



WILL COUNTY LAND USE DEPARTMENT COMMUNITY DEVELOPMENT DIVISION

CDBG Public Service Projects

2011 Request for Proposals

*Will County Land Use Department
Community Development Division
58 E. Clinton Street, Suite 500
Joliet, Illinois 60432
Phone: (815) 774-7890*



OVERVIEW OF REQUEST FOR PROPOSALS (RFP) PROCESS

INTRODUCTION

Will County anticipates receiving Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) for the period of October 1, 2011 – September 30, 2012 (PY 2011) and is presently accepting proposals. The allocation amount for the upcoming program year, however, is unknown. Will County may not receive final notification of the annual CDBG award amount from the Department of Housing and Urban Development until potentially April or May 2011. The County will reserve the right to award more or less than previous funding levels as the allocation is dependent on the final entitlement amount authorized by Congress and the Department of Housing and Urban Development.

The County will utilize these funds to create decent, affordable housing; provide a suitable living environment; and expand economic opportunities for low- and moderate-income residents of Will County.

OVERVIEW OF CDBG PROGRAM REQUIREMENTS

PURPOSE OF CDBG FUNDS

The Community Development Block Grant (CDBG) is an annual grant from the U.S. Department of Housing and Urban Development (HUD) provided to states and local governments on a formula basis. The main purpose of these funds is to develop viable urban communities by providing decent housing and a suitable living environment, as well as to expand economic opportunities for low- and moderate-income persons.

CDBG NATIONAL OBJECTIVES

Funds must be used to carry out activities that will meet one of the three broad National Objectives: benefit low- and moderate-income persons; aid in the prevention or elimination of slums or blight; or meet other community development needs having a particular urgency. These objectives are described below:

Low/Moderate Income Area Benefit

The public service is available to *all* the residents in a particular primarily residential area, and at least 51% of those residents (or less if the exception criteria are applicable) are L/M income persons.

Low/Moderate Income Limited Clientele

The public service is limited to a specific group of people, at least 51% of whom are L/M income persons. Services qualifying under this category serve a specific clientele, rather than providing service to all the persons in a geographic area.

(Most public services qualify under this category.)

Slum or Blighted Area

The public service is provided within a designated slum or blighted area, and is designed to address one or more conditions which contributed to the deterioration of the area.

Urgent Needs

The public service is designed to alleviate existing conditions that pose a serious and immediate threat to the health or welfare of the community, they are of recent origin or recently became urgent, and the grantee is unable to find other available funds to support the activity.

PUBLIC SERVICE**What is the Public Service Cap?**

The amount of CDBG funds obligated within a program year to support public service activities under this category may not exceed 15% of the total grant awarded to the grantee for that year plus 15% of the total program income it received in the preceding program year.

Public service eligible activities:

To determine if the activity meets a national objective, please refer to the CDBG Guide to National Objectives and Eligible Activities.

The *Public Service* must be either:

- A new service; or
- A quantifiable increase in the level of a service.

Eligible *Public Service* Activities include, but are not limited to:

- Child care,
- Health care,
- Job training (including training a qualified pool of candidates for unspecified jobs but see Special Economic Development Activities and Special Activities by CBDOs categories),
- Recreation programs,
- Education programs,
- Public safety services,
- Fair housing activities (but see Program Administration category),
- Services for senior citizens,
- Services for homeless persons,
- Drug abuse counseling and treatment,
- Energy conservation counseling and testing,
- Homebuyer down payment assistance, and
- Welfare (but excluding provision of income payments described at §570.207(b)(4)).

Paying the cost of operating and maintaining that portion of a facility in which the service is located is also considered to fall under the basic eligibility category of Public Services, even if such costs are the only contributions made by CDBG for those services.

RFP TIMELINE

May 4, 2011	Technical Assistance Workshop (2:00 p.m.)
May 20, 2011	Deadline for Proposals (4:00 p.m.)
June 6, 2011	CDBG/HOME Public Hearing (10:30 a.m.)
June 6-June 14, 2011	Advisory Board convenes to rank and further discuss the recommendations to be made to the Will County Board
June 14 – July 14, 2011	Annual Action Plan review period
July 16, 2011	Action Plan presented to the Will County Board for approval
August 2, 2011	Applicants notified of intent to award
August 15, 2011	Annual Action Plan submitted to HUD

CDBG Public Services RFP: For CDBG Public Services activities please apply through the Will County Land Use Department, Community Development Division competitive application process. Through the Public Service Project RFP process, the County seeks to maximize the benefits of these funds by partnering with local non-profit organizations.

ELIGIBLE APPLICANTS

Eligible applicants include non-profit or for-profit organizations that have been operating in good standing with the State of Illinois. Any party on the Excluded Parties List System (<https://www.epls.gov/>) is considered ineligible for funding.

DEADLINE

Proposals are due no later than 4:00 p.m. Friday, May 20, 2011 and must be date stamped by the Community Development Division for official time received. Proposals are to be submitted at:

Will County Land Use Department
 Attention: Michelle Allen
 Community Development Division
 58 E. Clinton Street, Suite 500
 Joliet, IL 60432

Proposals submitted by fax or email will not be accepted.

