
Chapter 1 – Project Start-up

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CHAPTER I

PROJECT START-UP

Overview

This chapter offers background information on the Community Development Block Grant (CDBG) Program and summarizes the key considerations and important steps each grantee will need to take to start a successful CDBG grant award project. All grant recipients will be required to comply with all applicable parts of the Housing and Community Development Act of 1974, as amended, 42 U.S.C. §§ 5301, et seq.; the applicable Department of Housing and Urban Development (HUD) regulations, including but not limited to 24 CFR Part 570 and Form HUD-4010, as now in effect or as they may be amended during the term of the project contract; all administrative directives and procedures established by the Department, including the most recent version of the CDBG/NSP Grant Administration Manual; and all other applicable local, state, and federal laws, regulations, administrative directives, procedures, ordinances, or resolutions. This manual provides information to help grant recipients comply with these regulations.

Each grantee may incur reimbursable administrative costs as of the authorized date in its Notice of Award letter. Administrative costs will be eligible for reimbursement once the grantee meets all start-up conditions, documents compliance with state and federal requirements, and executes a contract with the Department. If the grantee fails to meet start-up conditions, a contract is not executed, a grant recipient is unable to comply with the terms and conditions of the contract, document federal or state requirements, or administrative, acquisition, or construction costs incurred are ineligible for CDBG funding, those costs will be the sole responsibility of the grantee. All CDBG projects must also meet Special Contract Conditions and demonstrates compliance with state and federal regulations to be eligible to incur acquisition or construction-related costs and complete project activities.

Start-up Conditions

Prior to executing a contract, the following start-up conditions must be completed and submitted to the Department. Additional details are listed in this chapter as well as in other chapters of this manual.

- a. Updated budget and implementation schedule,
- b. Compliance with federal and state audit requirements,
- c. Established financial accounting system,
- d. Documentation of firm commitment of non-CDBG funds,
- e. Approved Project Management Plan, and
- f. Executed contract with the Department.

Special Contract Conditions

Prior to completing any non-administrative project activities, the following special contract conditions must be completed by the grant recipient. Additional details are contained in this manual.

- a. Completed Signatory and Depository forms,
- b. Environmental requirements completed,
- c. Documentation of completed Civil Rights requirements,
- d. Other special conditions placed on the grant by the Department as established in the contract, and
- e. Executed Interlocal or Sub-Recipient Agreement, as applicable.

Start-Up Conditions

I. Project Budget

The preliminary project budget submitted in the grant recipient's application must be updated to reflect current conditions at the time of contract execution, and will be attached to and incorporated by reference into the contract. At the time the project is ready to enter into a contract, an updated budget narrative explaining the amounts listed for each line item that CDBG will fund, will be required to be submitted. It is important that the preliminary project budget at the time of contract execution is acceptable to all of the funding sources identified. When the project is ready to begin the construction phase, the project budget will need to be revised to reflect the actual amount in the construction bid. In the event that the construction bid is less than the budgeted amount, the construction line items must be revised to reflect the reduced costs. For information on the process to follow in amending the project budget after the contract has been executed, see Chapter 4.

Program Income Plan

Program Income" is defined as any income earned by a grantee from a CDBG supported activity, such as, repayments of principal or interest to a local revolving loan fund program generated by housing rehabilitation or economic development activities. As further established in the contract, a program income plan will need to be developed for those project activities that could generate program income.

- "Program Income" funds are the monies that are received after a project has been completed and closed out and are retained at the local level as authorized by the Department. Program income can also be generated while a project is yet underway, such as when homes are sold that were assisted with CDBG first-time homebuyer funds.
 - For example, if your local government planned to retain program income received from its CDBG funded housing project, it would have had to complete a Program Income Plan as part of the required application. This Program Income Plan would have outlined the use of program income anticipated to be received in conjunction with a revolving loan fund for ongoing housing purposes to assist low and moderate-income homeowners or renters, and may have included a goal to fund other eligible CDBG activities.
 - Any community that have been receiving program income from a previous CDBG project funded after 1992 must have submitted a summary of past program income earnings, activities funded, and other information along with the CDBG grant application. Under HUD regulations, communities are also required to submit annual program income reports to THE DEPARTMENT if they have received program income from CDBG-supported activities.

