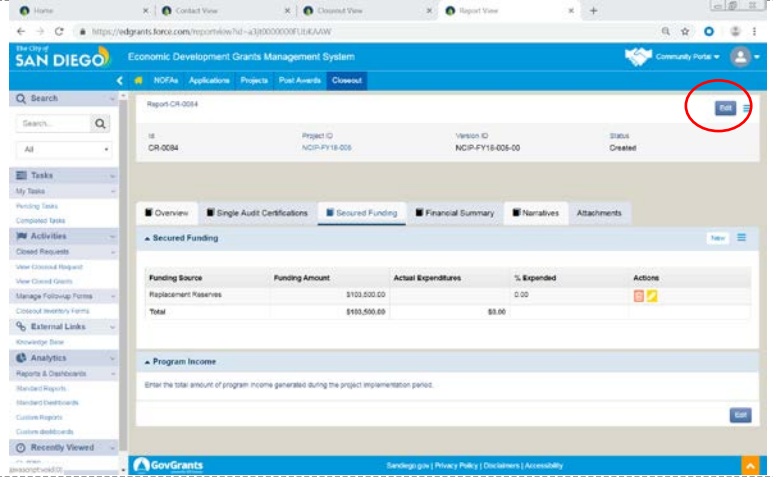
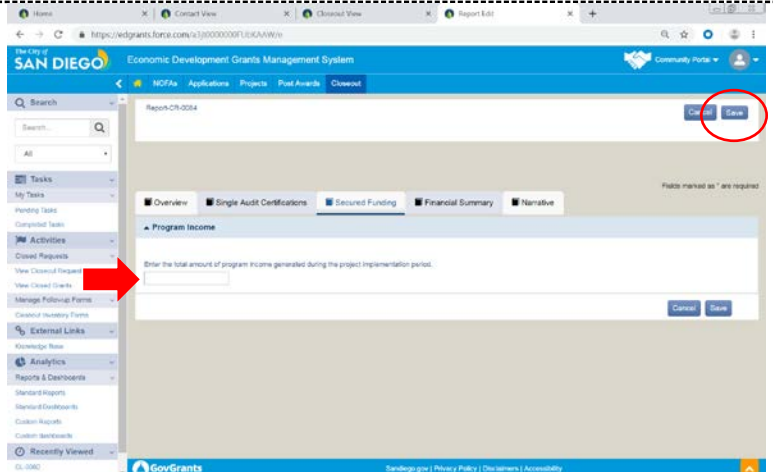
Step	Description	Screenshot
7	To populate the first form, click on the <b>'Edit'</b> button. The fields will open for you to enter information into.	
8	Populate all the fields in the <b>'Details'</b> and <b>'Disposition'</b> (if applicable) sections <u>only</u> of the form. Make sure you enter an accurate description of the item in the <b>'Property Description'</b> field. <b>NOTE: The other sections are for City staff use only and should not be populated by your organization.</b>	
9	After you are done completing the form, click on the <b>'Save'</b> button to preserve your entries.	

Step	Description	Screenshot
10	If you have no item to report worth more than \$5,000 and purchased using CDBG funds, check the box in the <b>'Overview'</b> section that says, "By checking this box your organization certifies that no single item with a value of over \$5,000 was purchased." <b>NOTE: You must check the box if you have no items to report. Otherwise, you will be precluded from completing the closeout process.</b>	
11	If you have other items to report, click on the <b>'New'</b> button to create another form. Populate the form by following steps 7–9 above. Repeat until all items necessary have been reported.	
12	Scroll to the <b>'Business Information'</b> section. <b>NOTE: This section is applicable only to construction projects (such as facility improvements).</b> Here you will need to report each contractor and subcontractor that worked on the construction project. Click on the <b>'New'</b> button to create a form to populate.	