TECHNICAL ASSISTANCE WORKSHOP

Attendance of the Technical Assistance Workshop will be optional for any organization submitting a proposal in response to this Request for Proposal (RFP) unless other arrangements can be made prior to the deadline. At this workshop, staff will provide an overview of application requirements, project eligibility, and will be available to answer any questions regarding program requirements. This workshop will be held:

DATE: Wednesday, May 4, 2011
TIME: 2:00 p.m. – 3:00 p.m.
LOCATION: Will County Land Use Department
Community Development Division
58 E. Clinton Street, 4TH Floor Conference Room
Joliet, Illinois 60432

RFP REVIEW PROCESS

All responses to this RFP will be reviewed by the Community Development Division of the Will County Land Use Department. The responses will then be heard and reviewed by the Will County CDBG/HOME Advisory Board at a public hearing schedule for **Monday, June 6th at 10:30 a.m.**

At the public hearing, applicants will be allowed to make a 3 to 5 minute presentation on the merits, goals, and projected outcome(s) of their project. The presentation will be followed by a question and answer session conducted by the Advisory Board and Community Development Division. These presentations will be open to attendance by the public and other applicants.

It is the responsibility of the Community Development Division to ensure that each Proposer's RFP contains all the information and documents required to verify that the proposal is appropriate for CDBG funding (i.e., it meets one of the National Objectives and is an eligible CDBG activity as determined by HUD guidelines).

This Advisory Board evaluates the content of the proposals and determines:

- Whether the proposed project appropriately addresses the identified needs;
- Whether the proposed project complies with existing state and county laws, ordinances, regulations and policies;
- Whether, if funded, implementation of the project would be delayed by the application for and processing of required discretionary permits, licenses, staff hiring, leveraged funding, etc.;
- Feasibility of timely implementation of the project; and
- Whether cost estimates appear to be accurate.

Additionally, prior to the public hearing (or after) the Community Development Division may visit the proposal sites, which may bear on the final points and ranking recommendation. If a proposal is determined to be ineligible, the Proposer is informed and the proposal is withdrawn from consideration. In cases where there is uncertainty as to the proposal's eligibility, the County's HUD representative will be consulted for a final decision.

The Advisory Board will evaluate proposals based on information provided in the original submission, but reserve the option of requesting additional information for clarification purposes.

AWARD RECOMMENDATIONS

Following the review of public service proposals, the Advisory Board will make a recommendation which will go before the Will County Board for all community development proposals to be funded in Program Year 2011.

The recommendation will describe:

Eligible proposals recommended for funding, in accordance with general funding allocations included in the approved annual CDBG/HOME Action Plan;

All CDBG projects will be recommended and approved by the Will County Board through the approval of the Draft Annual Action Plan at the July 2011 County Board Meeting.

CITIZEN PARTICIPATION:

Citizen input on the Action Plan is obtained through the public hearing process and action plan display comment period. Notices are published in local newspapers, the County's website, and posted publicly in County Office buildings at least 10 days in advance of the Public Hearing. Notices for the Action Plan 30-day display period are published in local newspapers, the County's website, and posted publicly in County Office buildings. All community residents may attend and comment on the proposals presented.

Draft copies of the proposed Action Plan for the new funding year (including the overall proposed budget) are displayed for a 30-day citizen comment period. This Draft Action Plan is available on the County's website www.willcountyllinois.com and in paper-based format in the Community Development Division of the Will County Land Use Department.

If anyone has public comment to be read at the public hearing and are unable to attend, comments may be forward in writing to the Community Development Division before **Tuesday, June 14th, 2011:**

Will County Land Use Department
Community Development Division
Attn: Michelle Allen
58 E. Clinton Street, Suite 500
Joliet, Illinois 60432

The Will County Board approves the Annual Action Plan by resolution following the citizen comment period. All comments will be included in the submission of the Action Plan. Each applicant will be notified in writing regarding their grant application status.

Final approval of the annual Action Plan is completed by the U.S. Department of Housing and Urban Development's Office of Community Planning and Development. The number of awards will be determined by the number of qualifying Proposers and the amounts requested by each. Award amounts may or may not be equal to the full amount requested in the proposal. If the County has committed funds to a project that can no longer proceed (i.e. other required funding is no longer available, site is not feasible due to environmental issues, etc.), the County reserves the right to redistribute funds. At the County's discretion, the funding commitment may be increased based on funding availability and need.

DISCLAIMER

The County reserves the right to: 1) accept or reject any or all proposals received; 2) waive any non-substantive deficiency or irregularity; 3) negotiate with any qualified Proposer; 4) award a contract in what it believes to be the best interest of the County; 5) cancel this request, in part or its entirety, if it is deemed to be in the best interest of the County; 6) reject the Proposal of any Proposer who has previously failed to perform properly; 7) reject the Proposal of any Proposer who has failed to complete a contract within the specified timeframe; 8) reject the Proposal of any Proposer that is not in a position to fulfill a resulting contractual obligation.

This Request for Proposals (RFP) does not commit the County to award any contract, pay any pre-award expenses, or pay any costs incurred in the preparation of a Proposal.

CERTIFICATIONS TO BE EXECUTED

The subrecipient hereby assures and certifies that it will comply with the regulations, policies, guidelines and requirements with respect to the acceptance and use of Federal funds for this federally-assisted program. Certifications are attached to this document as appendices. All certifications and appendices *must be executed* by the chief executive officer, president, or owner.

APPENDIX 1: Certifications

APPENDIX 2: Conflict of Interest Provision

APPENDIX 3: Drug free Workplace Requirements

APPENDIX 4: Lobbying & Drug free Workplace requirements

APPENDIX 5: Title VI of Civil Rights Act of 1964

APPENDIX 6: Residential Anti-Displacement & Relocation Plan

APPENDIX 7: Fair Housing

CONSOLIDATED PLAN PRIORITIES

The Will County Consolidated Plan provides the recommended strategy and basis for the use of federal funds granted to Will County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME) for the period beginning October 1, 2010 and ending on September 30, 2014. This Consolidated Plan outlined the County's five-year funding priorities for the use of CDBG funds. The County identified high priorities for housing and non-housing activities.