As part of project start-up activities, grantees must review the Program Income Plan submitted with the grant application and ensure that it accurately reflects the local government's current plans to administer any program income funds received. CDBG guidance on the use of Program Income is included in the publication, *CDBG Program Income Manual*, available on-line at:

<http://comdev.mt.gov>

II. Project Implementation Schedule

The project implementation schedule submitted in the grant recipient's application must be updated to reflect current conditions at the time of contract execution, and will be attached to and incorporated by reference into the contract. The final implementation schedule for the CDBG contract should identify all key tasks and more precisely define, if possible, when each must be accomplished to complete the

overall project. All CDBG project activities must be completed as identified in the grantee's implementation schedule and the executed contract with the Department. The Department, in its sole discretion, may grant an extension to this deadline if the project is near completion and the grant recipient can demonstrate a good faith effort to complete the project on time and within the original budget.

III. Established Financial Accounting System and Audits

Local government grantees must be in compliance with the auditing and reporting requirements provided for in 2 CFR Part 200, Section 2-7-503 and 18-4-311, MCA, and demonstrate that they have an established financial accounting system in place that conforms to generally accepted accounting principles (GAAP).

The Community Development Division (CDD) staff will contact the Department of Administration, Local Government Services (LGS) Bureau and Federal Audit Clearinghouse to confirm whether a grant recipient is in compliance with the auditing and reporting requirements. A grantee can also view information related to their audit and financial status available at any time on the Department of Administration, Local Government Services website at <http://sfsd.mt.gov/LGSB>.

The LGS Bureau services are available at the request of any local government to help the entity comply with statutory financial and budgetary reporting requirements.

The costs of audits prepared in accordance with federal and state regulations are allowable charges to CDBG projects. Generally, the percentage of costs charged to CDBG projects cannot exceed the percentage of CDBG funds expended in relation to total funds expended by the local government during the fiscal years covered by the audit. The percentage may be exceeded, however, if appropriate documentation demonstrates higher actual cost. The grantee must provide the necessary information required to determine the percentage of funds applicable to the CDBG project audit when the audit report and final certifications of completion are submitted for MDOC review. Any procurement of professional services to complete an audit will need to follow procurement requirements as outlined in Chapter 3 of this manual.

IV. Obtaining Firm Commitment of Other Funding Sources

The CDBG grant recipient must provide adequate documentation of the firm commitment of all non-CDBG funds for the project, identified in the preliminary project budget submitted in the grant recipient's application. A description of acceptable documentation of non-CDBG funding sources is included in this manual.

If the CDBG grant recipient changes one of its sources of funding after executing a contract with the Department, or if the cost of the project increases substantially after obtaining the firm commitment of non-CDBG funds and additional funding is required from existing or new sources, the grantee should notify the Department immediately. The Department may, at its sole discretion, suspend distribution of CDBG funds until there is once again a firm commitment of funds for the project.

V. The Management Plan

All CDBG grant recipients must prepare and submit a signed management plan. A sample management plan is included as an exhibit in this manual. The management plan will establish how the grantee will allocate responsibility for complying with the CDBG grant and other state or federal requirements, including but not limited to the proper financial management of CDBG funds, review of contracts and requests for reimbursements, compliance with labor standards, and completion of

environmental review. In all cases, the grantee must maintain effective control over and accountability for all funds.

In the management plan, the grantee may designate an existing or new public employee (such as a planning director, public works superintendent, or clerk) as the CDBG grant manager; hire a consultant to manage the grant through applicable competitive procedures for procurement of services; or contract with another local government or existing special purpose agency, such as an economic development corporation, to manage a grant. Procurement of consultant or professional services are more fully explained in Chapter 3, prior to hiring a consultant or professional service please consult your project liaison to complete the appropriate federal requirements.

If the grantee will work with any other governmental entity or non-profit organization to manage its CDBG grant, the grantee must execute an agreement establishing the responsibilities and duties between the two agencies. CDBG uses either an Interlocal Agreement for those entities that are districts or other governmental entities or a Sub-recipient Agreement for non-profit or for-profit entities that will administer the project or own and operate the facility. This is discussed below as a Special Contract Condition. A sample agreement is included as an exhibit in this manual and explained in more details in Chapter 3, Procurement. All executed contracts or agreements, including those for engineering services or grant services, to be paid for in whole or in part by CDBG funds must be submitted to the Department. Additionally, CDBG may request a copy of any contract related to project activities.