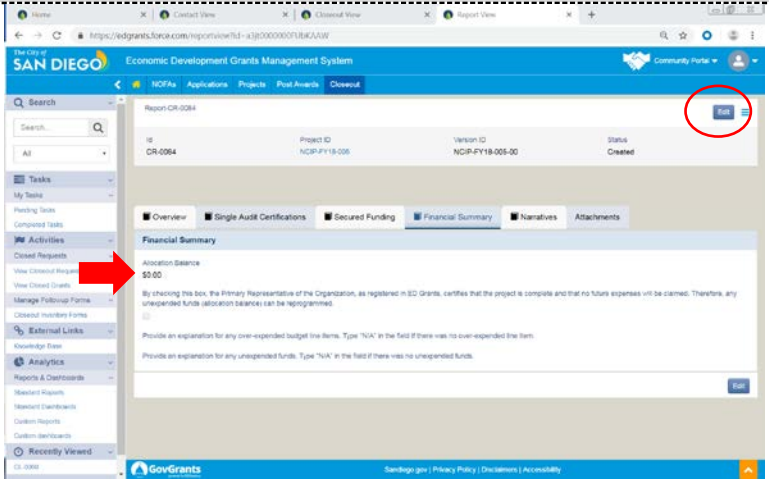
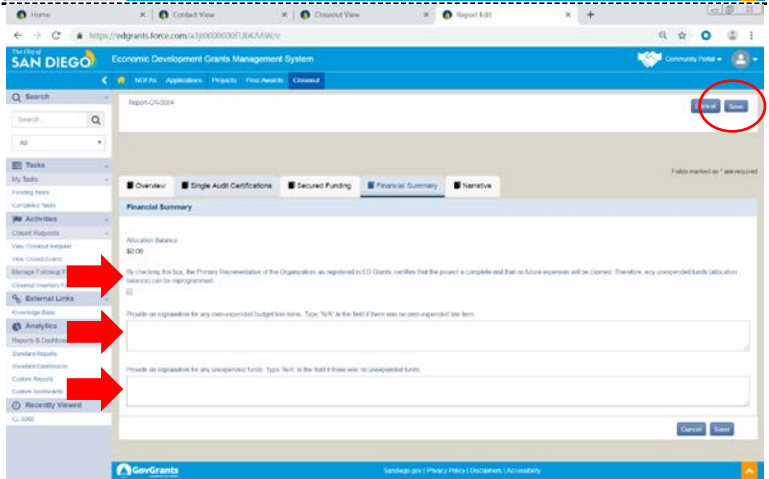
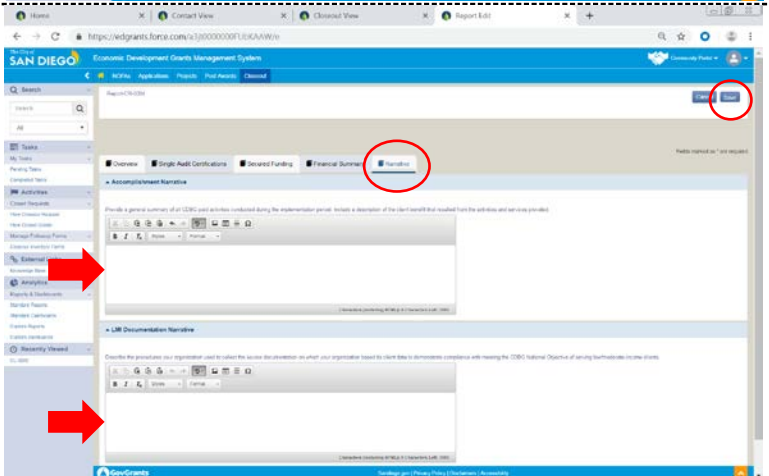
Step	Description	Screenshot
13	Populate all the fields in the form and then click on the <b>'Save'</b> button to preserve your entries. If you have other contractors and subcontractors to report, click on the <b>'New'</b> button and repeat steps 12 and 13 until you have entered all of them. <b>NOTE: Each contractor and subcontractor will need to be entered separately as its own line.</b>	 A screenshot of the 'New' form in the Economic Development Grants Management System. The form is titled 'Closeout View' and contains various fields for contractor information, including 'Contractor or Subcontractor Name', 'Address', 'City', 'State', 'ZIP Code', and 'Contractor or Subcontractor ID'. A red circle highlights the 'Save' button in the top right corner.
14	Click on the <b>'Reports'</b> tab of the Closeout Request. Here you will find two sections: <b>'Closeout Report'</b> and <b>'Year-End Report.'</b> Click on the eyeball icon to open the Closeout Report in the <b>'Closeout Report'</b> section. <b>NOTE: Projects with an implementation period of more than one year have at least one Year-End Report (one report to cover each year of implementation, minus the final year). Projects with an implementation period of only one year have only the Closeout Report.</b>	 A screenshot of the 'Reports' tab in the Closeout View. The page shows two sections: 'Closeout Report' and 'Year-End Report'. A red arrow points to the 'Reports' tab in the left sidebar, and another red arrow points to the 'Closeout Report' section. The 'Closeout Report' section displays a table with columns for ID, Project Title, Status, and Actions. The 'Year-End Report' section is currently empty.
15	You will find the following tabs in the Closeout Report: <b>Overview</b> ; <b>Single Audit Certifications</b> ; <b>Secured Funding</b> ; <b>Financial Summary</b> ; <b>Narratives</b> ; and <b>Attachments</b> . Click on the <b>'Overview'</b> tab and carefully review the information for accuracy. Contact your assigned City project manager if there are any corrections or updates needed. Review the <b>'Comments'</b> section at the bottom for any additional instructions or guidance from the City.	 A screenshot of the 'Overview' tab in the Closeout Report. The page displays a detailed view of the project, including a 'Project Description' section with a table of goals and objectives. A red circle highlights the 'Overview' tab in the left sidebar. The table includes columns for 'Consolidated Plan Goal', 'Strategic Plan Goal', 'HUD Matrix Code', 'CDBG Citation', 'National Objective', 'Objective Category', 'Outcome Category', and 'Outcome Indicator'. The 'Project Description' section also includes a table with columns for 'Annual Units', 'Total Served', '% Served', and 'Programmatic Report (RFR)'.

