



**COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
MANUAL
for**

Public Services Projects

*Washington County
Office of Community Development
Updated February 2025*

Instructions to all Applicants for Community Development Block Grant Funding

This Program Manual outlines the various requirements that apply to entities receiving Community Development Block Grant (CDBG) funding for Public Service projects. The CDBG program is funded by the federal Department of Housing and Urban Development (HUD) and administered by Washington County Office of Community Development (OCD). OCD's responsibility is to ensure that federal and local program requirements are met, which is guided by the County's current Consolidated Plan, and the Community Development Block Grant Program Policy Manual. The purpose of the CDBG Program Manual is to provide guidance to project sponsors about the steps they must undertake and consider before applying for funding.

Federal requirements are often detailed and technical. We have not attempted to include all federal requirements in this manual; rather to provide enough information for project sponsors to determine whether to proceed with an application. Sponsors are encouraged to contact OCD for additional guidance on individual project needs. Federal requirements may be vague and/or subject to interpretation. Do not hesitate to contact OCD if you have any questions as to how to proceed. If necessary, we will contact HUD for guidance.

Please be aware that Federal requirements often apply to non-CDBG funded portions of a project or to activities that are undertaken prior to receipt of a grant award. For example, the implications of environmental review requirements, which prohibit any "choice-limiting" activities be performed on the project site after the application for funding is submitted but prior to completion of the environmental review and "Notice to Proceed". It is challenging and costly to implement federal regulations after a project has begun. **Please contact OCD before taking any steps in the development of your project if you intend to apply for CDBG funding.**

Once you are notified your project has been selected for funding, OCD will conduct the environmental review and draw up an agreement with your jurisdiction or agency. This agreement will require compliance with specific federal and local program requirements. OCD will send you a "Notice to Proceed" when the environmental review is completed and the agreement between the County and your jurisdiction or agency will be signed by both parties. From that date to the termination date specified in the agreement, you will be able to undertake project activities reimbursable by the grant program.

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Section I: Environmental Review Requirements

Environmental Review Requirements

This section offers guidance for the completion of an Environmental Review (ER) under HUD regulations found at [24 CFR part 58](#). It is critical that environmental reviews be conducted in a timely and accurate manner so that projects may move forward and receive positive consideration for CDBG funding.

Incomplete or inaccurate reviews may result in decisions to deny or rescind project funding.

The Federal Requirement

The environmental review process is required for all federally funded projects to ensure that the proposed project doesn't negatively affect the surrounding environment and that the site itself doesn't have an adverse effect from the existing environmental conditions. This requirement falls under the National Environmental Policy Act of 1969 (NEPA) and other provisions of law which can be referenced in regulation [24 CFR part 58](#). As the Responsible Entity (RE), Washington County is authorized to assume HUD environmental review, decision making, and action responsibilities.

Why are Environmental Reviews Important?

- To disclose any environmental impacts of proposed projects to decision makers and the public;
- To avoid or mitigate environmental affects that may cause harm to humans;
- To avoid or mitigate any harm to the surrounding environment;
- To commit to the legal responsibility, we have as grantees and sub-grantees from HUD.
- To commit community's environmental needs and standards.

Overview of the Environmental Review Process

The level of review required for the Environmental Review process, varies based on the type of project. Most Public Service projects fall under the Exempt level of Environmental Review. The Environmental Review Checklist for Public Services provides information for OCD staff to determine whether a project may be considered to meet the requirements for an Exempt level Environmental Review, or whether more detailed information will be needed to complete the review. OCD will complete this checklist for public services as it applies to your project prior to contract execution.

Please note that no choice-limiting actions can take place until the entire HUD Environmental Review process has been completed. Choice-limiting actions include but are not limited to: executing a purchase agreement for acquisition (though an option agreement is allowed), executing a lease agreement, demolition, construction, and executing construction contracts.

Environmental Review Checklist for Public Services

**Determination of Exemption and Determination of
Categorical Exclusion (not subject to Section 58.5)
24 CFR 58.34(a) and 58.35(b)**

Activity Name and Grant Number:	
Address:	
Activity Description:	
Funding Source: CDBG HOME ESG HOPWA EDI ICDBG NAHASDA Other: _____	
√	The activity falls into the category below, which is listed at 24 CFR 58.34(a) as Exempt.
	1. Environmental and other studies, resource identification, and development of plans and strategies
	2. Information and financial services
	3. Administrative and management activities
	4. Public services that will not have a physical impact or result in any physical changes including but not limited to services concerned with: <ul style="list-style-type: none"> ▪ Employment ▪ Crime prevention ▪ Child care ▪ Health ▪ Recreation needs ▪ Drug abuse ▪ Education ▪ Counseling ▪ Energy conservation ▪ Welfare ▪ Other _____
	5. Inspections and testing of properties for hazards or defects
	6. Purchase of insurance
	7. Purchase of tools
	8. Engineering or design costs
	9. Technical assistance and training
	10. Temporary or permanent improvements that do not alter environmental conditions and are limited to activities to protect, repair or arrest the effects of disasters or imminent threats to public safety, including those resulting from physical deterioration.
	11. Payment of principal and interest on loans made or obligations guaranteed by HUD
√	The activity falls into the category listed below, which is listed at 24 CFR 58.35(b) as a Categorically Excluded activity not subject to Section 58.5.
	1. Tenant-based rental assistance
	2. Supportive Services (including but not limited to): <ul style="list-style-type: none"> ▪ Health care ▪ Housing services

	<ul style="list-style-type: none"> ▪ Permanent housing placement ▪ Day care ▪ Nutritional services ▪ Short term payments for rent/mortgage/utility costs ▪ Assistance in gaining access to government benefits/services 		
	<p>3. Operating Costs:</p> <table style="width: 100%; border: none;"> <tr> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> ▪ Maintenance ▪ Security ▪ Operation ▪ Utilities </td> <td style="width: 50%; border: none;"> <ul style="list-style-type: none"> ▪ Furnishings ▪ Equipment ▪ Supplies ▪ Staff training and recruitment </td> </tr> </table>	<ul style="list-style-type: none"> ▪ Maintenance ▪ Security ▪ Operation ▪ Utilities 	<ul style="list-style-type: none"> ▪ Furnishings ▪ Equipment ▪ Supplies ▪ Staff training and recruitment
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	<p>4. Economic Development Activities:</p> <ul style="list-style-type: none"> ▪ Equipment purchase ▪ Inventory financing ▪ Interest subsidy ▪ Operating costs ▪ Other expenses not associated with construction or expansion 		
	<p>5. Activities to assist homeownership of existing or dwelling units under construction not assisted with Federal funds:</p> <ul style="list-style-type: none"> ▪ Closing costs and down payment assistance to homebuyers ▪ Interest buydowns or other actions resulting in transfer of title 		
	<p>6. Affordable housing pre-development costs</p> <ul style="list-style-type: none"> ▪ Legal consulting ▪ Developer and other site-option costs ▪ Project financing ▪ Administrative costs for loan commitments, zoning approvals, and other activities which don't have a physical impact 		
	<p>7. Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under Part 58, if: the same responsible entity conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under Section 58.47</p>		

24 CFR 58.6 Requirements

Section 1. Flood Disaster Protection Act

Are funds for acquisition (including equipment) or construction (including repair and rehabilitation) purposes?	Yes Continue	No Proceed to Section 2- Act does not apply
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<p>Is the Activity in an area identified as having special flood hazards (SFHA)?</p> <p>Identify FEMA flood map used to make this determination:</p> <p>_____</p> <p>Community Name and Number</p> <p>_____</p> <p>Map panel number and date</p>	<p>Yes Document and Continue</p>	<p>No Document and Proceed to Section 2- Act does not apply</p>
<p>Is the Community participating in the National Insurance Program (or has less than one year passed since FEMA notification of Special Flood Hazards)?</p>	<p>Yes-Document and follow instructions below.</p>	<p>No-Federal Assistance may not be used for this project.</p>
<p>Flood Insurance under the National Flood Insurance Program must be obtained and maintained for the economic life of the project, in the amount of the total project cost. A copy of the flood insurance policy declaration must be kept on file.</p>		

Section 2. Airport Runway Clear Zones (Civil) and Accident Potential Zones (Military)

<p>Does the project involve HUD assistance, subsidy or insurance for the purchase or sale of an existing property?</p>	<p>Yes Continue</p>	<p>No—Proceed to Section 3--Regulation does not apply.</p>
<p>Is the project located within 2,500 feet of a civil airport or 15,000 feet of a military airfield?</p>	<p>Yes Continue</p>	<p>No—Document and Proceed to Section 3--Regulation does not apply.</p>
<p>Is the project located within an FAA-designated civilian airport Runway Clear Zone (RCA) or Runway Protection Zone, or within the military Airfield Clear Zone (CZ) or Accident Potential Zone/Approach Protection Zone (APZ), based upon information from the airport or military airfield administrator identifying the boundaries of such zones?</p>	<p>Yes Continue</p>	<p>No—Document and Proceed to Section 3—regulation does not apply.</p>
<p>Comply with 24 CFR Part 51, Subpart D. This may include providing a written notice to a prospective buyer or leaser of the potential hazards from airplane accidents and the potential that an airfield operator may wish to purchase the property. Maintain copies of the signed notice. For properties located in a military clear zone, make and document a determination of whether the use of the property is consistent with DOD guidelines. Notice Sample: http://www.hud.gov/offices/cpd/energyenviron/environment/compliance/qa/airporthazards.pdf</p>		

Section 3. Coastal Barrier Resources Act

<p>Section 58.6 also requires compliance with the Coastal Barrier Resources Act. There are no Coastal Barrier Resource Areas in Washington, Oregon, Alaska, or Idaho. Therefore, the Act does not apply.</p>
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Certification

A Request for Release of Funds (RROF) is not required for this project. The activity may be initiated without further environmental review beyond 24 CFR Part 58.6.

Name of project _____

Responsible Entity Signature _____

Name and Title (print) _____

Date _____

**Section II: Guidelines for Project Beneficiary Income
Verification & Documentation**

CDBG Program Guidance: Project Beneficiary Income Verification & Documentation

The Community Development Block Grant (CDBG) program exists to serve low- and moderate-income community members and areas.

Project sponsors generally must verify household income eligibility for beneficiaries of federally assisted programs and activities. Community Development Block Grant program resources must be used in ways that primarily benefit people in Washington County with incomes at or below 80% of the Median Family Income (MFI) for their household size. The CDBG program regulations require that the income of all adult (18 or older) household members be included in the determination of "annual income." Also, income limitations are relative to household size. In practice, this means that before determining income, you must first determine the number of persons comprising the household, then calculate the income of all adult persons in the household.

CDBG Program Income Limits refer to the HUD Median Family Income (MFI) Levels for the Portland Primary Metropolitan Statistical Area. These income limits are included in the application package for CDBG funding and are available upon request.

