A G E N D A

CITY OF SEASIDE
COMMUNITY DEVELOPMENT
ADVISORY COMMITTEE

REGULAR MEETING
OLDEMEYER CENTER
986 Hilby Avenue
Wednesday, July 18, 2018
6:30 PM

PLEASE TURN OFF YOUR CELL PHONES UPON ENTERING THE MEETING

COMMUNITY DEVELOPMENT ADVISORY COMMITTEE

1. **ROLL CALL**

2. **PUBLIC COMMENT**

3. **APPROVAL OF MINUTES**

4. **WELCOME TO 2018-2019**
Powerpoint presentation

5. **OLD BUSINESS**

A. **STATUS REPORT ON ANNUAL ACTION PLAN AND ANALYSIS OF IMPEDIMENTS**

PURPOSE & RECOMMENDATION: The purpose of this item is to update the CDAC on the status of the Annual Action Plan and the county-wide collaboration on the Analysis of Impediments.

B. **UPDATE ON 2017-2018 SUBRECIPIENT ON-SITE MONITORING**

PURPOSE & RECOMMENDATION: The purpose of this item is to update the CDAC on the two subrecipients monitored during the 2018-2018 fiscal year.

6. **NEW BUSINESS**

A. **CDBG ACTIVITY REPORTING CHANGES FOR 2018-2019**

PURPOSE & RECOMMENDATION: The purpose of the item is to introduce the City Data Services procedures to the CDAC.

B. **DETERMINE SUBRECIPIENTS TO BE MONITORED DURING 2018-2019 CYCLE**

PURPOSE & RECOMMENDATION: The purpose of this item is for the CDAC to determine the subrecipients desired to receive in-depth monitoring during the 2018-2019 grant cycle.

7. **REVIEW LONG RANGE CALENDAR**

A. **REVIEW LONG RANGE CALENDAR AND MAKE ADJUSTMENTS, IF NEEDED**

8. **REPORTS FROM COMMITTEE MEMBERS**

9. **REPORTS BY STAFF**

10. **ADJOURNMENT**

Next Regularly Scheduled Meeting:
August 15, 2018
6:30 PM

The City of Seaside is committed to providing accessible facilities and accommodating people with disabilities in all of its services programs and activities. If special considerations are needed by any person to fully participate in this meeting, they are asked to contact the City Clerk at 899-6707 no fewer than two business days prior to the meeting to allow reasonable arrangements. The City Council chamber is equipped with a portable microphone and assisted listening devices are available at all meetings.

City Council Meetings that are held in the City Council Chambers are broadcast live to all Seaside residents on Comcast Channel 25 and U-verse Channel 99. Meetings are also available through live streaming at:
http://cvp.telvue.com/player?id=T01629&video=52314&noplaylistskin=1&width=400&height=300
Videos of past meetings are available on demand through the City's website: http://www.ci.seaside.ca.us

Agenda-related writings or documents provided during public meetings are available for public inspection during the meeting or from the office of the City Clerk. This agenda is posted in compliance with California Government Code Section 54954.2(a) or Section 54956.

CITY OF SEASIDE
STAFF REPORT

Item No.: 5.A.

TO: Community Development Advisory Committee

BY: Sharon Mikesell, Administrative Analyst

DATE: July 18, 2018

SUBJECT: **STATUS REPORT ON ANNUAL ACTION PLAN AND ANALYSIS OF IMPEDIMENTS**

PURPOSE & RECOMMENDATION

The purpose of this item is to update the CDAC on the status of the Annual Action Plan and the county-wide collaboration on the Analysis of Impediments.

BACKGROUND

The Annual Action Plan was submitted to HUD on June 11. The San Francisco Field Office has reviewed the draft and has asked for some clarifications as there are many new subrecipients and types of activities undertaken as well as some updated form adjustments. Subrecipient contracts will be sent out for execution upon notification by the City that the AAP has been approved by HUD. It is not unusual for the notification to be received in September.

Since it is after July 1, subrecipients may start tracking costs and activities for their reimbursements. If a project requires environmental clearance, the project should be delayed until we receive HUD approval. All public services subrecipients are exempt.

The Analysis of Impediments project is proceeding. The stakeholder and community workshops have been completed. The next regional conference call for the five participating agencies and the consultant team is scheduled for July 25. The project is on schedule for completion by the deadline of October 2019.

ATTACHMENTS

None

Sharon Mikesell - Seaside CDBG: Monitoring Follow-Up Letter

From:	"Clemons, Patrice" <pclemons@mbakerintl.com>
To:	Jenifer Miller <Jenifer.Miller@usw.salvationarmy.org>
Date:	6/28/2018 10:38 AM
Subject:	Seaside CDBG: Monitoring Follow-Up Letter
CC:	Sharon Mikesell <SMikesell@ci.seaside.ca.us>
Attachments:	Seaside_Monitoring Checklist_SalvArmy.pdf

Hello Jenifer,

It was a pleasure to meet you and review your program. The attached letter contains details of the CDBG monitoring, including analysis and positive conclusions regarding your program. You have no outstanding items, and thus this monitoring is complete.

Thank you again for being responsive and helpful throughout this process.

Please let me know if you have any questions.

Sincerely,

Patrice Clemons | Associate Planner | Michael Baker International
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COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
SUBRECIPIENT MONITORING CHECKLIST
CITY OF SEASIDE

I. Subrecipient Information

Date of Monitoring Visit: February 21, 2018 Time: 1 p.m.

Subrecipient: The Salvation Army Monterey Peninsula (The Salvation Army)

Address: 1491 Contra Costa Street, Seaside CA, 93955

Phone: 831-899-1335 ext. 2713

Person(s) Interviewed: Corps Officer Major Patti Bradley and Housing Department Director Jenifer Miller

Project Location: Housing Programs at two locations: 1491 Contract Costa (main office and community center), 1430 Imperial (emergency shelter Frederiksen) and 535 Palm Avenue (10 unit transitional housing Casa De Las Palmas)

Project Name: The Salvation Army Monterey Peninsula_- Housing Programs

Funding Amount: $16,126 Reviewer: Sharon Mikesell / Patrice Clemons

HUD Activity Number: 1306 / Grantee Activity ID #17-7198

Monitoring letter sent on: February 9, 2018 Follow-up visit/letter sent on: April 13, 2018

Specific Type of Activity: (*check one*)

- ☐ Acquisition, Disposition, Clearance, Relocation
- ☐ Economic Development
- ☐ Administration and Planning
- ☐ Public Facilities and Infrastructure Improvements (roads, drainage, utilities)
- ☐ Public Service
- ☐ Housing
- ☐ Other

Responsible Entity / Funding Category:

- ☐ Community-Based Organization
- ☐ City of Seaside

Activity Description:

Grant funds will be used to pay staff time for providing services at two affordable housing sites: Frederiksen House is a 90-day four-unit shelter and Casa De Las Palmas is a ten-unit transitional housing for homeless families (includes one unit for on-site Program Director). Casa De Las Palmas facility provides up to two years of housing for qualified clients. Housing clients at both facilities receive fully furnished apartments (kitchen, bedrooms, and living rooms), and utilities paid. Clients in Frederiksen House pay no rent while those in Casa De Las Palmas paying up to 30% of their incomes for rent. All housing clients have the benefit of access to other TSA services, including preschool enrollment, food boxes, spiritual counseling and the availability of the Community Center.