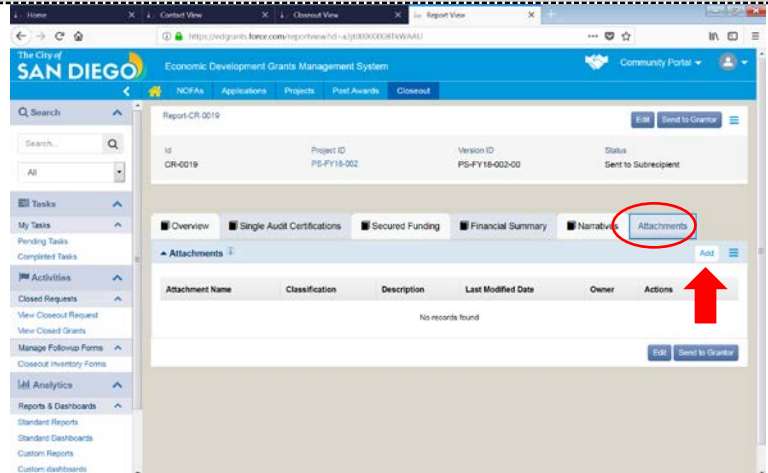
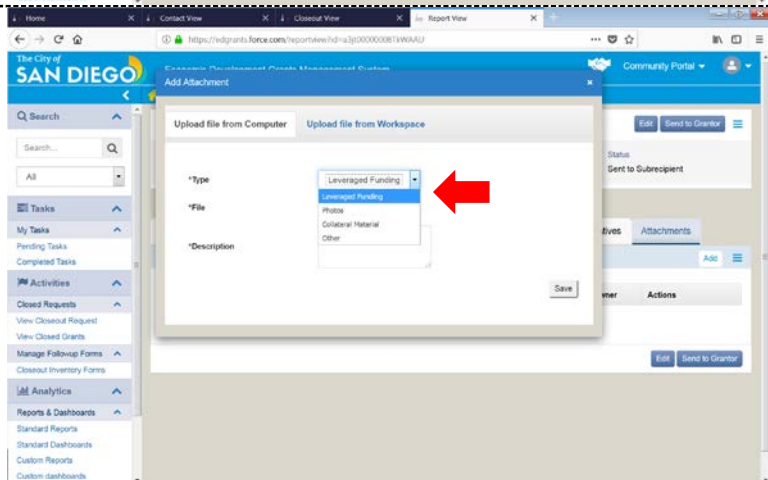
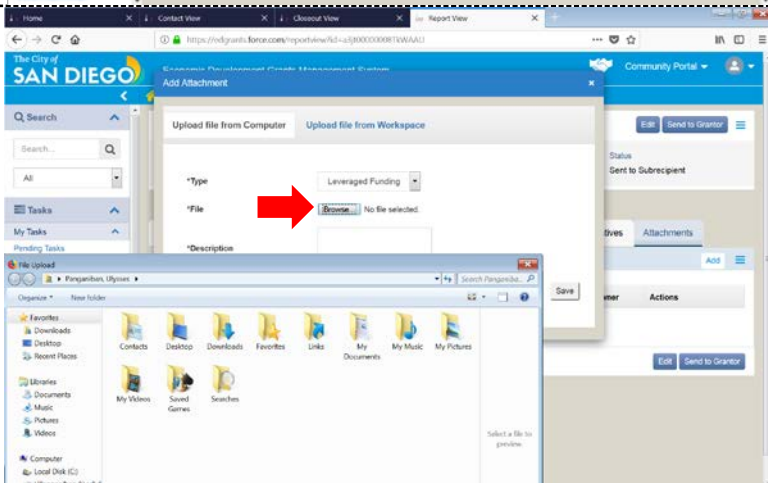


