WESTCHESTER URBAN COUNTY CONSORTIUM - COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM

FY 2019-2021 CDBG PROGRAM MANUAL

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The Community Development Block Grant (CDBG) Program is a major federal urban assistance program that provides millions of dollars to the Westchester Urban County Consortium annually. The Westchester County Department of Planning has administered the Westchester Urban County Community Development Block Grant Program for over 34 successful years. Even so, municipal officials and interested Westchester residents often do not know what the Community Development Block Grant program is, or how they may take advantage of available CDBG funds.

This manual is designed to help communities, not-for-profit and for-profit organizations that provide CDBG-eligible services to understand the requirements of the program. The manual provides an explanation of the history and goals of the federal community development program and answers questions concerning eligible activities, grant application procedures, and recipient requirements.

For more information about the Westchester Urban County Consortium Community Development Block Grant Program, please call (914) 995-2427, or write to:

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Application & Instructions – FY 2019 - 2021 CDBG Application
An Introduction To The Community Development Block Grant Program

What is the Community Development Block Grant Program?

The Community Development Block Grant (CDBG) is a federal grant program of the U.S. Department of Housing and Urban Development (HUD) that provides funds to communities for neighborhood revitalization and improvement.

Established by Title I of the Housing and Community Development Act of 1974, the primary goal of CDBG is to develop and strengthen viable urban communities by providing decent housing and suitable living environments principally for low and moderate income persons. The Westchester Urban County Consortium received CDBG funding since this program was established in 1976 through Fiscal Year 2010. These funds were allocated for housing, public improvements, social services, and economic development in communities that were part of the Westchester Urban County Consortium.

In 2017, HUD notified the County that the Analysis of Impediment was deemed acceptable in accordance with the Fair Housing Settlement Agreement. As such, the County will apply for CDBG funding commencing with Fiscal Year 2019 which runs from May 1, 2019 to April 30, 2010. It is intended that the funding will be allocated for housing and infrastructure improvements in communities that are part of the new Westchester Urban County Consortium municipalities (see Appendix A and B – Listing of Consortium communities and Map).

Four of Westchester County's largest municipalities qualify for their own entitlement status. These municipalities – the Cities of Mount Vernon, New Rochelle, White Plains, and Yonkers, each receive their own CDBG grants from HUD. Agencies that provide services primarily for residents of these communities must contact the City offices for their application and grant information. Contact information for each of these programs can be found in the Appendix N – Other Community Development Offices in Westchester County.

In contrast to previous federal discretionary programs that required applications for specific categorical grants, the 1974 federal legislation establishing the CDBG program enabled communities to develop flexible, locally specific, comprehensive community development strategies by consolidating several programs into "block grants."
Inherent in the strategy is the requirement that CDBG-funded projects accomplish one of the following National Objectives:

- Benefit low/moderate income (LMI) persons
- Eliminate or prevent slums and blight
- Meet an urgent need of recent origin

Since its passage in 1974, the Act has been amended to reflect changes in federal priorities and experience garnered from program implementation. The Housing and Community Development Act of 1977, for example, opened CDBG funding opportunities to previously ineligible applicants. Acts in 1979 and 1981 expanded the list of eligible economic development activities and changed the citizen participation requirements. And the Act in 1993 required the CDBG Program to become part of a Consolidated Plan.

While the program objectives have remained consistent, the emphasis on low and moderate income benefit has been increased. The Housing and Community Development Act of 1983 added the requirement that at least 51 percent of all people benefiting from a particular CDBG activity must be in the low/moderate income category and that 70% of all funds spent annually must benefit low/moderate persons.

Block Grant funds are made available annually through HUD to entitlement entities\(^1\) that administer the funds and then allocate them to municipalities and not-for-profit agencies for community development projects. However, the amount of each entitlement grant changes annually based on the budget adopted by Congress. HUD uses a statutory formula, which includes objective analysis of community need based on poverty, population, and age of housing stock to determine the actual annual allocation each year to the Westchester Urban County Consortium.

**Thirty-Four Years of Community Development in Westchester: A Diverse Array of Successful Projects**

The funding priorities and policies for CDBG are an outcome of the Consortium’s Consolidated Plan. This current application round is covered by the FY 2019-2023 Consolidated Plan.

Each year the County Executive, upon recommendations from the County Planning Board, with approval of the Board of Legislators, submits an Action Plan application on behalf of the Consortium to the U.S. Department of Housing and Urban Development (HUD). This application incorporates projects developed by municipalities, social service organizations and recommended by the Westchester County Department of Planning.

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\(^1\) Entitlement entities are municipalities with populations of 50,000 or more, or counties with consortium populations of 200,000 or more.
The Department of Planning handles the day-to-day administration of the block grant received from HUD and provides funds to applicants whose projects have been approved.

In its role as an entitlement entity, Westchester County has developed its own CDBG program and funding priorities based on legislative requirements. Maximum priority has been given to activities benefiting low and moderate income persons or aiding in the prevention or elimination of slums and blight. Applications are solicited by the County in three-year funding cycles; but specific project awards are allotted and approved on an annual basis. The current round of applications will cover grants for the Fiscal Years 2019-2021.

The fiscal year of the Consortium runs May 1st through April 30th each year.

Typical projects encompass a wide range of community development activities designed to revitalize neighborhoods, improve housing, promote economic development, promote fair housing, and support community facilities and services. Over its thirty years of existence in the Consortium, the CDBG program has helped revitalize older neighborhoods, rehabilitate residential and commercial buildings, increase housing choice and construct public improvements within participating municipalities. Examples of such projects that have received CDBG dollars during previous funding cycles include:

### Previous CDBG Awards

<table>
<thead>
<tr>
<th>Project</th>
<th>National Objective</th>
<th>Eligible Activity</th>
<th>Amount</th>
<th>Accomplishments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Village of Sleepy Hollow</td>
<td>Low/Mod Income Area</td>
<td>Infrastructure Improvements</td>
<td>$106,188</td>
<td>1669 Persons</td>
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<tr>
<td>Village of Port Chester</td>
<td>Low/Mod Income Area</td>
<td>Infrastructure Improvements</td>
<td>$249,999</td>
<td>1,061 Persons</td>
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<tr>
<td>Rehabilitation of existing</td>
<td>Low/Mod Income Area</td>
<td>Housing Rehabilitation</td>
<td>$40,000</td>
<td>12 households</td>
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<tr>
<td>rental housing units</td>
<td>Rental Housing Units</td>
<td>Public Facility Improvements</td>
<td>$144,906</td>
<td>1,488 Persons</td>
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<tr>
<td>Village of Ossining</td>
<td>Low/Mod Income Area</td>
<td>Infrastructure Improvements</td>
<td>$113,000</td>
<td>1,330 Persons</td>
</tr>
<tr>
<td>Village of Hastings-on-Hudson</td>
<td>Low/Mod Income Area</td>
<td>Infrastructure Improvements</td>
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CHAPTER II
The National Objectives

The Basic Requirements

To develop a CDBG project it is helpful to follow a step-by-step process.

In order to be eligible for funding, each proposed CDBG activity must comply with four steps:

1. Meet a National Objective;
2. Meet Performance Measurements;
3. Be an Eligible Activity (see Chapter III); and
4. Be Adequately Documented.

It is therefore extremely important to determine at the outset whether or not a project or activity meets at least one of the three National Objectives of the program. To begin, check to see if a proposed project meets one of these criteria:

**STEP 1: NATIONAL OBJECTIVES**

| A. Benefit low and moderate income (LMI) persons. |
| B. Aid in the prevention or elimination of slums or blight. |
| C. Meet an urgent community development need of recent origin. |

**IF A PROPOSED PROJECT DOES NOT HAVE ONE OF THE OBJECTIVES, IT WILL NOT BE CONSIDERED FOR FUNDING.**

The following is a brief discussion of each National Objective including definitions, criteria, and examples.

**A. The Criteria for Activities Benefiting Low/Moderate Income (LMI) Persons:**

A low or moderate income person is defined in the statute as a **member of a household having an annual income equal to or less than 80% of the Area Median Income (AMI) as defined by HUD.** In addition, the Department of Housing and Urban Development (HUD) requires that income information be provided by income levels as follows:

- Extremely Low Income = 0 – 30% of median
- Very Low Income = 31 - 50% of median
- Low/Moderate Income = 51 – 80% of median
- Non-Low/Moderate income = 81% and above of median
Because the Area Median Income changes annually, the household’s low and moderate income level and eligibility may also change. Every applicant must document the income levels of the potential beneficiaries of CDBG funding at the time of application submission to ensure that at least 51 percent of the beneficiaries’ meet HUD guidelines.

Updated income information will also be required at the point that each individual and/or households is qualified to participate in the program that secures CDBG funding.

Each project must provide a benefit to at least 51 percent of individuals or households affected by the project that are within the HUD income limits. However, projects with a higher percentage of low and moderate income beneficiaries will score higher for funding. For specific information on income levels, see the Appendix G – Westchester County CDBG Income Limits.