Monitoring Procedure:

The City of Seaside conducts on-going desk monitoring of its social service Subrecipients over the course of the year and during quarterly reviews. Social Service Subrecipients are funded on a two-year cycle and must report their outcomes and expenditures on a quarterly basis. Staff conducts on-site monitoring of all these subrecipients over the course of the two-year cycle. Staff selected on-site monitoring of four subrecipients during the first year of their two-year cycle, and two subrecipients during 2017-18 program year, including The Salvation Army.

II. National Objective and Eligibility

1. Which National Objective does this project meet (570.208)*?

   Benefit to Low- and Moderate-Income Persons
   ____Low/Mod Area Benefit
   ____Limited Clientele Benefit
   __X_Low/Mod Housing Benefit
   ____Job Creation or Retention

   Aid in the Prevention or Elimination of Slums or Blight
   ____on an Area Basis
   ____on a Spot Basis

   An Urgent Need
   ____Needs Having a Particular Urgency

2. Which activity eligibility category (matrix code) does the project meet? (570.201-6)?

   _03T-Operating Costs of Homeless/AIDS Patients Programs_________________________________

III. Conformance to the Subrecipient Agreement

1. Contract Scope of Services – Is the full scope of services listed in the Agreement being undertaken? List any deviation.

   The Salvation Army is performing the scope of services that is listed within the Subrecipient Agreement and attached by-reference Application. The scope includes location, staff, beneficiaries, goals, and objectives. CDBG funds are to be used to cover salaries of two staff for case-management services provided at two housing sites, Frederiksen House and Casa De Las Palmas. City Staff toured the two sites, met the two case-manger staff, and reviewed files, including case-management notes on activities to assist residents. Salvation Army has files on each family served and only serves lower income families with children. No deviations found.

2. Levels of Accomplishments – Compare actual accomplishments at the point of monitoring with planned accomplishments. Is the project achieving the expected levels of performance (number of persons served, number of units rehabbed, etc.) and reaching the intended client group? Explain any problem the subrecipient may be experiencing. **Acknowledge major accomplishments.**

   The Salvation Army's goal is to reduce or eliminate homelessness in low-income families that have children by helping a family to secure stable housing through either a housing program or private residence. This is achieved by 1) providing a safe housing environment, including fully furnished apartments; 2) assist participants in securing stable housing at exit from the program, 3) provide intensive individual weekly or bi-weekly case management sessions focused on financial management, savings, employment, and securing housing, 4) provide monthly skill building workshops and community building house meetings. The Salvation Army's files show tracking of these objectives and they will be reported in the year-end report.

The Salvation Army aimed to serve 80 individuals by year's end, and has served 81 individuals as of the end of quarter 3. They served 56 in quarter one and 10 in quarter two. The Salvation Army noted that the graduates of the program have come to trust and rely on Salvation Army as a valued resource, that they often stay in-touch after completing the program. Graduates have even started their own self-help book club.

The City's Annual Action Plan state that its goal is to serve 95% low- to moderate- income persons. As of third quarter, they have reported 50% extremely low-income (0% to 30% below median family income (MFI), 38% low-income (31% to 50% of MFI), and 10% moderate income (51%-80% MFI). Overall, this is 100% of low- to moderate- income.

Thus, The Salvation Army is on target for meeting its performance goals and reaching intended client group.

3. Time of Performance – Is the work being performed in a timely manner (i.e., meeting the schedule as shown in the Agreement)? Explain.

   The Salvation Army started its program during the first quarter of the program year and has provided those services continuously without any interruptions. To illustrate, they reached 56 individuals within the first quarter, and every subsequent quarter have been on target to reaching their year-long goal of 80 individuals served. Lastly, the work is being performed in a timely manner according to the agreement of providing on-going monthly and year-long services.

4. Budget – Compare actual expenditures versus planned expenditures. Note any discrepancies or possible deviations.

   Their actual expenditures are within target of their planned expenditures and there are no discrepancies. Their budget shows anticipated breakdown of costs for its program operations, including CDBG and non CDBG sources. The Salvation Army's CDBG budget for this year included costs for two full-time staff that provide wrap-around services to the Frederiksen House, a 90-day emergency shelter, and Casa De Las Palmas, the two-year transitional housing units. To date, they have requested reimbursement for these staff and their case-management related activities only.

5. Requests for Payment – Are requests for payment being submitted in a timely manner and are they consistent with the level of work accomplished? Is program income properly accounted for and recorded? Explain.

   The Salvation Army submits reimbursement requests on a quarterly basis and is on track to spend down it's $16,126 grant allocation for program year 2017-18. Due to staff changes at the Salvation Army, new staff was unaware of the first quarter report deadline and missed it. They immediately remedied this situation, and have since been timely with their second and third quarter reports. Its quarterly invoices were $4,032 for quarters one, two, and three. As stated in their subrecipient agreement/application, they will use funds to support two full-time staff positions that provide support two housing programs. Their requests for reimbursement match this. Their requests include proof of hours, tasks, and pay rate, all of which appear reasonable and consistent with their responsibilities. Staff tasks shown in reimbursement requests include: case management, screening, workshops, training, phone screenings, and assessments. The City has reviewed and approved reimbursed of Q1, Q2, and Q3 costs. Their quarterly progress reports which are submitted with the reimbursement requests (see more details in #6 below) demonstrate work being accomplished and meeting objectives. Their reports show progress toward meeting their goal. This program does not receive program income.

6. Progress Reports – Have progress reports been submitted with payment requests (where required) on time and were they complete and accurate?