MONITORING PROCEDURES FOR SUCCESSFUL BIDDERS

The Community Development Division will monitor all subrecipients to ensure program compliance. Monitoring is an ongoing process that assesses the quality of program performance over the duration of the contract.

Monitoring provides information for making informed judgment about program effectiveness and management efficiency, as well as identifies internal weaknesses that may contribute to fraud or abuse.

The procedures established are to ensure program compliance with the requirements of the County and other applicable laws and regulations.

- **Desk Monitoring:** Desk monitoring is the review of pertinent program/project documents submitted by the subrecipient or by internal departments.
- **Internal & Onsite Monitoring:** Internal and onsite monitoring may include, but is not limited to: 1.) Review of program and financial records, 2.) Project files to verify supporting documentation is available and maintained, and 3.) Internal policies and procedures as applicable to the program.
- **Monthly Status Reports:** Monthly reporting is a requirement of the contract agreement. The information contained in the Monthly reports permits County staff to monitor program and financial performance of the subrecipient and allows early identification of potential compliance problems. The monthly reports are required to be submitted regardless of the level of activity or expenditure.

PROPOSAL INSTRUCTIONS AND CONTENT

- Please keep responses to questions as brief and concise as possible.
- All proposal documentation must be submitted in the order listed on the proposal checklist. All forms need to be submitted in a typed format.
- Each proposal should be submitted with one original (with original signatures) and two copies. The submittal will contain a cover letter.
- Letters from collaborating agencies or other funding sources should clearly specify their role in the project or contribution (financial or in-kind) that they will make.
- The organization shall only submit one public service application for CDBG per year.
- Proposals should follow the established outline and instructions and will be compiled in the order provided on the proposal checklist.
- The proposal section being addressed should be cited and quoted prior to the response. Attachments should be submitted at the end of the applicable section.
- Please verify that all dates, numbers, and budgets are for the appropriate year and are accurate.
- Proposals will be evaluated based on information provided in the submitted application. Omitted information will not be accepted unless clarification is requested by the CDBG Advisory Board or Community Development Division staff.
- Templates are provided for certain attachments and exhibits. Please use these templates. All other attachments must be developed and provided by the applicant.

All proposals are due to the Will County Land Use Department, Community Development Division by 4:00 p.m., Friday, May 20, 2011.

Any questions, or need for further information, should be directed to:

Michelle Allen
Phone: 815-774-7890
email: mallen@willcountylanduse.com
Will County Land Use Department
Community Development Division
58 E. Clinton Street, Suite 500
Joliet, IL 60433

EVALUATION CRITERIA

All eligible, complete proposals will be reviewed and ranked by the Community Development Division and the Advisory Board. Proposals will be reviewed and scored on a competitive basis relative to the evaluation criteria below. The maximum possible score is 100.

1. **Project Summary (50 points).** Proposer(s) will receive scores ranging from 0 to 50 points based upon their demonstration of readiness to proceed. Proposer must provide detailed explanation of an operations and project plan of new services and/or projected quantifiable increase in the level of a service. Other factors that will be considered include zoning, environmental assessment, staffing, and the commitment of other funding sources.
2. **Organizational and Financial Capacity, ability to proceed, and relevant experience (15 points).** Proposer(s) will receive scores ranging from 0 to 15 points based upon the capacity of the organization and relative experience with similar projects. Organization must provide evidence indicating that the Proposer has the financial capacity to provide the proposed activity. This includes and is not limited to leveraged funding availability, growth needs, and program administration.
3. **Leveraging of Funds (10 points).** Proposer(s) will be awarded points based upon the funds requested (plus any other County funds already committed) divided by total project cost. Points will be awarded for the proposed percentage of County funds in the project as follows:
 - a. 10 points = 50% or more of the project is leveraged
 - b. 8 points = 40-49% or more of the project is leveraged
 - c. 6 points = 30-39% or more of the project is leveraged
 - d. 4 points = 20-29% or more of the project is leveraged
 - e. 2 points = 10-19% or more of the project is leveraged
 - f. 0 points = Less than 10% of the project is leveraged
4. **Performance Measures Priorities (5 points)** All CDBG Projects are required to link goals and activities with objectives, outputs, and outcomes. Proposals will be awarded 0-5 points.
5. **Targeted Income Benefit (15 points).** Proposer(s) will be awarded points based upon the targeted low/moderate income clientele, as follows:
 - a. **15 points** = activity targets clientele of a maximum of 30% LMI or a presumed benefit (e.g., elderly persons over age 65, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled", homeless persons, persons living with AIDS, and migrant farm workers.)
 - b. **7 points** = activity targets clientele of a maximum of 31-50% LMI and below
 - c. **4 points** = activity targets clientele of a maximum of 51-80% LMI and below
6. **Location of project – CDBG Target Area (5 points).** Proposer(s) will receive a score of 5 points if the project is located within one of the County's CDBG Target Areas. For non-construction public service projects, 5 points will be awarded for proposals that will exclusively serve residents of a CDBG Target Area. If a project does not meet either standard, 0 points will be awarded for this category.

PROPOSAL CHECKLIST

Project Title: _____

Project Location: _____

A complete proposal packet will include the following items and must be presented in the following sequence:

- _____ Proposal Checklist
- _____ Project Summary Form
- _____ Project Operations and Administration
- _____ Organization & Financial Capacity
- _____ Prior Performance
- _____ Contingency Plan
- _____ Leveraging of Funds
- _____ Performance Measures
- _____ Target Income Benefit
- _____ Target Area Benefit
- _____ ATTACHMENTS
- _____ APPENDICES

By my signature below, I warrant that I am a duly qualified **OFFICER** of the organization and that the information contained in this Request for Proposal for federal Community Development Block Grant Funds is true and correct, and I have reviewed written documentation in the organization’s files that support the information provided. I understand that if any information contained herein is not correct, this will automatically withdraw this agency’s RFP.