Activities which benefit Low/Moderate income persons may be classified as providing:

- **Area Benefit (LMA)**
- **Limited Clientele Benefit to persons of low/moderate income (LMC)**
- **Housing Benefit to persons of low/moderate income (LMH)**
- **Job Creation or Retention for persons of low/moderate income (LMJ)**

Potentially eligible activities under the Area Benefit category may include street improvements, water and sewer lines, and neighborhood facilities (see Chapter VI for the methodology of determining low/moderate income benefit projects). However, for certain “area benefit” projects the percentage of benefit required may be reduced. Applicants with eligible activities should talk with County staff to determine if special circumstances apply.

Potentially eligible activities under the Limited Clientele Benefit category may include the construction of a senior center, public services for the homeless, and meals on wheels for the elderly.

Potentially eligible Housing Benefit Activities include the acquisition of property for permanent housing, rehabilitation of permanent housing, conversion of non-residential structures into permanent housing, and eligible activities connected with new housing construction. Chapter V contains information on specific guidelines for housing projects.

Potentially eligible Jobs to low/moderate income persons may include acquisition, construction or rehabilitation of commercial or industrial buildings, structures, and other real property equipment and improvements; assistance to a private for-profit business to carry out an economic development project; economic development
services in connection with eligible activities under this benefit for the purpose of job creation or retention for low and moderate income persons.

To test whether a project will meet the low/moderate benefit National Objective, it is helpful to follow these guidelines:

To determine a project’s eligibility using **Area Benefit**, refer to the Census block group data in the *Appendices C-D – Documenting Area Benefit with Census Data & Documenting Area Benefit with User Data*. If the area is not eligible using this data, an area survey may be conducted only if the area that will benefit from the project is smaller than the block groups (*see Appendixes E-G – Documenting Area Benefit with an Income/Family Size Survey and Sample Survey Letter*).

To calculate **Limited Clientele Benefit**, determine the total household income of each user by household size. For example, if there are 25 program beneficiaries, using the limited clientele user forms provided in Appendix H-K summarize how many four-person (or three-person, or five-person) households are involved, and the total income of each family. In addition to the income information to be collected for each user, you must provide racial data in accordance with the federal standards on Race and Ethnicity. *Definitions for racial categories can be found in Appendix I*.

To calculate both **Area and Limited Clientele Benefit**, using the total data, calculate the percentage of those that meet the low/moderate income criteria against the total population that will benefit from a project.

To calculate **Housing Benefit activities**, using the total number of housing units, at least 51% of the housing units must have households whose income is at or less than 80% of the household’s income based on household size.

To calculate **Low/Mod Income Jobs Benefit**, a public benefit standard must be performed. For example, to qualify at least one full-time permanent job must be retained or made available for every $35,000 of CDBG funds used.

Staff in the Department of Planning are available to assist applicants in this evaluation. It is important to note that census data available from the Department can also provide the necessary low/moderate income information. Census Data will be based upon the American Community Survey (ACS).

A minimum of 70% of the Consortium’s annual grant must be spent on activities that meet this National Objective. Almost all projects recommended for funding meet this National Objective.
B. Criteria for Activities to Prevent or Eliminate Slums or Blight

Activities that address the prevention or elimination of slums or blight may be classified on:

- An Area Basis
- A Spot Basis
- An Urban Renewal Basis

1. Prevention or Elimination of Slums or Blight on an Area Basis

In order to qualify under the National Objective of slums/blight on an Area Basis, an activity must meet all of the following criteria:

a. The area must be designated as a slum/blight area by the grantee and must meet the definition of a slum, blighted, deteriorated or deteriorating area under state or local law.

b. A substantial number of deteriorated or deteriorating buildings or public improvements must be located throughout the area. This would be documented with Buildings Code violations.

c. Documentation must be maintained by the grantee on the boundaries of the area and the conditions which qualified the area under this objective at the time of designation.

d. The activity must address one of the conditions which contributed to the deterioration of the area.

Potentially eligible activities include assistance to commercial or industrial businesses, public facilities and improvements, and code enforcement, provided the assistance is designed to address one or more of the specific conditions which qualified the area.

2. Prevention or Elimination of Slums or Blight on a Spot Basis

In order to qualify under the National Objective of prevention or elimination of slums or blight on a Spot Basis, the activity must meet the following criteria:

a. Be designed to eliminate specific conditions of blight or physical decay at a specific location not incorporated in a slum or blighted area; and

b. Be limited to acquisition, clearance, relocation, historic preservation or building rehabilitation to eliminate specific conditions detrimental to public health and safety.
Potentially eligible activities under the objective of preventing or eliminating slums or blight on a Spot Basis include the removal of faulty wiring or falling plaster, historic preservation of a public facility, and demolition of a vacant, deteriorated, (non-historic) abandoned building.

3. Elimination of Slums or Blight in an Urban Renewal Area

This category is intended to permit the redevelopment of areas in which activities were begun under funds received under the Federal Urban Renewal program (replaced by the CDBG Program).

C. The Criteria for Activities to Meet an Urgent Community Development Need

In order to qualify an activity under the objective of meeting an **Urgent Community Development Need**, an activity must be designed to alleviate existing conditions in which the grantee certifies all of the following:

- That the existing conditions pose a serious and immediate threat to the health, safety or welfare of the community
- That the existing conditions are of recent origin (within the last 18 months)
- That the grantee is unable to finance the activity
- That other resources of funding are not available

A condition will generally be considered of recent origin if it developed/became critical within 18 months preceding certification. Activities meeting the urgent needs criteria involve emergency or disaster situations with substantial costs which overextend the ability of a community to pay the costs through local taxation.

Examples of activities meeting the urgent community need objective include ruptured sewer and water mains and damages resulting from major catastrophes or emergencies such as floods and earthquakes.
STEP 2: PERFORMANCE MEASUREMENTS SYSTEM

HUD has implemented a performance measurement system that is required for all projects funded under the CDBG Program and other federal programs. This system provides aggregate data and consistent reporting on objectives and outcomes of the CDBG program at a national level. Potential projects/programs must meet one of the objectives and outcomes outlined below based on local and/or program’s intent. There are three performance measurement components as follows:

| 1. Objectives | 2. Outcomes | 3. Performance Indicators |

1. OBJECTIVES:

- **Suitable Living Environment** – Activities that benefit communities, families, or individuals by addressing issues in their living environment;

- **Decent Housing** – Housing activities that meet family or community needs. This objective should NOT be used for activities where housing is an element of a larger effort; or

- **Creating Economic Opportunity** – Activities related to economic revitalization, commercial rehabilitation and job creation.

2. OUTCOMES:

- **Availability/Accessibility** – Activities that make services, infrastructure, housing, and shelter available and accessible. Note that accessibility does NOT refer only to physical barriers.

- **Affordability** – Activities that provide affordability in a variety of ways. It can include the creation or maintenance of affordable housing, basic infrastructure hookups, or services such as transportation or daycare.

- **Sustainability** – Activities that promote livable or viable communities and neighborhoods by providing services or by removing slums or blighted areas.

3. PERFORMANCE INDICATORS:

There are several common indicators that apply to most activities such as: funds leveraged, number of persons, households, units, income levels of persons or households by 30%, 50%, 80% and 80%+ of an area median income and race, ethnicity and disability categories.
In addition to these common indicators, specific performance indicators will be identified for the type of activities to be funded with CDBG funds as follows:

**Public Facilities and Improvements Projects**

Of the number of persons assisted, how many will have:

- new access to a public facility or infrastructure benefit;
- improved access to a public facility or infrastructure benefit; or
- public facility or infrastructure that is no longer substandard.

**Public Service Activities**

Of the number of persons assisted, how many will have:

- new access to a service;
- improved access to a service; or
- service or benefit that is no longer substandard

**Housing Benefit Activities**

Of the total number of owner-occupied units, how many are:

- units occupied by elderly
- units moved from substandard to standard (Housing Quality Standards (HQS) or local code)
- units qualified as Energy Star
- units made accessible
- units brought into compliance with lead safety rules

Of the total number of rental units rehabilitated, how many are:

- affordable units
- Section 504 accessible units
- units qualified as Energy Star
- units made accessible
- units brought into compliance with lead safety rule

**Low/Mod Income Jobs Activities**

Of the number of jobs, how many will have/were:

- employer sponsored health care benefits
- filled by a persons who was unemployed prior to taking the job created by the activity
- under specific categories and types of jobs
CHAPTER III

Eligible Activities

Once an activity has been classified as meeting a National Objective, the second step is to determine whether CDBG funds may be used for a specific project or activity. Many types of activities qualify for CDBG assistance; this section describes these in detail, by type. The proper classification of an activity ensures that CDBG funds are used only for eligible activities and may further identify applicable statutes, requirements and regulations for certain activities.

STEP 3: DETERMINING ELIGIBILITY

A. Eligible Activities
B. Explicitly Ineligible Activities
C. National Objective Conditions Affecting Eligibility

A. **Eligibility** - HUD has established a listing of eligible activities, below, in the CDBG regulations. It should be noted that the list occasionally changes and that several activities have specific eligibility requirements.

- **ACQUISITION OF REAL PROPERTY** - in whole or in part, by purchase, long-term lease, donation or other

- **DISPOSITION** - the payment of costs incidental to the disposition of real property acquired with CDBG funds

- **PUBLIC FACILITIES AND IMPROVEMENTS** - including acquisition, construction, reconstruction, rehabilitation, and installation (except government buildings)

- **PRIVATELY-OWNED UTILITIES** - including acquisition, reconstruction, rehabilitation, and installation

- **CLEARANCE** - including demolition, removal and movement of buildings and improvements
• **PUBLIC SERVICES** - new services and quantifiable increases in the level of existing services which have been provided by or on behalf of a unit of general local government within the prior 12 months. Funding may include labor, supplies, materials, facility operation, and maintenance.