   The organization's quarterly progress reports have been submitted on-time and with payment requests. As noted above, they were delayed in submitting quarter one, but quickly resolved the issues and provided a report. The Salvation Army's goal is to serve 80 unduplicated low- to moderate-income individuals by end of the year. During the first quarter they reported serving 56 individuals, followed by 10 in quarter two, and 15 in quarter three for a total of 81 individuals served. The Salvation Army uses an online HMIS (Homeless Management Information System) data reporting tool to track the demographics of those they serve. The form is required at time of intake from their other funding sources. Their progress reports appear to show complete and accurate information.

   Salvation Army noted that the progress report may be confusing to someone who has not been trained on them and recommended that more instruction be provided. The City will look into ways to help subrecipients understand the form better.

7. Special Conditions – Does the project conform to any special terms and conditions included in the Subrecipient Agreement? Explain.

   No special terms or conditions exist in its subrecipient agreement.

IV. Record-Keeping Systems (570.506)

Records should demonstrate that each activity undertaken meets the criteria for National Objectives compliance. Such records should be found in both the grantee's project file and the subrecipient file.

1. Filing System – Are the subrecipient's files orderly, comprehensive, secured for confidentiality where necessary, and up to date? Note any areas of deficiency.

   The Salvation Army offices and files were organized and locked. The City spot checked a few files at the main office and found them well labeled, detailed tracking, and organized. The City also reviewed the online HMIS reporting system used by Salvation Army and found that they were current. Most demographic information was electronically stored through the HMIS system; however, it was easily printed upon request. Staff found no deficiencies.

2. Documentation (activities, costs and beneficiaries) – Do the HCD project file and subrecipient records have the necessary documentation supporting the National Objective being met, eligibility, and program costs as they relate to 570.506? Do the project files support the data the subrecipient has provided for the CAPER?

   The project files and records have the necessary documentation to show that the National Objective of serving low- to moderate- income is being met. To illustrate, The Salvation Army uses the HMIS system to keep detailed demographic date including: household information, race/ethnicity, previous/current living situation, income, benefits, health insurance, disability, employment status, and education level. Clients are low-income and many are homeless. They keep files on-hand that contains their obligations under their CDBG subrecipient agreement so that they can easily refer to their CDBG requirements.

The Salvation Army has a comprehensive three-inch binder on the specifics of how the Housing programs will run, include income, demographics, and many other details. Their financial information shows proof of eligible program costs such as funds to cover staff time conducting case management for residents of housing program. Staff toured the two housing facilities, one for emergency housing and the other for transitional. In summary, the have documented activities, costs, and beneficiaries that support the data provided for the CAPER.

3 Record Retention – Is there a process for determining which records need to be retained and for how long?

The City reviewed The Salvation Army's retention policy and found that it met the minimum five-year requirement.

4. Site Visit (where applicable) – Is the information revealed by a site visit consistent with the records maintained by the subrecipient and with data previously provided to the grantee? Explain any discrepancies.

   City Staff toured two housing sites, Frederiksen House and Casa De Las Palmas, met the two case-manger staff, and reviewed files, including case-management notes on activities to assist residents. Salvation Army has files on each family served and only serves lower income families with children. These observed activities were consistent with records and data provided.

   a. Is the project manager located on-site and running the day-to-day operations? Do the staff seem fully informed about program requirements and project expectations? Explain.

      City staff met and spoke with the two staff persons who provide assistance to the two housing facilities. One staff person lives on-site at Casa Del Las Palmas. During regular business hours, this staff person is located at the community center and main offices. The second staff person works full-time on-site at Frederiksen House, a 90-day emergency shelter. When asked, both staff were well-informed regarding program requirements and expectations.

   b. Is the project accomplishing what it was designed to do? Explain any problems.

      The Salvation Army is achieving its goals and objectives to assist low income families with children to avoid homelessness. Progress is being closely tracked on whether residents achieve self-sufficiency and files overall show resident progress on meeting their goals. The programs provide not only housing, but safe, affordable, and healthy home environments so to help residents succeed. The case-management also reduces risk of future homelessness by assisting individuals with financial management, savings, skill building, employment, and securing housing once they leave. Overall, this project is accomplishing the goals set-out in its subrecipient agreement.

V. Financial Management Systems [85.20 (local governments) and 84.21–28 (nonprofits)]

1. Systems for Internal Control – Are systems in compliance with accounting policies and procedures for cash, real and personal property, equipment, and other assets (85.20(b)(3) and 84.20(b)(3))?

   The Salvation Army has policies in place and systems appear to be in compliance. They have a lengthy housing department manual that covers internal controls.

2. Components of a Financial Management System – Review the chart of accounts, journals, ledgers, reconciliation, data processing, and reporting system. Note any discrepancies.

The City found no significant discrepancies and The Salvation Army appears to have quality components of a financial management system in place. The City reviewed their most recent audit which showed compliance with financial standards and practices.

3. Accounting – Compare the latest performance report, drawdown requests, bank records, payroll records, receipts/disbursements, etc. Note any discrepancies.

   The City reviewed these documents and did not find any discrepancies.

4. Eligible, Allocable, and Reasonable Costs – See OMB Circulars A-87, A-122. Pay particular attention to the time distribution records where the subrecipient has employees who work on both CDBG-funded and non-CDBG-funded activities. Note any discrepancies.

   The City reviewed these documents and did not find any discrepancies.

5. Cash Management/Drawdown Procedures – See Treasury Circular 1075, 85.20(b)(7), and 84.20. Has all cash been promptly drawn down and deposited? Are all draw downs of federal funds properly recorded? Note any discrepancies.

   The City conducts draw downs and deposits of CDBG grant funds. Staff did not find any discrepancies.

6. Management of Program Income – If the subrecipient generates program income, refer to 570.504 and the Subrecipient Agreement about its use. Note any discrepancies.

   No program income is generated by this activity.

7. IPA Audit Reports/Follow-Up – (OMB Circular A-133) Determine if the subrecipient has expended $500,000 or more in federal funds for the subject program year.
   IPA Audit Required Yes____ No_X_ N/A____

   Date Conducted ____________

   Any findings related to CDBG activity? Status? Explain. Not applicable.

8. Maintenance of Source Documentation – (85.20(b) and 84.20(b)) Note any discrepancies in sample records, invoices, vouchers, and time records traced through the system.

   The City viewed electronic files and found no discrepancies.

9. Budget Control – Do actual expenditures match the line item budget? Refer to 85.20(b)(4) and 84.20. Note any discrepancies.

   The City found that actual expenditures for staff/tutor time fall within budgeted expenses.