Signed By

Submitting Official Title

Date

PROJECT SUMMARY – 50 points

POINTS: _____

1. Project Title: _____

2. Program Location (s) (be as specific as possible):

3. Legal property owner: _____

4. Local zoning restrictions that would affect the program: _____

5. Conditional use permit required? Yes (attach copy) No
Any other permits required? Yes (attach detail) No

7. Will this Public Service Project provide an increase in the level of service currently being provided? (0-5 points)

_____ Yes _____ No

8. Is this a Public Service Project which is currently funded by the CDBG program? (5 points)

_____ Yes _____ No If yes, for which year did it receive funds? _____

9. Will this Public Service Project provide a new service? (0-5 points)

_____ Yes _____ No

10. Describe how CDBG funding will enable you to provide new, expanded services, and/or fill in gaps in services. (0-10 points)

(Please use additional space if needed):

PROJECT OPERATIONS AND ADMINISTRATION:

1. **Project Summary and Viability:** This will include a demonstration of an operations project plan of a new services and/or projected quantifiable increase in the level of a service. Explain simply and clearly how proposed program will operate. Concentrate on practical details—what, where, when, who, and how—rather than program philosophy or purpose. Describe the purpose of the project and accomplishments expected once completed. In addition, present evidence of long-term project viability. **(1-15 points) (Please use additional space if needed):**

2. Describe the steps by which a client progresses through the program. Include how clients access the program, how much time they spend with staff on different activities, how they provide evidence of their eligibility, and how your collaboration with other agencies helps them. **(1-5 points) (Please use additional space if needed):**

3. **Staffing:** List in detail the key positions in the program and indicate their roles, specific responsibilities and qualifications. List any staffing additions, reassignments, etc. Positions should be consistently titled here, on the agency organizational chart and in the salary table of the budget. **(Please use additional space if needed):**

Program Outcomes: How will you identify and measure the changes and impacts brought about by your program? **Please use additional space as needed. (1-10 points)**

Program Component <i>(Program name and number served)</i>	Outcome <i>(Expected change in client's conditions, skills, behavior, etc.)</i>	Indicator <i>(How will you know an outcome has been achieved? Include a target number and percentage.)</i>	Measurement Tool <i>Survey, interviews, tests, assessments, document review, etc.)</i>

**ORGANIZATION & FINANCIAL CAPACITY AND RELEVANT EXPERIENCE:
10 POINTS**

POINTS: _____

Name: _____

Address: _____

Contact Person: _____ Phone: _____

Email Address: _____ FAX: _____

1. What is your organization’s mission statement? (Please attach to this section)
2. Incorporation date (month and year)? _____
3. Estimated Agency Budget for FY2011 \$ _____
4. Number of staff employed (full time equivalents) _____
5. Does your organization have any of the following written management policies:

Personnel policy?	Yes	_____	No	_____
Job descriptions?	Yes	_____	No	_____
Purchasing policy?	Yes	_____	No	_____
Code of Conduct?	Yes	_____	No	_____
ADA Policy?	Yes	_____	No	_____

PRIOR PERFORMANCE (0-5 points):

1. Discuss any previous projects that were funded by Will County.
(Please use additional space if needed):

2. Discuss the outcome, past performance measures, and information provided in the quarterly reports associated with the project(s).
(Please use additional space if needed):

3. Do you have any other CDBG or HOME funding applications currently pending with Will County? **(Please use additional space if needed):**

4. Are you collaborating with any agencies or organizations on this project? Do those agencies have a pending CDBG or HOME application with Will County? **(Please use additional space if needed):**

CONTINGENCY PLAN (0-5 points):

1. What is your contingency plan if your agency does not receive the requested CDBG funding? **(Please use additional space if needed):**

2. If your agency does not receive the full amount that you requested? **(Please use additional space if needed):**

LEVERAGING OF FUNDS – 15 POINTS

POINTS: _____

Project Operating Budget Summary Form

Project Title: _____

Project Location: _____

Identify the amount of CDBG funds requested in this application: _____

Budget Categories	TOTAL Project Cost Estimates	CDBG Funds		Applicant's Funds		Other	
		Amount	Status *	Amount	Status *	Amount	Status *
Administration							
Communication							
Equipment							
Furnishings							
Insurance							
Maintenance / supplies							
Professional services							
Rent							
Security							
Staff Costs							
Utilities / fuels							
Other (Please specify)							

SOURCE TOTAL

--

STATUS *: C=Committed Funds; P=Funds that have been applied for & decision is pending; N=Funds that have not yet been requested or secured.

In the table below, identify the amount of funds to be provided by other source(s) for this program. The date of commitment for funding from these other sources must be stated below.

Source:		\$
Award Date:	Date Available:	
Source:		\$
Award Date:	Date Available:	
Source:		\$
Award Date:	Date Available:	
Source:		\$
Award Date:	Date Available:	
Source:		\$
Award Date:	Date Available:	
Total Amount Committed By Other Sources:		\$

PERFORMANCE MEASURES**5 POINTS****POINTS: _____****OBJECTIVE**

For the purposes of the performance management system, state which of the following three objective categories best illustrates the purpose and intent of the activity:

- **Suitable Living Environment:** relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.
- **Decent Housing:** designed to cover the wide range of housing possible under HOME, CDBG, or ESG. This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort.
- **Creating Economic Opportunities:** applies to the types of activities related to economic development, commercial revitalization, or job creation.