VI. CDBG Contract

The executed contract between the grantee and the Department is the legal document that governs the administration of the grant, and will identify the following items:

- the total amount of CDBG funds to be provided;
- the scope of work;
- a preliminary project budget for the use of CDBG funds and any other funds involved in the project;
- the implementation schedule for the project;
- any special conditions placed on the grant by the Department; and
- the general terms and conditions associated with the grant.

The process of finalizing the contract will include finalizing the project budget and implementation schedule and incorporating the scope of work to be completed by the grantee. The grantee's application for CDBG grant funds, as approved by the Department, is incorporated by reference into the contract and the representations made therein are binding upon the Grantee.

At the time the project is ready to execute a contract, the CDBG liaison will contact the grantee to confirm grantee authorized representatives for signatures at the time the contract is being prepared. The contract will be reviewed in the Department and then transmitted to the grantee thru an electronic process for signatures. A copy of the final executed contract will be available electronically when all signatures have been obtained. Please contact the program staff if there are concerns or assistance needed with this process.

In the event a project can be completed for less than the grant amount, the grant contract may be amended to reflect the reduced costs. For example, if actual construction bids are less than the estimates included in the application budget, the construction budget would be finalized considering the bid price, plus a contingency, see Chapter 9 for more information. The difference between actual project

costs and the original grant award may be reallocated by the Department for unfunded or inadequately funded projects or added to the following year's CDBG allocation.

The Department may allow unused funds to be used for an eligible activity which further enhances the contracted project, subject to the Department's written approval. However, before the Department makes a determination to allow the additional activity to expend all or a part of the balance of remaining funds, the grantee must demonstrate that the activity will:

- (1) clearly enhance the overall impact of the original project;
- (2) provide at least a 51% benefit to persons of low and moderate-income;
- (3) completed in a timely manner,
- (4) completed with the unused funds, and
- (5) demonstrates satisfactory progress toward completion of the original contracted project activities.

AMENDING THE CONTRACT

All grantees must request approval of modifications to project activities, in advance, such as those involving new activities, alteration of the existing activities or budget, adjusting the schedule for project implementation, as proposed in the grant application or defined in the grant contract. Before the Department makes a determination to allow the amendment, the grantee must provide a written justification that clearly demonstrates that the modification is appropriate and will enhance the overall impact of the original project.

The Department will consider each request to determine whether the modification is substantial enough to necessitate reevaluating the project's original ranking. If warranted, the Department will analyze the proposed modification and its impact on the scores originally assigned the application. Amendments will not be approved which, when re-ranked, reduce the overall score assigned during the original grant competition below the lowest score received by a selected project.

The Department will require that a public hearing with reasonable notice be conducted by the grantee if the proposed amendment is determined to be a substantial change in project activities contained in the original application for CDBG funds.

Substantial changes in project activities or the geographic area of the project may also obligate the grant recipient to publish legal notices and to conduct additional environmental review in order to comply with federal environmental requirements.

Special Contract Conditions

I. Signature and Depository forms

The Department must receive an executed Signature Certification form authorizing specific local officials to sign requests for reimbursement. At least two officials must sign each request for reimbursement. This form will be used to verify the signatures on each request for reimbursement, received throughout the course of the project, match those listed on the Signature Certificate. If local officials change during the course of the project, the Department will require an update to the certificate occur prior to proceeding with a request for reimbursement.

The Designation of Depository form provides the necessary information for reimbursement to be sent directly to the designated bank account for the grant recipient. The Designation of Depository must indicate the name and/or number of a *non-interest-bearing account* (general depository) to which the Department will authorize the direct deposit of CDBG funds.

Federal regulations provide that local governments cannot earn interest on CDBG funds deposited into the local government's account for the grant. The procedures for processing a request for reimbursement are described in Chapter 4, Financial Management.