VI. Insurance

1. Has the subrecipient submitted a current copy of its Certificate of Insurance?

   The Salvation Army provided a current copy of its Certificate of Insurance.

2. Is the City named as an additional insured?

The City is names as an insured.

VII. Procurement

1. Procurement Procedures – Do the procedures the subrecipient uses for procurement of goods and services meet CDBG requirements? Review a sample number of procurements.

   The Salvation Army has a procurement policy and it references compliance with the Code of Federal Regulations. CDBG funds are used for staff time and no recent procurements have occurred that are for the Housing Programs.

2. Conflict of Interest – How does the subrecipient ensure there was no conflict of interest, real or apparent? Review the process and comment.

   The procurement policy contains provisions to address real or apparent conflicts of interest and disciplinary action if violated.

VIII. Equipment and Real Property

1. Has the subrecipient acquired or improved any property it owns in whole or in part with CDBG funds in excess of $25,000? If yes, review for compliance with 570.503(b)(7).
   Yes__________ No____X_____ N/A__________

2. Has the subrecipient purchased equipment with CDBG funds in excess of $1,000? Does the subrecipient maintain the records required at 84.34?
   Yes__________ No____X_____ N/A__________

3. Has a physical inventory taken place and the results reconciled with property records within the last two years?
   Yes__________ No___________ N/A___X_____

4. If the subrecipient disposed of equipment/property that was purchased with federal funds within the last five years:

   a. Were proceeds from the sale reported as program income?
      Yes__________ No___________ N/A___X_____

   b. Did the grantee approve expenditure of program income?
      Yes__________ No___________ N/A___X_____

   c. Was the program income returned to the grantee?
      Yes__________ No___________ N/A___X_____

IX. Non-Discrimination and Actions to Further Fair Housing

1. Equal Employment Opportunity – Refer to 570.506, 601, and 602. Note any deficiencies.

   The Salvation Army has an equal employment opportunity policy. Staff found no deficiencies.

2. Section 3 – Opportunities for Training and Employment for Local Residents – Refer to 570.506(g)(5) and 570.607(a) (affirmative action). Note any deficiencies.

   Section 3 requirements are not applicable to The Salvation Army's activities.

3. Fair Housing Compliance – Refer to 570.904 and 570.601(b). Note any deficiencies.

   Their program binder contains a no discrimination policy. The policy is found in the "in-take" process for housing units. City Staff informed The Salvation Army that the policy's language was out-of-date in that it did not include all types of prohibited federal and state requirements. The Salvation Army worked with its legal team and has updated its policy to be consistent with federal and state requirements.

4. Requirements for Disabled Persons – Refer to 8.6. Note any concerns.

   Some of the housing units are fully ADA accessible. The Salvation Army has a policy to follow all applicable Americans with Disability Act (ADA) laws and regulations, include no discrimination against beneficiaries or employees on the basis of disability and to provide reasonable accommodations as required under law.

5. Women and Minority Business Enterprises – Refer to 570.506(g), 85.36(e), and 84.44, affirmative steps documentation. Note any concerns.

   These requirements are no applicable to The Salvation Army's activities.

X. Conclusion and Follow-up

1. Is the subrecipient meeting the terms of the Subrecipient Agreement and HUD regulations? Discuss both positive conclusions and any weaknesses identified.

   The Salvation Army is meeting the terms of the Subrecipient Agreement and HUD regulations. Any issues identified have been resolved, as noted in the above sections.

2. Identify any follow-up measures to be taken by the grantee and/or the subrecipient as a result of this monitoring review.

   a. List the required schedule for implementing corrective actions or making improvements.

      All recommendations have been resolved by The Salvation Army at the time of and shortly after the on-site loan monitoring. No further correction action is requested.

   b. List the schedule for any needed technical assistance or training and identify who will provide the training.

      City staff provided technical assistance and training on-site during the monitoring and shortly to The Salvation Army. No additional training is scheduled at this time.

Patrice Clemons, CDBG Program Specialist
Sharon Mikesell, Economic Development Administrative Analyst — June 27, 2018

Project Monitor — Date

Sharon Mikesell - Seaside CDBG : Monitoring Follow-Up Letter

From:	"Clemons, Patrice" <pclemons@mbakerintl.com>
To:	Mel Mason <mel@villageprojectinc.org>
Date:	6/28/2018 10:36 AM
Subject:	Seaside CDBG : Monitoring Follow-Up Letter
CC:	Sharon Mikesell <SMikesell@ci.seaside.ca.us>
Attachments:	Seaside_Monitoring Checklist_Village.pdf

Hello Mel,

It was a pleasure to meet you and review your program. The attached letter contains details of the CDBG monitoring, including analysis and positive conclusions regarding your program. You have no outstanding items.

Thank you again for being responsive and helpful through this monitoring process.

Please let me know if you have any questions.

Sincerely,

Patrice

Patrice Clemons | Associate Planner | Michael Baker International
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pclemons@mbakerintl.com | www.mbakerintl.com

http://projects.mbakercorp.com/sigimg/MBI-email-sig-block-72dpi.png

COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM
SUBRECIPIENT MONITORING CHECKLIST
CITY OF SEASIDE

I. Subrecipient Information

Date of Monitoring Visit: February 22 and 23, 2018 Time: 2 p.m. on 2/22 and 10 a.m. on 2/23

Subrecipient: The Village Project, Inc.

Address: 378 Elm Avenue (after-school program site) and 1069 Broadway Avenue, Suite 201, (counseling and head quarters), Seaside CA, 93955

Phone: 831-392-1500

Person(s) Interviewed: Executive Director Mel Mason, Service Learner Jamelle Jones, Service Learner April Dunham

Project Location: Mae C. Johnson Education and Cultural Enrichment Academy and Service Learning Institute site located at 378 Elm Avenue.

Project Name: The Village Project

Funding Amount: $16,126 Reviewer: Sharon Mikesell / Patrice Clemons

HUD Activity Number: 1305 / Grantee Activity ID #17-7194

Monitoring letter sent on: February 9, 2018 Follow-up visit/letter sent on: April 13, 2018

Specific Type of Activity: (*check one*)

- ❑ Acquisition, Disposition, Clearance, Relocation
- ❑ Economic Development
- ❑ Administration and Planning
- ❑ Public Facilities and Infrastructure Improvements (roads, drainage, utilities)
- ❑ Public Service
- ❑ Housing
- ❑ Other

Responsible Entity / Funding Category:

- ❑ Community-Based Organization
- ❑ City of Seaside

Activity Description:

The use of CDBG funds will allow The Village Project to hire a part-time staff person and 4 tutors to work in the Mae C. Johnson Education and Cultural Enrichment Academy (Academy). Academy readies low-income, at-risk and underserved K-12 grade students for graduation through a multi-pronged learning approach that includes: the established strategy of one-to-one academic tutoring in the student's weak subject area, access to computers for academic research, a clean and safe study environment, transportation to and from the tutoring site and engagement in cultural enrichment activities.