OUTCOME:

State which of the three outcome categories is best reflects what will be achieved by funding the activity. The three outcome categories are:

- **Availability/Accessibility:** This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low- and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low- and moderate-income people where they live.
- **Affordability:** This outcome category applies to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
- **Sustainability: Promoting Livable or Viable Communities:** This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

Please indicate the objective and outcome of the proposed activity. Provide a summary of the proposed outputs and attach as “Performance Measures”: **(0-5 points)**

Objective: _____ **Outcome:** _____

TARGET INCOME BENEFIT (2010 Income Limits)

15 POINTS

POINTS: _____

Income Level	Family of 1	Family of 2	Family of 3	Family of 4	Family of 5	Family of 6	Family of 7	Family of 8
30% OF MEDIAN	15,800	18,050	20,300	22,550	24,400	26,200	28,000	29,800
VERY LOW INCOME	26,300	30,050	33,800	37,550	40,600	43,600	46,600	49,600
LOW-INCOME	42,100	48,100	54,100	60,100	64,950	69,750	74,550	79,350
Proposed Total to be Served								

Will there be anyone served by this program who does not meet the eligibility criteria?

- Yes No

If yes, please provide detail: _____

CDBG TARGET AREAS -- 5 POINTS**POINTS: _____**

Priority will be given for activities located in CDBG Target Areas. Please denote activity in appropriate target area(s). The boundaries of the PY '11 CDBG Target Areas can be found at: **(0-5 points)**

Township	City/Village Unincorporated	Census Tract	Block Group
Monee	University Park	883604	1
Joliet	Joliet/U	881200	3
Joliet	Joliet/U	883100	1-3
Joliet	Joliet/U	883000	1
Joliet	Joliet/U	882300	1,2
Joliet	Joliet/U	882200	2,4,5
Joliet	Rockdale	882900	1,2
Crete	Crete	883807	1
Crete	Crete/U	883807	2
Monee	University Park	883807	4
Crete	Crete/U	883803	2
Crete	Crete	883804	1
Joliet	Crest Hill	881600	1
Crete	Crete	883805	4,5
Du Page	Romeoville	880202	1-3
Lockport	Crest Hill	880900	1-4
Wilmington	Wilmington/U	883400	1
Wilmington	Wilmington	883400	2-6
Du Page	Romeoville	880201	1-5
Du Page	Romeoville/U	880201	5
Lockport	Romeoville	880501	1-4
Lockport	Romeoville/U	880501	1,5
Reed	Braidwood	884001	1-3
Reed	Godley	884001	2
Plainfield	Crest Hill/U	880406	1,2,4
Plainfield	Crest Hill	880406	3
Troy	Unincorporated	883205	3
Lockport	Lockport	880502	1
Lockport	Lockport/U	880502	1-3
Lockport	Lockport	880700	1,4
Lockport	Lockport/U	880700	2-4

APPENDICES:

APPENDIX 1: Certifications

APPENDIX 2: Conflict of Interest Provision

APPENDIX 3: Drug free Workplace Requirements

APPENDIX 4: Lobbying & Drug free Workplace requirements

APPENDIX 5: Title VI of Civil Rights Act of 1964

APPENDIX 6: Residential Anti-Displacement & Relocation Plan

APPENDIX 7: Fair Housing

ATTACHMENTS: Please provide one copy of the following:

1. Agency/Organization Information:
 - a. By-Laws, Articles of Incorporation, and 501 (c) (3) determination letter.
2. Copy of your most recent audited financial statement, including the management letter if one was issued.

If you have completed a financial year that has not yet been audited, please also attach an unaudited financial statement for that year.

3. An organizational chart. Highlight which staff who will be responsible for this project.
4. BOARD OF DIRECTORS:
 - a. Letter of support from organization's board
 - b. Board meeting minutes of project proposal discussion
 - c. A complete list of the members of your Board of Directors.
 - i. Include addresses and affiliations.
 - d. How many board members should you have according to your by-laws?
 - e. How many do you actually have as of this date?
 - f. How often does your board meet?
 - g. What was the actual attendance at each of the last three Board meetings?
 - h. Have you failed to reach a quorum at any Board meetings in the last 12 months?
If so, how many times?
 - i. Do any of your organization's staff members serve on your board?
 - j. What efforts do you make to ensure that your board represents the community it serves?

APPENDIX 1: CERTIFICATIONS

U.S. Department of Housing and Urban Development
Community Development Block Grant

The subrecipient hereby assures and certifies that it will comply with the regulations, policies, guidelines and requirements with respect to the acceptance and use of Federal funds for this federally-assisted program. Also, the subrecipient gives assurances and certifies with respect to the grant that:

- (a) It possesses legal authority to make a grant submission and to execute a community development and housing program;
- (b) Its governing body has duly adopted or passed as an official act a resolution, motion or similar action authorizing the person identified as the official representative of the subrecipient to submit the final application to Will County; all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the subrecipient to act in connection with the submission of the final application and to provide such additional information as may be required;
- (c) Prior to submission of its application to Will County, the subrecipient has met the citizen participation requirements by notification to the public of its intent to apply for CDBG funds and the public's opportunity to participate in the decision making process in choosing said use of funds;
- (d) It has developed its final application to Will County so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight; the final application to Will County may also include activities which the subrecipient certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious threat to the health and welfare of the community, and other financial resources are not available;
- (e) Its chief executive officer or other officer of the subrecipient:
 - (1) Consents to assume the status of a responsible Federal official under the National Environmental Policy Act of 1969 and other authorities as specified in 24 CFR 58.5; and
 - (2) Is authorized and consents on behalf of the subrecipient and himself/herself to accept the jurisdiction of the Federal courts for the purpose of enforcement of his/her responsibilities as such an official.
- (f) The grant will be conducted and administered in compliance with:
 - (1) Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352) and implementing regulations issued at 24 CFR Part 1; and the Fair Housing Act (24 U.S.C. 3601-20).1;