• **INTERIM ASSISTANCE PUBLIC FACILITIES AND IMPROVEMENTS** including limited improvement to a deteriorating area as a prelude to permanent improvements and activities to alleviate an emergency condition.

• **RELOCATION** - payments and assistance to persons displaced by regulatory and optional relocation.

• **LOSS OF RENTAL INCOME** - payment to homeowners for loss of rental income incurred by holding housing units to be used for relocation of those displaced by CDBG activities.

• **HOUSING REHABILITATION** - financing of publicly or privately owned residential property including the conversion of non-residential property for housing.

• **NEW HOUSING CONSTRUCTION** - financing or subsidizing the construction of new permanent residential structures by a qualified sub-recipient (see Page 19).

• **CODE ENFORCEMENT** - including the payment of salaries and overhead costs directly related to the enforcement of local codes in deteriorated/deteriorating areas.

• **HISTORIC PRESERVATION** - rehabilitation, preservation and restoration of historic properties. Historic properties, publicly or privately owned, may include those listed on or eligible for listing on the State or National Registers of Historic Places.

• **COMMERCIAL OR INDUSTRIAL REHABILITATION** - of private, for-profit businesses provided rehabilitation is limited to the exterior of the building, or the elimination of code violations.

• **SPECIAL ECONOMIC DEVELOPMENT** - including commercial or industrial improvements by a grantee or non-profit sub-recipient and assistance to private, for-profit entities for economic development projects.

• **SPECIAL ACTIVITIES BY SUB-RECIPIENTS** - activities which are not specifically listed as eligible in CDBG regulations may sometimes be
undertaken by qualified sub-recipients (see Chapter V for further discussion on qualified subrecipients).

- **PLANNING AND CAPACITY BUILDING** - including study, analysis, data gathering, plan preparation, and implementation plans. Types of eligible plans include: community development, capital improvements, environmental studies, historic preservation, housing and land use plans.

- **PROGRAM ADMINISTRATION** - reasonable costs of program administration related to the planning/execution of Community Development activities assisted with CDBG. Only the County Department of Planning will be eligible for this activity.

- **PAYMENT OF NON-FEDERAL SHARE** - CDBG funds may be used for non-federal share only for activities which are themselves eligible for CDBG assistance.

- **URBAN RENEWAL COMPLETION** - costs eligible for completing an urban renewal project funded under Title I of the Housing Act of 1949.

**B. Explicitly Ineligible** - Despite apparent inclusion within the listing of eligible activities, some activities fall within a category of explicitly ineligible activities.

In general, any activities not authorized under the provisions of eligible activities are ineligible for funding. The following activities may not be assisted with CDBG funds:

- **BUILDINGS (OR PORTIONS THEREOF) USED FOR THE GENERAL CONDUCT OF GOVERNMENT** (unless the proposed activity is related to ADA compliance).

- **GENERAL GOVERNMENT EXPENSES** - required to carry out the regular responsibilities of general local government.

- **POLITICAL ACTIVITIES** - the use of CDBG funds to finance facilities or equipment for political purposes is not eligible.

In addition, unless carried out by a qualified sub-recipient (see Page 19), the following activities will not be assisted with CDBG funds:

- **PURCHASE OF EQUIPMENT** - for example, construction and fire protection equipment, furnishings and personal property.
• **OPERATING AND MAINTENANCE EXPENSES** - for example, maintenance/repair of streets, parks, water and sewer facilities, staff salaries, and utility costs.

• **NEW HOUSING CONSTRUCTION** - is generally ineligible unless undertaken by a qualified sub-recipient.

• **INCOME PAYMENTS** – for example, income maintenance, housing allowances, down payments, and mortgage subsidies.

C. **National Objective** - Once an activity has been determined eligible, it is wise to check again to be sure the activity addresses one of the three National Objectives described in Chapter II.
CHAPTER IV

Documenting Benefit:
How To Prepare Information For Your Community Development Application

The essential aspect of any community development project is the information presented to document the National Objective addressed by the proposed community development project. Step 4 in this process is data collection to justify the statement that the proposed project meets a particular National Objective.

**STEP 4: OBTAIN ADEQUATE DOCUMENTATION**

The three National Objectives described in Chapter II are: benefit to low and moderate income people; prevention of slums and blight; or correction of an urgent need. The following chart summarizes the different National Objectives and the documentation required to justify project funding under them:

<table>
<thead>
<tr>
<th>Objective National</th>
<th>Requirements</th>
<th>Example of Data sources</th>
</tr>
</thead>
</table>
| Low/Moderate Income Benefit | • Map of boundaries of service area  
• Income characteristics of users  
• Quarterly/annual reports on beneficiaries and users by income and race/ethnicity | • Income surveys of neighborhood  
• Income documentation of users  
• Special needs surveys prepared by local government |
| Removal of Slum or Blight | • Board resolution designating area under state or local law  
• Substantial number of buildings or public improvements must be deteriorated  
• Map delineating boundaries of area  
• Activity addresses one or more of the deteriorated conditions  
• Detailed narrative describing programs and comprehensive plans for improvements | • Pre-rehabilitation inspection reports  
• Infrastructure conditions report  
• Detailed surveys of building conditions and code violations  
• Urban renewal plans |
| Urgent Need | • Certification that condition poses serious threat to the health and welfare of the community  
• Condition is recent  
• Applicant is unable to finance project  
• No other resources or funds available | • “Turn-Down letters” indicating no other source of funds is available  
• Health Department reports documenting a serious condition  
• Evidence that applicant designed activity to address the urgent need |
I. Low/Moderate Income Benefit: Required Documentation

As described in Chapter II, Low/Moderate income benefit activities are classified as: Area Benefit; Limited Clientele; or Housing Activities; or Jobs Benefit.

A. Area Benefit

HUD provides census data for the areas that qualify under the low/moderate income benefit on an area basis. The most current data and the accompanying maps delineating the areas for this round will be based upon the American Community Survey (ACS). The activity may benefit all of the area's residents. It is important that all the boundaries of the service area be clearly defined. This area need not be coterminous with census tracts or other officially recognized boundaries, but must include the entire area served by the activity.

Examples of Area Benefit are:

1. New sidewalks in a low/moderate income neighborhood

To qualify a project as Area Benefit to people of low and moderate income, an applicant needs to:

1. Establish the boundaries of the service area of the proposed community development project; and
2. Document the income of the families in the service area. If the HUD low and moderate income area data available from the Department does not show the area to be part of a low and moderate income block group, and there is reason to believe that the area is a “pocket of poverty,” the Department can provide technical assistance for conducting a survey of the households in the service area (see Appendices E-H - Documenting Area Benefit with an Income/Family Size Survey and Sample Survey Letter).

B. Limited Clientele Benefit

Activities in this category benefit a specific group of people, rather than all the residents in a particular area. HUD requires that at least 51 percent of the members of these specific groups be people of low-to-moderate income. Data on incomes of users is often available from the files of the service agency or sponsoring organization.
Examples of Limited Clientele activities are:

- Construction or rehabilitation of a community center or a center for senior citizens or day care
- Public services for the homeless; “Meals on Wheels” for the elderly

To qualify under this category, the activity must meet one of the following tests:

1. Benefit a clientele of which at least 51 percent must meet the HUD definition for low/moderate income households, and be from Consortium's households;

2. Be of such nature and location that it may be concluded that the beneficiaries will primarily be low and moderate income persons; or

3. Benefit a clientele generally presumed to be principally low/moderate income persons. Eligible activities must exclusively serve a group of persons in any one or a combination of the below categories. Supporting documentation must be included with the application to support the “presumed benefit category.”

<table>
<thead>
<tr>
<th>Presumed Benefit Clientele</th>
<th>Income Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Abused children</td>
<td>Extremely low income</td>
</tr>
<tr>
<td>Battered spouses</td>
<td>Low Income</td>
</tr>
<tr>
<td>Elderly persons (62 years of age and over)</td>
<td>Elderly persons (62 years of age and over) are also considered “presumed benefit clientele.” However, Westchester County is considered a “wealthy community,” income documentation will be required.</td>
</tr>
<tr>
<td>Severely disabled adults (meeting the Bureau of the Census’ Current Population Reports definition of “severely disabled.”)</td>
<td>Low Income</td>
</tr>
<tr>
<td>Homeless persons</td>
<td>Extremely low income</td>
</tr>
<tr>
<td>Migrant farm workers</td>
<td>Low Income</td>
</tr>
<tr>
<td>Illiterate adults</td>
<td>Low Income</td>
</tr>
<tr>
<td>Persons living with AIDS</td>
<td>Low Income</td>
</tr>
</tbody>
</table>
Documenting **Limited Clientele Benefit** With User Data

Applicants who need documentation for limited clientele projects can obtain information about beneficiaries and users with “user information forms” (see Appendicies J-L – CDBG Limited Clientele Reporting Form & Narrative).

Not-for-profit organizations, depending upon the type of activity they conduct, may already have user forms and statistics. Health care centers may use intake forms to document family income; day care centers may use admittance applications to obtain data. Organizations are required to have policies and procedures in place for the activity for which CDBG funds are being requested to determine the in-take process and how participants are determined income eligible.

