

**City of Saint Louis**

**PROGRAM GUIDELINES**

**FOR**

**HOMEOWNER REHABILITATION (HMR)**

**City of Saint Louis  
Community Development Block Grant (CDBG) Program  
300 North Mill Street, St. Louis, MI 48880  
(989) 681-2137**

**The City of St. Louis agrees to adopt the CDBG Policy Manual as their Program Guidelines to follow, adhere to, with respect to all policy, procedure, compliance, reporting for this CDBG Program.**

**INTRODUCTION**

These policies have been adopted by the City of Saint Louis (UGLG) to administer MSHDA’s Community Development Block Grant (CDBG) Program including Homeowner Rehabilitation (HMR) activities. Amendments to these Program Guidelines must be approved by MSHDA prior to a majority vote of the UGLG Board.

**EXPENSE ALLOCATION**

<b>CDBG PROGRAM ACTIVITIES</b>	<b>CDBG FUNDS</b>	<b>TOTAL</b>
Homeowner Rehabilitation (HMR)	328,000	328,000
Administration (up to 18%)	72,000	72,000
Leverage Funds	0	0
Leverage Funds	0	0
<b>TOTALS</b>	<b>\$400,000</b>	<b>\$400,000</b>

**Program Funds:** Loan repayments/recaptured funds from all CDBG State programs must be treated as program income and must be spent throughout the duration of the program on the same activities as stated in present and prior grant applications. Administration funds up to 18% may be utilized to help defray the cost of administering the CDBG Program.

**Program Area:** The CDBG Program is offered (mapped area) target area with boundaries identified and will assist eligible homeowners.

**Household Income Restrictions:**

The following documentation of program benefit is required for all CDBG-funded activities that are carried out under the LMI Housing National Objective. Additional back-up documentation must be kept on file.

1. For each assisted unit, the family size and income ranges (30%, 50%, 80%) of occupant households, and the amount of CDBG funds spent on the project.
2. Documentation that the housing is occupied by LMI households are affordable.
3. Data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in, and/or beneficiaries of CDBG activities. Grantees are required to report income and demographic information for the individuals living in the house.

CDBG Income Limits are determined by HUD each year in a very large excel document for all counties in the United States. For convenience and ease, please refer to CDBG Income Limits (10-N) which will be updated when new limits are provided by HUD.

## **GENERAL PROVISIONS**

**Purpose of the CDBG Program:** This program is intended to provide funds for the following:

**Homeowner Rehabilitation (HMR):** Rehabilitation and improvement of owner occupied, single family residential units. All HMR repairs must conform to the CDBG Policy Manual Construction Standards, Michigan International Builders Code, Michigan Electrical Code, the UGLG Construction Rehabilitation Standard, and comply with local zoning regulations and ordinances. The HMR Project workbook and proforma will be used for each activity. HMR will enable CDBG funds to assist single-family Housing Rehabilitation Repairs to be brought up to MSHDA's rehabilitation standards and BOCA property maintenance code. The HMR major emphasis is serving the UGLG's residents by upgrading the homes owned by low to moderate income households must be at or below 80% area median income. For further information refer to the HMR QUICKFINDER.

## **THIRD PARTY ADMINISTRATOR SERVICES**

The applicant may indicate on the application a Third-Party administrator (TPA) with whom it will contract for Grant implementation. If a TPA is proposed: 1) the procurement process outlined in the CDBG policy manual must be followed, and 2) Complete Grant Management Plan identifying the individuals to be responsible for various roles and responsibilities of grant implementation, and 3) MSHDA must receive a copy of the administrative agreement (Contract) between the applicant and TPA.

Grantee's Authorized Official must execute and submit a completed Grant Management Plan and all required attachments for MSHDA NDD for review and approval.

All documentation referenced above must be received as pre-disbursement condition to the Grant Agreement.

## **TIERED ENVIRONMENTAL REVIEW**

HMR projects will use the Tiered Environmental when not all project sites have been identified.

The Tier I deals with the projects overall broad target area.

The Tier II is a site-specific review completed on each individual property as it is identified, after publication and prior to commitment of funds, to the project site. Used for HMR activities (Categorically Excluded Subject to 58.6 (CEST)).

For information on the Environmental Review process review Chapter 7 of the Policy Manual.