Monitoring Procedure:

The City of Seaside conducts on-going desk monitoring of its social service Subrecipients over the course of the year and during quarterly reviews. These Subrecipients are funded on a two-year cycle and must report their outcomes and expenditures on a quarterly basis. Staff conducts on-site monitoring of all these subrecipients over the course of the two-year cycle. Staff selected on-site monitoring of four subrecipients during the first year of their two-year cycle, and two subrecipients during 2017-18 program year, including The Village Project.

II. National Objective and Eligibility

1. Which National Objective does this project meet (570.208)*?

   Benefit to Low- and Moderate-Income Persons
   __X_Low/Mod Area Benefit
   ____Limited Clientele Benefit
   ____Low/Mod Housing Benefit
   ____Job Creation or Retention

   Aid in the Prevention or Elimination of Slums or Blight
   ____on an Area Basis
   ____on a Spot Basis

   An Urgent Need
   ____Needs Having a Particular Urgency

2. Which activity eligibility category (matrix code) does the project meet? (570.201-6)? __05D-Youth Services_

III. Conformance to the Subrecipient Agreement

1. Contract Scope of Services – Is the full scope of services listed in the Agreement being undertaken? List any deviation.

   The full scope of services is listed within the Subrecipient Agreement. It describes the activities in detail, for example, the location, staff, beneficiaries, goals, and objectives. City Staff observed tutoring and after-school enrichment activities being conducted and reviewed staff and student activity tracking files. No deviations found.

2. Levels of Accomplishments – Compare actual accomplishments at the point of monitoring with planned accomplishments. Is the project achieving the expected levels of performance (number of persons served, number of units rehabbed, etc.) and reaching the intended client group? Explain any problem the subrecipient may be experiencing. **Acknowledge major accomplishments.**

   The Academy objectives are to reduce or eliminate problems that prevent students from succeeding in school both academically and socially. This is achieved 1) by tutors assisting children and youth with their homework to improve grades; and 2) by tutors providing enrichment opportunities for children and youth to engage in positive activities to reduce school suspensions and detentions. Examples of activities include counseling, gardening, outdoor recreation, art, positive interaction with adults and fellow youth, and games. The Academy was predicted to serve 27 students. In the first quarter, they met this goal by serving 38 students, and another 3 students in the second quarter. The third quarters has no new students. The Village Project noted that the program has resulted in the teachers and parents being more involved with helping students to track and improve their academic performance and emotional well-being.

Additionally, the Village Project's objectives are to reduce student drop-out rate, juvenile justice system involvement, and the number of suspensions. This objective will be measured by tracking student progress reports, report cards, test results, teacher recommendations, and parent reports. The Village Project's files show tracking of these objectives and they will be reported in the year-end report.

The City's Annual Action Plan state its goal to serve primarily low- to moderate- income persons. Last year, The Village Project served 95% low- to moderate- income students. This year, they have reported 100% of low- to moderate- income to-date.

Thus, The Village Project is on target for meeting its performance goals and reaching its intended client group.

3. Time of Performance – Is the work being performed in a timely manner (i.e., meeting the schedule as shown in the Agreement)? Explain.

   The Village Project started its program during the first quarter of the program year and has provided those services continuously without any interruptions. The work is being performed in a timely manner according to the agreement of providing on-going monthly and year-long services.

4. Budget – Compare actual expenditures versus planned expenditures. Note any discrepancies or possible deviations.

   Their actual expenditures are within target of their planned expenditures and there are no discrepancies. Their budget shows how The Village Project anticipated breakdown of costs for its program operation. The Village Project's CDBG budget for this year included costs for part-time mentors at the after-school tutoring and enrichment program. To date, they have requested reimbursement for mentors time only.

5. Requests for Payment – Are requests for payment being submitted in a timely manner and are they consistent with the level of work accomplished? Is program income properly accounted for and recorded? Explain.

   The Village Project has consistently submitted reimbursement requests on a quarterly basis and is on track to spend down it's $16,126 grant allocation for program year 2017-18. Its quarterly invoices were $4,031.50 for quarters one, two, and three. As stated in their subrecipient agreement/application, they have four tutors and one coordinator for the Academy and their CDBG grant funds help support the equivalent of one part-time tutor. Their requests for reimbursement match this. Their requests include proof of hours of approximately 10-20 per week for various tutors, which are reasonable and consistent with part-time work and hours of an after-school tutor. Their quarterly progress reports which are submitted with the reimbursement requests (see more details in #6 below) demonstrate work being accomplished and meeting objectives. The City has reviewed and approved reimbursed of Q1, Q2, and Q3 costs. This program does not receive program income.

6. Progress Reports – Have progress reports been submitted with payment requests (where required) on time and were they complete and accurate?

The organization's quarterly progress reports have been submitted on-time and with payment requests. New staff in quarter two reported duplicate numbers (not understanding that beneficiaries are only counted once). The organization quickly resolved the issue and submitted updated reports. The organization's quarterly reports now have unduplicated numbers. The Village Project's goal was to serve 27 students for the year. By first quarter end, they exceeded their goal at 38 students served. According to The Village Project this was due to a huge demand from parents, more than anticipated, for this type of tutoring and enrichment program for their children. They have an active waitlist for the Academy.

City staff found that a higher number of students than typical were above-moderate income level. New staff was using the incorrect income categories and immediately made corrections and resubmitted progress reports. With these corrections, their progress reports now show complete and accurate information and show that 100% of students are low- to moderate- income.

7. Special Conditions – Does the project conform to any special terms and conditions included in the Subrecipient Agreement? Explain.

   No special terms or conditions exist in its subrecipient agreement.

IV. Record-Keeping Systems (570.506)

Records should demonstrate that each activity undertaken meets the criteria for National Objectives compliance. Such records should be found in both the grantee's project file and the subrecipient file.

1. Filing System – Are the subrecipient's files orderly, comprehensive, secured for confidentiality where necessary, and up to date? Note any areas of deficiency.

   The Village Project's offices and files were organized and locked. The City spot checked a few files at the main office and at the after-school site and found them well labeled, detailed tracking, and organized. The after-school site files were current as of that day and are updated daily. The files contained such information as their program application, demographic information, release of information, report cards, income verification, medical information, attendance, and weekly student progress reports. They recently switched to a different performance tracking system and could see that the new entries are done consistently. They also keep a CDBG binder that contains general information like their subrecipient agreement.

2. Documentation (activities, costs and beneficiaries) – Do the HCD project file and subrecipient records have the necessary documentation supporting the National Objective being met, eligibility, and program costs as they relate to 570.506? Do the project files support the data the subrecipient has provided for the CAPER?

   The project files and records have the necessary documentation to show that the National Objective of serving low- to moderate- income is being met. To illustrate, The Village Project requires proof of income and the proof is verified by staff and kept in the files. They keep a CDBG binder that contains their obligations under their subrecipient agreement. New staff took over the tracking of income level and with minimal City staff training, this new staff learned how to properly report the number, race, and income level of beneficiaries served. On one occasion staff had misunderstood the form resulting in duplicate county of beneficiaries and miscalculation of income, but they quickly resolved this issue and provided updated and correct quarterly reporting forms.

   The Village Project has a comprehensive three-inch binder on the specifics of how the Academy program will run. Also, their files on mentor time and individual student progress are detailed and complete. Their financial information shows proof of eligible program costs such as mentor costs.

In summary, the have documented activities, costs, and beneficiaries that support the data provided for the CAPER.

3 Record Retention – Is there a process for determining which records need to be retained and for how long?

The City reviewed The Village Projects retention policy. Their policy complies with a higher standard as set by the County, another funder, which has retention for seven years instead of five years.

4. Site Visit (where applicable) – Is the information revealed by a site visit consistent with the records maintained by the subrecipient and with data previously provided to the grantee? Explain any discrepancies.

City staff visited the Academy's site on two occasions. The Academy has three classrooms, a playground and field, and outdoor garden. Within the classrooms are small kitchens, computers, study area, and library/quiet room. City staff observed tutors aiding students. On the second occasion, City staff observed the tutors meeting to review program performance and for training. These observed activities were consistent with records and data provided.

a. Is the project manager located on-site and running the day-to-day operations? Do the staff seem fully informed about program requirements and project expectations? Explain.

The Academy is operated by two part-time site coordinators, five part-time tutors, and two part-time van drivers. The on-site coordinator was a volunteer full-time position during the previous year because of lack of funding. This year, still with limited funding, two full-time Cultural Healer positions share responsibilities of being on-site coordinators. They work on-site at the Academy during its operating hours and help supervise. The Executive Director provides supervision over all these positions. City Staff toured the site on two separate occasion by one of the on-site supervisors and spent time observing mentors. They provide information and files immediately upon request. These staff seem fully informed of program requirements and expectations.

b. Is the project accomplishing what it was designed to do? Explain any problems.

The Academy is achieving its goals and objectives to assist lower income and disadvantaged students to achieve academic success and social enrichment. Student academic performance is being closely tracked for improvement and files overall show student progress so far this year, and from last year. Moreover, students are taught discipline, respect for themselves and others, and encouraged to develop confidence. The students social and emotional well-being is tracked in files as well. The Village Project provides counseling and mental health programming for the students and their family members. This compliments the Academy in reaching its goals for improved academic and social well-being. Additionally, parents and teachers are being encouraged and given the opportunity to be more involved in caring for the student's success. Overall, this project is accomplishing the goals set-out in its subrecipient agreement.

V. Financial Management Systems [85.20 (local governments) and 84.21–28 (nonprofits)]

1. Systems for Internal Control – Are systems in compliance with accounting policies and procedures for cash, real and personal property, equipment, and other assets (85.20(b)(3) and 84.20(b)(3))?

The Village Project has policies in place and systems appear to be in compliance

2. Components of a Financial Management System – Review the chart of accounts, journals, ledgers, reconciliation, data processing, and reporting system. Note any discrepancies.

   The City found no significant discrepancies and The Village Project appears to have quality components of a financial management system in place. The City reviewed their most recent audit which showed compliance with good financial standards and practices.

3. Accounting – Compare the latest performance report, drawdown requests, bank records, payroll records, receipts/disbursements, etc. Note any discrepancies.

   The City reviewed these documents and did not find any discrepancies.

4. Eligible, Allocable, and Reasonable Costs – See OMB Circulars A-87, A-122. Pay particular attention to the time distribution records where the subrecipient has employees who work on both CDBG-funded and non-CDBG-funded activities. Note any discrepancies.

   The City reviewed these documents and did not find any discrepancies.

5. Cash Management/Drawdown Procedures – See Treasury Circular 1075, 85.20(b)(7), and 84.20. Has all cash been promptly drawn down and deposited? Are all draw downs of federal funds properly recorded? Note any discrepancies.

   The City conducts draw downs and deposits of CDBG grant funds. Staff did not find any discrepancies.

6. Management of Program Income – If the subrecipient generates program income, refer to 570.504 and the Subrecipient Agreement about its use. Note any discrepancies.

   No program income is generated by this activity.

7. IPA Audit Reports/Follow-Up – (OMB Circular A-133) Determine if the subrecipient has expended $500,000 or more in federal funds for the subject program year.
   IPA Audit Required   Yes____   No_X_   N/A____

   Date Conducted ____________

   Any findings related to CDBG activity? Status? Explain. Not applicable.

8. Maintenance of Source Documentation – (85.20(b) and 84.20(b)) Note any discrepancies in sample records, invoices, vouchers, and time records traced through the system.

   The City found no discrepancies.

9. Budget Control – Do actual expenditures match the line item budget? Refer to 85.20(b)(4) and 84.20. Note any discrepancies.

   The City found that actual expenditures for staff/tutor time fall within budgeted expenses.

VI. Insurance

1. Has the subrecipient submitted a current copy of its Certificate of Insurance?

   The Village Project provided a current copy of its Certificate of Insurance.

2. Is the City named as an additional insured?

   The City is names as an insured.

VII. <u>Procurement</u>

1. <u>Procurement Procedures</u> – Do the procedures the subrecipient uses for procurement of goods and services meet CDBG requirements? Review a sample number of procurements.

   The Village Project has a procurement policy and it references compliance with the Code of Federal Regulations. CDBG funds are used for staff time and no recent procurements have occurred that are for the Academy program.

2. <u>Conflict of Interest</u> – How does the subrecipient ensure there was no conflict of interest, real or apparent? Review the process and comment.

   The procurement policy contains provisions to address real or apparent conflicts of interest. For example, board members cannot participate in the decision and awarding of funds to an entity if they receive gifts or do business with that entity.