Department staff will provide assistance in the development of a user information form for any organization that does not currently have one.

C. **Housing Activities Benefiting Low/Moderate Income People**

Under this activity, CDBG funds are primarily used for the rehabilitation of residential and mixed-use buildings. Because the original intent of the CDBG program was for housing rehabilitation, there are limitations on the way funds may be used for the construction of new housing and housing services.

Chapter V describes housing activities and CDBG funding in greater detail. However, important questions to ask when determining the eligibility of a housing activity are:

1. Does the activity benefit low and moderate income people, or remove a blight (see Appendix K – Multi-Family Housing Form); and

2. Is the sub-recipient an eligible public or private non-profit organization or a special limited profit corporation?

Examples of Housing Activities benefiting low and moderate income people are:

- Acquisition of property for permanent housing by eligible subrecipients
- Rehabilitation of permanent housing by eligible subrecipients
- Eligible activities connected with new housing construction
- Eligible activities that relate to housing services
C. Jobs Activities Benefiting Low/Moderate Income People

CDBG activities may include acquisition, construction or rehabilitation of commercial or industrial buildings, structures, and other real property, equipment and improvements; assistance to a private for-profit business to carry out an economic development project; or economic development services in connection with eligible activities under this benefit for the purpose of job creation or retention to low and moderate income persons.

There are two requirements that must be met in order to determine if an activity is eligible for CDBG funds: evaluating project costs and financial requirements; and evaluating public benefit. It is recommended that applicants considering an economic development project discuss the proposed activity with staff of the Department of Planning prior to submitting an application.

II. Prevention or Elimination of Slums and Blight: Required Documentation

Activities which eliminate or prevent slums and blight can be conducted on an Area Basis, a Spot Basis, or in an Urban Renewal Area.

A. Elimination of Slum or Blight on an Area Basis

Potentially eligible activities with the objective of eliminating slums and blight on an Area Basis include assistance to commercial/industrial properties for exterior or code related improvements, public facilities and improvements, as well as code enforcement, provided the assistance is designed to address one or more of the specific conditions that qualified the area as one of slum and blight.

B. Elimination of Slums or Blight on a Spot Basis

In order to qualify under the National Objective of elimination of slums and blight on a Spot Basis the activity must meet the following criteria:

1. It must be designed to eliminate specific conditions of blight or physical decay on a Spot Basis not located in a slum or blighted area; and

2. It must be limited to acquisition, clearance, relocation, historic preservation or building rehabilitation to eliminate special conditions detrimental to public health and safety. Potentially eligible activities under the objective of eliminating slums or blight on a spot basis include the removal of faulty wiring or falling plaster, historic preservation of a public facility, or demolition of a vacant, deteriorated, (non-historic) abandoned building.
C. Elimination of Slums or Blight in an Urban Renewal Area

This category is intended to permit the redevelopment of areas in which activities were begun with funds received under the federal Urban Renewal or other related programs (replaced by the CDBG Program). In order to qualify under the objective to eliminate slums or blight in an Urban Renewal Area, an activity must be:

1. Located within an urban renewal project area; and
2. Be necessary to complete the urban renewal plan.

III. Urgent Need: Required Documentation

The records to document urgent need should include the following:

- Photographs of the condition
- Building Department statements regarding health and safety hazards
- State or Federal designation of the condition as a disaster
- Documentation of onset of condition.

In addition, if a participating unit of general local government within an urban county uses CDBG funds for an urgent need, the county MUST be able to document that the participating local government was unable to finance the activity.
In conformance with the needs identified in the research for the development of the Westchester Urban County Consortium FY 2009-2013 Consolidated Plan, the County will give priority consideration to applications based on these priorities with its FY 2019-2021 round as follows:

I. Fair and Affordable Housing; and

II. Infrastructure Improvements

I. Fair and Affordable Housing

For many years, Westchester County has encouraged municipalities and not-for-profit organizations to use CDBG funds to create fair and affordable and inclusionary housing. Westchester's economy and quality of life are linked to the availability of fair and affordable residential space. The CDBG program provides communities with opportunities to address the need for housing for persons of low and moderate income and to further fair housing choice.

Statutory regulations set forth the ways in which CDBG funds may be used for housing activities. Restrictions exist on certain kinds of activities for not-for-profits which are different from those imposed on for-profit organizations. Additional restrictions, differing from those for rehabilitation, apply to new construction. Because requirements differ, it is recommended that applicants considering an affordable housing project discuss the proposed activity with staff of the Department of Planning prior to submitting an application.

In general, the following guidelines may be used in developing an application for affordable housing:

- Housing Rehabilitation: for-profits and not-for-profits may apply for funds for housing rehabilitation.

- New Construction: Private and public not-for-profits and municipalities may apply for funds for activities associated with new construction for
• housing; for-profits may apply for these funds only in limited circumstances, as noted below.

• Housing Services: municipalities and not-for-profits may apply for funds to provide services that will promote affirmatively further fair housing, overcrowded and unsafe housing, better access for the disabled, eviction and foreclosure prevention and expanded opportunities for Veterans.

1. **Eligible Housing Activities**

Eligible Housing Activities are classified in one of three groups:

a. **Rehabilitation**

b. **New Construction**

c. **Housing Services**

a. **Rehabilitation** - Property owners located in one of the Westchester Urban County Consortium communities may apply for funds at any time through the Property Improvement Program. Low/moderate income requirements apply to both owner and rental unit programs (at least 51 percent low/moderate persons for a specified time). This program is organized independently from the three-year CDBG process and funds are made available on a first come, first served basis. Funds are provided as a grant if applied through this application round; otherwise, they are available as a loan with an interest rate based on the rent roll's ability to repay the loan.

b. **New Construction** - As noted in Chapter III, new construction is often an explicitly ineligible activity. CDBG funds may, however, be used to finance or subsidize the construction of new permanent residential structures under the following conditions:

   (1) If the applicant is an eligible sub-recipient for special activities;

   (2) If the activity meets a National Objective;

   (3) If the activity is necessary or appropriate to achieve community development objectives (documentation required);

   (4) If the activity is for neighborhood revitalization, economic development, or energy conservation.
c. **Housing Services:** Activities are eligible if they promote and affirmatively further fair housing, services that address overcrowded and unsafe housing, better access for the disabled population, assistance that prevents eviction and foreclosure proceedings and expanded housing opportunities for Veterans under the following conditions:

1. the activity meets a National Objective;
2. the activity is necessary or appropriate to achieve non-housing community development objectives.

2. **Eligible Subrecipients**

Subrecipients for housing activities include public or private non-profit agencies, authorities or organizations receiving CDBG funds from the County. Normally activities which are not specifically listed as eligible in the CDBG regulations may not be undertaken. However, **three types of subrecipients** are able to take on special activities such as new housing construction.

**SPECIAL ACTIVITY (HOUSING) SUB-RECIPIENTS**

- a. Neighborhood-Based Non-profit Organizations
- b. Small Business Investment Companies
- c. Local Development Corporations

**NOTE:** **ONLY THE THREE TYPES OF SUBRECIPIENTS DEFINED BELOW MAY UNDERTAKE OTHERWISE INELIGIBLE ACTIVITIES.**

a. **Neighborhood-Based Non-Profit Organization** - an association or corporation duly organized to promote and undertake community development activities on a not-for-profit basis within a neighborhood. The organization is considered neighborhood based provided the majority of either its membership, clientele, or governing body are residents of the neighborhood where activities assisted with CDBG funds are to be carried out.

b. **Small Business Investment Company** - an entity organized pursuant to Section 301(d) of the Small Business Investment Act of 1950.

c. **Local Development Corporations** - organized pursuant to Title VII of the Headstart, Economic Opportunity, and Community Partnership Act of 1974 or the Community Economic Development Act of 1981, and/or
eligible for assistance under Section 501, 502, or 503 of the Small Business Investment Act of 1958.

Special activities may be carried out by a qualified sub-recipient for the purchase of equipment, operation and maintenance expenses, income payments and new housing construction.

3. Special Exceptions

Provided they meet a National Objective, the following activities may be eligible under other criteria even though they may not fall within the limited conditions permitting funding for new housing construction.

- **ACQUISITION** - of sites for use or resale for new housing
- **CLEARANCE** - of sites for use or resale for new housing
- **PUBLIC FACILITIES AND IMPROVEMENTS** - including site improvements to publicly-owned land to be used or sold for new housing
- **DISPOSITION** - of real property (acquired with CDBG funds) which will be used for new housing
- **REHABILITATION** - of an existing non-residential structure to residential
- **ADMINISTRATIVE COSTS** - including certain “soft costs” associated with the development of new housing (when costs incurred in support of new housing activities are not otherwise eligible)

II. Infrastructure Improvements (Sustainable Investments)

Priority for funding will be given to proposed CDBG projects within the areas as it relates to the following priorities:

- Activities that relate to the development of a Neighborhood Revitalization Strategy Area plan that will address the revitalization needs in eligible Consortium community's most distressed areas. The goal of neighborhood revitalization projects should focus on strengthening the physical and social fabric of the neighborhood by involving all appropriate stakeholders in the development and implementation of the project. Comprehensive neighborhood revitalization projects should contain components that identify the need for public improvements (sidewalks, parks, street lighting, street furnishings, water/sewer systems, parking facilities, pedestrian/bike paths, transit facilities, etc.)
Neighborhood revitalization projects that can build on affordable housing developments (new construction, rehabilitation, adaptive reuse), economic development (business expansion loans, exterior renovation, code enforcement compliance market studies, downtown managers, joint marketing assistance, etc.) and social services (day care services, senior citizen services, employment training, recreational facilities, etc.) will be a priority.