## **APPLICANTS**

### **APPLICANT CRITERIA/SINGLE FAMILY HOUSING**

Housing Rehabilitation assistance will be made to all eligible homeowners residing within the UGLG's targeted area who meet the eligibility requirements. The HMR improvements are listed in the policy manual but are not limited to the list in the policy manual, please contact CDBG Program staff for guidance for items not listed.

### **HMR APPLICANT REQUIREMENTS**

Applicant must be an individual, or family, who has ownership by warranty deed and occupies a single-family dwelling residential property or is purchasing property under a mortgage. The warranty deed or mortgage must be recorded in the County Register of Deeds office. Properties with a Reverse Mortgage are not eligible for assistance.

The Applicant's home must be at least 5 years old, and Applicant must have occupied the home for 1 year prior to making application. The activity cap of \$8000 results in all assistance occurring as a grant. Applicant must reside in the premises for the term of the grant.

Applicants approved for Homeowner Rehabilitation (HMR) assistance may not apply for more HMR assistance if their MSHDA grants/loans combined are over \$75,000 for a period of 5 years. This does include Emergency Repair program income projects.

**Conflict of Interest:**

The Unit of Local Government cannot provide assistance to an employee, an employee's immediate family member, or any individual associated with the CDBG program. Exceptions may be possible, on a case-by-case basis, if a Conflict of Interest Disclosure is submitted outlining why participation is warranted, and MSHDA legal approves the disclosure request. See CDBG Policy Manual, Chapter 1 Program Overview, Conflict of Interest Regulations section. They may apply for other programs through the Michigan State Housing Development Authority.

**Applicant Package:**

The Program Administrator shall be responsible for establishing a permanent file for all approved applications and ensuring that all necessary documents are included in the applicant's permanent file. The Program Administrator shall provide the necessary forms to all applicants who, after preliminary screening for eligibility, appear to be qualified for rehabilitation assistance. Applicants for rehabilitation assistance shall furnish the required documents in the HMR Project Workbook. They may need provide other documents required by the Administrator. An application shall be considered "received" only after all required applicant documents are received in the Program office. At that time, they shall be "date and time stamped" in order received. Applicants will be served on a first-come, first-served basis. A member of the UGLG staff will interview the applicant to ensure the applicant is aware of the program scope and project expectations as grant assistance. If the applicant decided not to proceed, they will indicate in writing. This will be documented as a closed file.

**Benefit to Low- and Moderate-Income Residents:**

The Housing and Community Development Act of 1974 requires low- and moderate-income persons be eligible in making a rehabilitation deferred loan or local loan on residential property. Low and moderate is interpreted to mean persons whose income is less than 80% of the median income for UGLG residents as reported by State of Michigan for non-metropolitan areas. The income guidelines adopted by the UGLG are in accordance with the CDBG Income Limit Guidelines as established by the Department of Housing and Urban Development.

The following documentation of program benefit is required for all CDBG-funded activities that are carried out under the LMI Housing National Objective. Additional back-up documentation must be kept on file.

1. For each assisted unit, the family size and income ranges (30%, 50%, 80%) of occupant households, and the amount of CDBG funds spent on the project.
2. Documentation that the housing is occupied by LMI households are affordable. For convenience and ease, please refer to CDBG Income Limits (10-N) which will be updated when new limits are provided by HUD.
3. Data on the racial, ethnic and gender characteristics of persons who are applicants for, participants in, and/or beneficiaries of CDBG activities. Grantees are required to report income and demographic information for the individuals living in the house.
4. To be eligible for our programs, an applicant's income must not exceed current Income Limits as set forth by HUD. The following two income methods are used to calculate the gross income projected over the next 12 months for all adult household members IRS Form 1040 Long Form Method and Part 5 Annual Income. For all

CDBG activities, Grantees will calculate annual income as defined in 24 CFR 5.609, also refer to as Part 5 Annual Income, and is used to determine program eligibility and to calculate subsidy. Please refer to Policy Manual Chapter 10 Income Verification for more information.

**Eligible Properties:**

The Michigan State Historic Preservation Office (SHPO) will be notified of all potential projects in which the property is 50 years of age or older. For properties listed on or eligible for the National Register of Historic Places, activities associated with conforming repair and rehabilitation activities to the standards and/or design comments resulting from the consultation process contained with SHPO.

Necessary repairs to manufactured homes.