Funding recipients receiving funding for Public Service projects are required to determine the number of low-income beneficiaries that will access the services provided within a one-year time period, typically between July 1 – June 30th of the program year in which they are receiving CDBG funding. Multi-year projects determine the number of beneficiaries for the two- or three-year period that services are provided. Activities may also qualify if they serve clients that are documented to be income eligible as defined by HUD Income Standards. If the facility project will ***exclusively*** serve any of the following groups, then they are ***presumed*** to be serving low-income beneficiaries:

- abused children
- battered spouses
- elderly persons (over the age of 62)
- adults meeting the Bureau of Census definition of "severely disabled"
- homeless persons
- illiterate adults
- persons living with AIDS
- migrant farmworkers

The attached Sample Client Intake Form at the end of this section contains the minimum information that must be collected by the Sponsor for all beneficiaries during the specified one-year time period.

Instructions for the Race and Ethnic Data Reporting

Applicants and organizations receiving Federal financial assistance from the Department of Housing and Urban Development (HUD) are required to report race and ethnic information. The revised definitions of ethnicity and race have been standardized across the federal government and are provided below.

Please note that HUD's collection of racial data treats ethnicity as a separate category from race. To report race and ethnicity data correctly, each person must first identify his or her race, and then select the appropriate ethnicity (either Hispanic/Latino or NOT Hispanic/Latino). For example, if a participant answers that they are Latino, the project sponsor would indicate "Hispanic/Latino" under the ethnicity column, and then ask the person to indicate which category under race most closely identifies with that

person’s continent of origin. OCD recognizes that these federally defined categories may not directly correlate with the racial and ethnic categories each participant identifies with. However, this data is helpful in demonstrate impact of services funded with CDBG.

<i>Race</i>	<i>Ethnicity</i>
American Indian or Alaska 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.	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.”
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.	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.
Black or African American. A person having origins in any of the black racial groups of Africa. Terms such as “Haitian” or “Negro” can be used in addition to “Black” or “African American.”	
Native Hawaiian or Other Pacific Islander. A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.	
White. A person having origins in any of the original peoples of Europe, the Middle East or North Africa.	

HUD states that self-reporting of self-identification, rather than observer identification is the preferred method for collecting race and ethnicity data. Self-identification for race and ethnicity means that responses are based on self-perception. Project sponsors must make every effort to collect this demographic data. When using the “Other Multi-Racial” category, project sponsors need to track the race categories or race combinations included in that category and include that detail in the narrative section following the chart when reporting.

CDBG Client Intake Form
(Effective May 1, 2024)

Date: _____

Income Reporting

In the table below, please find your household size (the total number, including yourself, who live in your home) in the first column, and then look at the three numbers in the columns to the right of your household size. Please circle the one number that is both **higher** than your annual income, and the **closest** to your annual income:

Household Size	80% AMI (Low Income)	50% AMI (Very Low Income)	30% AMI (Extremely Low Income)
1	\$66,100	\$41,300	\$24,800
2	\$75,550	\$47,200	\$28,350
3	\$85,000	\$53,100	\$31,900
4	\$94,400	\$59,000	\$35,400
5	\$102,000	\$63,750	\$38,250
6	\$109,550	\$68,450	\$41,100
7	\$117,100	\$73,200	\$43,900
8	\$124,650	\$77,900	\$46,750

Race and Ethnicity Reporting (Report for both Race AND Ethnicity)

1) Please check the box below next to your race: (You may check more than one box.)	2) Please check the box below next to your ethnicity: (Check only one box.)
<input type="checkbox"/> American Indian or Alaska Native	<input type="checkbox"/> Hispanic or Latino
<input type="checkbox"/> Asian	<input type="checkbox"/> Not Hispanic or Latino
<input type="checkbox"/> Black or African American	
<input type="checkbox"/> Native Hawaiian or Other Pacific Islander	
<input type="checkbox"/> White	
<input type="checkbox"/> American Indian or Alaska Native and White	
<input type="checkbox"/> Asian AND White	
<input type="checkbox"/> Black/African American and White	
<input type="checkbox"/> American Indian/Alaska Native and Black	
<input type="checkbox"/> Other Multi-Racial	

<p>Do you have a disability?</p> <input type="checkbox"/> Yes <input type="checkbox"/> No	<p>Please check the box below next to your gender:</p> <input type="checkbox"/> Male <input type="checkbox"/> Female
<p>Are you a City of Hillsboro or City of Beaverton resident?</p> <input type="checkbox"/> Yes <input type="checkbox"/> No	<p>If you checked "female" above, are you the head of your household (either living alone, or a single mother, or living with a female roommate)?</p> <input type="checkbox"/> Yes <input type="checkbox"/> No

Section III: CDBG Guidelines for Procurement of Goods and Services

CDBG Program Guidance: Procurement of Goods and Services

This section outlines requirements for purchasing products, materials, or services with federal funds. Project sponsors must be aware of requirements for competitive selection of the contractors that will carry out the work proposed in a CDBG funding application. These requirements apply to the full scope of a project funding in whole or in part with CDBG funds.

The Federal Requirement

[2 CFR 200](#) provides the Uniform Administrative Requirement, Costs Principles, and Audit requirements for federal awards.

Key procurement and contracting requirements that apply include:

Cost reasonableness must be determined and documented for all project costs including costs for purchase of goods and services. Some form of price analysis must be made and documented in the project sponsor's files in connection with every procurement action. At a minimum, records must include: criteria for proposal selection, justification for lack of competition when competitive bids or offers are not obtained, and the basis for making a cost reasonableness determination. [2 CFR Part 200 – Subpart E](#) stipulates that a cost is reasonable if, in its nature and amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.

Using a price analysis to determine cost reasonableness may be accomplished via a comparison of price quotations submitted, independent and qualified third-party estimates or in-house estimates that are performed and documented prior to receiving contractor proposals, or written comparisons to market prices and similar indicators.

The applicant makes the final contractor selection and will contract directly with the contractor. Washington County Office of Community Development does not and will not have a contractual relationship with the contractor, does not endorse or recommend one contractor over another, warranty the work or performance of any contractor.

In selecting project contractors for funding requests of any amount, affirmative effort shall be made to provide opportunities for minority business enterprises (MBEs) and women's business enterprises (WBEs) to submit project proposals. Listings can be found at [Oregon Business Xpress : Certification for Minority, Women, Veteran, & Small Business Owners : State of Oregon.](#)

A Minority Business Enterprise (MBE) is defined as a business firm which is at least 51 percent (51%) owned by minority group members, or in the case of a publicly owned business, at least 51 percent (51%) of the stock of which is owned by minority group members. A Women's Business Enterprise (WBE) is defined as a business firm which is at least 51 percent (51%) owned by women group members, or in the case of a publicly owned business, at least 51 percent (51%) of the stock of which is owned by women group members. The minority or women's ownership must exercise actual day to day management and control of the business; **Minority and Women's Business Enterprises must be officially certified or recognized as such, and must be included on the state of Oregon's listing of such**

firms, available at [Oregon Business Xpress : Certification for Minority, Women, Veteran, & Small Business Owners : State of Oregon](#) Please consult with OCD staff to assure that you receive and work with a copy of the most recently-updated MBE/WBE list.

OCD and its recipients of CDBG funds will both maintain records which describe MBE/WBE outreach activities undertaken, and will require that prime contractors, developers and owners of CDBG-assisted projects do the same and submit annual reports on their MBE/WBE outreach activities to OCD as a condition of receipt of federal funds while funded projects are underway.

As a prerequisite to demonstrate MBE/WBE goal achievement, applicants will need to provide OCD with the following information:

- Copies of timely solicitation letters (dated a minimum of fourteen (14) calendar days prior to bid opening) sent to MBE/WBE firms. The solicitation letters should include the specific type or work and delivery schedule conforming to the type of work that the MBE/WBE firm performs.
- Documentation of any other efforts to extend opportunities to MBE/WBE firms, such as advertisements in minority and women trade association newsletters and minority-owned media and written notification sent to minority and women contractor associations.
- The names of selected MBE/WBE subcontractors to be utilized.
- The type of work and dollar amount to be awarded to each MBE/WBE subcontractor.
- The total dollar amount of MBE/WBE participation.

Methods of Procurement

Whatever method of procurement is used, all contracts and Requests for Proposals (RFP's) must be reviewed by the Office of Community Development before prospective vendors are allowed to tender a bid or submit a proposal. In addition, OCD must pre-authorize any noncompetitive proposal procurement.

Small purchasing procedures are applicable for the procurement of services, supplies, or other property costing in the aggregate not more than \$100,000. These procedures are relatively simple, informal and do not always involve competitive bidding. In obtaining goods or services by the small purchase method, local Contract Review Board Rules and ORS 279 must be followed, where applicable. In addition, a minimum of three competitive price quotes must be obtained for any small purchase.

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate.

Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids, or competitive proposals and one of the following circumstances apply:

- a) The item is available only from a single source;
- b) Public emergency when the urgency for the project will not permit a delay relative to competitive solicitation;
- c) After solicitation of a number of sources, competition is determined inadequate; or,
- d) HUD authorizes noncompetitive negotiation.

Contract Compliance

The sponsor's subcontracts must contain the provisions of this section:

- a) All CDBG-funded contracts must be provided to Washington County Office of Community Development to review prior to execution. All **contract documents** must include the following language: ***“This contract and the work it will carry out is being funded in whole or in part with funding from the U.S. Department of Housing and Urban Development through the Washington County Office of Community Development CDBG program.”***
- b) Termination for cause and for convenience by the sponsor including the manner by which it will be affected and the basis for settlement (for all contracts in excess of \$10,000). Sample contract language will be provided by OCD upon request.

The sponsor must also monitor for insurance requirements and invoices for completion where applicable.

Section IV: Non-Discrimination, Fair Housing and Accessibility Requirements

Non-Discrimination, Fair Housing and Accessibility Requirements for Projects Receiving CDBG Funding

Different sets of accessibility-related nondiscrimination requirements apply to the CDBG program: the Architectural Barriers Act, the Fair Housing Act, and the Americans with Disabilities Act (ADA), and Section 504. It is important to note that these requirements will vary depending on the type of proposed activity.

The Architectural Barriers Act

The Architectural Barriers Act of 1968 requires certain federal and federally-funded buildings and other facilities to be designed, constructed, or altered in accordance with standards that ensure accessibility to, and use by, physically handicapped people. Projects meeting the definition of a “building” (as defined below) is subject to the requirements of the Architectural Barriers Act as it is implemented through the Uniform Federal Accessibility Standards (UFAS) ([24 CFR Part 40](#) and [41 CFR Part 101](#)).

Building: any building or facility (other than (A) a privately owned residential structure not leased by the Government for subsidized housing programs and (B) any building or facility on a military installation designed and constructed primarily for use by able bodied military personnel) the intended use for which either will require that such building or facility be accessible to the public, or may result in the employment or residence therein of physically handicapped persons, which building or facility is:

- 1) To be constructed or altered by or on behalf of the United States;
- 2) To be leased in whole or in part by the United States after August 12, 1968; or
- 3) to be financed in whole or in part by a grant or a loan made by the United States after August 12, 1968, if such building or facility is subject to standards for design, construction, or alteration issued under authority of the law authorizing such grant or loan.

The Fair Housing Act

The Federal Fair Housing Act makes it illegal for landlords, managers, homeowners, real estate agents, mortgage brokers, lenders, banks and others to discriminate against anyone on the basis of:

- Race
- Color
- National Origin & Ethnicity
- Religion
- Family Status (families with children under 18)
- Physical or Mental Disability
- Sex & Gender

State Protected Classes Include:

- Marital status
- Legal sources of income (including Section 8 Invoice Holders)
- Sexual orientation including gender identity
- Honorably discharged veterans / military status
- Survivors of domestic violence

The Americans with Disabilities Act

The Americans with Disabilities Act (ADA) provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, state and local government services and telecommunications. The ADA also states that discrimination includes the failure to design and construct facilities that are accessible to and usable by persons with disabilities. The ADA also requires the removal of architectural and communication barriers that are structural in nature in existing facilities. Removal must be readily achievable, easily accomplishable and able to be carried out without much difficulty or expense.

Section 504

HUD's regulations implementing Section 504 in federally assisted programs services and activities are codified at [24 CFR Part 8](#). These apply to all HUD-funded projects.

Section 504 states:

“No otherwise qualified individual with a disability in the United States... shall, solely by reason of her or his disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program, service or activity receiving Federal financial assistance or under any program or activity conducted by any Executive agency or by the United States Postal Service.”

HUD's Section 504 regulations define an individual with a disability as any person who has a physical or mental disability that substantially limits one or more major life activities; has a record of such an impairment; or is regarded as having such an impairment [[24 CFR 8.3](#)]. Major life activities include walking, talking, hearing, seeing, breathing, learning, performing manual tasks, and caring for oneself. The law also applies to individuals who have a history of such impairments as well as those who are perceived as having such an impairment.

A person who meets the above definition, and who is otherwise qualified for the program, service or activity, is covered under Section 504. To be otherwise qualified means the individual meets the essential eligibility requirements, including, for example, requirements for tenancy, if the program is a housing program.

Section 504 covers all programs, services and activities of recipients of HUD financial assistance, including, for example:

- Outreach and public contact, including contact with program applicants and participants
- Eligibility criteria
- Application process
- Admission to the program
- Tenancy, including eviction
- Service delivery
- Employment policies and practices

Section 504 Prohibitions Against Discrimination:

- Denying a qualified individual with disabilities the opportunity to participate in, or benefit from, the housing, aid, benefit, or service.
- Failing to afford a qualified individual with disabilities the opportunity for equal participation and benefit.
- Failing to provide a qualified individual with disabilities a program or service that affords the same opportunity to benefit as that afforded others.
- Providing different or separate housing, aid, benefits or services on the basis of disability unless providing such is necessary to provide housing or benefits that are as effective as that provide to persons without disabilities.
- Providing significant assistance to an agency, organization or person that discriminates on the basis of disability in any aspect of a federally assisted activity.
- Denying a qualified individual with disabilities the opportunity to participate as a member of planning or advisory boards.
- Denying a dwelling to an otherwise qualified buyer or renter because of a disability of that buyer or renter or another prospective tenant.
- Limiting in any other manner a qualified individual with disabilities in the enjoyment of any right, privilege, advantage, or opportunity afforded to others.
- Providing programs or services to qualified individuals with disabilities in settings that are unnecessarily separate, segregated or restricted.

Recipients' Responsibilities Under Section 504:

- Take steps to ensure effective communication with applicants, beneficiaries, and members of the public. [[24 CFR 8.6](#)]
- Take steps to ensure that employment activities, including job announcements, recruitment, interviews, hiring, work assignments, promotions and dismissals, do not discriminate on the basis of disability. [[24 CFR 8.10 - 8.13](#)]
- Ensure that all non-housing programs are operated in a manner that does not discriminate on the basis of disability and that new construction and alterations of non-housing facilities are made accessible in accordance with applicable standards. [[24 CFR 8.21](#)]
- Operate existing housing programs in a manner that does not discriminate on the basis of disability, and take steps, as needed, to ensure that existing housing programs are readily accessible to and usable by persons with disabilities. Develop and implement a transition plan to assure compliance. [[24 CFR 8.24](#)]
- Provide reasonable accommodations which may be necessary for a person with a disability to use or participate in the program, service or activity; unless the recipient can demonstrate that the accommodation will result in an undue financial and administrative burden or a fundamental alteration in the nature of the program, service or activity. A reasonable accommodation is an adaptation or modification to a policy, program, service, or workplace which will allow a qualified person with a disability to participate fully in a program, take advantage of a service, or perform a job. Reasonable accommodations may include, but are not limited to, adjustments or modifications to buildings, facilities, dwellings, and may also include provision of auxiliary aids, such as readers, interpreters, and materials in accessible formats. [[24 CFR 8.4, 8.11, 8.20, 8.21, 8.24, 8.25, 8.33](#)]

- Pay for a reasonable accommodation needed by the individual (e.g., a ramp to a unit) unless providing that accommodation would be an undue financial and administrative burden or a fundamental alteration of the program. [[24 CFR 8.4](#), [8.11](#), [8.20](#), [8.21](#), [8.24](#), [8.25](#), [8.33](#)]
- Ensure that all new construction of housing facilities is readily accessible to and usable by persons with disabilities, and meets the requirements of applicable accessibility standards. [[24 CFR 8.22 and 8.32](#)]
- Ensure that substantial alterations, when undertaken, meet the requirements for new construction. [[24 CFR 8.23\(a\)](#)] Ensure that all other alterations, to the maximum extent feasible, meet the requirements of the applicable accessibility standards. [[24 CFR 8.23\(b\)](#)]
- Conduct any required needs assessments (for recipients who are public housing agencies) to determine the extent to which the housing needs of persons with disabilities are being met in the recipient’s program and in the community. [[24 CFR 8.25](#)]
- Distribute accessible dwelling units throughout projects and sites and make such units available in the same ranges of sizes and amenities to provide housing choices for persons with disabilities that are the same as those provided to others. [[24 CFR 8.26](#)]
- Adopt suitable means to ensure persons with disabilities are made aware of the availability of accessible units and to maximize use of accessible units by individuals needing the features of these units. [[24 CFR 8.27](#)]
- Conduct any required self-evaluations of programs, services, and activities to determine if they are programmatically and physically accessible to persons with disabilities, and involve persons with disabilities in these evaluations. [[24 CFR 8.51](#)]
- Recipients with 15 or more employees must designate an employee to ensure the recipient’s programs, services and activities meet the requirements of Section 504; adopt a grievance procedure to effect due process standards and prompt and equitable resolutions of complaints. [[24 CFR 8.53](#)]
- Recipients with 15 or more employees must notify participants, beneficiaries, applicants and employees of their nondiscriminatory provisions. [[24 CFR 8.54](#)]
- Recipients must maintain records and reports of efforts to meet the requirements of Section 504, and keep these records on file so that they are available if a complaint is filed, or if HUD conducts a compliance review. [[24 CFR 8.55](#)]

Oregon Accessibility Laws

The State of Oregon has its own laws addressing certain aspects of accessibility:

Current Oregon law is very broad and extends the reach of the ADA accessibility standards beyond those covered by the federal law to include certain private educational facilities, “private membership clubs, and churches” when located in buildings of two stories or more which are either: a) over 4,000 square feet in ground floor area; or b) over 20 feet in height).

ORS 447.233 contains explicit numerical requirements for accessible parking spaces and related signage, dimensional requirements, and access spaces.

ORS 456.506 et seq., passed in 2003, adopted most of the accessibility criteria of the FHA and mandated they be included in all new non-owner-occupied housing, even single units, if those units were financed or subsidized in any way by state or federal funds, guarantees, or tax credits.

Section V: CDBG Funding Terms and Contract Compliance

CDBG Funding Terms and Contract Compliance

Promissory Note Agreement

All Public Services project sponsors shall enter into a Promissory Note with the County. The Promissory Note guarantees that the sponsor will operate the project to meet a national objective of the CDBG program during a pre-determined period of time; and it imposes conditions which the county determines are necessary to protect the county's CDBG investment. Following completion of the project, OCD will return the canceled Promissory Note to the sponsor.

Contract Exhibits

The County must complete the HUD Part 58 Environmental Review before entering into CDBG grant agreement with a project sponsor. Once this is complete and all contracts are signed by the County Administrator or their designee, the project sponsor will receive the final executed grant agreement accompanied by the "Notice to Proceed," allowing eligible costs chargeable to the CDBG program to be incurred. **Please note that OCD is prohibited from reimbursing project sponsors for any activities performed prior to the date specified in the Notice to Proceed!**

Regular CDBG Sponsor Workshops will be held to inform project sponsors on how access and be reimbursed with CDBG funding. Attendance at the workshop is strongly recommended as requirements change frequently.

The contracting process begins with the issuance of the Notice of Award letter. The Notice of Award letter includes additional documents required for contracting. The following items must be returned to the OCD office by the date specified in the Notice of Award letter to ensure prompt contracting:

Exhibit A, "Project Description, Scope of Activities and Anticipated Accomplishments"	Prepared by OCD. Project sponsors are only reimbursed for activities included in this project description, so be sure that the scope of work and corresponding budget are an accurate reflection of the project. If the description is inaccurate, please contact OCD staff for revision as needed.
Exhibit B – Budget Summary	The Budget Summary is available in MS Excel format and will be emailed. Please complete the budget summary and <i>email</i> it back to OCD for review prior to signing and submitting the approved contract version.
Insurance Requirements	Provide project sponsor's most recent Certificate of Liability insurance showing " Washington County, its officers, agents, elected officials and employees " listed as an additional insured on the policy along with the additional insured endorsement certificate. Refer to the section, "insurance requirements" at the end of this section for further instructions on the types and amounts of insurance that is required.
FFATA Checklist	Refer to the checklist at the end of this section for further instructions.

Faith-Based Checklist	Refer to the checklist at the end of this section for further instructions.
Section 504 Checklist	Refer to the checklist at the end of this section for further instructions.
Matching Funds letter	According to program policy, project sponsors have <i>90 days</i> after the Notice of Award to verify the availability of matching funds for the project as proposed in the application. <i>Please note this requirement and submit the letter to this office by that date designated in your Notice of Award letter verifying that all proposed funds are in place for the project.</i>

Following receipt and review of the completed contract exhibits and all other requested items, OCD staff will prepare agreements and send them to the project sponsor for endorsement along with the Promissory Note. OCD staff will then send the fully executed agreement along with the Notice to Proceed.