II. Environmental Review

CDBG grants are subject to the National Environmental Policy Act (NEPA), found in 24 CFR Part 58 and Montana Environmental Policy Act (MEPA). For detailed information on MEPA, see *A Guide to the Montana Environmental Policy Act*, or *A Citizen's Guide to Public Participation in Environmental Decision making*, at: <http://leg.mt.gov/css/Publications/Environmental/default.asp> or <http://leg.mt.gov/css/Services%20Division/Lepo/mepa/default.asp>

Environmental processes must be completed prior to carrying out any choice-limiting actions, including but not limited to, acquisition or construction-related activities. Any actions taken by the grant recipient that are considered a choice-limiting action could result in the loss of CDBG funding. Please be advised that if project activities are modified to the extent that a new environmental review is required, NEPA and MEPA processes must be followed before additional work can be completed. For additional information, please review Chapter 2 for specific guidance on environmental requirements.

Until a CDBG grant recipient has a completed Environmental Review Record covering all project activities including receipt of the State's formal Release of Funds, a grantee may not incur CDBG funds for any activity except those listed as environmentally exempt under 24 CFR Part 58.34 and specifically authorized by the Department. The Department may issue a specific authorization for each grant recipient to allow them to begin incurring costs for environmentally-exempt activities that are for administrative purposes only. For additional information, please see Chapter 2 of this manual.

III. Civil Rights

To ensure that grantees comply with HUD civil rights requirements, the Department requires that the Civil Rights compliance occurs prior to the first release of funds. These actions are more fully described in Chapter 5, Civil Rights, but include:

- a. Undertake actions to affirmatively further fair housing,
- b. Adopt a Hatch Act Resolution,
- c. Conduct a Self-Evaluation and Transition Plan. Review Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA),
- d. Adopt complaint resolution procedures to ensure compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990 (ADA).

CDBG Grantees must ensure accessibility (both structurally and administratively) to programs, services, and benefits for persons with physical and mental disabilities. Grantees and their contractors may not discriminate against qualified individuals with disabilities. Passing the above resolutions is an essential special contract condition that must be completed. The resolutions must be passed by the local government and actions taken before CDBG funds are drawn.

Any postponement of Civil Rights requirements, must be made in writing by the grant recipient and subsequently approved by the Department.

IV. Other special conditions

The grant recipient shall satisfy other specific requirements considered necessary by the Department to accomplish the purpose of the project as evidenced by the application to the department. These specific requirements may include meeting design requirements or those listed in the CDBG ranking report. Please contact the Department project liaison for additional information specific to the project.

V. Interlocal or Sub-recipient Agreement

If the grantee will work with any other governmental entity or non-profit organization to manage its CDBG grant, the grantee must execute an agreement establishing the responsibilities and duties between the two agencies. CDBG uses either an Interlocal Agreement for those entities that are districts or other governmental entities or a Sub-recipient Agreement for non-profit or for-profit entities that will administer the project or own and operate the facility. As an example, the local government may choose to contract with an existing special purpose agency such as a local housing authority, human resource development council, or a water or sewer district. An interlocal agreement and other special steps may be necessary in such cases. Additional information can be found in Chapter 9 of this manual.

Additional Information

I. Federal Requirements

1. **The Federal Housing and Community Development Act of 1974** (42 USC 5301) provides the statutory basis for the CDBG program nationwide. The State of Montana assumed administrative responsibility for the "Small Cities" CDBG Program in 1982 and the distribution and use of CDBG funds allocated to the State for its local governments under 50,000 population.

Under the Act, recipients of CDBG funding are responsible for the following:

- carrying out their local projects in a timely and satisfactory manner;
- carrying out their projects substantially as they are described in their CDBG applications and contract documents;
- ensuring that only eligible activities are undertaken with CDBG funding;
- ensuring that each activity undertaken with CDBG funding principally benefits low and moderate-income persons, aids in the prevention or elimination of slums and blight, or meets other community development needs having particular urgency;
- maintaining a system for financial management that provides accurate information about CDBG expenditures and assures financial accountability and control;
- promoting fair housing and equal opportunity in the implementation of project activities;
- complying with the National Environmental Policy Act (NEPA); and
- complying with all applicable laws and regulations. The most important federal requirements that apply to CDBG projects are briefly summarized in the "Certifications for Application" (found in the Montana CDBG Application Guidelines.) The chief elected official of each CDBG applicant signed and submitted the Certifications with the application for CDBG funds. Most of these requirements are discussed in detail in following chapters.