- The recipient owns the home and the site on which the home is situated, and has occupied that home on that site for at least one year prior to receiving assistance; and
  - The manufactured home is on a permanent foundation or will be put on a permanent foundation with these funds.
- A. Funds may be used for payment of incidental expenses directly related to accomplishing authorized activities such as fees for connection of utilities (water, sewer, gas, electric), credit reports, surveys, title clearance, loan closing, inspections, and architectural and other technical services. All fees will be in accordance with local prevailing rates and so documented.
- B. Funds may not be used to:
1. Refinance any debt or obligation of the homeowner other than obligations incurred for eligible items covered by this section entered into after date of agreement with grantee.
  2. Repair or rehabilitate any property located in the Coastal Barrier Resources System as designated by the Coastal Barrier Resource Act.
  3. Expanding structures, or completing unfinished spaces, if not required by code.
  4. Materials, fixtures, grading, or filling of a type of quality which exceeds what customarily is used in the locality for properties of the same general type as the property to be rehabilitated.
  5. Appliances, such as dishwashers, washing machines and clothes dryers.
  6. Penalties or special assessments which are a requirement of the homeowner.
  7. Furnishings, such as items of furniture, drapes, and appliances that are not required by housing code.
  8. Repair or rehabilitate any property located in a Federal Emergency Management Agency (FEMA) designated floodplain.
- C. Administration Costs.
1. Payment of reasonable salaries or contract for professional, technical, and clerical staff actively assisting in the delivery of the Homeowner Rehabilitation program.
  2. Payment of necessary and reasonable office expenses such as office rental, supplies, utilities, telephone services and equipment. (Any item of non-expendable personal property having a unit value of \$1,000 or more, acquired with federal funds will be specifically identified to the grantor in writing. An itemized list

of all equipment purchased with CDBG will be kept on file and will include date of purchase, serial # and description. This file will be made available upon request. Equipment purchases over 5 years old (date of purchase) will be deleted from this list and will become the property of the UGLG.

3. Payment of necessary and reasonable administrative costs such as worker's compensation, liability insurance, and the employer's share of Social Security and health benefits. Payments to private retirement funds are permitted if the grantee already has such a fund established and ongoing.
4. Payment of reasonable fees for training of grantee personnel.
5. Payment of necessary and reasonable costs for an audit upon expiration of the grant agreement.
6. Other reasonable travel and miscellaneous expenses necessary to accomplish the objectives of the specific grant which were anticipated in the individual grant proposal, and which have been approved as eligible expenses at the time of grant approval.

D. Administration funds may **not** be used for:

1. Preparing housing development plans and strategies except as necessary to accomplish the specific objectives of the Homeowner Rehabilitation program.
2. Substitution of any financial support previously provided or currently available from any other source.
3. Buying property of any kind from families receiving assistance from the grantee under the terms of the program.
4. Paying for or reimbursing the grantee for any expense or debts incurred before the grantor executes the grant agreement.
5. Paying any debts, expenses, or costs, which should be the responsibility of the individual families receiving CDBG assistance outside the cost of repairs, rehabilitation, or replacement.
6. Any type of political activities prohibited.
7. Other costs including contributions and donations, entertainment, fines and penalties, interest, and other financial costs unrelated to the assistance to homeowners, legislative expenses, and any excess of costs from other grant agreements.

### **CONTRACTOR REQUIREMENTS**

1. The CDBG Policy Manual contractor requirements must be met. Eligible contractors must be licensed contractors residing in and their principal place of business is in the UGLG's County. If a suitable number of local contractors do not participate, out of county contractors can be utilized. Minority, female, and disadvantaged business contractors are encouraged to bid on projects. See MSHDA MBE WBE Database, listed under EEO at <https://www.michigan.gov/mshda/developers/architects-and-contractors>.
2. The UGLG will provide a prequalified list of contractors with appropriate qualifications based on the nature of the job, including but not limited to, potential lead and asbestos remediation. The homeowner may select an alternate contractor so long as they meet all other requirements, possess necessary certifications, and are the lowest responsible bidder.