EXAMPLE – EXHIBIT A

**PROJECT DESCRIPTION, SCOPE OF ACTIVITIES
AND ANTICIPATED ACCOMPLISHMENTS**

I. Project Number and Title:

CDBG Project #XXXX—Action Non-Profit Northwest, Services for Youth

II. Description of: Project, Activities, Anticipated Accomplishments, Low and Moderate or Other Target Group Beneficiaries.

A. Nature and Purpose of the Project:

Action Non-Profit Northwest is designed to provide assistance to youth in obtaining one-on-one tutoring in ESL. Action Non-Profit Northwest will work with Washington County schools to identify low-income youth who are struggling academically in the school district. Summer programs will be provided to continue the ESL training between school years. CDBG funds will be used to pay for personnel salary and benefits, office supplies, travel and training, and professional services.

B. Proposed Location or Impact Area(s):

County-wide excluding the City of Beaverton and City of Hillsboro

C. Duration/Timing of the Project:

July 1, 20XX thru June 30, 20XX

D. Number of Low and Moderate Income or Target Group Beneficiaries:

168 low-income youth

E. Component Activities (CDBG vs. Others):

CDBG = \$45,000.00 Agency = \$55,000.00

F. Quantitative Projections for CDBG Component Activities (in units, linear feet, square feet, etc.) for all acquisitions, construction, reconstruction, rehabilitation, etc.: CDBG funds will be used to fund staff salary and benefits, as well as operating costs that include office supplies, travel/training, and professional services.

EXAMPLE – EXHIBIT B

		Project Number:	XXXX
		Project Year (funded):	20XX
	Budget Summary (2 page form)		
	Community Development Block Grant		
Project Title: Tutoring Services for Youth			
Legal Name of Entity: Action Non-Profit Northwest			
Address: XXXX SW A Street City: Hillsboro State: OR Zip: 97123			
I. BUDGET LINE ITEMS			
A. Personnel Services			
1. No. of Employees	2. Job Title	3. Total Salary	4. Portion Chargeable to CDBG
1	Project Coordinator	\$ 54,950.00	\$ 23,450.00
5. Subtotal		\$ 54,950.00	\$ 23,450.00
6. Extra Help/Overtime			
7. Fringe Benefits		\$ 23,550.00	\$ 10,050.00
8. TOTAL PERSONNEL COSTS		\$ 78,500.00	\$ 33,500.00
		Materials and Services	Portion Chargeable to CDBG
I.B. Materials and Supplies			
9. Office Supplies		\$ 500.00	\$ 500.00
10. Operating Supplies			
11. Communications			
12. Travel and Training		\$ 1,000.00	\$ 1,000.00
13. Legal & Public Notices			
14. Professional Services		\$ 20,000.00	\$ 10,000.00
15. Construction Contracts			
16. Other: Specify			
17. TOTAL MATERIALS AND SERVICES		\$ 21,500.00	\$ 11,500.00

C. CAPITAL OUTLAY			Total Capital Outlay	Portion Chargeable to CDBG
18. Capital Outlay	Quantity	Item		
19. Real Property Acquisition				
20. TOTAL CAPITAL OUTLAY			\$ -	\$ -
			21. Total Project Cost	22. Total CDBG Award
			\$ 100,000.00	\$ 45,000.00
II. SOURCES OF PROJECT FUNDING				
1. Federal				
2. State			\$ 30,000.00	
3. Local Cash			\$ 15,000.00	
4. County				
5. In-Kind Service and Supply				
6. Other (detail)			\$ 10,000.00	
7. Subtotal			\$ 55,000.00	
8. CDGB			\$ 45,000.00	
9. TOTAL PROJECT COST			\$ 100,000.00	
III. AUTHORIZATION				
<u>2/10/XX</u>		<u>Mary Smith</u>		
Date		Authorized Signature for Project		
<u>2/10/XX</u>		<u>John Cage</u>		
Date		Authorized Signature for Project		
COUNTY USE ONLY				
Reviewed and approved by Washington County Office of Community Development on				
XXX XX, 20XX by _____				
				Signature

INSURANCE *(Taken from the CDBG Boilerplate Grant Agreement for Public Service Projects)*

Agency shall provide insurance coverage and limits as described below. All insurance carried by Agency must be primary to and non-contributory with any insurance, including any self-insurance or retentions carried by the County.

- A. **Workers' Compensation Insurance.** Agency shall comply with ORS 656.017, which requires subject employers to provide Oregon workers' compensation coverage for all their subject workers. No Workers' Compensation Insurance has been or will be obtained by the County for Agency or Agency's employees and subcontractors. Agency shall provide and maintain workers' compensation coverage for its employees, officers, agents or partners as required by applicable workers' compensation laws including employers' liability with limits not less than \$500,000/ \$500,000/ \$500,000.
- B. **Commercial General Liability Insurance.** Agency shall at all times carry a Commercial General Liability insurance policy for at least \$1,000,000 per occurrence and at least \$2,000,000 in the aggregate per project, for Bodily Injury, Property Damage, and Personal Injury. This insurance shall include contractual liability coverage for the indemnity provided under this Agreement.
- C. **Automobile Liability Insurance.** Agency shall at all times carry Automobile Liability Insurance in the amount of \$1,000,000 combined single limit per accident for Bodily Injury and property damage for Agency's vehicles, whether owned, hired, or non-owned, which coverage is for Washington County, its agents, officers, elected officials and employees.
- D. **Professional Liability/Errors and Omissions Insurance.** Agency shall at all times carry a Professional Liability/Errors and Omissions type insurance policy with limits of not less than \$1,000,000 each occurrence (or each claim if coverage is afforded on a claims made basis) and \$2,000,000 in the annual aggregate. If this policy is a "claims made" type policy, the policy type and company shall be approved by Washington County prior to commencement of the Work.
- E. **Physical Abuse and Molestation Insurance** with limits of not less than \$1,000,000 to cover actual or threatened physical abuse, mental injury, sexual molestation, or negligent employment, supervision, investigation, reporting to proper authorities or retention of any person for whom the Agency is responsible for, including but not limited to Agency and Agency's employees and volunteers. Coverage can be provided by a separate policy or as an endorsement to the general or professional liability policies.
- F. **Extended Reporting Coverage ("Tail Coverage").** For Professional Liability/Errors & Omissions Insurance written on a "claims made" basis and for any other required liability insurance provided on a "claims made" basis, Agency shall provide "tail" coverage at the completion of the contract for a duration of thirty-six (36) months or continuous "claims made" liability coverage provided for thirty-six (36) months following contract completion. Continuous "claims made" coverage will be acceptable in lieu of "tail" coverage provided the retroactive date of the coverage is on or before the effective date of this Agreement.

- G. **Bonding.** The Agency shall ensure that every director, officer or employee who is authorized to act on behalf of the Agency for the purpose of receiving or depositing funds into Agency project accounts or issuing financial documents, checks, or other instruments of payment for projects be bonded or covered under a commercial crime policy to provide for protection against loss. The bond or commercial crime policy must be endorsed to add "Client Coverage". The amount of the coverage must be \$100,000 or the total amount received by Agency pursuant to this Agreement, whichever is greater, and must be secured until the entire amount is repaid in accordance with the terms of the Promissory Note and Trust Deed. The Agency shall provide the County with a copy of the bonding instrument or a certification of coverage from the bonding company or commercial crime policy issuer.
- H. **Maximum Deductible/Retention.** Any deductible or retention must be disclosed on the certificate of insurance and no deductible or retention may exceed \$25,000 without the prior written consent of the County.
- I. **Additional Insureds.** The County, its agents, officers, elected officials and employees all while acting in their official capacity as such, must be named as additional insureds on all insurance, other than worker's compensation insurance and professional liability insurance, required under this Agreement. The additional insured status must include both ongoing and completed operations and must be continued for at least 24 months after the project is completed and accepted. Such insurance shall include "cross-liability" coverage as provided under the standard ISO forms "Separation of Insured" clause.
- J. **Proof of Insurance.** Agency shall deliver to the County, prior to the commencement of the work, a certificate of insurance evidencing all policies required by this Agreement including additional insured provisions afforded by the policy. This requirement can be satisfied by providing a copy of the coverage form and/or the endorsement(s).

Further, it shall be an affirmative obligation of the Agency to notify the County within two (2) business days of the cancellation or substantive change of any insurance policy or endorsement required herein, and failure to do so shall constitute a breach of this Agreement.

- K. **Subcontractor/ Subgrantee Insurance.** Agency shall require and verify that all of its subcontractors or subgrantees of any tier provide insurance coverage and limits identical to the insurance required of the Agency under this Agreement, unless this requirement is expressly modified or waived by the County.
- L. **Self Insurance.** If the Agency is self-insured, for any of its insurance requirements herein, it shall submit satisfactory evidence to the County of the terms and conditions of its own insurance coverage. A certification of self-insurance shall constitute compliance with the section.
- M. **Acceptability of Insurers.** All insurance required pursuant to this section shall be issued by an insurance company or companies doing business in the state of Oregon. Insurance is to be placed with a carrier(s) having a Best's rating of no less than A:VII. Any exception must be approved by the County.

N. **Builders Risk Insurance.** In addition to the requirements above, if this Agreement is for a capital project, the following will also be required:

(1) During the term of this Agreement, for new construction, the Agency shall or shall require the Owner to maintain in force, at its own expense, Builders Risk insurance on an all risk form, including earthquake and flood, for an amount equal to the full amount of this Agreement. Such insurance shall be maintained until the facility has reached substantial completion. The Agency shall or shall require Owner to name Washington County as Additional Insured and Mortgagee under the Builder's Risk insurance policy and any loss shall be adjusted by the Agency, Owner and County, as their interests may appear. The property insurance deductibles will be no more than \$25,000 per occurrence. The Agency shall or shall require the Owner to pay costs not covered because of such deductibles.