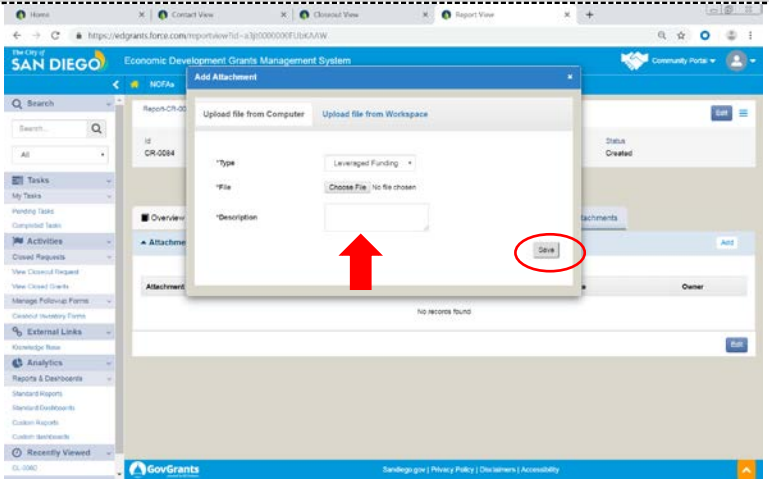
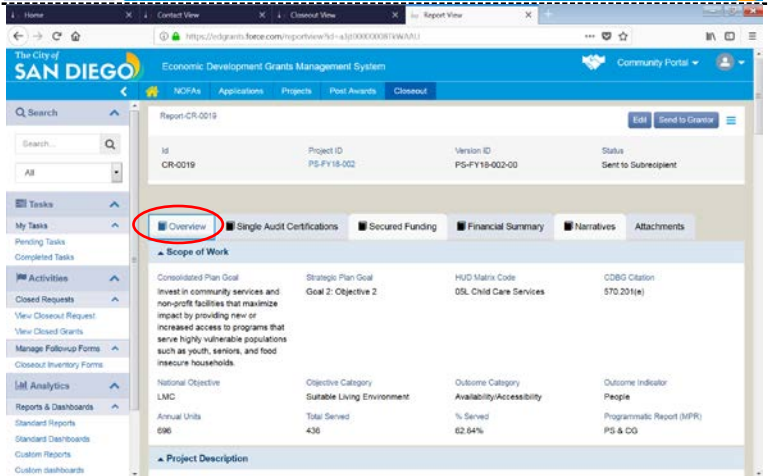
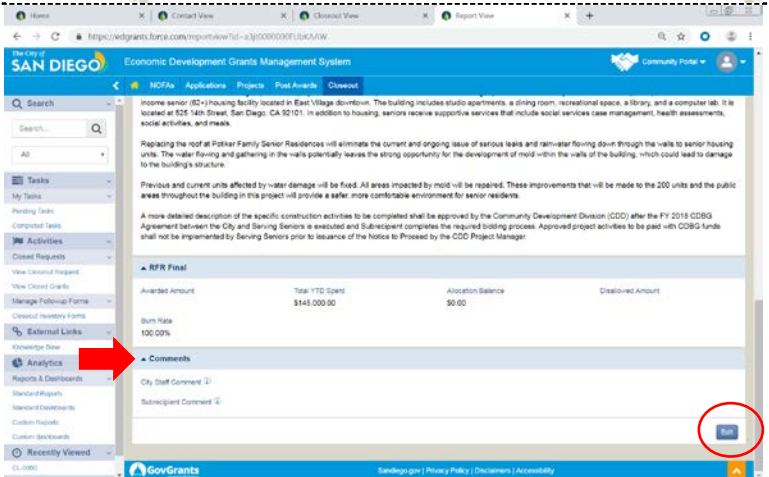
Step	Description	Screenshot
16	Click on the <b>'Single Audit Certifications'</b> tab. Review the certification language and determine which option applies to your organization (i.e., whether or not your organization expended \$750,000 or more in federal awards during the most recent fiscal year end date). Click on the <b>'Edit'</b> button to open the fields in the tab.	
17	Enter in the <b>'Report Date'</b> field the date of your organization's most recent fiscal year end date using the pop-up calendar to select the appropriate date. <b>NOTE: Implementation of the project should have been done and completed on or before this date.</b>	
18	Select the appropriate option in terms of the \$750,000 expenditure threshold in federal funds during the most recently completed fiscal year of your organization. In addition, enter in the <b>'Audited Financial Statements Due Date'</b> field the date when you expect to have your Audited Financial Statements approved by your Board of Directors and ready to be sent to the City. If applicable, enter in the <b>'Single Audit Due Date'</b> field the date when you expect to have your Single Audit approved by your Board of Directors, submitted to the Federal Audit Clearinghouse, and ready to be sent to the City. Click on the <b>'Save'</b> button to preserve your entries. <b>NOTE: The above-mentioned reports must cover the fiscal year whose end date you entered in the 'Report Date' field.</b>	

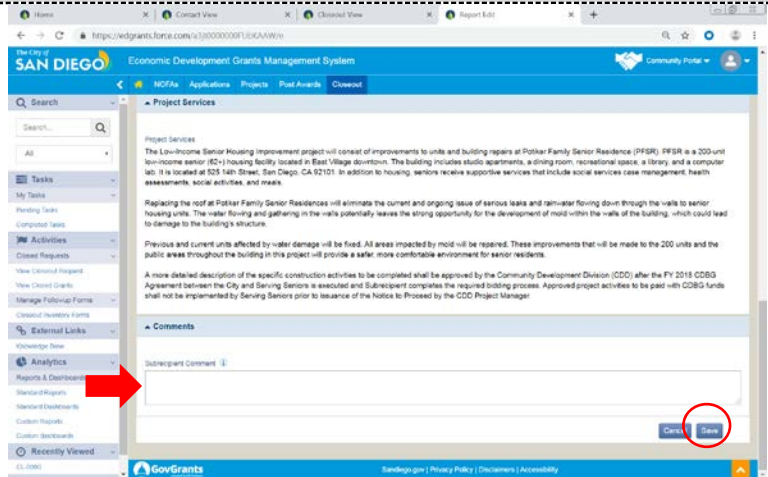
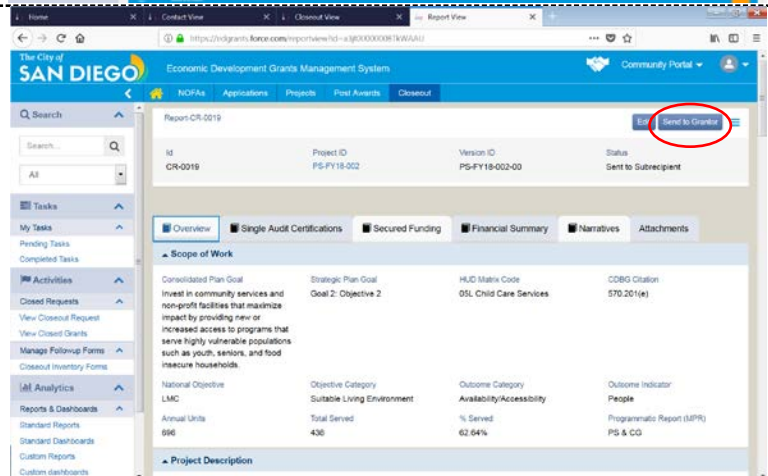
Step	Description	Screenshot
19	Click on the <b>'Secured Funding'</b> tab. You will see the non-CDBG secured funding sources and related amounts your organization had committed to spend on the project. Review the information presented for accuracy and completeness. You may edit the actual expenditure amounts using the pencil icon (✎), however, you cannot delete a line. To add a source, click on the <b>'New'</b> button and populate the fields that open. Click on the <b>'Save'</b> button to preserve your entries. <b>NOTE:</b> The information entered here will be compared to the total amount of leveraged funding previously committed by your organization to this project and may impact your organization's performance evaluation and scores of future proposals.	
20	Click on the <b>'Edit'</b> button to open the <b>'Program Income'</b> field.	
21	Enter the total amount of program income generated during the project implementation period as a result of using CDBG funds. Click on the <b>'Save'</b> button to preserve your entry. <b>NOTE:</b> Consult with the current edition of the Operating Manual for more information on what constitutes program income.	