3. Contractor will provide all materials, equipment, and labor necessary to perform the work stated in the Bid Specification. All materials and workmanship must meet minimum standards as set forth in the UGLG's Construction Rehabilitation Standard packet, BOCA Basic National Property Maintenance Code, and Michigan Energy Code. All materials used are to be new materials unless otherwise stipulated in the specifications.
4. Contractor will be responsible for obtaining any required work permits and arranging for subsequent permit inspections.
5. Contractor will conform to all applicable local codes and ordinances whether or not specifically stated in the Specifications.
6. Contractor will furnish evidence of Comprehensive Public Liability Insurance (\$300,000) protecting the Homeowner in the event of bodily injury, including death, and (\$100,000) in the event of property damage arising out of the work performed by the contractor or a sub-contractor.
7. Contractor will furnish evidence of Worker's Compensation Insurance when applicable and any other coverage required by Michigan Statutes. Statement of Sole Proprietorship will be required from contractors operating as such.
8. Bids and contracts must contain contractor and sub-contractors performing work on each job. UGLG must confirm the Contractor and sub-contractors working on the project are not listed on the HUD Limited Denial of Participation List.
9. Contractor must sign the contractual agreement with the Homeowner, as prepared and approved by the UGLG.
10. Contractor will be required to begin work within 10 calendar days from receipt of the "Proceed to Work Order" or show just cause for not beginning work.
11. Contractor shall disqualify his bid by specifying material not otherwise specified in bid specifications. Contractor must bid each numbered item and show lump sum of all items.
12. All contractors working on a home built prior to 1978, which has tested positive for lead-based paint, will have attended the Lead Based Paint training which includes OSHA safe work practices and must be supervised by a certified Lead Based Paint Abatement Supervisor, OR workers must have successfully completed one of the following courses:
  - a. A lead-based paint abatement supervisor course, offered by the Department of Health & Human Services.
  - b. A lead-based paint abatement worker course, offered by the Department of Health & Human Services.
  - c. The Lead-Based Paint Maintenance Training Program (Work Smart, Work Wet and Work Clean to Work Lead Safe).
  - d. The Remodeler's and Renovator's Lead-Based Paint Training Program.
  - e. Lead and Asbestos abatement contractors must provide copies of licenses and certificates.

Asbestos: General Asbestos Policy. All construction, demolition, and rehabilitation that is done in whole or in part with CDBG funds must comply with state and federal asbestos removal requirements. Only EPA asbestos certified specialists, or other workers along with a supervisor, can carry out asbestos abatement tasks. Asbestos activities must be associated with an approved rehabilitation activity. It is the responsibility of the grantee, developers, owners, and contractors to know and comply with local, state, and federal construction standards. See Asbestos Applicability Worksheet.

12. If the contractor is unable to complete his work due to conditions within his control, the contractor will pay for additional inspection plus twice the amount of the item not completed will be withheld from the balance until final inspection and final payment.
13. Each contractor will be responsible for all landscaping that is damaged during work being performed. If landscaping is found damaged on final inspection all remaining monies will be withheld until the damage is repaired to original condition.
14. The contractor may be removed from bidding if failing to respond to the invitation to bid for a period of 6 months.
15. Once removed from bidding, for poor workmanship, the contractor may request re-instatement from the UGLG.

### **HMR INSPECTION**

1. The initial inspection will be conducted by the designated inspector for the UGLG to determine building code issue areas needing to be addressed.
2. Any home built prior to 1978 that requires more than \$5,000 in federal funds and will require work to be performed on any surface which may contain Lead Based Paint will be required to have a Lead Based Paint Assessment performed by a certified Lead Based Paint Inspector.
3. Radon testing has been cleared in the Tier 1 Environmental Review, and as the UGLG is not a high radon area, no testing is required for rehabilitation activities.
4. The inspector may be requested by the Director to conduct a special inspection either prior to homeowner's acceptance of the prepared specifications or, if conditions warrant such, during actual construction.
5. The final inspection made by the inspector is conducted after receipt of the Work Completion Statement to determine contractor's compliance with work specifications.
6. Contractors must arrange with local code officials for inspections and final approval on any building, electric, plumbing and/or mechanical permits required.
7. Any inspection fee charges and cost incurred from code rehabilitation and emergency repair projects by the Housing Inspector will be charged against the Administration or Project Processing Fee budget category as follows:
8. Initial Inspection (includes mileage, walk through inspection report and cost estimate). \$90
9. Bid Specification/Final Cost Estimate (includes preparation of bid specifications, final cost estimates, and mileage). Bid specification shall be itemized per item plus cost breakdown. \$ 90
10. Other inspections (includes mileage and signed inspection forms for half-way rough-in, special and final inspections). \$90
11. All the inspection fee charges, and cost incurred from code rehabilitation projects by the Home Improvement Inspector will be charged against the Administration or Project Processing Fee budget category.