- (2) Title VIII of the Civil Rights Act of 1968 (Pub. L. 90-284), as amended; and that the subrecipient will administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing;
 - (3) Section 109 of the Housing and Community Development Act of 1974, as amended, and the regulations issued pursuant thereto;
 - (4) Section 3 of the Housing and Urban Development Act of 1968, as amended;
 - (5) Executive Order 11246, as amended by Executive Orders 11375 and 12086, and implementing regulations issued at 41 CFR Chapter 60;
 - (6) Executive Order 11063, as amended by Executive Order 12259, and implementing regulations when published for effect;
 - (7) Section 504 of the Rehabilitation Act of 1973 (Pub. L. 93-112), as amended and implementing regulations when published for effect;
 - (8) The Age Discrimination Act of 1975 (Pub. L. 93-135), as amended, and implementing regulations when published for effect;
 - (9) The relocation requirements of Title II and the acquisition requirements of Title III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, and implementing regulations at 24 CFR Part 42;
 - (10) The labor standards requirements as set forth in 24 CFR 570, Subpart K and HUD regulations issued to implement such requirements;
 - (11) Executive order 11988 relating to the evaluation of flood hazards and Executive Order 11288 relating to the prevention, control, and abatement of water pollution;
 - (12) The flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (Pub. L. 93-234);
 - (13) The regulations, policies, guidelines and requirements of OMB Circular Nos. A-102, Revised, A-87, A-110, and A-122 as they relate to the acceptance and use of Federal funds under this federally-assisted program;
- (g) No member, officer, or employee of the subrecipient, or its designees or agents, no member of the governing body of the locality in which the program is situated, and not other public official of such locality or localities who exercises any functions or responsibilities with respect to the program during his/her tenure or for one year thereafter shall have any interest, direct or indirect, in any contract or subcontract, or the process thereof, for work to be performed in connection with the program assisted under the Grant and that it shall incorporate, or cause to be incorporated, in all such contracts or subcontractors a provision prohibiting such interest pursuant to the purposed of this certification;

- (h) It will comply with provisions of the Hatch Act which limits political activity of employees;
- (i) It will give HUD and the Comptroller General or any authorized representatives access to and the right to examine all records, books, papers, or documents related to the grant;
- (j) It will comply with the lead-based paint requirements of 24 CFR Part 35 issued pursuant to the Lead-based Paint Poisoning Prevention Act (42 U.S.C. 4801, et seq.);
- (k) The maintenance of this project, if funded as proposed, will not be included as a request for funding in a future project proposal;
- (l) If applicable, the jobs to be created with this proposal are not jobs that are relocating from other areas within Will County;
- (m) If applicable, any funds to be recaptured with this proposal must be returned “to the Will County CDBG program within three (3) days of the receipt of such funds.”
- (n) If applicable, it will enforce Section 519 Certification: “Excessive Force”.

The applicant hereby certifies that all parties involved will comply with the aforestated assurances.

Attest Date

Chief Executive Officer Date

Title

APPENDIX 2:
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
CONFLICT OF INTEREST PROVISIONS

A. Applicability

(1) In the procurement of supplies, equipment, construction, and services by recipient, and by subrecipients (including those specified at 570.204(c), the conflict of interest provisions in Attachment O of OMB Circulars A-102, and A-110, respectively shall apply.

(2) In all cases not governed by Attachment O of the OMB Circulars, the provision of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient, by its subrecipients, or to individuals, businesses and other private entities under eligible activities which authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to individuals and other private entities pursuant to 570.203, 570.204 or 570.455).

B. Conflicts prohibited

Except for approved eligible administrative or personnel costs the general rule is that no persons described in paragraph (c) below who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this Part or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds thereunder, either for themselves for those with whom they have family or business ties, during their tenure or for one year thereafter.

C. Persons covered

The conflict of interest provision of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, elected official or appointed official of the recipient, or of any designated public agencies, or subrecipients under 570.204, which are receiving funds under this part.

D. Exceptions: threshold requirements

Upon the written request of the recipient, HUD may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it determines that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project. An exception may be considered only after the recipient has provided the following:

- (1) A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
- (2) An opinion of the recipient’s attorney that the interest for which the exception is sought would not violate State or local law.

E. Factors to be considered for exceptions

In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d) of this section, HUD shall consider the cumulative effect of the following factors, where applicable:

- (1) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project which would otherwise not be available;
- (2) Whether an opportunity was provided for open competitive bidding or negotiation;
- (3) Whether the person affected is a member of a group or class of low or moderate income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;
- (4) Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision making process with respect to the specific assisted activity in question;
- (5) Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;
- (6) Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict;
- (7) Any other relevant considerations.

I, the undersigned chief elected official of the _____(Village, City, Township), do hereby acknowledge and understand the above Conflict of Interest Provisions. Furthermore, we certify that no one employed by this entity, nor anyone currently on our governing board has or will have a conflict as described in the above cited Conflict of Interest Provisions.