Step	Description	Screenshot
22	Click on the <b>'Financial Summary'</b> tab and review the pre-populated <b>'Allocation Balance'</b> figure for accuracy. If the figure needs to be edited, consult with your assigned City project manager. Click on the <b>'Edit'</b> button to open the fields.	
23	If the <b>'Allocation Balance'</b> figure is correct, check the box to certify that the project is complete and that no future expenses will be claimed. Provide an explanation for any over-expended budget line items. Type 'N/A' in the field if there was no over-expended line item. Provide an explanation for any unexpended funds. Type 'N/A' in the field if there were no unexpended funds. Click on the <b>'Save'</b> button to preserve your responses.	
24	Click on the <b>'Narratives'</b> tab and then click on the <b>'Edit'</b> button to open the fields for <b>'Accomplishment Narrative'</b> and <b>'LMI Documentation Narrative.'</b> Read the instructions and provide a response in each field. Click on the <b>'Save'</b> button to preserve your responses. <b>NOTE: There is a character count limit imposed. Provide well thought-out responses. Your assigned City project manager may ask you to revise your responses if he or she deems them inadequate.</b>	

Step	Description	Screenshot
25	Click on the <b>'Attachments'</b> tab to upload documents pertinent to the project, including, but not limited to, audited financial statements, collateral material distributed, photos, leveraged funding expenditure table, success stories, etc. Click on the <b>'Add'</b> button to initiate the uploading process.	
26	In the <b>'Add Attachment'</b> pop-up window, select the appropriate type of document you would like to upload. Make sure you are under the <b>'Upload File from Computer'</b> tab.	
27	Click on the <b>'Choose File'</b> button and navigate to the file you would like to upload. Select the file and click on the <b>'Open'</b> button to upload the file. <b>NOTE:</b> The system will only accept the following file types: PDF, JPEG, and PNG.	

Step	Description	Screenshot
28	In the 'Description' field, add a short narrative describing the file uploaded. Click on the 'Save' button to complete the uploading process. Repeat steps 26–28 until you have uploaded all the files desired/required.	
29	Click on the 'Overview' button again and scroll to the bottom to the 'Comments' section.	
30	Click on the 'Edit' button to open the field for 'Subrecipient Comment.'	

Step	Description	Screenshot
31	Enter a comment in the field. Include any questions you may have to City staff and/or any other information regarding the project and its closeout that you would like to document. Click on the <b>'Save'</b> button to preserve your entry.	
32	Review all the tabs once again for accuracy and completeness. Make any necessary edits following the steps above. If you are ready to submit the Closeout Report to the City for review and approval, click on the <b>'Send to Grantor'</b> button. Email your assigned City project manager that you have submitted the Closeout Report. <b>NOTE: Only the Primary Representative will have access to the 'Send to Grantor' button.</b>	
33	Your assigned City project manager will review the Closeout Report, as well as the overall Closeout Request. If any modifications or clarifications are needed, he or she will send the Closeout Report back to you with comments in the <b>'City Staff Comment'</b> field. Follow the steps above to make any edits and resubmit the Closeout Report and/or Closeout Request to the City.	<b>End</b>