12. The UGLG reserves the right to terminate a contract with a Homeowner should the inspection or subsequent bids estimate the project to exceed \$8200.

### **HMR BID SPECIFICATIONS**

The UGLG may use MSHDA's Construction Rehabilitation Standard (in the CDBG Policy Manual), listing items that are to be considered on bids. The UGLG Construction Rehabilitation Standard packet will be given to all interested licensed Contractors. This specification book has been prepared by the UGLG Code Enforcement Officials.

The Homeowner must sign the "Approval of Bid Specifications" form. The homeowner is advised to question any items which are unclear and inform the UGLG of any additional work to be done (if eligible) before project is let for bids.

### **HMR BIDS**

1. The UGLG will prepare a Request for Qualifications (RFQ) to establish a pre-qualified list of contractors for homeowners to contact for bids. The UGLG will check contractors for debarment before finalizing the approved list.
2. Homeowners may also solicit bids from a contractor not on the pre-qualified list should they meet all requirements and hold relevant certifications.
3. The UGLG has established an \$8000 target with an \$8200 cap for individual homeowner projects. Contractors and homeowners will be notified of this limit.
4. The homeowner will solicit bids from the RFQ list or a qualified alternate and the UGLG will review. The homeowner will voice his/her choice of contractor. The homeowner will be reminded that it is the general practice to accept the lowest responsible bid (within 10% of the inspector's estimate). If the owner chooses the higher bid, he/she must pay the difference between the lowest responsible bid and the chosen, higher bid. This difference must be paid prior to the start of any work. Following UGLG approval, the homeowner will award the bid and notify the contractor.
5. Following UGLG approval, the homeowner will award the bid and notify the contractor. Upon the homeowner's acceptance, the contractor is notified of the bid award. If the low bidder was not selected due to a choice by the homeowner, the UGLG will notify the low bidder of this in writing.
6. The UGLG City Council reserves the right to reject all bids in excess of 10% of the Inspector's estimate (when applicable), upon receipt of a single bid, or when the bids appear to be out of line.
7. To prevent unnecessary change orders and cost over-runs on projects, contractors will be asked to bid projects on an item-by-item basis. This will enable the Housing Department to keep project costs under control.
8. Typically, 3 or more bids will be required, however if only one bid is received the homeowner and/or UGLG City Council members have the option to accept that bid if it is within 10% of the housing inspector's estimate or may elect to rebid the project.
9. Contingency Funds providing for contingencies must be related to construction activities. A contingency must be identified in the specific budget line item for which it is intended and must be reasonable in amount (no more than 20%).

### **HMR WORK PERFORMANCE**

1. Contractor will begin work within 10 days of contract signing and issuance of the "Proceed to Work Order".

2. Homeowner will notify the UGLG of the date work is started. This date will be documented in the applicant's file.
3. Contractor will notify the UGLG of any problems occurring during the performance of work.
4. All necessary work change orders more than 10% of the project cost will be approved by a committee consisting of the UGLG. They will be issued by the UGLG and signed by both the contractor and the homeowner. Any work change order in excess of 10% of the project cost will be reviewed by the full UGLG acted upon by the full UGLG board at the next regular meeting.
5. Lien Protection Procedure. Using the proper Lien Procedure protects the homeowners, workers, suppliers, contractors, builders, and grantees. Using the proper Lien Forms and timeline submittals will provide full lien protection.

#### **HMR PAYMENTS TO CONTRACTOR**

1. UGLG will receive invoices from contractors to directly reimburse, except for any amount after \$8200 has been allocated should the homeowner choose to expand their bid.
2. UGLG may disburse up to 40% of the total contract amount, if less than 40% of the approved improvements are complete with proper documentation provided by contractor.
3. UGLG may disburse up to 70% of the total contract amount, if at least 70% of the approved improvements are complete with proper documentation provided by contractor.
4. UGLG may disburse up to 95% of the total contract amount, if at least 100% of the approved improvements are complete. UGLG will notify Housing Inspector to conduct final inspection.
  - a. Inspector will set appointment with homeowner and contractor.
  - b. Inspector will ensure that all items on the work specifications were completed satisfactorily.
  - c. Inspector will give signed reports to the UGLG.
4. Upon receipt of project acceptance by Homeowner and Inspector, and final inspections of permits by local code officials:
  - a. Contractor is entitled to a 95% disbursement of the contract amount, provided he has supplied waiver of lien forms signed by all sub-contractors and has signed the Contractor's Final Invoice Release of Claims & Warranty.
  - b. The final 5% of a project's contract amount will be released 7 days following final acceptance of the completed work.
5. The UGLG is authorized to prepare draws to the contractor determined upon work progress inspections.