- Activities that will address energy conservation that includes “energy star” appliances as well as green technology to the construction and/or rehabilitation of public facilities and centers such as activities that are aimed at improving the operation efficiency of a facility (new heating system, additional insulation, etc.) will be given priority consideration. Utilization of “green” and sustainable materials, equipment, technologies or design will be a consideration in the funding recommendation. Facility projects must identify results (physical improvements, social initiatives, job growth/retention, etc.) expected to be achieved in terms that are quantifiable over one year periods within the neighborhood. In order to gauge the effectiveness of the project, baseline needs information must be provided and benchmark projections must be indicated showing progress on an annual basis, for those projects requesting multiple years of funding.

- Activities that will address storm water management that mitigates flood conditions to remove hazardous conditions and at the same time improve water quality such as projects that will protect drinking water and improve surface water quality. Funding recommendation will be given to activities that replace aging infrastructure within the Consortium communities.

- Activities that will provide pedestrian friendly improvements for livable downtowns such as traffic flow improvements, sidewalks improvements that will enable residents to access to transportation services that will provide viable and cost effective transit services to large percentage of the population that rely on bus rapid transit to work sites and other essential services.

The County will consider applications for public facilities projects that will continue to promote improvements to a whole neighborhood through the Consortium and can leverage on County investment and other County initiatives, especially Capital budget projects.
III. Opportunities for Youth

Priority for funding will be given to proposed CDBG projects as it relates to the following priorities:

- Programs that will prevent and reduce the incidence of gang involvement and teen pregnancy among the County’s low and/or moderate income youth.

- Services for growing number of grandfamilies – Programs that provide support services to grandparents that are raising their grandchildren such as information and counseling, referrals and support programs easy accessible and social activities for both grandparents and grandchildren.

- Services to young people with mental health issues – Programs that will assist young people who experience emotional, social and behavioral challenges thus improving the quality of life for families of children with emotional disturbances.

- Expanding day-care opportunities - day care services to allow low- and moderate-income adults to return to work. These activities, such as children day care scholarships, expansion/rehabilitation of facilities, etc., should either be new services or demonstrate a quantifiable increase of an existing service.
CHAPTER VI

The Application Process

The Three-Year Cycle

Westchester County maximizes the total amount of grant funds by committing and distributing funds over a three-year period.

The County Department of Planning solicits applications for the Urban County Community Development Block Grant program only once every three years. The next round of funding will cover fiscal years 2019, 2020, and 2021.

The application process begins with an information workshop on April 30, 2019. Applications and Program Manual will be available in the County's website at https://planning.westchestergov.com/land-use-development/community-development. Completed applications are due June 29, 2018, and reviews will be conducted throughout July to November 2018. No more than four (4) applications can be submitted by each applicant and the funding request cannot exceed $250,000 per application.

Preliminary notification of recommended funding allocations will be made in January, 2019, for all three years. Final allocations are made in each April after the County receives approval from HUD. Note that only one year of projects is submitted to HUD for approval at a time. By allocating projects over three years, recipients have sufficient time to plan and design projects and to develop projects which overlap construction seasons.

<table>
<thead>
<tr>
<th>Date</th>
<th>CDBG APPLICATION SCHEDULE</th>
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<tbody>
<tr>
<td>April 30, 2018</td>
<td>Workshop: Distribution of Applications for New Funding</td>
</tr>
<tr>
<td>June 29, 2018</td>
<td>FY 2019 - 2021 Application Deadline</td>
</tr>
<tr>
<td>July/Nov 2018</td>
<td>Staff Reviews</td>
</tr>
<tr>
<td>January 2019</td>
<td>Community Development Advisory Group (CDAG)</td>
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<td></td>
<td>Urban County Council Meeting</td>
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<td></td>
<td>Public Hearing on Recommended Allocations for FY 2019</td>
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<td></td>
<td>Presentation of Recommendations to County Executive</td>
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<tr>
<td></td>
<td>Review of Award Recommendations with Westchester County Planning Board</td>
</tr>
<tr>
<td>February/March 2019</td>
<td>Submission of Legislation for FY 2019 Application and Recommended Funding to BOL for approval</td>
</tr>
<tr>
<td></td>
<td>Final Public Hearing</td>
</tr>
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<td></td>
<td>Approval by Board of Legislators</td>
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<tr>
<td>Date</td>
<td>Event Description</td>
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<tr>
<td>March 15, 2019</td>
<td>Submission of Final Application and Action Plan to HUD for FY 2019</td>
</tr>
<tr>
<td>April 2019</td>
<td>Application Approved by HUD</td>
</tr>
<tr>
<td>May 1, 2019</td>
<td>FY 2019 Program Year Begins</td>
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<tr>
<td>July 1, 2019</td>
<td>Deadline for Updates to Applications on File</td>
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<tr>
<td>July, 2019</td>
<td>Review of FY 2020 and 2021 Preliminary Recommendations</td>
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<tr>
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<td>February/March 2021</td>
<td>Submission of Legislation for FY 2021 Application and Recommended Funding to BOL for approval</td>
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<tr>
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<td>April, 2021</td>
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</tr>
<tr>
<td>May 1, 2021</td>
<td>FY 2021 Program Year Begins</td>
</tr>
</tbody>
</table>
The Review Process

Competition for the Westchester Urban County Consortium Community Development Block Grant Program is serious; the Department typically receives requests for three times the amount of funding available.

To ensure that projects are selected fairly, staff members from the Department conduct extensive reviews of all submissions. Department staff make site visits to every project and meet with each applicant in order to obtain additional information. Each applicant has an opportunity to submit supplemental material if necessary.

Recommendations for funding are presented first by staff in review sessions, and preliminary determinations for funding are made to the Community Development Advisory Group (CDAG), the Westchester Urban County Council (UCC), the Westchester County Planning Board, the County Executive, and the Board of Legislators. Two public hearings are held to provide citizens with opportunities to comment on proposed awards.

How Community Development Projects Are Selected

Staff begin the evaluation of each project by first asking the following questions:

1. Is one of the three National Objectives being addressed by the project?
2. Is there sufficient documentation to support the National Objective?
3. Is the proposed project an eligible activity?
4. If the applicant has received community development grants in the past, were those projects completed in a timely fashion? Has the recipient maintained any previous improvements to public facilities appropriately for the useful life (i.e. removal of graffiti, bubblegum on sidewalk, maintenance of green spaces, etc.)?
5. Is the proposed project a continuation of a project previously funded by the Westchester County Community Development Block Grant Program?
6. Has the Community Development Advisory Group representative from the municipality where the proposed activity will be conducted commented upon the project?
7. Does the project represent an innovative or creative approach to a problem?
8. Is the project one-of-a-kind, not duplicated by an existing program?
9. If the project is related to housing, does the community submitting the application have a plan for providing housing for low and moderate income people or incentives to encourage the development of such housing or to overcome any impediments to fair and affordable housing that the County has identified?

10. How does the proposed project contribute to the development of affordable housing?

11. Is the project implementation schedule realistic?

12. Has the applicant provided a matching source of funds?

13. Is the project consistent with Westchester County and HUD policies?

14. Is the project consistent with the local Master Plan and Patterns for Westchester: The Land and People?

Answers to these questions are used by staff to prepare recommendations on each project.

HUD also imposes several requirements on the allocation of projects as follows:

- No more than 20% of funding can be spent on County’s Planning and Administrative expenses;
- No more than 15% of funding can be spent on social service program expenses;
- At least 70% of funding must be spent on projects that benefit low and moderate income persons.

For the FY 2019-2021 funding cycle, the County has established several priority areas. Because of the severe shortage of fair and affordable housing units in Westchester, the County has determined affordable housing, sustainable investment and opportunities for youth to be the top priorities.

Projects that create additional fair and affordable units, either through new construction, rehabilitation, or adaptive reuse, will receive special consideration. Projects that propose to maintain units threatened with removal from the housing stock due to code violations or inadequate infrastructure will also be given special consideration. Special programs to promote the development of accessory apartments, shared living, or activities which promote residential uses above stores (mixed-use), activities that promote affirmatively further fair housing, services that address overcrowded and unsafe housing, better access for the disabled population, assistance that prevents eviction and foreclosure proceedings and expanded housing opportunities for Veterans are examples of housing activities encouraged by the County.
The County will place emphasis on activities that specifically focuses on promoting sustainable communities such as energy conservation to public facilities and centers as well as green technology, storm water management that mitigates flooding conditions, replacement/upgrade of aging infrastructure and improvements for livable downtowns.
CHAPTER VII

Recipient Responsibilities

Each recipient of a CDBG grant must comply with the statutory requirements of the program. These requirements are two-fold:

- To complete projects as expeditiously as possible in compliance with all applicable regulations; and
- To provide reports to the County on individuals who benefit from the activity funded by the grant.

I. Timely Performance

To help applicants complete projects as quickly as possible, the Department has developed the following process:

Figure 3
In each of the phases of project implementation, a recipient has specific responsibilities, which are:

**A. Project Design Responsibilities**

For construction projects, recipients who will receive design assistance from the Department are required to complete a site survey before the design phase begins. The cost of the survey must be paid by the recipient and may not be considered as a contribution toward the required grant match.

Other project design responsibilities include the preparation of project budgets, a list of involved individuals, and a preliminary scope of work for the activity. Each recipient will meet with Department staff in a “scope meeting” to refine the project and develop a specific schedule prior to implementing the project.

**B. Contract Responsibilities**

A recipient is responsible for remembering that:

1. No expenses may be incurred nor may any work begin on activities to be paid for with CDBG grants until a Westchester County contract has been executed between the recipient and the County, and a contract has been executed between the recipient and the contractor.

2. Environmental and historic preservation reviews must be conducted on every project. The reviews are conducted by staff from the Department; however, recipients may be asked to submit associated information. A State Environmental Quality Review (SEQR) should be conducted by the municipality, when applicable, depending on the scope of the project. For larger, more involved public works and construction projects, the County of Westchester should be listed as an involved agency and be sent the State Environmental Assessment Form before the community establishes Lead Agency.

3. Every recipient implementing a construction project must participate in a “pre-construction conference.” Depending on the type of project, payment of federal Davis-Bacon wages (see Appendix L - Glossary) may be required. Use of minority and women contractors, minority and women-owned businesses, and local vendors is strongly encouraged.

4. Compliance with Section 3 - Recipients of CDBG funds, to the greatest extent possible, should provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.
Once a contract has been executed between the County and the recipient, it is important for the recipient to note the following:

- Payments for completed activities should be completed as quickly as possible;

- Requests to extend the term of a contract must be made in writing to the Commissioner of Planning sixty days in advance of the expiration of the contract, complete with a reason for the extension; and

- Requests for changes in the scope of work detailed in an executed contract must be made in writing to the Director of Community Development. Change orders may be executed or contracts may be amended, depending on the nature of the change.

C. Performance Responsibilities

In recent years HUD has increased the need for CDBG funds to be expended as quickly as possible. When funds are not expended within the regulatory time frames by the agency administering the CDBG funds, sanctions are imposed. These sanctions result in the reduction of available grant funds.

To avoid sanctions, the County has several requirements to help communities implement projects quickly, and to facilitate communication between the County and recipients, in order to avoid unnecessary delays. These requirements include:

- The submission of tracking reports every 4 months updating project status; and quarterly reports including the number of beneficiaries participating in CDBG-funded activities; and

- Frequent meetings with project administrators and County staff to discuss project status.

D. Citizen Participation Responsibilities

The CDBG Program has specific requirements regarding citizen participation. To apply for CDBG funds, each grantee must follow a plan that provides for and encourages citizen participation. The Citizen Participation Plan focuses on access to information regarding proposed and actual use of CDBG funds, technical assistance to groups representative of low/moderate income persons, non-English speaking needs, and public hearings in locations that are accessible to disabled persons. The Plan further emphasizes participation by persons of low and moderate income who live in areas for which CDBG projects are proposed as well as by a fair housing organization.
Organized citizen participation for members of the Westchester Urban County Consortium centers around the activities of the Community Development Advisory Group (CDAG) (See Appendix P – CDAG Representatives Listing). The group is composed of citizen representatives from each of the Consortium communities and several county-wide organizations. CDAG members advise the County Executive through the Department staff of community development needs and the progress of community development projects. In addition to the above, each municipality involved in the Consortium’s CDBG program is expected to inform the members of their community about the CDBG program and how the funds are being used within their community. This can be accomplished in a variety of ways, public meetings, round table discussions, press releases, inclusion as an agenda item during the village/town/city board meetings, etc. It is important that each municipality reach out to their community regarding the availability and use of CDBG funds.
CHAPTER VIII

Program Policies

The Westchester County Community Development Block Grant Program maintains policies regarding the allocation of funds for certain items.

1. **CDAG Representative:** The County will not consider an application from a municipality that does not have an active CDAG (Community Development Advisory Group) representative.

2. **Reconsideration of Funding Recommendations:** Funds are recommended through a three year cycle. The recommendations are then reviewed annually to assure timely performance. Funding recommendations are subject to change with this annual review. Application deficiencies can be corrected by July 1 of each year for consideration with the following year's funding.

3. **Matching Funds:** May be obtained from a number of other sources, including federal, state, corporate, local, and non-local sources.

4. **For all public improvements,** the County may require a Topographical Site Survey: The County does not consider the cost a municipality incurs in conducting surveys necessary for the design of public improvements to be part of a match or contribution towards total project costs.

5. **Resurfacing of Streets:** Resurfacing or repairing of streets is not an eligible activity unless the activity is part of pavement restoration in conjunction with a street or infrastructure improvement.

6. **Commuter Lots:** The repairing or construction of commuter parking lots are not considered for funding; nor will the acquisition of land for the construction of a commuter lot be considered.

7. **Underground Utility Wires:** The County does not provide grant funds for the underground installation of existing utility wires.

8. **Synthetic Siding:** The County will not provide rehabilitation financing for installation of synthetic siding to replace wood shingles or clapboard.
9. **Overcoming Impediments:** The County encourages applications for projects that will aid in overcoming the effects of any impediments to fair and affordable housing identified by the County.

10. **Minority Business Enterprise/Women Business Enterprise:** Pursuant to Section 308.01 of the Laws of Westchester County, it is the goal of the County to encourage, promote and increase participation of business enterprises which are owned and controlled by persons of color or women in contracts and projects funded by the County, and to monitor such participation.

11. **Reporting Performance:** Once a project has been awarded funding, properly completed payment vouchers and appropriate documentation are required.

12. **Maintenance of CDBG Funded Projects:** Upkeep and maintenance of improvements to public facilities is the responsibility of the recipient.

Regardless of a road’s ownership (State, County, or local), upkeep and maintenance of CDBG funded sidewalks and street amenities is the Recipient’s responsibility.
CHAPTER IX

Appendix A

MEMBERS OF THE WESTCHESTER COUNTY URBAN COUNTY CONSORTIUM
FY 2019– FY 2021

TO BE DETERMINED

NOTE: All municipalities must pass resolutions in the Spring 2018 that will allow their participation to continue into this new three-year cycle.
Appendix B

MAP OF CONSORTIUM COMMUNITIES

TO BE DETERMINED
Appendix C

CENSUS GEOGRAPHY

A. Blocks: Blocks are the lowest level and smallest units of census geography (see Figure 5, Appendix E). Census blocks are compact units, usually standard "city blocks", bounded by roads or other physical features. Data available at block level is limited to population distribution by age and race, as well as housing data covering occupancy status, average rent, and average value of owner-occupied housing units.

B. Block Groups: A block group is a combination of numbered census blocks. It is a subdivision of a census tract, and is identified by the fact that a set of blocks share the same first digit. All the information available about the census tracts is also available for block groups with the addition of information on household income. Detailed statistics about both population and housing for an area may be found by block groups.

C. Census Tracts: Census tracts are geographic and statistical subdivisions consisting of blocks and block groups within a municipality for which data is collected. Tracts generally have permanent, identifiable boundaries such as streets, rivers or railroad tracks. The population and housing stock of each group is relatively homogeneous. County-wide, the average number of people in a census tract is 4,000. The general characteristics of census tracts make them useful tools for defining and studying the socio-economic make-up of an area.

At the census tract level, information about population and housing is available. For example, under population, census tracts include data on age, race, sex, ancestry, occupation, income and education. Under housing, available data includes that on number of units, rooms, persons per unit, value, vacancy rate, renter or owner costs, plumbing, and heating.
Appendix D

WHERE TO OBTAIN CENSUS DATA

Census tract and block information can be obtained from municipal government offices or from the Westchester County Department of Planning. Most of these reports present data at the municipal level.

Low/moderate persons and income data for blocks and block groups is available in Appendix O.

DOCUMENTING BENEFIT WITH CENSUS DATA

1. Documenting Area Benefit with Census Data

If a proposed activity addresses the National Objective of area benefit to low/moderate income persons, it is most helpful to start by using census data, the most comprehensive and consistent source for local demographic information.

The federal government relies on census data for its decision-making regarding the allocation of funds to local governments. Demographic information about communities comes directly from census data, which is collected and up-dated to assist in preparing an application for the CDBG Program.

2. Documenting Area Benefit Using Survey Data

A proposed activity would probably benefit residents in an area comprised of several block groupings rather than benefiting residents of an entire census tract. Information on conducting income surveys follows. Additional questions should be addressed to Department staff.
Appendix E

DOCUMENTING AREA BENEFIT WITH AN INCOME/FAMILY SIZE SURVEY

Because projects often do not fall within census tract boundaries and because census data may not accurately reflect the income levels of beneficiaries (as shown in the example on Figure 2, p. 16), it may be necessary to conduct a survey of income related to household size.

The following steps summarize the procedure to use in conducting a neighborhood income survey:

1. **Find a Local Sponsor.** There will be a higher response rate if the survey is conducted under the auspices of a local entity. This entity may be the municipality, with a letter coming from the mayor or town supervisor, or it may be a local not-for-profit organization. A cover letter written by the sponsor should briefly explain the purpose of the survey and the fact that the information requested can be provided on an anonymous basis, and ask residents for their cooperation.