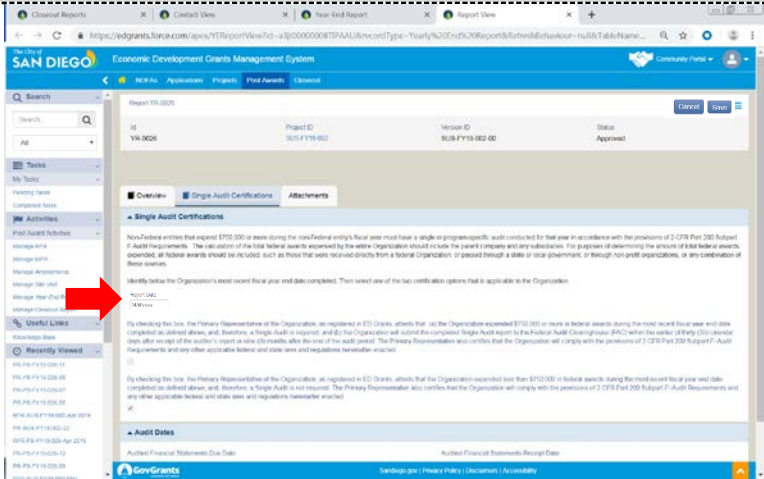
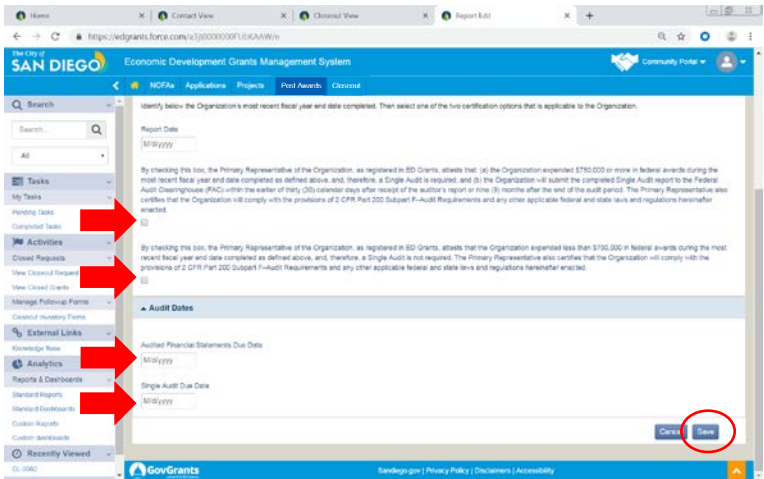
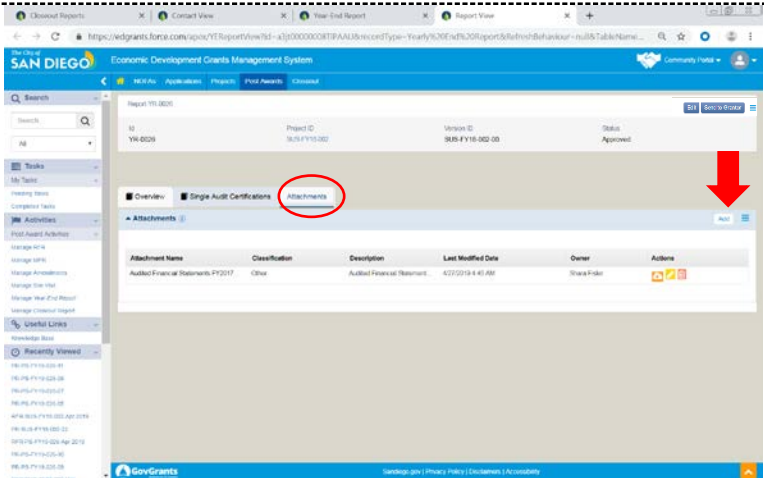


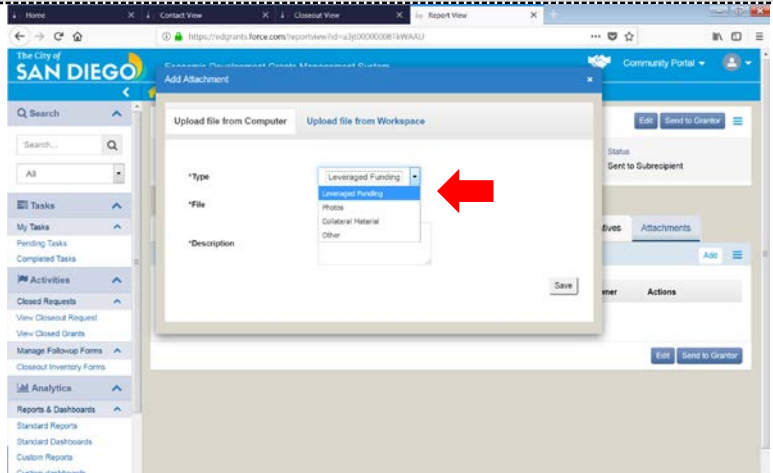
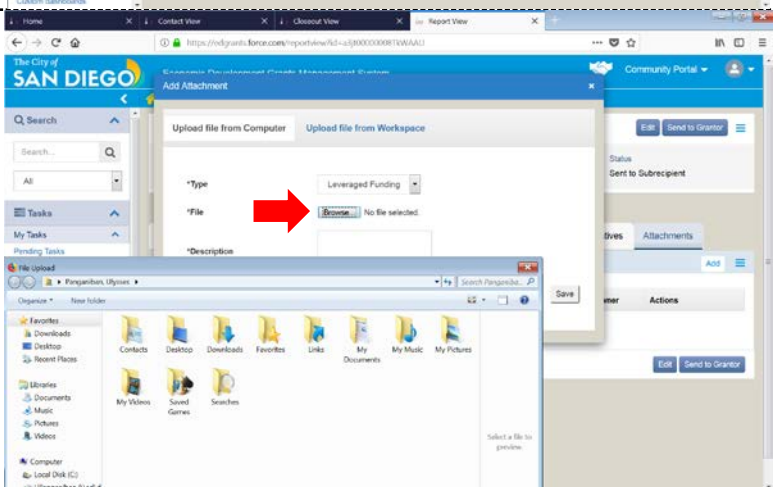
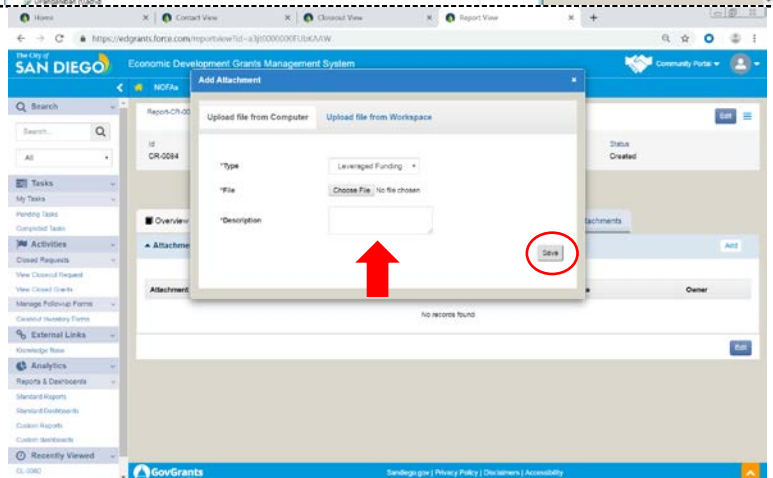
## How to Complete and Submit a Year-End Report in ED Grants:

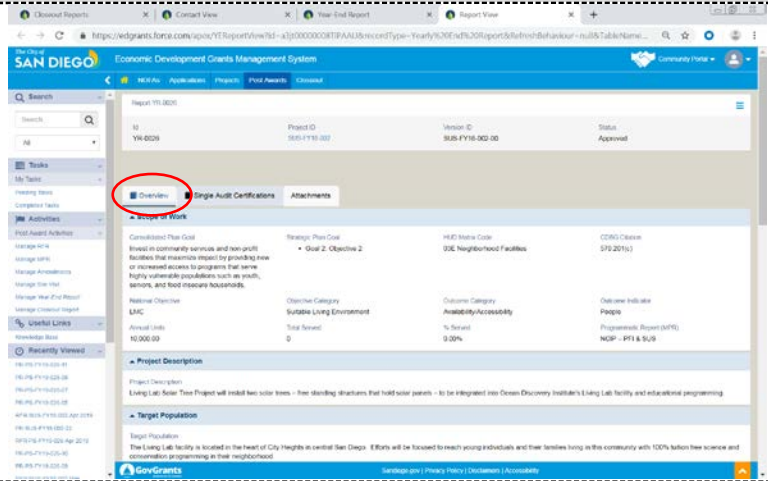
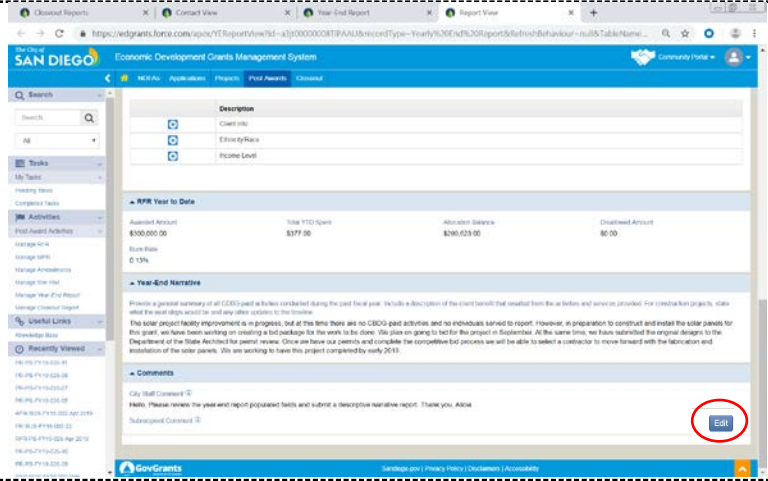
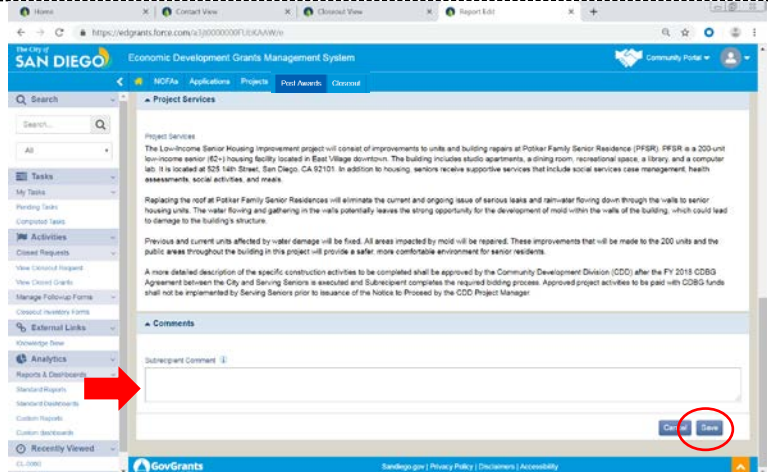
Step	Description	Screenshot
1	Log into <a href="http://edgrants.force.com">http://edgrants.force.com</a> using the credentials for either the Primary Representative or Secondary Representative of your organization. <b>NOTE:</b> While both the Primary Representative and Secondary Representative are able to work on the Year-End Report, only the Primary Representative will be able to officially submit it to the City.	
2	Click on the 'Projects' tab and find the project you would like complete the Year-End Report on in the 'Projects – All' section. Click on the corresponding eyeball icon.	
3	Click on the 'Reports' tab and scroll down to the 'Year-End Report' section. Click on the corresponding eyeball icon to open the report.	