Witness/attest Date

Chief Executive Officer Date

APPENDIX 3:
DRUG FREE WORKPLACE REQUIREMENTS

It will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the subrecipient's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about:
 - (a) The dangers of drug abuse in the workplace;
 - (b) The subrecipient's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace.
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will:
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency (HUD) in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted:
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended;
or

APPENDIX 4:

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification – Paragraph n

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification – Paragraph o

1. By signing and/or submitting this application or grant agreement, the subrecipient is providing the certification set out in paragraph (o).
2. The certification set out in paragraph (o) is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the subrecipient knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. For subrecipients other than individuals, Alternate I applies. (This is the information to which entitlement subrecipients certify.)
4. For subrecipients who are individuals, Alternate II applies. (Not applicable for CDBG Entitlement grantees.)
5. Workplaces under grants, for subrecipients other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the subrecipient does not identify the workplaces at the time of application, or upon award, if there is no application, the subrecipients must keep the identity of the workplace(s) on file available for Federal Inspection. Failure to identify all known workplaces constitutes a violation of the subrecipients' drug-free workplace requirements.
6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
7. If the workplace identified to the agency (HUD) changes during the performance of the grant, the subrecipient shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph five).

APPENDIX 5:

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
INSTRUCITONS FOR COMPLIANCE WITH TITLE VI
OF THE CIVIL RIGHTS ACT OF 1964

Title VI of the Civil Rights Act of 1964 states:

“No person in the United States shall, on the ground of race, color or national origin, be excluded from participation in, be denied the benefit of, or be subjected to discrimination under any program or activity receiving Federal financial assistance.”

Section 1.4(b) (2) (i) of the regulations of the Department of Housing and Urban Development issued pursuant to Title VI requires that:

“A recipient, in determining the types of housing accommodation, facilities, services, financial aid, or other benefits which will be provided under any such program or activity, or the class of a person to whom, or the situations in which, such housing, accommodations, facilities, services, financial aid, or other benefits will be provided under any such program or activity, or the class of persons to be afforded an opportunity to participate in any such program or activity may not, directly or through contractual or other arrangement, utilize criteria or methods of administration which have the effect of substantially impairing accomplishment of the objectives of the program or activity as respect to persons of a particular race, color or national origin.”

As evidence of compliance with the above, the applicant shall provide the information as required in a, b, c and/or d below, as appropriate, to supplement the data relative to the locations of concentrations of minority groups and proposed activities shown on the map submitted as part of the application. Additional pages should be used, if necessary. If there are not minorities in the community, check here ___ and disregard questions a through d.

- a. IDENTIFY THE MINORITY GROUP(S) POPULATION, OR PORTION THEREOF, RESIDING IN THE APPLICANTS JURISDICTION THAT WILL NOT BE SERVICED BY ONE OR MORE OF THE PROPOSED ACTIVITIES.

- b. EXPLAIN WHETHER THE MINORITY GROUP POPULATION, OR PORTION THEREOF, NOT SERVICED BY THE PROPOSED ACTIVITY(IES) ALREADY RECEIVES SUCH SERVICE, IF SO, DEFINE THE EXTENT OF EACH OF THESE EXISTING SERVICES AND INDICATE WHETHER THEY ARE EQUAL TO, GREATER THAN OR LESS THAN THE PROPOSED

APPENDIX 6:

RESIDENTIAL ANTI DISPLACEMENT
AND RELOCATION ASSISTANCE PLAN
UNDER SECTION 104(d) OF THE HOUSING AND COMMUNITY
DEVELOPMENT ACT OF 1974, AS AMENDED

Will County will require all subrecipients to replace all occupied and vacant occupiable low/moderate-income dwelling units demolished or converted to a use other than as low-moderate-income housing as a direct result of activities assisted with funds provided under the Housing and Community Development Act of 1974, as amended, as described in 24 CFR 570.606(b)(1).

All replacement housing will be provided within three years of the commencement of the demolition or rehabilitation relating to conversion. Before obligating or expending funds that will directly result in such demolition or conversion, Will County will make public and submit to the HUD Chicago Field Office, the following information in writing:

1. A description of the proposed assisted activity;
2. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be demolished or converted to a use other than as low/moderate income dwelling units as a direct result of the assisted activity;
3. A time schedule for the commencement and completion of the demolition or conversion;
4. The general location on a map and approximate number of dwelling units by size (number of bedrooms) that will be provided as replacement dwelling units;
5. The source of funding and a time schedule for the provision of replacement dwelling units; and
6. The basis for concluding that each replacement dwelling unit will remain a low/moderate-income dwelling unit for at least 10 years from the date of initial occupancy.

Will County will require subrecipients to provide relocation assistance, as described in 570.606(b)(2), to each low/moderate-income household displaced by the demolition of housing or by the conversion of a low/moderate-income dwelling to another use as a direct result of assisted activities

Consistent with the goals and objectives of activities assisted under the Act, Will County will take the following steps to minimize the displacement of persons from their homes:

1. **Minimize Necessary Displacement:** Will County shall recommend and approve for funding projects which will minimize, to the greatest extent feasible, the direct permanent involuntary displacement of tenant households, businesses, farms, and non-profit organizations. Projects which are deemed beneficial, but which may cause such displacement may be recommended and approved, but only if it has been demonstrated that such displacement is necessary and vital to the project and efforts have been taken to reduce the number of tenant households, businesses, farms, and non-profit

APPENDIX 7:
FAIR HOUSING

Certifications executed by the County as “Grantee” and Certifications executed by the applicant as “subrecipient” clearly state (among other issues), that the Grantee and/or subrecipient, are in compliance with all regulations, policies, guidelines, and requirements with respect to the acceptance and use of federal funds for this CDBG program. This Appendix specifically sets forth the procedures for compliance to the following certifications:

Certifications:

Title VI of the Civil Rights Act of 1964 (Pub. L. 88-352; 42 U.S.C. Sec. 2000d, et seq.); and implementing regulations in 24 CFR part 1.