2. **Draw Up Preliminary Survey Boundaries.** Based on your knowledge of the area, delineate the section you believe qualifies for CDBG assistance.

3. **Develop a Coding System by Block Face (see illustration below).** Data collected will be most easily interpreted if the survey is conducted by block face. The usual coding system is a letter, preferably the first letter in the street name, and a number. For example, if Main Street - code M" - has four block faces in the survey area, the faces would be coded M1, M2, M3 and M4.

![Figure 5](image-url)
If the survey area includes more than one street name beginning with the same letter, you will have to improvise. The important thing is to devise the system before the collection of information begins.

4. **Obtain a Count of Dwelling Units in the Survey Area by Block Face.** This is best done by actually counting - not by estimating - the units in the area. If several families share one dwelling unit they should be counted as one household and receive one survey form. However, if a house is divided into separate apartments, each receives its own form. Tax maps are not an accurate source because multi-family houses may be listed as single-family in tax records. When counting look for number of doorbells, mail boxes or main entrances. The Planning Department can help if gaining entrance to larger buildings is difficult. A publication called The Multi-Family Development Listing lists buildings with more than five units by address and is available from the County Planning Department.

5. **Prepare Survey Forms.** Prepare a master original form (see Appendix F – Sample Survey Letter) on which are listed pertinent questions. These should also be translated into Spanish where applicable. It is best to use one form for each block face with the block-face code appearing in the letterhead beneath the survey name. This form can then be reproduced as many times as there are households on a particular block face. The form must be approved by the Department prior to its use.

6. **Package Surveys to Obtain Best Results.** The response rate will be higher if a stamped, addressed return envelope is included with the survey. Each survey envelope should contain: one cover letter, one survey form, one return envelope. Writing the appropriate block face code on the envelope expedites the tabulation process.

7. **Distribute Survey Packets.** If a mailing list corresponds to the survey area, distribute the packets by mail. In cases where this is not possible, the packets should be hand delivered. It is illegal to put them into mail boxes, but they may be put in doors, tucked under doormats so that most of the envelope is showing, or put near the mail box. The more visible the survey packets are, the higher the number of responses will be. As responses come in, put them in a special file for safe keeping.

8. **Tabulate Survey Data.** When sufficient time has elapsed to receive an adequate response, responses must be tabulated in order to ascertain the results. It is helpful to make up a matrix by income level and household size and to note the percent low/moderate income by family.
9. **Calculate the Survey’s Margin of Error.** The Department staff will provide technical assistance to determine the margin of error for a survey based on the number of survey packets distributed, the number returned, and the low/moderate percentage.

10. **Present the Survey Findings.** To present the survey findings to the community and to the Department, you will need to prepare both a map of the area and a narrative stating your conclusions. The map should include the boundaries of the survey area, the neighborhood name, the census tract and block group, and the low/moderate percentage. The narrative should state the margin of error and your conclusions concerning the area’s eligibility for the proposed activity.
Appendix F

February 2018

Village of Southville
Office of the Mayor
32 South Street
Southville, NY 10001

New Center Neighborhood Income Survey

All Information is confidential and anonymous

Results will be used to benefit the residents
of the New Center area of Southville

1. Total number of persons in household _____:

2. If you are a single person, which of the following matches your total annual income?

   _____ $23,400 or less (-30% of median income)
   _____ $39,000 or less (-50% of median income)
   _____ $62,400 or less (-80% of median income)

3. If you are a family (two or more), which of the following matches your total annual income?

   _____ $71,300 or less (2-person)
   _____ $80,200 or less (3-person)
   _____ $89,100 or less (4-person)
   _____ $96,250 or less (5-person)

4. Please indicate the number of persons in your household who are:

<table>
<thead>
<tr>
<th></th>
<th>Total</th>
<th>#</th>
<th>Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. White</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. Black/African American</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. Asian</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. American Indian/Alaskan Native</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. Native Hawaiian/Other Pacific Islander</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>6. American Indian/Alaskan Native &amp; White</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. Asian &amp; White</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. Black/African American &amp; White</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. American Indian/Alaskan Native &amp; Black/African American</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. Other Multi-Racial</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>TOTAL</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Please confirm the most updated income numbers with the Planning Department staff before using a survey. The Income used in this sample is as of April 14, 2017. You must contact the County for updates on an annual basis.

See Appendix I for completion of race/ethnicity data.
Appendix G

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

INCOME LIMITS AS OF APRIL 14, 2017

WESTCHESTER COUNTY DEPARTMENT OF PLANNING
Based on Westchester County Area Median Income of $111,400
for a 4-Person Household - established by HUD

<table>
<thead>
<tr>
<th>Incomes (updated 7/18/17)</th>
<th>1 Person Household</th>
<th>2 Person Household</th>
<th>3 Person Household</th>
<th>4 Person Household</th>
<th>5 Person Household</th>
<th>6 Person Household</th>
</tr>
</thead>
<tbody>
<tr>
<td>120% AMI</td>
<td>$93,600</td>
<td>$107,000</td>
<td>$120,300</td>
<td>$133,700</td>
<td>$144,350</td>
<td>$155,050</td>
</tr>
<tr>
<td>100% AMI</td>
<td>$78,000</td>
<td>$89,100</td>
<td>$100,250</td>
<td>$111,400</td>
<td>$120,300</td>
<td>$129,200</td>
</tr>
<tr>
<td>80% AMI^1</td>
<td>$62,400</td>
<td>$71,300</td>
<td>$80,200</td>
<td>$89,100</td>
<td>$96,250</td>
<td>$103,400</td>
</tr>
<tr>
<td>MTSP^2 60% AMI</td>
<td>$46,800</td>
<td>$53,520</td>
<td>$60,180</td>
<td>$66,840</td>
<td>$72,240</td>
<td>$77,580</td>
</tr>
<tr>
<td>MTSP^2 50% AMI</td>
<td>$39,000</td>
<td>$44,600</td>
<td>$50,150</td>
<td>$55,700</td>
<td>$60,200</td>
<td>$64,650</td>
</tr>
<tr>
<td>30% AMI</td>
<td>$23,400</td>
<td>$26,750</td>
<td>$30,100</td>
<td>$33,400</td>
<td>$36,100</td>
<td>$38,750</td>
</tr>
</tbody>
</table>

^1 2017 80% HUD uncapped incomes published by HUD.

^2 Multi-family Tax Subsidy Projects Income Limits: Westchester County, NY Statutory Exception Area was subject to HUD's Hold Harmless Policy in 2007. Section 3009(a)(E)(i) of the Housing and Economic Recovery Act of 2008 (Public Law 110-289) provides a general "hold-harmless" policy for MTS projects after calendar year 2008. Based on HUD's estimate of Median Family Income for FY2014, this "hold-harmless" policy was invoked for FY2014 MTSP Income Limits in Westchester County, NY Statutory Exception Area.

Allowable AMI and Restricted Rent Limits:
HUD establishes the AMI for each metro statistical area. The base AMI is reflective of income for an average family of 4 persons. The current AMI represents 100% for a family of 4. Percentages change based upon the number of persons per household. A number of persons less than 4 reduce the percentage. Conversely, a number higher then 4 increases the percentage. A family of 3 represents 90% of AMI; a family of 2 represents 80% of AMI; a family of 5 represents 108% of AMI; and a family of 6 represents 116% of AMI. See scale below:

<table>
<thead>
<tr>
<th># Person</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
<th>6</th>
<th>7</th>
<th>8</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adjustment</td>
<td>70%</td>
<td>80%</td>
<td>90%</td>
<td>100%</td>
<td>108%</td>
<td>116%</td>
<td>124%</td>
<td>132%</td>
</tr>
</tbody>
</table>
Appendix H

Westchester County Community Development Block Grant Program
CDBG SUBRECIPIENT REPORT – PUBLIC SERVICES ACTIVITIES

Project Activity: _______________________________________________________________
Agency Name: ___________________________________________________________________
Agency Address: _______________________________________________________________
Contact Person (Name/Title): _______________________________________________________
Signature: ______________________________________________________________________

**Reporting Period**

From: ___________________     To:   _______________
Quarterly: ___________________   Annually:  _______________

<table>
<thead>
<tr>
<th>Amount of Funds Leveraged by CDBG-Funded Activity</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Federal funds</td>
<td></td>
</tr>
<tr>
<td>State funds</td>
<td></td>
</tr>
<tr>
<td>Local funds</td>
<td></td>
</tr>
<tr>
<td>Private funds</td>
<td></td>
</tr>
</tbody>
</table>

| Total Funds Leveraged                           |        |

<table>
<thead>
<tr>
<th>Persons Assisted by this CDBG-Funded Activity</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Unduplicated Persons Assisted</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Income Category (% of Median Family Income “MFI”)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Persons Assisted (0-30%)</td>
<td></td>
</tr>
<tr>
<td>Total Persons Assisted (31 – 50%)</td>
<td></td>
</tr>
<tr>
<td>Total Persons Assisted (51%-80%)</td>
<td></td>
</tr>
<tr>
<td>Total Persons Assisted (81% - Over)</td>
<td></td>
</tr>
</tbody>
</table>

| Total Persons Assisted                           |         |

<table>
<thead>
<tr>
<th>Race/Ethnicity of Persons Assisted</th>
<th>Total</th>
<th>Hispanic</th>
</tr>
</thead>
<tbody>
<tr>
<td>White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black or African American</td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Native Hawaiian or Other Pacific Islander</td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian or Alaska Native and White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Asian and White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Black or African American and White</td>
<td></td>
<td></td>
</tr>
<tr>
<td>American Indian or Alaska Native and Black</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Multi-Racial</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| Total Number of Persons Assisted                 |         |

<table>
<thead>
<tr>
<th>HUD Performance Indicator for Public Service Activities</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td># of Persons Assisted with NEW access to services</td>
<td></td>
</tr>
<tr>
<td># of Persons Assisted with IMPROVED access to services</td>
<td></td>
</tr>
</tbody>
</table>
Appendix I
(Instructions and Definitions)

HUD revised the federal data on race and ethnicity for eligible CDBG activities. HUD switched to using 10 race categories and ONE ethnicity category (HISPANIC) that is spread across all of the race categories.