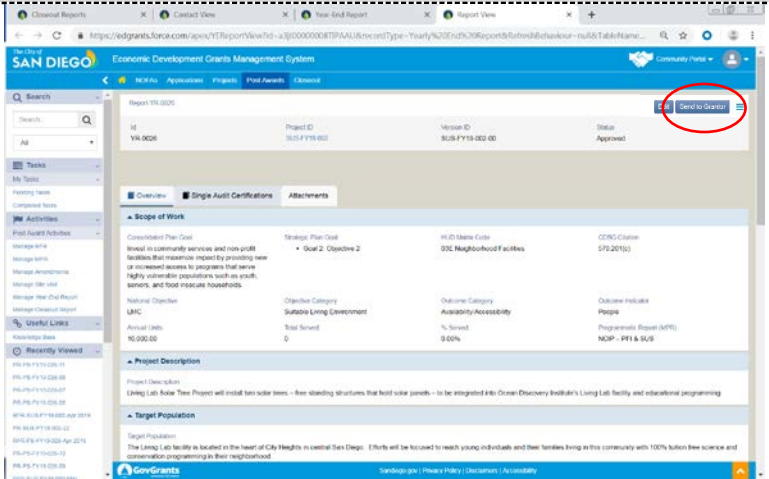
Step	Description	Screenshot
4	You will find the following tabs in the Year-End Report: <b>Overview</b> ; <b>Single Audit Certifications</b> ; and <b>Attachments</b> . Click on the ' <b>Overview</b> ' tab and carefully review the information for accuracy. Contact your assigned City project manager if there are any corrections or updates needed. Review the ' <b>Comments</b> ' section at the bottom for any additional instructions or guidance from the City. Click on the ' <b>Edit</b> ' button to open the ' <b>Year-End Narrative</b> ' section.	
5	Scroll to the ' <b>Year-End Narrative</b> ' section, read the instructions, and provide a response in the field. Click on the ' <b>Save</b> ' button to preserve your response. <b>NOTE: There is a character count limit imposed. Provide a well thought-out response. Your assigned City project manager may ask you to revise your response if he or she deems it inadequate.</b>	
6	Click on the ' <b>Single Audit Certifications</b> ' tab. Review the certification language and determine which option applies to your organization (i.e., whether or not your organization expended \$750,000 or more in federal awards during the most recent fiscal year end date). Click on the ' <b>Edit</b> ' button to open the fields of the tab.	



Step	Description	Screenshot
7	Enter in the <b>'Report Date'</b> field the date of your organization's most recent fiscal year end date using the pop-up calendar to select the appropriate date.	
8	Select the appropriate option in terms of the \$750,000 expenditure threshold in federal funds during the most recently completed fiscal year of your organization. In addition, enter in the <b>'Audited Financial Statements Due Date'</b> field the date when you expect to have your Audited Financial Statements approved by your Board of Directors and ready to be sent to the City. If applicable, enter in the <b>'Single Audit Due Date'</b> field the date when you expect to have your Single Audit approved by your Board of Directors, submitted to the Federal Audit Clearinghouse, and ready to be sent to the City. Click on the <b>'Save'</b> button to preserve your entries. <b>NOTE:</b> The above-mentioned reports must cover the fiscal year whose end date you entered in the <b>'Report Date'</b> field.	
9	Click on the <b>'Attachments'</b> tab to upload documents pertinent to the project, including, but not limited to, audited financial statements, collateral material distributed, photos, leveraged funding expenditure table, success stories, etc. Click on the <b>'Add'</b> button to initiate the uploading process.	

Step	Description	Screenshot
10	In the 'Add Attachment' pop-up window, select the appropriate type of document you would like to upload. Make sure you are under the 'Upload File from Computer' tab.	
11	Click on the 'Choose File' button and navigate to the file you would like to upload. Select the file and click on the 'Open' button to upload the file. <b>NOTE:</b> The system will only accept the following file types: PDF, JPEG, and PNG.	
12	In the 'Description' field, add a short narrative describing the file uploaded. Click on the 'Save' button to complete the uploading process. Repeat steps 9–12 until you have uploaded all the files desired/required.	

Step	Description	Screenshot
13	Click on the <b>'Overview'</b> button again and scroll to the bottom to the <b>'Comments'</b> section.	
14	Click on the <b>'Edit'</b> button to open the field for <b>'Subrecipient Comment.'</b>	
15	Enter a comment in the field. Include any questions you may have to City staff and/or any other information regarding the project and its Year-End Report that you would like to document. Click on the <b>'Save'</b> button to preserve your entry.	

Step	Description	Screenshot
16	Review all the tabs once again for accuracy and completeness. Make any necessary edits following the steps above. If you are ready to submit the Year-End Report to the City for review and approval, click on the <b>'Send to Grantor'</b> button. Email your assigned City project manager that you have submitted the Year-End Report. <b>NOTE: Only the Primary Representative will have access to the 'Send to Grantor' button.</b>	 A screenshot of the EdGrants system interface. The top navigation bar includes 'Home', 'My Tasks', 'My Projects', 'My Reports', and 'My Settings'. The main content area shows a report titled 'Report Y19-2020'. The 'Send to Grantor' button is circled in red in the top right corner. The report details include a 'Scope of Work' section with a table of objectives and outcomes, and a 'Project Description' section.
17	Your assigned City project manager will review the Year-End Report. If any modifications or clarifications are needed, he or she will send the Year-End Report back to you with comments in the <b>'City Staff Comment'</b> field. Follow the steps above to make any edits and resubmit the Year-End Report to the City.	End

For additional support, email [CDBG@sandiego.gov](mailto:CDBG@sandiego.gov) or visit the 'Resources' tab at [edgrants.force.com](https://edgrants.force.com).