2. **Title 24 of the Code of Federal Regulations (CFR), Part 570, Subpart I, "State CDBG Program."** These regulations adopted by the U.S. Department of Housing and Urban Development (HUD) provide the basis for states to receive and distribute CDBG funds to local governments in their nonentitlement areas. While these implementing regulations are primarily

intended to define state administrative responsibilities, they also identify many of the management and compliance issues each state must monitor at the local level. These regulations make each state accountable for conducting "such reviews and audits of the units of general local government as may be necessary or appropriate to determine whether they have satisfied the applicable performance criteria which incorporate, among other things, the requirements of this Title and other applicable laws."

3. **Title 24 of the Code of Federal Regulations (CFR), Part 570, Subparts C, J, K and O, "CDBG Program - Entitlement Grant Regulations.** HUD adopted these regulations in 1988 for the "Entitlement CDBG Program" which assists communities over 50,000 population, such as Billings, Great Falls, and Missoula. The HUD Entitlement CDBG Program regulations provide additional guidance on HUD policy regarding a variety of issues involved in the management of local state-funded CDBG projects. Copies of the current regulations for the HUD "Entitlement CDBG Program" are available from the Montana Department of Commerce (MDOC or Department) upon request.

II. Grant Administration Workshop

The Department regularly conducts a grant administration workshop for communities awarded new grants. The workshop is designed for elected local officials who are ultimately responsible for the grant; project managers who will have overall day-to-day administrative responsibility; and clerks, clerk-treasurers, clerk and recorders, or other officials who will have responsibility for overseeing CDBG finances. It is extremely important that the officials and staff that will be responsible for day-to-day grant management, especially financial management, attend this workshop. Any consultant or member of the public may also attend the workshop.

The Department recognizes any grant administration arrangement can be a critical relationship that assists with accurate and appropriate completion of regulations. CDBG funds can be used for grant administration or professional services needed to complete project activities. Regardless of the agreement and procurement documented, direct responsibility for completion of grant activities, compliance with federal and state requirements, and proper financial management of CDBG funds, rests with the governing body of the CDBG recipient. Additional information is found in Chapter 3 of this manual.

III. HUD Oversight

a. Underperformance and HUD "At-Risk" Management:

The HUD reporting system tracks all projects and provides automated alerts for those projects identified as "at-risk" or in need of correction due slow or untimely performance. The program will use the HUD alert system to communicate with grantees whose projects are underperforming to assist them with improving their performance and address the 'at-risk' status. The following three performance measures will be used to determine if a project is underperforming:

1. No draws submitted to the program within 270 days of an executed contract, or
2. No beneficiary data reported after 2 years and 9 months from the date of an executed contract, or
3. No beneficiary data reported, and project is 65% drawn.

b. Failure to Perform and HUD Remediation Plan Status:

The HUD reporting also provides automated alerts for those projects identified as failing to perform or in need of immediate correction. CDBG will use the HUD alert system to communicate with grantees whose projects are failing to provide benefit to eligible households and complete the project in a timely manner. If a grantee receives a remediation plan notice, they must prepare a corrective action plan within 30 days of notification, the plan must resolve the issue, and be approved by CDBG staff. The following three performance measures will be used to determine if a project is failing:

1. No draws submitted to the program within 12 months of an executed contract, or
2. No beneficiary data reported after 3 years from the date of an executed contract, or
3. No beneficiary data reported and project is 80% drawn.

IV. Proof of Insurance and Workmen's Compensation

Prior to release of funds, grantees must also submit to the Department of Commerce evidence of insurance coverage as set forth in the CDBG grant contract and evidence of current payment of workmen's compensation for the local government's employees.

V. Project Files

Keeping complete and detailed records is crucial to successful management of a CDBG project. Local officials and staff should maintain detailed records of day-to-day project activities. Organized project files will aid the grant recipient in documenting compliance with state and federal regulations. All records related to grant activities are to be available on request and need to be kept by the CDBG grantee for five years after the date of final closeout provided through written correspondence by the Department.

Original and complete documentation of all project files must be retained in the offices of the local governing body and be available during normal business hours to any persons authorized to review them, including the Department project liaison, legislative auditor, Comptroller General of the United State, HUD, or other authorized representative.