Of the 10 race categories, five will be for a single race:

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

- **Black/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.”

- **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 Phillippine Islands, Thailand, and Vietnam.

- **American Indian/Alaskan Native** – A persons having origins in any of the original peoples of North and South American (including Central America), and who maintains affiliation or community attachment.

- **Native Hawaiin/other Pacific Islander** – A person having origins in any of the original people of Hawaii, Guam, Samoa, or other Pacific Islands.

Five of the ten race categories will be for multi-race situations:

- **American Indian or Alaska Native & White** – A person having these multiple race heritages as defined above.

- **Asian and White** – A person having these multiple race heritages as defined above.

- **Black or African American & White** - A person having these multiple race heritages as defined above.

- **American Indian or Alaska Native & Black or African American** - A person having these multiple race heritages as defined above.

- **Other Multi-Racial** – For reporting individual responses that are not included in any of the other categories listed below.

**HISPANIC** - Hispanic will be an ethnicity category within HUD’s reporting requirements. Recipients of CDBG funds should categorize beneficiaries not only by race categories but simultaneously also by Hispanic/Latino ethnicity.

**For example:** An organization provides assistance to 20 seniors (18 are White and 2 are Hispanic). You will need to determine whether the 2 Hispanic persons meet one of the 10 races listed above. Let’s say that the two (2) Hispanic persons are White. In the subrecipient form, enter 20 under the “# Total Column” 20 in the “White” category and two (2) in the “# Hispanic Column.”
Appendix J

(continuation of Limited Clientele
Reporting Form)

OBJECTIVE
Please √ only ONE):

________ Create suitable living environment

________ Provide decent affordable housing

________ Create economic opportunities

OUTCOME
Please √ only ONE)

________ Availability/accessibility

________ Affordability

________ Sustainability

1. Goal of Overall Grant:

2. Goal for this Quarter:

3. Progress this Quarter:

Please use this sheet to complete a narrative about your organization. Include a description of the project(s) and the original scope of the activity, and any changes that have been made to the project. Include copies of written reports, annual statements, publications.
Appendix K

CDBG SUB-RECIPIENT REPORT – MULTI-FAMILY HOUSING PROJECTS

Project Activity: __________________________________________________________

Contact Person (Name/Title): __________________________________________________

Report Period: To Be Completed After Construction/Rehabilitation

<table>
<thead>
<tr>
<th>Amount of Funds Leveraged by CDBG-Funded Activity</th>
<th>Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other Federal funds</td>
<td></td>
</tr>
<tr>
<td>State funds</td>
<td></td>
</tr>
<tr>
<td>Local funds</td>
<td></td>
</tr>
<tr>
<td>Private funds</td>
<td></td>
</tr>
</tbody>
</table>

**Total Funds Leveraged**

<table>
<thead>
<tr>
<th>Housing Units Assisted by this CDBG-Funded Activity</th>
<th>Total Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Housing Units Assisted</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Household Assisted by this CDBG-Funded Activity</th>
<th>Total Households</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Number of Household Assisted</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Income Category (% of Median Family Income “MFI”)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Households Assisted (0-30%)</td>
<td></td>
</tr>
<tr>
<td>Total Households Assisted (31 – 50%)</td>
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<tr>
<td>Total Households Assisted (51%-80%)</td>
<td></td>
</tr>
<tr>
<td>Total Households Assisted (81% - Over)</td>
<td></td>
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</table>

**Total Households Assisted**

<table>
<thead>
<tr>
<th>Race/Ethnicity of Households Assisted</th>
<th>Total</th>
<th>Hispanic</th>
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<tbody>
<tr>
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<td></td>
</tr>
<tr>
<td>Black or African American</td>
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<td></td>
</tr>
<tr>
<td>American Indian or Alaska Native</td>
<td></td>
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<tr>
<td>Asian</td>
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<td></td>
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<td>Native Hawaiian or Other Pacific Islander</td>
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<td>American Indian or Alaska Native and White</td>
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<td>Black or African American and White</td>
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<td></td>
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<tr>
<td>American Indian or Alaska Native and Black</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other Multi-Racial</td>
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<td></td>
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</table>

**Total Number of Households Assisted**

<table>
<thead>
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<th>Of the Total Rental Units, Number of:</th>
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<tbody>
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<td>Affordable Units</td>
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<tr>
<td>Section 504 Accessible Units</td>
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</tr>
<tr>
<td>Brought from Substandard to Standard Condition</td>
<td></td>
</tr>
<tr>
<td>Units Qualified as Energy Star</td>
<td></td>
</tr>
<tr>
<td>Brought into Compliance with Lead Safety Rules</td>
<td></td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Of the Total Affordable Units, Number of:</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Units Occupied by Elderly</td>
<td></td>
</tr>
</tbody>
</table>

Income documentation must be maintained for monitoring purposes.
# Appendix L - GLOSSARY

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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</thead>
<tbody>
<tr>
<td>CDAG</td>
<td>Community Development Advisory Group. Comprised of citizen representatives, one from each community in the Westchester Urban County and from several county wide organizations. The CDAG meets quarterly, and is an integral part of the CDBG application process (see p. 23)</td>
</tr>
<tr>
<td>CDBG</td>
<td>Community Development Block Grant (Program)</td>
</tr>
<tr>
<td>Davis-Bacon</td>
<td>Federal law enacted in 1931. Requires the inclusion of minimum wage rates and fringe benefits for new construction and rehabilitation projects implemented with federal funds.</td>
</tr>
<tr>
<td>Housing Company</td>
<td>Housing companies are incorporated under articles 2 and 4 of the Private Housing Finance Law or the Membership Corporation Law of New York.</td>
</tr>
<tr>
<td>HUD</td>
<td>(U.S. Department of) Housing and Urban Development</td>
</tr>
<tr>
<td>Income</td>
<td>To determine whether a family or household is low-and moderate-income, you may select any of the three definitions listed below:</td>
</tr>
<tr>
<td></td>
<td>(1) Annual income as defined under the Section 8 Housing Assistance Payments Program;</td>
</tr>
<tr>
<td></td>
<td>(2) Annual income as reported under the Census long-form; or</td>
</tr>
<tr>
<td></td>
<td>(3) Adjusted gross income as defined for purposes of reporting under IRS Form 1040 for individual Federal annual income tax purposes.</td>
</tr>
<tr>
<td>Median</td>
<td>The level of income, as defined by HUD, that serves as the standard against which the incomes of beneficiaries of CDBG-funded programs are measured.</td>
</tr>
<tr>
<td>PHA</td>
<td>Public Housing Authority - the administering body of a particular public housing facility. Comprised of a seven member board of commissioners; five are appointed by the local municipality for terms of five years, two are elected by the tenants for two year terms.</td>
</tr>
<tr>
<td>UCC</td>
<td>Urban County Council. Comprised of elected or appointed officials, one representative from each of the communities in the Westchester County Urban County. Meets regularly to discuss matters of interest to the Urban County and to review decisions concerning CDBG applications.</td>
</tr>
</tbody>
</table>
Appendix M

Community Liaisons
Effective April 2019

TO BE DETERMINED
Appendix N

Community Development Offices in Westchester County

MOUNT VERNON
Department of Planning & Community Development
City of Mount Vernon, City Hall
One Roosevelt Square – 2nd floor
Mount Vernon, New York 10550
Telephone (914) 699-7230
Fax (914) 699-1435

NEW ROCHELLE
Department of Planning & Community Development
515 North Avenue
New Rochelle, New York 10801
Telephone (914) 654-2186
Fax (914) 632-9118

WHITE PLAINS
Department of Planning
255 Main Street/Annex B.dg.
White Plains, New York 10601
Telephone (914) 422-1366
Fax (914) 422-1301

YONKERS
City of Yonkers
Bureau of Community Development
87 Nepperhan Avenue
Yonkers, New York 10701
Telephone (914) 377-6650
Fax (914) 377-6672

COUNTY OF WESTCHESTER
Department of Planning
148 Martine Avenue, Room 414
White Plains, New York 10601
Telephone (914) 995-2427
Fax (914) 995-9093
Appendix O

LOW/MODERATE INCOME AREAS BY BLOCK GROUPS
(See attached)

TO BE DETERMINED
Appendix P

CDAG Representatives Listing
(see attached)

TO BE DETERMINED