VIII. <u>Equipment and Real Property</u>

1. Has the subrecipient acquired or improved any property it owns in whole or in part with CDBG funds in excess of $25,000? If yes, review for compliance with 570.503(b)(7).
   Yes__________ No____X_____ N/A__________

2. Has the subrecipient purchased equipment with CDBG funds in excess of $1,000? Does the subrecipient maintain the records required at 84.34?
   Yes__________ No____X_____ N/A__________

3. Has a physical inventory taken place and the results reconciled with property records within the last two years?
   Yes__________ No___________ N/A___X_____

4. If the subrecipient disposed of equipment/property that was purchased with federal funds within the last five years:

   a. Were proceeds from the sale reported as program income?
      Yes__________ No___________ N/A___X_____

   b. Did the grantee approve expenditure of program income?
      Yes__________ No___________ N/A___X_____

   c. Was the program income returned to the grantee?
      Yes__________ No___________ N/A___X_____

IX. <u>Non-Discrimination and Actions to Further Fair Housing</u>

1. <u>Equal Employment Opportunity</u> – Refer to 570.506, 601, and 602. Note any deficiencies.

   The Village Project has a general nondiscrimination policy plus a nondiscrimination policy on the admission of students into the Academy. Staff found no deficiencies.

2. Section 3 – Opportunities for Training and Employment for Local Residents – Refer to 570.506(g)(5) and 570.607(a) (affirmative action). Note any deficiencies.

   Section 3 requirements are not applicable to The Village Project's activities.

3. Fair Housing Compliance – Refer to 570.904 and 570.601(b). Note any deficiencies.

   Fair Housing Compliance requirements are not applicable to The Village Project's activities.

4. Requirements for Disabled Persons – Refer to 8.6. Note any concerns.

   The Village Project has a policy to follow all applicable Americans with Disability Act (ADA) laws and regulations, include no discrimination against beneficiaries or employees on the basis of disability and to provide reasonable accommodations as required under law.

5. Women and Minority Business Enterprises – Refer to 570.506(g), 85.36(e), and 84.44, affirmative steps documentation. Note any concerns.

   These requirements are not applicable to The Village Project's activities.

X. Conclusion and Follow-up

1. Is the subrecipient meeting the terms of the Subrecipient Agreement and HUD regulations? Discuss both positive conclusions and any weaknesses identified.

   The Village Project is meeting the terms of the Subrecipient Agreement and HUD regulations. Any issues identified have been resolved, as noted in the above sections.

2. Identify any follow-up measures to be taken by the grantee and/or the subrecipient as a result of this monitoring review.

   a. List the required schedule for implementing corrective actions or making improvements.

      All recommendations have been resolved by The Village Project at the time of and shortly after the on-site loan monitoring. No further correction action is requested.

   b. List the schedule for any needed technical assistance or training and identify who will provide the training.

      City staff provided technical assistance and training on-site during the monitoring and shortly to The Village Project staff. No additional training is scheduled at this time.

Patrice Clemons, CDBG Program Specialist
Sharon Mikesell, Economic Development Administrative Analyst — June 27, 2018

Project Monitor — Date


My garden

CITY OF SEASIDE
STAFF REPORT

Item No.: 6.A.

TO: Community Development Advisory Committee

BY: Sharon Mikesell, Administrative Analyst

DATE: July 18, 2018

SUBJECT: **CDBG ACTIVITY REPORTING CHANGES FOR 2018-2019**

PURPOSE & RECOMMENDATION

The purpose of the item is to introduce the City Data Services procedures to the CDAC.

BACKGROUND

The 2018-2019 fiscal year has an unusually high number of CDBG activities. There are eight (8) public services subrecipients for 2018-2019 and eight (8) new projects to report to HUD through the IDIS reporting system.

During 2017-2018 there were five public services subrecipients and three new projects with one carried over (now completed) project. The Cutino Park ADA project is carrying over into this fiscal year as it is not completed. One of the five public services recipients did not reapply for the new fiscal year.

As a result, the administrative duties related to the CDBG program have more than doubled for the 2018-2019 fiscal year as all must be tracked and reported to HUD as well as to the CDAC. The City is required to continue participation in the Analysis of Impediments to Fair Housing and the annual Consolidated Annual Performance Evaluation Report (CAPER), Annual Action Plan and start of the new Consolidated (5 year) plan must occur.

As a result, our administrative budget must be stretched to accommodate the increased workload. The City Council has also repeatedly discouraged the use of consultants and prefers tasks be done in-house whenever possible.

The City has contracted with City Data services to standardize the CDBG reporting procedures and will no longer be contracting with Michael Baker International for CDBG services. The City Data data management service is utilized by the City of Salinas and Monterey County. Since reporting would be done through City Data Services, staff will not need to re-enter data and it will easily interface with IDIS for financial reporting and create more efficient use of staff time.

City Email size limitations will no longer be a factor for applications or for reimbursements.

Data collection efforts will be standardized as well as application procedures for the next round of applications.

Staff will be meeting with City Data Services over the next few weeks to ensure a smooth transition and instructions will be provided for reimbursement procedures as soon as it is available.

ATTACHMENTS

None

CITY OF SEASIDE
STAFF REPORT

Item No.: 6.B.

TO: Community Development Advisory Committee

BY: Sharon Mikesell, Administrative Analyst

DATE: July 18, 2018

SUBJECT: **DETERMINE SUBRECIPIENTS TO BE MONITORED DURING 2018-2019 CYCLE**

PURPOSE & RECOMMENDATION

The purpose of this item is for the CDAC to determine the subrecipents desired to receive in-depth monitoring during the 2018-2019 grant cycle.

BACKGROUND

Subrecipients are subgrantees of the CDBG grantee. The term *subrecipient* has a specific meaning in the CDBG regulations. More specifically, a subrecipient must be a nonprofit public benefit corporation or a public agency. A subrecipient agreement should be used to pass CDBG requirements to the subrecipient. The management and oversight of subrecipients is a critical task of the entitlement jurisdiction. Using a subrecipient to implement the local CDBG program does not relieve the original grantee of its responsibilities under CDBG and other federal rules and regulations.

Reporting Requirements

The City has established reporting requirements for its subrecipients throughout the project term. Subrecipients are required to submit quarterly progress reports to the City detailing funding activity, milestones reached in accordance with the project schedule, and accomplishments.