VI. Involving the Public

Congress and HUD have always placed strong emphasis on citizen participation in the CDBG program. Montana's CDBG Program places strong emphasis on involving the public during the development of an application for CDBG funding and to implement project activities. The need to keep the public informed and involved does not stop after a grant recipient receives notice that your grant application was selected for funding.

1. Section 104 (a)(2) of the Federal Housing and Community Development Act provides that to enhance public accountability, the grantee must in a timely manner furnish citizens information about the amount of funds available for proposed community development and housing activities, including the estimated amount proposed to be used for activities that will benefit persons of low and moderate income.

The Housing and Community Development Act requires that CDBG recipients:

- Provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of slum and blight areas and of areas in which [CDBG] funds are proposed to be used, and provide for participation of residents in low and moderate income neighborhoods as defined by the local jurisdiction;

- ❑ Provide citizens with reasonable and timely access to local meetings, information, and records relating to the grantee's proposed use of funds, and relating to the actual use of funds;
- ❑ Provide for technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals with the level and type of assistance to be determined by the grantee;
- ❑ Provide for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least the development of needs, the review of proposed activities, and review of program performance. Hearings shall be held after adequate notice, at times and locations convenient to potential or actual beneficiaries, and with accommodation for the handicapped;
- ❑ Provide for timely written answers to written complaints and grievances, within 14 working days where practicable; and
- ❑ Provide for the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents can be reasonably expected to participate.

2. Media or Press Release or Events

For any special media event, press release, ribbon cutting or public meeting, prepare clear, concise background information for reporters. Reporters may be unfamiliar with the issues of concern to you and often will not have time to do background research before their deadline. You can refer the media to the Commerce Communications team: <http://commerce.mt.gov/News/MediaContacts> or by contacting MDOC at 841-2700.

Project signs or other project communications may be used by a grant recipient. If project signs, newsletters, flyers or other written communications are used, provide a copy of the draft sign or public communication to your department liaison for review and comment. Reasonable costs for preparing a project sign is an eligible use of grant funds and should be coordinated with other funding sources involved with the project.

3. Complaints

The Federal Housing and Community Development Act makes it clear that local citizens have the right to offer their views at any point during the development and implementation of a CDBG project. Any comment, suggestion, criticism, or complaint made by a citizen should be taken very seriously and deserves a prompt response. As a rule of thumb, the more promptly local officials or the project manager can investigate the basis for a complaint and try to offer a reasonable solution, the better.

The federal statute that governs the CDBG program and all recipients of CDBG grant funds requires that "a timely written answer to written complaints and grievances" be provided by CDBG grantees "within 15 working days where practicable" (42 U.S.C. § 5304(a)(3)(E)). Telephoned or oral complaints also deserve a prompt response. The local government's response to any complaint must be documented.

The normal procedure if a complaint is filed with MDOC, the Governor, HUD, or a member of the congressional delegation, is to refer the complaint to local officials for response. MDOC will not dictate the form or manner of the response to local officials. The Department's staff are available to advise the community regarding any federal or State requirement that may be at question. In most cases, the final resolution of the complaint is the authority and responsibility of the local grant recipient, unless the complaint deals with State or federal CDBG policies or requirements. When the grant recipient has

reached a decision as to whether or how the complaint is to be resolved, MDOC will communicate the local government's decision to the agency or office that originally referred it to MDOC for action.

Records of all citizen comments, whether in the form of letters or written notes summarizing telephoned or oral comments, should be placed in the citizen participation file for the project, along with the community's letter of reply or notes indicating how the grant recipient responded to the comment. Federal regulations require that the Project Completion Report prepared by the grantee for project closeout include a summary of each citizen comment regarding the project, along with an assessment of the comment and a description of any action taken in response to the comment.

CHAPTER 1

EXHIBITS

- 1-A Sample Management Plan**
- 1-B Sample Management Plan Format for a Public Facilities Project Administered by Local Staff**
- 1-C Sample Management Plan Format for a Housing Project Administered with the Assistance of a Consultant**
- 1-D Signature Certification Form**
- 1-E Designation of Depository Form**
- 1-F Guidelines on Firm Commitment of Non-CDBG Funding**
- 1-G Project Start-up Checklist**