#### **HMR COMPLAINT POLICY**

The complaint policy is in the grant policy manual and the UGLG's policy must contain the following:

- Review Committee

- Procedures
- Filing Complaints
- Response
- Dispute Resolution
- Final Recourse
- Reinstatement

### **FAIR HOUSING & EQUAL OPPORTUNITY PROCEDURE**

UGLG complies with MSHDA's CDBG program's policy manual for Fair Housing and Equal Opportunity requirements. In compliance with Fair Housing requirements, UGLG will maintain a Fair Housing Log which discloses information regarding any and all fair housing concerns and their outcomes, as well as Affirmative Fair Housing actions taken to further fair housing.

Persons wishing to file a housing related complaint or concern will be referred to the Michigan Department of Civil Rights, HUD, and the Fair Housing Center in Michigan. Persons wishing to file a complaint or concern that is employment related will be referred to the Equal Employment Opportunity Commission and the Michigan Department of Civil Rights.

UGLG will notify MSHDA if a complaint or concern is filed.

### **UGLG PROGRAM ADMINISTRATION**

The UGLG is responsible for the HMR Workbook completion and submission of all required program documents including those set forth in the following:

- Step 1 Applicant Eligibility
- Step 2 Property Evaluation
- Step 3 Contractor Selection
- Step 5 Closing and Lien Documents
- Step 6 Construction Management
- Step 7 Project Closeout

Additionally, UGLG is responsible for the oversight of all MSHDA CDBG program-required activities on its online grant management systems including timely submission of Financial Status Reports (FSRs), Progress Reports and Project Completion Reports.

### **HMR PAYMENT OF EXPENDITURES**

Grant recipients under the CDBG Program are required to comply with the grant administration and financial management guidelines set forth in 2 CFR part 200, Uniform Administrative Requirements for Grants in Aid to State.

### **UGLG PAYMENT PROCESS**

1. Vouchers to institute payment of bills will be prepared by the UGLG staff for approval. Once approved for payment, vouchers will be signed by the UGLG staff.
2. The UGLG staff will issue checks for payment. To ensure a proper register of checks, these checks will be UGLG staff checks and not those of the UGLG's General Fund. The checks will be signed by the Treasurer and a Deputy Treasurer or any other authorized person to sign city disbursement checks.

3. The UGLG staff appointed by the UGLG City Council will be responsible for proper maintenance of books of account.
4. The UGLG staff will be responsible for preparing Grant Payment Requests and Status of Funds Reports.
5. Monthly financial reports will be prepared by the UGLG staff on the administration and rehabilitation accounts. These reports will show the following:
  - a. Program Budget
  - b. Actual Expenses for the Month
  - c. Year to Date Expenses
  - d. Current Cash Balance
  - e. Balance of Unexpended Program Budget
6. All other accounting functions will be the responsibility of the UGLG staff.

### **HMR MARKETING PLAN**

The purpose of this plan is to describe how the community will promote the CDBG housing programs and how the program information will reach eligible participants.

**Market Identification.** Single family households located within the City of St. Louis.

**Marketing Goal.** For purpose of this application, it is the goal of the UGLG to reach a minimum of 200 households with a variety of information regarding housing assistance.

#### **Marketing Methods**

1. UGLG will do a news release when funding announcements are made, and a notice of application availability will be mailed alongside one round of utility bills to homeowners.
2. Several times during the program, relevant information will be published in local newspapers or posted on official social media accounts as necessary.
3. Posters and fliers are distributed around UGLG in opportune places such as supermarkets, banks, laundromats, drug stores and distributed at meetings, if applicable.
4. An UGLG staff member will appear upon request, at local governmental meetings and organizational meetings to discuss the CDBG Program.

Marketing Budget     \$500

### **GRANT MONITORING**

The Neighborhood Development Division (NDD) is responsible for ensuring that funds are committed and expended in accordance with the program requirements of NDD's funding sources -- MSHDA CDBG grants, Monitoring Plan identifies monitoring objectives, ongoing monitoring procedures, and criteria for on-site monitoring of program participants. This annual monitoring plan serves as a strategy for determining compliance as well as guidance for NDD housing staff. More information can be found in the CDBG Policy Manual.