(2) Insurance - Reconstruction Following Casualty

i. Maintenance of Insurance – At its sole cost and expense, the Agency shall or shall require Owner to keep the building and all other improvements on the premises insured throughout the term of this Agreement and the Trust Deed required therein, against loss or damage by fire and such other risks, including earthquake and flood, written on an “all risk” form on a replacement cost basis, including coverage for loss or damage due to leakage of sprinkler systems and coverage for loss or damage due to explosion of steam boilers, pressure vessels, oil or gasoline storage tanks or similar apparatus.

ii. Insurance Casualties – Insurance Proceeds – In the event of any loss, damage or casualty which is covered by the insurance described in paragraphs (1) and (2) of this subsection M, the parties to this Agreement shall proceed cooperatively to settle the loss and collect the proceeds of such insurance, which proceeds shall be held in trust by the County (including interest earned by County on such proceeds) for use in accordance with the terms of this Agreement. The parties recognize that insurance proceeds shall be used for the purpose of repairing and restoring the improvements damaged by the casualty to their former condition or replacement of the same with equivalent or more suitable improvements.

iii. Insured casualties – Reconstruction – using such insurance proceeds (set forth in paragraph (ii) above, the parties shall proceed with reasonable diligence as soon as sufficient funds are available to prepare plans and specifications for, and thereafter carry out, all work necessary: (a) to repair and restore the building and/or improvements on the premises damaged by the casualty to their former condition, or (b) to replace said building and/or improvements on the premises to a quality and usefulness for the Project described in the application submitted by the Agency for the CDBG funding and the plans associated therewith, at least equivalent to, or more suitable than, the building and/or improvements which were damaged.

- O. The County, in its sole discretion, may waive or modify some or all of the insurance required in Section 11 of this Agreement. Any such waiver or modification must be approved in writing by the County's Risk Manager.

FFATA Checklist (contracts \$30,000 and over)

The Federal Funding Accountability and Transparency act (FFATA) requires the Office of Management and Budget (OMB) to maintain a single, searchable website that contains information on all Federal spending awards. As part of this, Washington County OCD is requiring all agencies that have been awarded funding to complete this form.

To Be Filled Out By OCD Staff	
Program source	
CFDA program number for grant	
Name of agency receiving award	
Amount of award	
Project number	
Award title descriptive of the funding action	
To Be Filled Out By Agency	
Address of the entity including: (Zip + 4)	
Place of performance including: (Zip + 4)	
Congressional district	
Total compensation and names of top five executives*	1.
	2.
	3.
	4.
	5.
Unique Entity ID number	
Central Contractors Registration (CCR) number**	

*Must give total compensation and names of top five executives if:

1. More than 80% of annual gross revenues from the federal government, and those revenues are greater than \$25M annually and
2. Compensation information is not already available through reporting to the SEC.

**Note: Because CCR registration expires annually, grantees are required to update their CCR information annually.

How do you get a Unique Entity ID?

Visit <https://www.gsa.gov/about-us/organization/federal-acquisition-service/office-of-systems-management/integrated-award-environment-iae/iae-systems-information-kit/unique-entity-identifier-update> for guidance.

What is a CCR and how do you register?

CCR stands for Central Contractor Registration, which is the primary registrant database for the U.S. Federal Government. CCR collects, validates, stores and disseminates data in support of agency acquisition missions. Here is the link to information needed to register and become familiar with CCR:

- Registration information: <https://www.sam.gov/portal/public/SAM/>

Staff use only

CFDA #	Program
14.218	CDBG
14.239	HOME
14.231	ESG
14.218	NSP

Please sign below certifying that the above information is correct:

Signature

Print Name

Date

Washington County Office of Community Development
Checklist Relating to Faith-Based Organizations
Seeking CDBG or HOME Funds

In September 2003, the US Department of Housing and Urban Development (HUD) provided new guidelines that expanded the ways in which Faith-Based Organizations may participate in HUD programs. To ensure that Washington County is up-to-date in complying with these new regulations, the Office of Community Development is requiring ALL APPLICANTS for CDBG or HOME funds to complete this checklist, whether or not your organization is a Faith-Based Organization. Organizations that are not faith-based may simply complete Section A, answer the first question in Section B in the negative, and complete Section C and return the application to the Office of Community Development. Please complete one of these for each application that you submit, as some of the answers might be different for various programs.

If you have any questions or would like assistance, please contact 503-846-8814.

Please complete this form and return it to:
Washington County
Office of Community Development
328 W. Main St., Suite 100
Hillsboro, OR

A. General Information

Name of Organization:

Name and Title of Contact Person:

Project:

Contact Phone Number:

B. Questions About Your Agency and Project:

Please answer all required questions.

1. Does your organization provide inherently religious activities, such as worship, religious instruction or proselytization?

If yes, please complete the remainder of Section B. If no, proceed to Section C.

- 2a. When and where does your organization offer religious activities? Please be specific.
- 2b. When and where does your organization offer the services to be funded with HUD funds? Please be specific.

- 2c. Are these religious activities offered separately in time from the assistance to be funded with HUD funds? Please explain.
- 2d. Are these religious activities offered in a separate location from the assistance to be funded with HUD funds? Please explain.
- 3. Is participation in the religious activities voluntary for the beneficiaries of the HUD-funded assistance? Please explain.
- 4. Is the HUD-funded assistance that your organization offers open to all, without respect to religion or religious belief? Please explain.
- 5. Does your organization take religion into consideration in the employment of individuals to perform work for your organization? If yes, please explain.
- 6a. Are you planning to use HUD funds for the acquisition, construction or rehabilitation of a structure or site? If yes, please proceed to 6b. If no, please proceed to Section C.
- 6b. Will a part of that structure or site be used to inherently religious activities? If yes, please answer 6c-f below. If no, please proceed to Section C.
- 6c. What part of the structure or site will be used for inherently religious activities?
- 6d. What part of the structure or site will be paid for with HUD funds?
- 6e. Can the portion of the structure or site funded with HUD funds be clearly distinguished from the portion where religious activities will occur? If yes, please describe how this can be accomplished.
- 6f. Please complete the chart below:

	Total Structure	HUD-Funded Portion of Structure	Portion Where Religious Activities Will Occur
Square feet			
Cost (\$)			

Assurances and Signature

I am an authorized representative of the organization described in Section A. I affirm that all of the statements on this form are true and accurate.

Signature Date

Name: Title:

Instructions for the Section 504 Checklist

This checklist is designed to assess your organization's compliance with requirements under Section 504 of the Rehabilitation Act of 1973.

These requirements are based on the regulations governing Section 504 of the Rehabilitation Act of 1973 ([24 CFR 8](#)), the Fair Housing Act ([24 CFR 100](#)), and the Uniform Federal Accessibility Standards (UFAS) ([24 CFR 8.32](#) and Appendix A to [24 CFR 40](#)).

Regarding compliance with Section 504 communications provisions, [24 CFR 8.6](#) requires that your organization take appropriate steps to ensure effective communication with applicants, beneficiaries, and members of the public. In effect, this means that, "to the maximum extent possible," persons with disabilities receive the benefits and services of the CDBG funded program or activity. You are not, however, required to take actions that can be demonstrated to result in a fundamental alteration in the nature of a program or activity or in undue financial and administrative burdens.

With respect to the accessibility of non-housing facilities, [24 CFR 8.21](#) and [8.32\(a\)](#) requires the design and construction of all new non-housing facilities to be readily accessible to, and usable by, persons with disabilities. The regulations also require alterations to existing non-housing facilities to make such facilities accessible to, and usable by, persons with disabilities, unless such alterations result in a fundamental change to the nature of the program or an undue financial and administrative burden.

Program accessibility requirements under Section 504, at [24 CFR 8.4](#) and [8.20](#), call for your organization to operate its non-housing programs or activities in ways that makes them readily accessible to, and usable by, persons with disabilities, unless it can be demonstrated that the actions taken to make these programs accessible would fundamentally change the nature of the program or impose undue financial or administrative burdens.

Please note that Section 504 record keeping requirements (at [24 CFR 8.55](#)) will be reviewed at your CDBG monitoring visit. OCD staff will examine applicable records maintained by your organization to determine that, not only are such records available, but that they correspond to information contained in performance and other reports submitted to OCD. While a lack of documentation may not imply discrimination, your organization's data serves as a basis for further investigation of compliance with nondiscrimination requirements.

Section 504 Checklist

A. General Information:

Name of Organization:

Name and Title of Contact Person:

Project:

Contact Phone Number:

Questions About Your Agency and Project:

Please answer all required questions.

ACCESSIBILITY PROCEDURES

1.

If your organization has 15 or more employees, does it have a formal, written grievance procedure for resolution of complaints alleging discrimination based on disability? (If yes, obtain copy for FHEO review of due process standards.) [24 CFR 8.53(b)]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
Describe Basis for Conclusion: 	

ACCESSIBILITY OF NON-HOUSING FACILITIES

2.

Does your organization maintain documentation (e.g., blueprints and construction specifications) that all new non-housing facilities assisted with CDBG program funds are being designed and constructed to be readily accessible to, and usable by, persons with disabilities in conformance with accessibility requirements?	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

3.

Do your organization's records indicate that, if any alterations have been made to existing non-housing facilities, that such alterations have made these facilities usable by, and accessible to, persons with disabilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	N/A
Describe Basis for Conclusion:			

ACCESSIBILITY OF HOUSING PROGRAMS

4.

Do records indicate that programs or activities are readily accessible to, and usable by, persons with disabilities? [24 CFR 8.4, 24 CFR 8.20, 24 CFR 8.21(c)(2)]	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No
Describe Basis for Conclusion:		

COMMUNICATIONS

5.

a. Has your organization taken steps to ensure effective communication with applicants, beneficiaries, and members of the public who have hearing, vision, or speech impairments using: i. Qualified sign language and oral interpreters? 1 Readers? iii. Use of tapes? iv. Braille materials? v. TTY? 1 Other (describe below)? [24 CFR 8.6]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

b. If the answer to "a" above is "no," describe the method(s) used by your organization to facilitate effective communication.
Describe Basis for Conclusion:

6.

Has your organization adopted and implemented procedures to ensure that interested persons (including those with impaired vision or hearing) can obtain information concerning the existence and location of accessible services, activities and facilities? [24 CFR 8.6(b)]	<input type="checkbox"/> <input type="checkbox"/> Yes No
Describe Basis for Conclusion:	

7.

Is there documentation to show steps that your organization has undertaken to attract persons with disabilities, such as: making buildings more accessible to persons with physical disabilities; home visits to assist applicants for program benefits in filling out applications; supplying sign language interpreters for public meetings on issues relating to your programs? [24 CFR 8.54(b) and (c)]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

RECORD KEEPING

8.

Does your organization maintain data for compliance purposes showing the extent to which persons with disabilities are beneficiaries of the program(s) being reviewed? [24 CFR 8.55 (b) and 24 CFR 8.121]	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Describe Basis for Conclusion:		

9.

Are copies of your organization's Reasonable Accommodation Policy, Section 504 Self-Evaluation Form and Transition Plan available for review?	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> N/A
Describe Basis for Conclusion:			

Section VI: Finance/Accounting Overview

FINANCE/ACCOUNTING

The following procedures are guidelines that should be adhered to in financial transactions in order to meet federal requirements under Washington County Office of Community Development's Community Development Block Grant (CDBG) Program.

FINANCIAL PROCEDURES

To assist sponsors in meeting the financial guidelines, OCD has developed standard policies and procedures under the following sections for:

- 1) Authorizations
- 2) Budgeting/Budget Summary
- 3) Budget Revisions
- 4) Contingency Funds
- 5) Surplus Project Funds
- 6) Program Income
- 7) How to Submit a Voucher Request for Reimbursement

Limited technical assistance in setting up proper internal controls and record keeping can be obtained through OCD. However, sponsors will be ultimately held responsible for management of their project and budget.

Authorizations

In order to ensure that financial information including budgets, budget revisions and requests for payment are properly authorized, all forms and/or submissions will require the signature of the chief executive/financial officer, or their designee. Additional personnel authorized to sign/submit financial documents are maintained within the ZoomGrants system and are listed as authorized financial collaborators.

Budgeting/Budget Summary

The Budget Summary Form is used in conjunction with Voucher Requests and is designed to enable sponsors, program staff, County finance and federal auditors to identify and track the expenditure of program funds to specific cost categories. The sponsor, prior to executing a standard contract with the County, must complete the Budget Summary Form. Upon receipt of the Budget Summary Form, OCD will prepare the standard project contract which incorporates the Project Description and Scope of Activities, and Budget Summary Form as exhibits. The Budget Summary Form information is also entered in ZoomGrants (see example below). The sponsor will enter all funding sources/revenues in the top section and then enter all funding uses/expenses in the bottom section, including any matching amounts.

Funding Sources/Revenues	Washington County Total Project Cost	Beaverton Total Project Cost	Hillsboro Total Project	Ineligible Match	Total Project Cost	Contract Budget (original)
CDBG Request	\$ 42,000.00			\$ 0.00	\$ 42,000.00	\$
Federal	\$ 0.00			\$ 0.00		\$
State				\$ 0.00		\$
County				\$ 0.00		\$
Municipal				\$ 0.00		\$
In-kind	\$ 5,000.00			\$ 0.00	\$ 5,000.00	\$
Private cash donations	\$ 67,300.00			\$ 0.00	\$ 67,300.00	\$
Other:				\$ 0.00	\$ 0.00	\$
Other:				\$ 0.00		\$
Other:				\$ 0.00		\$
Total	\$ 114,300.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 114,300.00	

Funding Uses/Expenses	Washington County CDBG	Washington County CDBG Match	Total Project cost prior to Hillsboro/Beaverton	City of Beaverton CDBG/match	City of Hillsboro CDBG/match	Total Project Cost	Contract Budget (original)
Personnel Costs		\$ 5,000.00	\$ 5,000.00			\$ 0.00	\$
Office Supplies			\$ 0.00				\$
Operating Supplies			\$ 0.00				\$
Communications			\$ 0.00				\$
Travel & Training			\$ 0.00				\$
Legal & Public Notices			\$ 0.00				\$
Professional Services			\$ 0.00				\$
Construction Costs			\$ 0.00				\$
Capital Outlay			\$ 0.00				\$
Property Acquisition			\$ 0.00				\$
Relocation Expenses			\$ 0.00				\$
Appraisal Fees			\$ 0.00				\$
Other:	\$ 42,000.00	\$ 109,300.00	\$ 151,300.00			\$ 0.00	\$
Other:			\$ 0.00				\$
Other:			\$ 0.00				\$
Other:			\$ 0.00				\$
Total	\$ 42,000.00	\$ 114,300.00	\$ 156,300.00	\$ 0.00	\$ 0.00	\$ 0.00	

Match (\$) \$ 114,300.00

Claiming Volunteer Hours as Match

In general, the following rules apply to volunteers:

A person cannot be a volunteer if the person is otherwise employed at any time on the project activity in the construction or maintenance work for which the person volunteers.

- Volunteers cannot be paid to provide materials or supplies unless the recipient has obtained the materials/supplies through a competitive process under the appropriate procurement rules.
- Persons providing work subject to the Davis-Bacon Act (laborers and mechanics in the construction trades) must be paid the applicable federal prevailing wage unless they meet the requirements for volunteers contained in 24 CFR Part 70.3 entitled "Use of Volunteers on Projects Subject to Davis-Bacon and HUD-Determined Wage Rates." This rule is available, upon request, from the department.

In-Kind value of volunteer labor for the purpose of documenting local match, the Office of Community Development has established that volunteer labor is to be valued as follows:

- The time of a person who donates their professional skills shall be credited at their standard hourly fee. For example, a lawyer who donates their time to provide legal services.
- The time of a person that provides labor for which they are not normally paid shall be credited at the area's current minimum wage. For example, a teacher that volunteers to perform carpentry work.

Budget Revisions

A request for a budget revision must be submitted to the Office of Community Development before a sponsor:

- (1) Overspends in one cost category and proposes to use the surplus remaining in another cost category to cover any shortfall; or
- (2) Allows costs for any category or the total unobligated balance of project funds to be reduced to a level that is inadequate to meet current or anticipated obligations.

If approved, the budget revision will be entered into ZoomGrants by the Office of Community Development.

Contingency Funds

Contingency funds are not available for public services project. Requests for the use of contingency funds may only be requested for a public facility or infrastructure project, as the amount of funding that is allowed to be spent on public service activities is capped at 15% of the annual CDBG award received from HUD.

Surplus Project Funds

Surplus project funds that result from completing a project under budget shall be reported to OCD as soon as practicable. Sponsors must obtain written approval from OCD if they wish to use any surplus project funds. Such requests must be made in writing prior to incurring costs. Costs must be related to the project for which the project sponsor originally received CDBG funds. Unspent surplus income is returned to OCD to be used as reprogrammable income. (See Program Policy Manual, policy number 3.) If an extension of time is needed to fully expend awarded funds, the project sponsor should contact OCD staff as soon as possible.

Program Income

Program income is defined as any funds accruing to a sponsor as a result of using CDBG resources. Examples include rental fees from the use of a community facility, sale proceeds from purchased equipment or property, and fees charged for services funded by program resources.

Sponsors are required to keep records of the sources of program income, reporting unanticipated program income as soon as possible. The use of all program income must be documented. Program income may be used to support the operation of a CDBG program activity. Program income not used to continue or benefit the original CDBG activity shall be returned to the program.

How to Submit a Voucher Request for Reimbursement

Reimbursement vouchers are submitted with relevant back-up documentation through ZoomGrants.

Project sponsors need to understand the difference between direct costs and indirect costs, and be aware of which type of costs are being charged to the CDBG grant. Direct Costs are costs that only benefit one program or activity. Indirect costs are those costs that benefit more than one activity or program. **Project sponsors MUST have a federally approved cost allocation plan with an established indirect cost rate or use the de minimus rate to charge indirect costs.** This plan must be submitted to

OCD for approval. If a project sponsor has a cost allocation plan but it has not been approved by a federal agency, we can NOT pay for those indirect costs.

Project sponsors should contact OCD with any questions about indirect cost rates to address any issues quickly and reduce any delays in processing vouchers.

When sponsors receive billings or incur costs for projects, the amount due can be paid and then reimbursement may be requested from OCD, or the sponsor may request reimbursement from OCD and then pay the amount due. The sponsor must disburse any reimbursement or combination of reimbursement made by the Washington County Office of Community Development that exceeds \$5,000 within 72 hours of receipt.

Costs which are charged must be included in the approved Budget Summary and must be allowable by [2 CFR Part 200 Subpart E](#).

To request payment for projects, the voucher request form must be completed in ZoomGrants. The voucher request includes the amount requested, by cost category, according to the approved budget for the project. After the voucher has been processed, the voucher form will be returned along with check payments. The voucher form is not emailed or sent for payments made electronically.

HOW TO SUBMIT AN INVOICE FOR REIMBURSEMENT

BOX 1 This box is auto populated by ZoomGrants/OCD staff

PO Number --- County generated PO number.

Release # --- County generated sequential release number

Account Code --- County generated for payment processing and GL allocation(s).

Environmental Release Date — For most projects, the environmental release date is July 1st of the year the project is funded. To be sure, check the letter you receive from this office that gives you your “Notice to Proceed.” This letter usually accompanies your fully executed copy of the contract. The date specified in the letter is the date you can start expending grant funds. **You cannot incur costs prior to the environmental release date (the start date of your project).**

Funding Year — if you have a project that began July1, 20XX it will ALWAYS be that same year project whether it is a one year or two year project.

Project Number --- this identifies project and is unique to each project.

ZOOMGRANTS		How do I do this?	Email This Voucher Request	Save as PDF	Print	Close Window	A ▲ ▼
Name of Organization	Washington County Office of Community Development						
Name of Project	CDBG Public Services 2023-2024 (1 year)						
P.O. Number							XXXXXX
Release #							
Account Code							XXX-XXXXXX-XXXXX-XXXXXXXX
Environmental Release Date							mm/dd/yyyy
Funding Year							23-24
Project #							XXXX

BOX 2

Total Requested — this field will show the total of what you have requested for a prior invoice request. To see this you need to pull up a prior invoice. It will be empty for a new invoice request. Once you fill out a new invoice, hit the refresh button and the requested amount for this invoice will appear.

Funding Amount Approved — this box will only show what has been approved from a prior invoice request. It's an easy way to check to see if an invoice has been approved.

Date submitted --- This field will be filled once you hit the Submit Invoice Request button. Use the [Delete This Invoice Request] button to remove the invoice.

Invoice Request Contact --- This is the preparer. A preparer is the person who fills out the invoice and attaches the back-up documentation. A preparer **CAN** also be an authorized signer, but does not have to be.

Invoice Request Number --- You will need to generate an invoice number for this field. Please keep your numbering system consistent for better clarity.

Show/Hide Invoice Request Status --- This box will show history/status of invoice requests and funding balance.

Name of Organization	Tel: xxx-xxx-xxxx Fax: xxx-xxx-xxxx	Project Contact Name email address Tel: xxx-xxx-xxxx
Address		
City, State, Zip	EIN: xx-xxxxxxx	
Total Requested \$ 6,905.00	Date Submitted mm/dd/yyyy	Voucher Request Contact Name email address Tel: xxx-xxx-xxxx
Funding Amount Approved \$ 6,905.00	Return to Applicant	
	Voucher Request Number	
	<input type="text"/>	

Funding Uses/Expenses Line Items --- Use only the lines that are in your approved budget. Enter the amount you are requesting for this time period. Once you refresh your invoice, your total should match Total Requested box. When using an "Other" line, you **must** add a description.

***Be aware that the system will allow a line item to go into a negative balance. If you experience a negative balance you will need to lower the amount requested. If you feel you need to adjust your approved budget in any way you should contact OCD immediately before incurring any more costs. You

can locate the Budget Revision Request form in your ZoomGrants Library. OCD **will not** approve any invoice that shows a negative line item balance.

Funding Uses/Expenses

Line Item (from application)	Description	Requested	Funding Amount Approved
Personnel Costs			\$ <input type="text"/>
Office Supplies			\$ <input type="text"/>
Operating Supplies			\$ <input type="text"/>
Communications			\$ <input type="text"/>
Travel & Training			\$ <input type="text"/>
Legal & Public Notices			\$ <input type="text"/>
Professional Services			\$ <input type="text"/>
Construction Costs			\$ <input type="text"/>
Capital Outlay			\$ <input type="text"/>
Property Acquisition			\$ <input type="text"/>
Relocation Expenses			\$ <input type="text"/>
Appraisal Fees			\$ <input type="text"/>
Other:	Emergency Rent Assistance	\$6,905.00	\$ <input type="text" value="6905"/>
Other:			\$ <input type="text"/>
Other:			\$ <input type="text"/>
Other:			\$ <input type="text"/>
		\$6,905.00	\$6,905.00

QUESTIONS

Question 1 --- Enter date parameters in which the costs were incurred. Example: Mar 1 – Apr 30 20XX

Question 2 --- If you have an approved Budget Revision, enter the number of the most recent request. Enter a zero (0) if you have not had a budget revision.

Question 3 --- This question pertains to the Line Item Details – Personnel Costs. If applicable, list name(s) and position(s) of all employees funded this quarter.

Invoice Request Certification --- The person submitting the invoice will have their name added (signed) to the voucher request certification statement.

Documents Requested --- Please attach all back-up documentation pertaining to the funds requested for this invoice. Vouchers will not be processed or paid if adequate documentation is not included.

1. The costs presented in this request were incurred between the time periods of (dates):

June 1st,2024-June 30th,2024

2. Please include the most recent budget revision # and approval date. If you have not had a Budget Revision please enter 0.

0

3. Personnel (State names of employees funded in whole or in part by Block Grant during quarter)

Name 1, Name 2...

Documents Requested *

Voucher Request Back-up Documentation (E.g. Timesheets, receipts, etc.)

Budget Revision

Required? Uploaded Documents *



Voucher Request XXXXXX



-none-

** ZoomGrants™ is not responsible for the content of uploaded documents.*

Voucher Request Certification

1). I (we) certify that two authorized signers have reviewed and approved this voucher request, that to the best of our knowledge and belief this report is correct and complete, and that all expenditures and obligations are for the purpose set forth in the grant award documents. Items of cost were determined allowable under 2 CFR Part 200 OMB Super Circular. Funds drawn will be disbursed within 72 hours after receipt if the amount drawn exceeds \$5,000.

2). By signature below, I (we) understand that these funds are from the Community Development Block Grant Program (CFDA #14.218) and as such, are subject to the requirements of that federal program.

Signed by:

Digital Signature

Date/Time Stamp

BACK-UP DOCUMENTATION

Back-up documentation is a critical component of your request for reimbursement.

One of the areas that seem to cause the most problems is providing documentation for staff salaries (personnel line item) when staff work in multiple programs/projects. The reason for that is because you must track ACTUAL HOURS spent on the CDBG projects as opposed to an approximation or PERCENTAGE of hours.

For personnel charges, you need to provide timesheets that clearly show the hours you and/or your staff worked on this CDBG project. If you spent 5 hours on Monday, 3 hours on Tuesday, and 6 hours on Wednesday working on the CDBG, it should be reflected this way on your timesheet. Work with your agency's finance person to be sure that your timesheets can accommodate tracking your hours in such a way.

EXAMPLE: Employee A works 110 hours in one month on the CDBG project, and has an hourly wage of \$10.00. The timesheet would reflect the 110 hours spent on the CDBG project and would note the hourly wage for a total of \$1,100. If applicable (i.e., if taxes and fringe benefits are included in your budget) you would need to then calculate the appropriate amount for taxes and fringe benefits that are

relevant to the \$1,100 and submit that amount along with the timesheet. The total of salary and taxes and benefits would be the amount shown under Personnel Costs.

You CANNOT round off and say Employee A worked ~ 64% of his/her time on the CDBG project.

If you have multiple employees, you should provide some kind of summary sheet (in addition to the timesheets) that shows what you are requesting.

Office Supplies/Operating/Travel/Communications/Legal Notices

If you have multiple invoices/sales slips for reimbursement for any of the above line items, you should copy the bills legibly and highlight the amount on each invoice. For each line item category, it helps to attach a spread sheet to the first page showing the total for all receipts.

The amount on the spreadsheet will equal the amount on page 1 or the invoice for that line item.

If you have funds budgeted in the professional service line item or the construction line item, provide the professional invoices that detail the work completed and the amount requested.

If you are using CDBG to pay a portion of a bill, mark on the bill "\$XXX charged to CDBG and \$XXX charged to _____ (name other program). Or another way to indicate this would be to write on the invoice "Charge only \$XXX to CDBG." Then highlight that amount.

The important thing to remember is to prepare your invoice with a clear connection between your invoices and your total request for payment.

Beneficiaries – Program Accomplishments

****Beneficiary reporting must be done on a quarterly basis. You can't submit the quarter invoice without doing your quarterly report first.**

Question 1 --- You will need to add contact information for the person filling out the accomplishments report.

Question 2 --- This is a branching question. Based on your selection certain questions will appear, therefore only requiring you to answer the questions that pertain to your application. The question numbering will skip some questions.

Question 3 –For this question, you will be providing information on accomplishments. Before you can fill this out, you need to know what the contract states you will accomplish overall. Look at Exhibit A of your contract under “Number of Low and Moderate Income or Target Group Beneficiaries (public service projects) or Quantitative Projections” (construction projects). This will tell you what will be accomplished with this contract.

Describe in detail what tasks were performed for which you are requesting reimbursement. If you are a public service or housing project, you may have on-going activities such as case management, provision of services like counseling, weatherization activities, after-school activities, etc. For infrastructure/facilities projects describe the unit of service being provided such as project design, lineal feet of pipe/sidewalk/pavement, what type of construction work done.

Lastly, you will be required to answer question 13 with a narrative explaining any missed goals or delays with your project. If you are not experiencing any issues, you will still need to insert “N/A” in the field box.

Question 4 --- RACIAL/ETHNIC PROFILE OF PERSONS SERVED

*****Please see Race/Ethnicity sheet below for a more detailed explanation of race and ethnicity categories.**

HUD regulations have changed regarding how racial data is collected. There was a shift towards collecting race and ethnicity data similar to how the 2000 Census collected the data. HUD expanded the racial categories to include dual races. Under the new requirements, Hispanic is no longer a racial category. It is an ethnic category, which can overlay a race. Ethnicity can be based on language, cultural affiliation, country or origin, customs, ancestry, etc. Clients need to identify their race and whether or not they are Hispanic/Latino. Your income and race totals for both current request and cumulative-to-date should agree.

Cumulative number will auto fill as each quarterly report is submitted.

Question 5 --- INCOME PROFILE OF PERSONS SERVED

Public Service projects must complete this section to receive payment. This section takes the number of people served and breaks it down by income.

There is a row for “current request” numbers and a row for “cumulative to-date” numbers.

In the row for "current request," your total # of households/persons served should equal the number in Item 3 "Provided this Request." Of that number, how many are in the moderate-low-income bracket, how many are in the low-income bracket, and how many are in the extremely low-income bracket? The three income categories should equal the total amount served (current request).

In addition, if your accomplishments are in housing units or households, you will need to collect this data if you are collecting by persons.

Question 6 --- ACCESS TO NEW OR IMPROVED SERVICES

Insert number of individuals served with a new or improved service for this time period.

*****What is the difference between new or improved access?**

PUBLIC SERVICES

Where a service or facility did not exist, the assistance provided results in "new" access to that service or facility. Where a service/facility was limited in size or capacity, and the assistance expanded the existing service or facility, the result would be "improved" access.

New access to a service is when a service is offered for the first time. This indicator would be used in the instance when a public service has not previously been available to these households. For instance, the sponsor might elect to fund a new job transportation service for working mothers. No such program currently exists in the area and so this is access to a new service for these households.

Improved access to a service is when a service was offered, but the public service activity allowed the sponsor to expand the service, in terms of size, capacity, or location. For instance, assume that an existing meals on wheels program only provided lunch and the expanded service provides lunch and dinner service. For these elderly households, this would constitute improved access. If a sponsor is re-funding an ongoing program, the improved access indicator is generally used.

Question 7 --- OTHER DEMOGRAPHIC DATA

Fill numbers where applicable.

Question 8 --- OTHER DEMOGRAPHIC DATA

*****This question pertains to Rehab and Weatherization projects only.**

This is tracked per household not on an individual basis. If one household member fits into more than one category it should than be counted in both places. For example: a household member can be elderly and disabled therefore you would add that household in both categories as elderly and disabled.

Question 9 --- TOTAL NEW HOUSEHOLDS SERVED THIS PERIOD BY INCOME

*****This question pertains to Rehab and Weatherization projects only.**

HUD income guideline levels which are adjusted yearly should be used for this question. Contact OCD staff for updated Income form.

Question 10 --- APPLICABLE PAINT REQUIREMENTS

*****This question applies to Rehab and Weatherization.**

HUD requires that you track the number of homes built before January 1, 1978 that lead based paint safe practices were used. Use second line for homes built before 1978 in which no paint was disturbed. Use line three if a home was built after January 1, 1978.

Question 11 --- TOTAL UNDUPLICATED **OWNERS** SERVED THIS PERIOD BY RACE/ETHNICITY

*****For rehab and weatherization programs this will be by Household. All other projects will report by Individuals.**

*****Please see Race/Ethnicity sheet below for a more detailed explanation of race and ethnicity categories.**

HUD regulations have changed regarding how racial data is collected. There was a shift towards collecting race and ethnicity data similar to how the 2000 Census collected the data. HUD expanded the racial categories to include dual races. Under the new requirements, Hispanic is no longer a racial category. It is an ethnic category, which can overlay a race. Ethnicity can be based on language, cultural affiliation, country or origin, customs, ancestry, etc. Clients need to identify their race and whether or not they are Hispanic/Latino. Your income and race totals for both current request and cumulative-to-date should agree.

Cumulative number will auto fill as each quarterly report is submitted.

Question 12 --- TOTAL UNDUPLICATED **RENTERS** SERVED THIS PERIOD BY RACE/ETHNICITY

*****For rehab and weatherization programs this will be by Household. All other projects will report by Individuals.**

*****Please see Race/Ethnicity sheet below for detailed explanation of race and ethnicity categories.**

Clients need to identify their race and whether or not they are Hispanic/Latino. Your income and race totals for both current request and cumulative-to-date should agree. If you are using the "other multiracial" category, please describe the demographics of the individuals in that category in the narrative section below the chart.

Cumulative number will auto fill as each quarterly report is submitted.

Question 13 --- NARRATIVE FOR GOALS NOT MET OR SCHEDULE ISSUES

You are required to answer question 13 with a narrative explaining any missed goals or delays with your project schedule. If you are not experiencing any issues you will still need to insert "N/A" in the field box.

Indicate any unexpected and/or significant changes in project output. If you are halfway through a project, and you have served only 25% of the people to-date, you should let us know that. Indicate what the problem is and how you are handling it.

Race/Ethnicity Data Collection Requirements From the Office of Management and Budget

The race categories established by HUD are:

Single Race

White
Black or African American
Asian
American Indian/Alaska Native
Native Hawaiian/Other Pacific Islander

Multi-Race

American Indian/Alaska Native & White
Asian & White
Black/African American & White
American Indian/Alaska Native & Black
Other Multi-Racial

HUD defines these categories as follows:

RACE CATEGORIES

American Indian or Alaska Native: A person having origins in any of the original peoples of North and Southern American (including Central American) and who maintains tribal affiliation or community attachment.

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.

Black or African American: A person having origins in any of the black racial groups of Africa. Terms such as Haitian or Negro can be used in addition to “Black or African.”

Native Hawaiian or Other Pacific Islander: A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific islands.

White: A person having origins in any of the original peoples of Europe, the Middle East or North Africa.

ETHNICITY (Treated as a category separate from race.)

Hispanic or Latino: A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race. The Spanish origin can be used in addition to Hispanic or Latino.

Not Hispanic of Latino: A person not of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

What is the best way to approach obtaining this information?

The OMB has indicated that “HUD partners should use a two-question format, meaning that separate questions for race and ethnicity should be used. Both questions must be answered. **The ethnicity question should precede the race question.** The OMB recommended this sequence because pre-tests

conducted by the US Census Bureau found that placing ethnicity before race significantly reduced the non-response rate to the ethnicity question.”

Does HUD Accept observer identification?

HUD states that self-reporting of self-identification, rather than observer identification is the preferred method for collecting race and ethnicity data. Self-identification for race and ethnicity means that responses are based on self-perception.

How does one account for races not represented by the single and mixed categories?

OMB’S new standards for race and ethnicity do not include an “other race” category. Therefore, program offices and HUD partners must make every effort to collect data for the aforementioned racial and ethnic categories. The OMB does not provide guidance as to how to collect and report responses that do not easily fit into one or more of the revised racial categories.

What do I do if someone is of a race not contained in the above nine established race categories?

You may use the category “Other Multi-Racial” but you must track what these race categories or race combinations are and provide a narrative description in the space provided.

Section VII: Monitoring

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) MONITORING PROCEDURE

Through onsite and desk monitoring, the OCD staff can determine whether the project sponsor's performance meets CDBG program requirements and improve project performance by providing technical assistance and making recommendations. The specific purposes of monitoring are to:

- Validate the accuracy of information presented project sponsors;
- Follow-up on problems identified during the monitoring visit;
- Determine compliance for those activities where there is sufficient information to make eligibility and/or national objective determinations;
- Evaluate the reasonableness of judgments made for those activities that necessarily involve high levels of program participant judgment;
- Ascertain the Sponsor's ability to ensure that activities carried out meet compliance requirements;
- Verify the accuracy of the project sponsor's records; and,
- Identify apparent causes of any problem(s) and offer recommendations for corrective actions.

Eligibility and National Objective Compliance Criteria

The specific categories of eligible activities under which an activity may be carried out by a project sponsor using CDBG funds are found at [24 CFR 570.201](#) through [24 CFR 570.206](#). The criteria for determining whether an activity addresses one or more of the three national objectives are found at [24 CFR 570.208](#).

Documentation

As described in the CDBG regulations at [24 CFR 570.200\(a\)](#), each Sponsor is required to maintain records that fully describe the assisted activity, including related financial and eligibility information, typically to show that the project funded with CDBG funding is benefitting low and moderate income individuals. The required documentation that must be maintained by the program participant is described at [24 CFR 570.506\(a\)](#) and [\(c\)](#) for eligibility and at [24 CFR 570.506\(b\)](#) for national objectives.

Approach to Monitoring

OCD staff views monitoring not as a once a year or periodic exercise, but as an ongoing process involving continuous communication, analysis of reports and audits, technical assistance, and periodic meetings as needed. It is the responsibility of OCD staff to keep fully informed concerning Sponsor's compliance with program requirements and the extent to which technical assistance is needed.

The overriding goal of monitoring is to ensure that CDBG funds are supporting critical services and projects that benefit low- and moderate-income households and communities. This is done by supporting project sponsors in compliance, prevent/identify deficiencies, and design corrective actions to improve or reinforce Sponsor performance as needed. Any identified deficiencies in need of corrective action will be handled through discussion, negotiation, or technical assistance in a manner that maximizes collaboration and maintains a positive relationship between project sponsors and OCD staff. Monitoring also provides opportunities to identify project accomplishments as well as successful

management, implementation, and evaluation techniques that might be replicated by other project sponsors.

OCD will conduct monitoring throughout the year. OCD staff will revise the Monitoring Checklist annually to determine which are to be monitored. The Program Manager will be provided the monitoring schedule. Past practice has been to monitor all Sponsors who have spent funds since last year, but in years where there may be too many projects to monitor, staff will use their discretion to implement a method to calculate those projects that may be more vulnerable and require monitoring more than others.

Monitoring Standards

Because it is not always possible that OCD staff will be able to monitor all of a project sponsor's activities, projects and/or functions, or even review activities in a specific area spanning a sponsor's entire program year, OCD staff generally review a random sample based on a risk calculation of project files or units to monitor performance. Non-random sampling will be used for projects or programs that have only a few files or units to review, for any projects with unresolved problems remaining from previous monitoring visits, for any new types of projects being undertaken, and/or projects considered high risk. Note that any sample review of project sponsor records that raises questions concerning the accuracy of the data indicates the need for further follow-up.

All new competitively funded CDBG projects contracted in a given fiscal year will be monitored at least once.

Multi-year public service projects will be monitored annually (after first year's monitoring) if any one of the following applies:

- Had findings/concerns in last year's OCD monitoring.
- Had finding in last completed federal audit concerning CDBG funding.
- Project sponsor has been in existence less than five years.
- Project sponsor is a first-time recipient of CDBG. funds in Washington County.
- Staff determines that the complexity of project necessitates annual monitoring.

OCD staff may make a determination to monitor a Sponsor more often as needed. OCD staff may also elect to monitor multi-year public service contracts every other year if all of the following apply:

- Sponsor had no findings/concerns in last year's OCD monitoring.
- Had no findings in last completed federal audit concerning CDBG funding (if federal audit is required)
- Project sponsor is an experienced organization.
- Project sponsor has recently received CDBG funds and is familiar with regulations.
- Project scope has not changed
- Desk audits of voucher requests reveal no concerns.

Public services set-aside projects will be monitored every other year unless one of the following applies:

- Had findings/concerns in previous OCD monitoring.

On-Site Monitoring Procedure

OCD staff will email to set up an agreed upon time with project sponsor and follow-up with a letter and the monitoring checklist that OCD staff will complete at the monitoring visit. In preparation, the project sponsor should review the monitoring checklist and ensure records are ready for OCD staff's review.

Prior to the monitoring visit, the project sponsor should send a letter certifying that federal funding did or did not trigger the federal single audit requirements. A sample letter template is at the end of this section. This letter should be signed by the Chief Financial Officer or Executive Director and returned to OCD staff before the monitoring visit. Staff will also request a copy of the most recent financial audit, if applicable.

OCD staff will review the project sponsor audit for any findings and record it in a federal tracking database. When possible, OCD will coordinate with the Cities of Beaverton and Hillsboro to monitor projects that receive CDBG funds from multiple jurisdictions jointly.

Single Audit Responsibilities

All sponsors that expend \$1,000,000 or more in federal funds in a year (\$750,000 if be audited for time period prior to October 1, 2024) must meet the audit requirements as specified in [2 CFR 200](#). Additionally, all financial transactions with CDBG monies are subject to federal audit. Each sponsor is required to permit independent auditors access to the records and financial statements at least once a year, or not less frequently than every two years. Sponsors must be prepared to explain how transactions were made, why, and be able to account for any funds expended.

During an audit, the auditor will examine records to ascertain if:

- 1) Funds are properly budgeted and approved;
- 2) Budget revisions have been documented and approved;
- 3) Personnel charges are properly allocated to the block grant and based on payroll documents such as time and attendance records;
- 4) All expenditures can be traced to source documents (i.e., purchase orders, invoices, canceled checks);
- 5) Drawdowns have been timely;
- 6) Only allowable activities have been claimed as costs toward the project;
- 7) The sponsor's accounting system reflects all assets, liabilities, etc.;
- 8) Property has been managed and inventoried properly;
- 9) In-kind costs and costs billed to other funds are clearly documented; and,
- 10) If there are billings for indirect costs, a federally approved indirect rate and allocation plan have been approved by HUD through OCD prior to the expenditure of any CDBG funds.

In addition, the auditor will ascertain if the sponsor's program has been accomplished in the manner set out in the application and/or the contract with the County.

In order for the Washington County CDBG Program to comply with federal regulations, OCD works with grant recipients to expend CDBG funds in the timely manner.

SAMPLE ONLY

[Insert Agency Name or print on letterhead]

Notification of Single Annual Audit

[Insert Date]

As a recipient of a federal loan or grant from Washington County's Office of Community Development, this letter is intended to fulfill the requirement to provide assurance that as a sub-recipient of federal funds that our organization is in compliance with [2 CFR Part 200](#): Audits of States, Local Governments and Non-profit Organizations). The certification below indicates the amount of federal expenditures from all sources for the fiscal year ended _____, 20__.

Please check one of the boxes below:

- Single audit NOT required (Total Federal Expenditures within the fiscal year identified above is less than \$1,000,000)

- Single Audit Required (Total Federal Expenditures within the fiscal year identified above is \$1,000,000 or more). A copy will be provided to Washington County Office of Community Development at its soonest availability.

The contact person responsible for the audit arrangement is [Contact person's name] and can be reached at [Contact person's phone #].

Certification by Chief Financial Officer or Executive Director:

Signature

Date

Title

Address

Note: If a single audit is required, the subrecipient must have it conducted in accordance with [2 CFR Part 200](#) for the fiscal year noted above. The Single Audit must be submitted by agency to the Federal Audit Clearinghouse (<http://harvester.census.gov/sac/>) within the earlier of 30 days after the receipt of the auditor's report, or nine months after the end of the audit period.



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For accommodations, translations, complaints, and additional information, contact 503-846-8814, or for voice to TTY relay dial 711 or 1-800-735-1232.

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