City staff will conduct all subrecipient audits or reviews necessary per federal rules and regulations. The City is responsible for the preparation of the Consolidated Plan, annual Action Plan, and Consolidated Annual Performance and Evaluation Report (CAPER) using the information collected through any subrecipient reporting requirements established.

Desk reviews or on-site reviews are acceptable methods of monitoring.

The City's goal is to monitor subrecipients once a year. With limited staffing, annual monitoring is not always possible. In general, subrecipients who have received funding for the first time will be monitored in the first year. Subrecipients who have had a history of "clean" monitoring visits and are usually found to be in compliance with the regulations will be candidates for less frequent monitoring. Reports and progress will be regularly reviewed throughout the program year for signs of noncompliance or difficulty making progress.

Subrecipients who consistently provide complete, well-organized reports, adhere to performance goals and schedules, expend funds in a timely manner, and have a history of compliance are candidates for desk review.

Monitoring a subrecipient is an opportunity to identify any concerns or capacity issues. It also provides an opportunity to offer the subrecipient technical assistance. Technical assistance will be ongoing throughout the project term and include various techniques exercised by the grantee.

To assist in limiting inadequate performance of subrecipients and to help build capacity, the City will conduct orientation sessions and application workshops. This type of technical assistance will typically be held at the beginning of a funding cycle.

In the past, staff has found that scheduling group sessions has been successful for subrecipients to get comfortable with reporting requirements. Sessions will be scheduled at the Seaside Creates office at 656 Broadway during regular business hours as that is generally the time the appropriate subrecipient staff is available to attend.

The CDAC has the option of scheduling visits to subrecipient sites as public-ally noticed special meetings subject to the Brown Act. Due to the work schedules of the CDAC and the possibility of the unavailability of a quorum, staff recommends in lieu of a visit, the CDAC recommend any desired subrecipients make a presentation at a regularly scheduled CDAC meeting to illustrate their CDBG funded project, key staffing, a summary of the program and the accomplishments and provide pertinent project files for examination.

In past years, the former year's subrecipients that had not received recent on-site monitoring were scheduled for on-site visits.

All subrecipients of CDBG funding for public service/projects during the 2017-2018 cycle received on-site monitoring by staff within the past three years. There are no significant issues to address.

There are many new subrecipients and more than double the CDBG projects in the 2018-2019 cycle. Timely expenditure of CDBG funds is crucial.

All subrecipients will receive desk monitoring throughout the year by staff as their reimbursement requests are received. The CDAC should recommend which subrecipients (if any) should receive additional monitoring with their involvement.

ATTACHMENTS

1. List of 2018-2019 CDBG

2018-2019 CDBG FUNDED

PUBLIC SERVICES FUNDS

- Action Council of Monterey County-Palenke Arts
- Community Partnership for Youth
- ECHO housing
- Girls, Inc of Central Coast
- Greater Victory Temple Community Program
- Legal Services for Seniors
- Meals on Wheels of the Monterey Peninsula
- The Village Project

NON-PUBLIC SERVICE PROJECTS

- Boys and Girls Clubhouse Improvements
- CHS-Genesis House Improvements
- DelMonte Manor Playground Installation
- Del Monte Monor Security System
- Veteran’s Transition Center-creation of transitional housing

NOT SUBRECIPIENTS:

- City of Seaside-Cutino Park accessibility equipment
- City of Seaside-Microbusiness Assistance
- City of Seaside-Wanda Sidewalk

CITY OF SEASIDE
Community Development Advisory Committee (CDAC)
Long Range Calendar
July 2018- – June 2019

July CDAC Meeting Orientation Presentation Discuss 2018-2019 CDBG Subrecipient Monitoring Schedule (possible site visits) Status of AAP and Analysis of Impediments	**July 18, 2018**
Staff draft Consolidated Annual Performance & Evaluation Report (CAPER)	July and August
Last possible day AAP Due to HUD with appropriate attachments/certifications	August 16, 2018
Funding Approval Document received and contract documents to sub recipients	upon HUD approval of AAP-TBD
August CDAC Meeting - CAPER preview - Fourth Quarter (Apr-Jun) and Annual Program Reports - Update on subrecipient reporting for 2018-2019 cycle	**August 15, 2018**
Annual Planning Notice & Notice of CAPER Publication - notice of community workshop	August 31 2017
Draft CAPER publication (15 day comment)	September 5, 2018
September CDAC Meeting and Community Workshop - Annual Community Needs Assessment Workshop - There will not be an application process this year - Community Needs Topics targeted more to Consolidated Plan Update research	**September 19, 2018**
City Council public hearing CAPER	September 20, 2018
CAPER due to HUD	September 30, 2017
October CDAC Meeting - Annual Priority Needs - Update of Affirmatively Furthering Fair Housing (Analysis of Impediments)/Countywide Collaboration efforts	**October 17, 2018**
City Council - **Presentation of the needs identified at the September workshop and the annual process/two year cycle**	**November 1, 2018 (date may vary as no Council action is necessary)**
NOFA announcement in Monterey County Weekly Not applicable this year.	**XXX**
November CDAC Meeting/no proposal workshop this year **Meeting to be cancelled (is evening before Thanksgiving)**	**November 21, 2018**
December CDAC Meeting First Quarter Program Report (Jul-Sep) Review Plans regarding public service monitoring	**December 19, 2018**
2019	
January CDAC Meeting - Discuss mid-year re-allocation (if needed)	**January 16, 2019**

Subject to change

February CDAC Meeting Second Quarter Program Report (October-December) Review of 2019-2020 subrecipients	**February 20, 2019**
Administrative draft Annual Action Plan to CDAC	March 15, 2019
March CDAC Meeting Review AAP and recommend to start Public Comment Period/City Council approval process ***2019-ANNUAL WORK PLAN to present to City Council (must be approved by CDAC by April 1)-City Council will review/approve in May***	**March 20, 2019**
City Council - present CDAC recommendations for annual Action Plan	**March 21, 2019**
Advertisement to run for Annual Action Plan/Public Hearing for AAP	**March 28, 2019**
Public Comment Period Annual Action Plan	**April 1-May 2, 2019**
April CDAC Meeting (likely to be cancelled)	**April 17, 2019**
City Council – public hearing - adopt annual Action Plan	**May 2, 2019**
Action Plan Due to HUD (subject to change by HUD)	**May 15, 2019**
May CDAC Meeting - 3rd Quarter sub recipient reports - Update on CDBG program	**May 15, 2019**
June CDAC Meeting (if needed) - Election of officers	**June 19, 2019**
Conditional notice of awards to Subrecipients	*TBD*

Subject to Change