Title VIII of the Civil Rights Act of 1968, as amended (Pub. L. 90-284; 42 U.S.C. Sec. 3601-3620 et seq.) (The Fair Housing Act)

Executive Order 11063

CDBG Regulations:

Sec. 570.601 Public Law 88-352 and Public Law 90-284; affirmatively furthering fair housing; Executive Order 11063

The following requirements apply according to sections 104(b) and 107 of the Act:

In accordance with the Fair Housing Act, the Secretary requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further the policies of the Fair Housing Act. Furthermore, in accordance with section 104(b)(2) of the Act, for each community receiving a grant under subpart D of this part (i.e. Entitlement Grants), the certification that the grantee will affirmatively further fair housing shall specifically require that grantee to assume the responsibility of fair housing planning by conducting an analysis to identify impediments to fair housing choice within its jurisdiction, taking appropriate actions to overcome the effects of any impediments identified through that analysis, and maintaining records reflecting the analysis and actions in this regard. Therefore, as a condition of receiving CDBG funds, municipalities are required to participate with the Will County Community Development Division in conducting an analysis of impediments to fair housing incorporating its municipal jurisdiction. Subsequent to this analysis, municipalities are also required to take appropriate actions to overcome its fair housing impediments as well as maintain records reflecting the actions.

Executive Order 11063, as amended by Executive Order 12259 (3 CFR, 1959-1963 Comp., p. 652; 3 CFR, 1980 Comp., p. 307) (Equal Opportunity in Housing), and implementing regulations in 24 CFR part 107, also apply.

570.602 Section 109 of the Act.

- (a) Section 109 of the Act requires that no person in the United States shall on the grounds of race, color, religion, national origin or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under, any program or activity funded in whole or in part with community development funds made available pursuant to the Act. For purposes of this section “program or activity” is defined as any function conducted by an identifiable administrative unit of the recipient, or by any unit of government, subrecipient, or private contractor receiving community development funds or loans from the recipient. “Funded in whole or in part with community development funds” means that community development funds in any amount in the form of grants or proceeds from HUD guaranteed loans have been transferred by the recipient or a subrecipient to an identifiable administrative unit and disbursed in a program or activity. In subsection (b) of this section, “recipient” means recipient as defined in 24 CFR 1.2(f).
- (b) Specific discriminatory actions prohibited and corrective actions.
- (1) A recipient may not, under any program or activity to which the regulations of this part may apply, directly or through contractual or other arrangements, on the ground of race, color, religion, national origin, or sex:
- (i) Deny any individual any facilities, services, financial aid or other benefits provided under the program or activity.
 - (ii) Provide any facilities, services, financial aid or other benefits which are different, or are provided in a different form, from that provided to others under the program or activity.
 - (iii) Subject an individual to segregated or separate treatment in any facility in, or in any matter of process related to receipt of any service or benefit under the program or activity.
 - (iv) Restrict an individual in any way to access to, or in the enjoyment of, any advantage or privilege enjoyed by others in connection with facilities, services, financial aid or other benefits under the program or activity.
 - (v) Treat an individual differently from others in determining whether the individual satisfies any admission, enrollment, eligibility, membership, or other requirement or condition which the individual must meet in order to be provided any facilities, services or other benefit provided under the program or activity.
 - (vi) Deny an individual an opportunity to participate in a program or activity as an employee.
- (2) A recipient may not use criteria or methods of administration which have the effect of subjecting persons to discrimination on the basis of race, color, religion, national origin, or sex, or have the

effect of defeating or substantially impairing accomplishment of the objectives of the program or activity with respect to persons of a particular race, color, religion, national origin, or sex.

- (3) A recipient, in determining the site or location of housing or facilities provided in whole or in part with funds under this part, may not make selections of such site or location which have the effect of excluding persons from, denying them the benefits of, or subjecting them to discrimination on the grounds of race, color, religion, national origin, or sex; or which have the purpose or effect of defeating or substantially impairing the accomplishment of the objectives of the act and of this section.
- (4)
- (i) In administering a program or activity funded in whole or in part with CDBG funds regarding which the recipient has previously discriminated against persons on the ground of race, color, religion, national origin or sex, or if there is sufficient evidence to conclude that such discrimination existed, the recipient must take remedial affirmative action to overcome the effects of prior discrimination. The word “previously” does not exclude current discriminatory practices.
 - (ii) In the absence of discrimination, a recipient, in administering a program or activity funded in whole or in part with funds made available under this part, may take any nondiscriminatory affirmative action necessary to ensure that the program or activity is open to all without regard to race, color, religion, national origin or sex.
 - (iii) After a finding of noncompliance or after a recipient has a firm basis to conclude that discrimination has occurred, a recipient shall not be prohibited by this section from taking any action eligible under Subpart C to ameliorate an imbalance in services or facilities provided to any geographic area or specific group of persons within its jurisdiction, where the purpose of such action is to remedy prior discriminatory practice or usage.
- (5) Notwithstanding anything to the contrary in this section, nothing contained herein shall be construed to prohibit any recipient from maintaining or constructing separate living facilities or rest room facilities for the different sexes. Furthermore, selectivity on the basis of sex is not prohibited when institutional or custodial services can properly be performed only by a member of the same sex as the recipients of the services.
- (c) Section 109 of the Act further provides that any prohibition against discrimination on the basis of age under the Age Discrimination Act of 1975 (42 U.S.C. 6101 et seq.) or with respect to an otherwise qualified handicapped person as provided in section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) shall also apply to any program or activity funded in whole or in part with funds made available pursuant to the Act. HUD regulations implementing the Age Discrimination Act are contained in 24 CFR part 146 and the regulations implementing section 504 are contained in 24 CFR part 8.

Specific Actions to be Taken by Subrecipient:

