

EXHIBIT A
CONSOLIDATED PLAN CHECKLIST - STATE

State: _____ Period Covered by Consolidated Plan: 3 4 5 years
 Start year: _____ End Year: _____

Reviewed by: _____ Date: _____

Programs covered by plan: CDBG HOME ESG HOPWA HTF

Date plan received in IDIS: _____

Original, signed SF 424s received Date Received: _____

Original, signed Certifications received Date Received: _____

Automatic approval date: _____

Note: *The 45-day review period begins when the Field Office receives the signed, hard copies of the SF-424 and certifications or email notification that the Con Plan has been submitted in IDIS, whichever is later.*

New Checklist Review Items:

The following information has been incorporated into this version of the checklist:

- **AFFH specific requirements** – Only required for grantees that have an AFH to HUD. To complete a review of AFFH requirements, CPD representatives will need access to the AFH Tool. See your System Administrator to obtain access.
- **HTF specific requirements** – Only applies to plans submitted on or after January 1, 2018. HUD released new HTF screen enhancements in Fall 2017. The screen enhancements have been built into this checklist.
- **Modernizing HUD’s Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards requirements** - Applies to consolidated plans submitted on or after January 1, 2018.
- **Project set-up** - Clarification on how projects should be set-up in the e-Con Planning Suite to eliminate duplication in IDIS and the CAPER report.

How to handle submissions when allocations have not been announced:

Field offices and grantees are advised to follow the latest CPD Notice, Guidance on Submitting Consolidated Plans and Annual Action Plans, on when plans should be submitted when allocations have not been announced.

The Notice is available at: <https://portal.hud.gov/hudportal/documents/huddoc?id=16-18cpdn.pdf>.

The 45-day review period:

The 45-day review period begins when the Field Office receives either the signed hard copies of the SF-424 and certifications or when they receive the email notification that the Con Plan and/or Annual Action Plan have been submitted in IDIS, whichever occurs later.

Plan approval, congressional release, and the grant agreement process:

Field Offices are reminded plans should not be approved in the system until notified by the Office of Field Management. It is important plans are not approved (changed to Review Completed status in IDIS) in advance of a congressional release. For questions on this process, contact the Office of Field Management.

No additional paper plan submissions (draft or final) should be required by the field office:

All Consolidated Plans must be submitted in the e-Con Planning Suite template. CPD Notice12-09 describes requirement at: <http://portal.hud.gov/huddoc/12-09cpdn.pdf>

- ONLY original, signed copies of the SF-424, assurances, and certifications must still be submitted in paper by the grantee
- Do not require a grantee to send in a paper version of a con plan or annual action plan, draft or official.
- Field Offices may review draft versions of the plan in the system when the grantee sets the plan in "Open-In Progress/FO Review" status on the AD-25 screen.

SF-424 Form:

This is a standard form required for use as a cover sheet for submission of pre-applications and applications and related information under discretionary programs.

Grantees should submit one SF-424 Form for each grant program.

Only original documents with "wet" signatures will be accepted. The most up to date version of the SF-424 Form may be found at www.grants.gov.

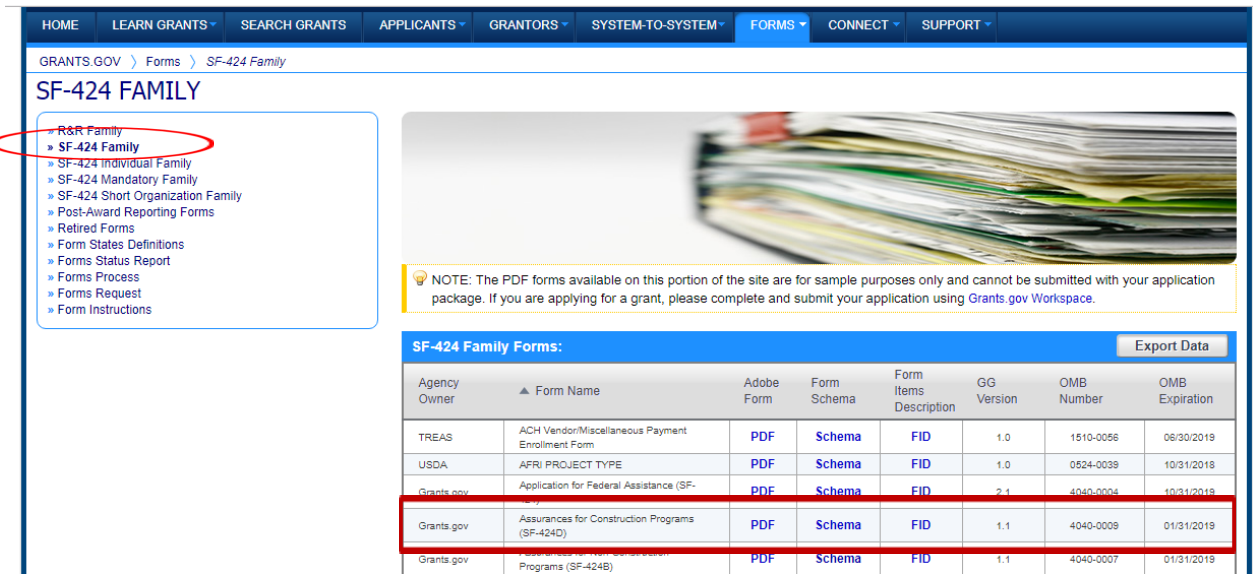
- Select Forms:



- Select SF-424 Family. The third item in the list is a fillable form. Complete and execute the form with an original signature. Mail executed forms to HUD prior to plan submission deadline. Electronic signatures will not be accepted by HUD. Copies of the executed document will not be accepted by HUD.



- Select the Assurances appropriate for each CPD program:
 - **SF-424D for grantees that undertake construction activities.** This would include construction activities undertaken by subrecipients, developers or contractors.
 - A SF-424D should be executed for each funding source. This means each program (CDBG, HOME, ESG, HOPWA and HTF) should have its own set of assurance documents.
 - Complete and execute the form(s) with an original signature. Electronic signatures will not be accepted by HUD. Copies of the executed document will not be accepted by HUD



Resource Links:

HUD Form SF-424D can be accessed at <https://www.grants.gov/web/grants/forms/sf-424-family.html#sortby=1>

Certifications:

Scanned copies of signed certifications can be attached in the AD-25 screen, however, grantees MUST submit all

original executed certifications to HUD. Electronic signatures should not be accepted at this time. The most up to date certifications can be found at: <https://www.hudexchange.info/resource/2396/consolidated-plan-certifications-state-and-non-state/>. Use the checklist to verify all required information is contained in the required certifications.

Note: The Drug Free Workplace certification is no longer required.

Screen-based checklists & monitoring exhibits:

Screen-specific checklists are provided from HQ through the Office of Field Management. Separate checklists for both State and Entitlement grantees are available for consolidated plan review and for annual action plan review. A CAPER screen based checklist is also available. Consortia grantees do not require a separate checklist. Consortia requirements are included in these checklists.

First Year Action Plan

The first-year action plan is a part of the consolidated plan set-up. The grantee should not submit a separate stand-alone action plan. The grantee should complete the action plan (AP) screens appearing below the strategic plan (SP) screens in the consolidated plan.

AD-25: Administration §91.220(a)

Yes **No** Does each original Standard 424 Form contain the correct ((DUNS) Number in block 8(c)) with the applicable programs, the correct dollar allocations, and signed by the appropriate official been received by the field office?

Note: States can upload scanned copies in the AD-25 screen, but they are still required to submit one original signed copy of each document to HUD.

Yes **No** Did the grantee enter HUD’s program year and not its local program year. If it is the local program year, send the plan back for the grantee to correct.

Yes **No** Programs Included: Did the grantee place a check next to each program its receives as an allocation? If not, send the plan back to the grantee to correct.

Comments/Verification: _____

ES-05: Executive Summary §91.300(c), §91.320(b)

Yes **No** Does the plan contain a concise executive summary that includes:
 _____ Objectives and outcomes?
 _____ An evaluation of past performance?
 _____ A summary of the citizen participation process and public comments?
 _____ A description of efforts made to broaden public participation in the development of the consolidated plan?

Comments/Verification: _____

PR-05: Lead and Responsible Agencies §91.300(b)

Yes **No** Is there a description of the lead agency or entity responsible for overseeing the development of the Consolidated Plan? See also PR-10 and PR-15.

Comments/Verification: _____

PR-10: Consultation/Coordination §91.110 §91.300(b), §91.315(l)

AFH Specific: *Once state has submitted an AFH it must comply with additional consultation requirements as described in the regulation. These requirements are noted on this checklist under "AFH specific".*

Yes **No** Does the plan provide a concise summary of the state's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health, and service agencies?

Yes **No** ESG Specific: Does the plan describe the state's consultation with continuums of care to determine how to allocate ESG funds, develop performance standards and evaluate outcomes of projects and activities assisted with ESG funds and develop funding policies and procedures for the operation and administration of HMIS?

Yes **No** Border States Only: Does the plan provide a concise summary of the state's activities to enhance coordination with local jurisdictions service Colonias and organizations working within Colonias communities? (Sec. 916(a)(2) of the NAHA)

Yes **No** Does the plan describe the following agencies, groups, and organizations and others who participated in the process and consultation with:
 ___ Housing Services and Assisted Housing
 ___ Health Services
 ___ Social and fair housing services, including those focusing on services to children, elderly person, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons

Yes **No** Does the plan describe coordination with the following entities in preparing the State's homeless strategy and resources available to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans and unaccompanied youth) and persons at risk of homelessness
 ___ Each Continuum(s) of Care in the State
 ___ Public and private agencies that address housing, health, social service, victim services, employment, or education needs of: low income individuals; of homeless individuals and families, including homeless veterans; youth and/or of other persons with special needs

Yes **No** Business and Civic Leaders

Yes **No** State and local health and child welfare agencies, including health department data on the addresses of housing units in which children have been identified as lead-poisoned

Yes **No** Consult with local governments in non-entitlement areas of the State (91.110(d) Method of Distribution)

Yes **No** Persons, especially low income persons, living in areas designated by the state as a revitalization area, areas designated by either a local jurisdiction or a state as a slum and blighted area and areas where CDBG funds are proposed to be used.

Yes **No** Public Housing Agencies administering public housing or the Section 8 program on a statewide basis as well as all PHAs that certify consistency with the state’s consolidated plan, including participation of residents of public and assisted housing developments (which includes residents of advisory boards, resident councils, and resident management corporations).

Yes **No** Does the plan identify any of the agency types described above that were not consulted and provide a rationale for not consulting?

Yes **No** Does the plan describe other local/regional/state/Federal planning efforts considered when preparing the plan? (**Note:** Continuum of care must be described, additional efforts are encouraged but not grounds for disapproval of a plan.)

Yes **No** With respect to the public entities involved, does the plan describe the means of cooperation among the state and local units of government in the metropolitan area in the implementation of the plan? This can be demonstrated by checking boxes on the table to indicate which agencies consulted with meet this description.

Modernizing HUD’s Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards Specific:

Yes **No** For consolidated plans submitted on or after January 1, 2018:
 ___ broadband internet service providers, organizations engaged in narrowing the digital divide
 ___ agencies whose primary responsibilities include the management of flood prone areas, public land or water resources
 ___ emergency management agencies

AFH Specific:

Yes **No** Describes how input was sought into how the goals identified in the AFH inform the priorities and objectives in the consolidated plan.

Yes **No** Describe consultation with any housing agency administering public housing or the Section 8 program on a statewide basis as well as all PHAs that certify consistency with the state’s consolidated plan on the AFH, on strategies for affirmatively furthering fair housing, and on proposed actions to affirmatively further fair housing in the consolidated plan.

Yes **No** Describes consultation with state-based and regionally-based organizations that represent protected class members, and organizations that enforce fair housing laws, such as fair housing enforcement agencies, including participants in the:
 ___ Fair Housing Assistance Program (FHAP);

- Fair housing organizations;
- Nonprofit organizations that receive funding under the Fair Housing Initiative Program (FHIP); and
- Other public and private fair housing service agencies, to the extent that such entities operate within the grantee’s area.

Yes **No** If applicable, describes consultation with regional government agencies in addition to adjacent units of general local government and local government agencies, including local government agencies with metropolitan-wide planning and transportation responsibilities, particularly for problems and solutions that go beyond a single jurisdiction.

Comments/Verification: _____

PR-15: Citizen Participation §91.115, §91.300(c)

Yes **No** Does the Consolidated Plan include a summary of the development of the plan and efforts to broaden public participation, including the names of organizations involved in the development of the plan?

Yes **No** Does the plan provide a summary of the citizen participation process and how it impacted goal setting?

Yes **No** Border States Only: Does the plan provide a summary of the citizen participation process and efforts made to broaden citizen participation in Colonias?

Yes **No** Is there a summary of the citizen participation process in the chart provided, and were the public hearing and comment period requirements satisfactory?

Yes **No** Are citizen comments included in the plan, and are the comments specifically and adequately addressed by the state? Note: If no comments received check the yes box but there must be a narrative statement indicating no comments received.

Yes **No** Does the state provide a summary of comments not accepted and reasons for not accepting them in the chart provided?

Yes **No** According to the table provided, did the state explore alternative public involvement techniques that encourage a shared vision of change for the community and the review of program performance (e.g. the use of focus groups or the internet?) Note: This is encouraged, but not grounds for disapproval of the plan.

Note: The state shall encourage the participation of low and moderate income persons residing in slum/blighted areas, residents in predominantly low and moderate income areas. A state is also expected to take whatever actions are appropriate to encourage the participation of all its citizens, including minorities and non-English speaking persons, as well as persons with disabilities.

Comments/Verification: _____

NA-10: Needs Assessment – Housing Needs Assessment §91.305

AFH-Specific: Once a jurisdiction has an AFH, the disproportionate housing needs assessment no longer needs to be included in the consolidated plan. Impacted screens: NA-15, NA-20, NA-25 and NA-30. The jurisdiction will have already documented its disproportionate housing needs in the AFH. The grantee now leaves blank the disproportionate housing needs assessment section. CPD is provided the opportunity to review and comment on the AFH, including the disproportionate housing needs assessment, at the time of its submission to HUD.

Yes **No** Does the grantee provide a concise summary of the estimated housing needs projected for the ensuing 3, 4 or 5-year period? See also NA-05 to NA-50

Yes **No** Has the grantee identified the estimated number and types of families with housing needs for a 5-year period?

Family types (extremely low-, low-, moderate, and middle income) that must be identified are:

- Extremely low-income, low-income, moderate-income and middle-income families, Renter/owner, Elderly, Single persons, Large families, persons with disabilities, victims of domestic violence, dating violence, sexual assault and stalking, formerly homeless receiving rapid re-housing assistance nearing termination.

Yes **No** Has the grantee described the number and type of single person households in need of housing assistance?

Yes **No** Has the grantee estimated the number and type of families in need of housing assistance who are disabled or victims of domestic violence, dating violence, sexual assault and stalking?

Note: Tables do not address the number and type of single person households, families who are disabled, or victims of domestic violence, dating violence, sexual assault or stalking who are in need of housing assistance. This must be addressed in a discussion box on NA-10. Estimates of housing needs for the number of families that contain persons with disabilities for each community are available in CHAS Table 6 produced from the American Community Survey at: http://www.huduser.org/portal/datasets/cp/chas/data_download_chas.htm

Yes **No** Based on the data provided, does the grantee discuss the most common housing problems? Housing problems for which data is provided include:

- Severe cost and cost burden
- Overcrowding (especially for large families)
- Substandard housing

Yes **No** Does the grantee discuss whether any populations/household types described by the data are more affected than others by these problems?

Yes **No** Has the grantee described the characteristics and needs of low-income individuals and families with children (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered? Does this discussion also include the needs of formerly homeless families and individuals who are receiving rapid-rehousing assistance and are nearing termination of that assistance?

Yes **No** If the grantee provides estimates of the at-risk population(s), does it also include a description of the operational definition of the at-risk group and the methodology used to generate the estimate?

Yes **No** Does the grantee specify housing characteristics that have been linked with instability and an increased risk of homelessness?

Yes **No** Did the grantee insert language dealing with housing needs from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan for disaster recovery if the community received federal disaster assistance?

Modernizing HUD’s Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards Specific:

Yes **No** For consolidated plans submitted on or after January 1, 2018: In the narrative section, did the grantee describe broadband needs in housing occupied by low- and moderate-income households based on an analysis of data for its low- and moderate-income neighborhoods. These needs include the needs for broadband wiring and for connection to the broadband service in the household units and the needs for increased competition by having more than one broadband Internet service provider serve the jurisdiction.

Comments/Verification: _____

NA-30: Needs Assessment – Disproportionally Greater Housing Need §91.305(b)(2)

AFH-Specific: See note at NA-10 screen review.

Yes **No** Has the grantee included a discussion of any racial or ethnic groups that have a disproportionately greater need in comparison to the needs of that income category? Housing needs include:

- Housing problems – NA-15
- Severe Housing Problems – NA-20
- Cost Burden – NA-25

Note: Disproportionately greater need exists when the percentage of persons in a category of need who are members of a racial/ethnic group is at least 10% points higher than the percentage of persons in the category. 91.305 (b)(2).

Yes **No** Does the grantee indicate if there are other needs not identified above?

Yes **No** Does the grantee indicate whether racial or ethnic groups identified on this screen are in specific areas or neighborhoods in the community?

Comments/Verification: _____

NA-35: Needs Assessment – Public Housing

Note: This screen is identified as optional for states, however it is provided to assist the state to meet the strategic planning requirements related to public housing. Data provided in this screen is based on the Public Housing Agencies selected by the grantee when the plan was created. A list of those agencies can be found on screen AD-25.

Yes **No** Does the Plan describe the needs of public housing residents? These may include housing improvements; supportive services (i.e. child care, education, workforce development, accessibility); improved living environment (i.e. neighborhood revitalization, capital improvements, safety, crime prevention, drug elimination); economic opportunity (i.e. resident services, family self-sufficiency) Also see MA-25.

Yes **No** Section 504 Needs Assessment: Has the state described the needs of public housing tenants and applicants on the waiting list for accessible units?

Yes **No** Has the state described the number and type of families on the waiting lists for public housing and section 8 tenant-based rental assistance? Based on the information above, and any other information available to the state, what are the most immediate needs of residents of public housing and Housing Choice voucher holders?

Yes **No** Has the state described how these needs compare to the housing needs of the population at large?

Comments/Verification: _____

NA-40: Needs Assessment – Homeless Needs Assessment §91.305(c)

Yes **No** Has the grantee satisfactorily identified the nature and extent of sheltered and unsheltered homelessness, including rural homelessness, within the jurisdiction?

Yes **No** In the tables provided on the screen, does the plan include for each category (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) the number of persons experiencing homelessness on a given night, the number of persons experiencing homelessness each year, the number of persons who lose their housing and become homeless each

year, the number of persons who exit homelessness each year, the number of days that persons experience homelessness, and other measures specified by HUD?

Yes **No** If the grantee identifies all or part of the homeless population is located in rural areas, has the grantee described the nature and extent of unsheltered and sheltered homelessness for persons in the rural areas?

Yes **No** If data is not available for the categories "number of persons becoming and exiting homelessness each year," and "number of days that persons experience homelessness," does the grantee describe these categories for each homeless population type (including chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth)?

Yes **No** In the screen tables, has the grantee estimated the number and type of families in need of housing assistance for families with children and the families of veterans?

Yes **No** As a narrative, has the grantee identified the nature and extent of homelessness by racial/ethnic group, to the extent information is available? If not available, grantee should indicate this as well.

Yes **No** CDBG-DR Specific: Did the grantee insert language on homeless needs from the "impact and unmet needs assessment" section of their HUD-approved CDBG-DR Action Plan for disaster recovery
Note: As there is extensive information in CDBG-DR Action Plans on recovery needs, the grantee is only required to include an abbreviated version of this information.

Comments/Verification: _____

NA-45: Needs Assessment – Non-Homeless Special Needs Assessment §91.305(b, d)

Yes **No** Has the grantee described the characteristics of special needs populations?

Yes **No** Has the grantee discussed the housing and supportive service needs of these populations and how these needs were determined?

Yes **No** HOPWA specific: Pre-populated screens are present for HOPWA grantees only. Based on data provided, does the plan identify the size and characteristics of the population with HIV/AIDS and their families?

Note: The estimated number of non-homeless persons with special needs must include, to the extent practical the number of elderly, frail elderly, persons with mental, physical, developmental disabilities, persons with alcohol or other drug addiction, persons with HIV/AIDS and their families, public housing residents, and any other categories the grantee may specify. See tables on this screen for needs of persons with HIV/AIDS. Estimates of housing needs for the number of households containing persons with hearing, vision, cognitive, ambulatory, self-care, and independent living difficulty for each community are available in CHAS Table 6 produced from the American Community Survey at: http://www.huduser.org/portal/datasets/cp/chas/data_download_chas.html.

Comments/Verification: _____

NA-50: Needs Assessment – Non-Housing Community Development Needs §91.315(f)

Yes **No** Does the grantee describe their need for public facilities and how the need was determined?

Yes **No** Does the grantee describe their need for public improvement and how the need was determined?

Yes **No** Does the grantee describe their need for public services and how the need was determined?

Yes **No** Border States Only: Does the state describe the non-housing community development needs in colonias?

Yes **No** CDBG-DR Specific: Did the grantee insert language dealing with infrastructure and economic development needs from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan for disaster recovery. Note: The grantee is only required to include an abbreviated version of this information.

Comments/Verification: _____

MA-10: Housing Market Analysis - Number of Housing Units §91.310(a)

Yes **No** Has the grantee described the significant characteristics of the housing markets, including aspects such as supply, demand, cost and condition of housing? See MA-10 for supply and demand, MA-15 for cost and MA-20 for condition.

Yes **No** Does the grantee describe the number and targeting (income level/type of family served) of units assisted with federal, state, and local programs?

Yes **No** Does the grantee provide an assessment of units expected to be lost from the affordable housing inventory for any reason, such as expiration of Section 8 contracts?

Yes **No** Does the grantee indicate whether the availability of housing units meets the needs of the population?

Yes **No** Does the grantee describe the need for specific types of housing?

Yes **No** CDBG-DR Specific: Did the grantee insert language on the number of housing units affected from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan?

Comments/Verification: _____

MA-15: Housing Market Analysis – Cost of Housing §91.310(a)

Yes **No** Does the grantee indicated whether there is sufficient housing for households at all income levels?

Yes **No** Does the grantee discuss how affordability of housing is likely to change considering changes to home values and/or rents?

Yes **No** Does the grantee discuss how HOME rents/Fair Market Rents compare to Area Median Rents and how this impacts their strategy to provide or preserve affordable housing? *Note: The last table on this screen with fields for Fair Market Rents, High HOME Rents and Low HOME Rents is mistakenly included for States. Statewide values for these fields do not exist. States should ignore this table.*

Yes **No** CDBG-DR Specific: Did the grantee insert language on the cost of housing from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan?

Comments/Verification: _____

MA-20: Housing Market Analysis – Condition of Housing §91.310(a)

Yes **No** Does the plan define “standard condition” and “substandard condition but suitable for rehabilitation” in its Consolidated Plan?

Yes **No** Vacant Units Table: Does the jurisdiction include an estimate of the number of vacant and abandoned buildings and whether the units in these buildings are suitable for rehabilitation?

Yes **No** Does the plan describe the need for owner and rental rehabilitation based on the condition of the grantee’s housing?

Yes **No** Has the grantee estimated the number of housing units occupied by low or moderate income families that contain lead-based paint hazards?

Yes **No** CDBG-DR Specific: Did the grantee insert language on the condition of housing units affected from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan?

Modernizing HUD’s Consolidated Planning Process to Narrow the Digital Divide and Increase Resilience to Natural Hazards Specific:

Yes **No** For consolidated plans submitted on or after January 1, 2018: Each jurisdiction must provide, as a part of the housing market analysis, an assessment of natural hazard risks to low- and moderate-income residents, including risks expected to increase due to climate change.

Comments/Verification: _____

MA-25: Housing Market Analysis – Public & Assisted Housing

Note: This screen is identified as optional for states, however it is provided to assist the states to meet the strategic planning requirements related to public housing. Data provided in this screen is based on the Public Housing Agencies selected by the grantee when the plan was created. A list of those agencies can be found on screen AD-25.

Yes **No** Based on the data provided, does the grantee describe the number and physical condition of public housing units in the jurisdiction, including those that are participating in an approved Public Housing Agency Plan?

Yes **No** Does the grantee describe the restoration and revitalization needs of public housing in the jurisdiction?

Yes **No** Does the plan describe the public housing agency’s strategy for improving the living environment of low- and moderate-income families residing in public housing? *Note: This does not apply to states that do not administer public housing directly.*

Comments/Verification: _____

MA-30: Housing Market Analysis – Homeless Facilities & Services §91.310(b)

Yes **No** Did the grantee provide data in the table of facilities and housing that meet the needs of homeless persons within the jurisdiction, particularly chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth?

Yes **No** Does the plan describe services targeted to homeless persons and mainstream services, such as health, mental health and employment services to the extent those services are used to complement services targeted to homeless persons?

Yes **No** If grantee listed these services and facilities on screen SP-40 (Institutional Delivery Structure) or screen MA-35 (Special Needs Facilities and Services), did they describe how these facilities and services specifically address the needs of these populations.

Comments/Verification: _____

MA-35: Housing Market Analysis – Special Needs Facilities & Services §91.310(c)

Yes **No** Has the grantee described, to the extent information is available, the facilities and services that assist persons who are not homeless but who require supportive housing?

Yes **No** Does the plan describe programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing?

Yes **No** Does the plan specify the activities that the grantee plans to undertake during the next year to address the housing and supportive services needs identified for persons who are not homeless but have other special needs? Are these activities linked to one-year goals?

Comments/Verification: _____

MA-40: Housing Market Analysis – Barriers to Affordable Housing §91.310(d)

Yes **No** Has the grantee described public policies that affect affordable housing? Factors which affect affordable housing may include:

- Tax policies affecting land and other property, Land use controls, Zoning ordinances, building codes, Fees and charges, Growth limits, Policies that affect the return on residential investment

Comments/Verification: _____

MA-45: Housing Market Analysis – Non-Housing Community Development Assets §91.315(f)

Yes **No** Does the plan describe the major employment sectors within the jurisdiction in the Business Activity table?

Yes **No** Does the plan describe the workforce and infrastructure needs of businesses in the jurisdiction?

Yes **No** Does the plan describe any major changes that may have an economic impact, such as planning public or private sector investments or initiatives that have affected or may affect job and business growth opportunities during the planning period and any needs for workforce development, business support or infrastructure these changes may create?

Note: The Desk Guide clarifies that the grantee should identify the need for economic development activities, including job training, business assistance, and infrastructure development.

Yes **No** Does the plan describe how the skills and education of the current workforce correspond to employment opportunities in the state?

Yes **No** Does the plan describe current workforce training initiatives and how these efforts will support the state’s consolidated plan?

Yes **No** Does the plan describe other state efforts to support economic growth?

Comments/Verification: _____

MA-50: Market Analysis – Needs and Market Analysis Discussion

Yes **No** Does the grantee provide a definition of “concentration”?

Note: Definitions of concentration should include separate definitions for minority concentration and low-income concentration.

Yes **No** Does the grantee describe if:

_____ There are areas where households with multiple housing problems are concentrated?

_____ There are any areas in the jurisdiction where racial or ethnic minorities or low-income families are concentrated?

Yes **No** Does the plan describe the characteristics of the market in these areas/neighborhoods?

_____ Including community assets in these areas/neighborhoods?

_____ Including other strategic opportunities in these areas?

Yes **No** Border States Only: Based on the needs analysis, does the plan describe the state’s needs in Colonias?

Yes **No** CDBG-DR Specific: Did the grantee insert language dealing with the needs and market analysis discussion from the “impact and unmet needs assessment” section of their HUD-approved CDBG-DR Action Plan.

Comments/Verification: _____

SP Screens: Strategic Plan §91.315

Note: When reviewing this section of the Consolidated Plan, keep in mind that the priorities/objectives should relate to the needs identified in the Housing and Homeless Needs and Housing and Market Analysis sections. Information entered on these screens will download into the AP screens automatically.

SP-10: Geographic Priorities §91.315(a)(1)

Yes **No** Does the grantee indicate the general priorities for allocating investment geographically within the jurisdiction (or within the EMSA for HOPWA) and among different activities and needs?

Yes **No** Does the grantee identify areas where geographically targeted revitalization efforts are carried out through multiple activities in a coordinated manner?

Note: This is encouraged, but not required and can be included in the narrative text box on SP-10 or an added text box.

Yes **No** AFH-Specific: If applicable, the grantee may have designated AFH-priority areas it would like to highlight in the consolidated plan, subsequent annual action plans and CAPERs.

Comments/Verification: _____

SP-25: Priority Needs §91.315(a)(2)

AFH Specific: To incorporate the AFH into the consolidated plan, a grantee will use this screen to enter the contributing factors associated with AFH goals. A grantee has the option of using the narrative sections to identify the contributing factor as AFH specific and to elaborate on the priority level designation.

Yes **No** Does the plan describe the grantee’s priority needs?

Note: Click the “View Summary” button under the “Priority Needs” table on this screen to see a summary of the information on each individual Need screen.

Yes **No** Does the plan describe the grantee’s priority homeless needs?

Note: This is accomplished by creating priority needs on this screen and classifying them as homeless needs.

Yes **No** Does the plan include the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing?

Yes **No** Did the state describe the priority non-housing community development needs, reflecting the needs that affect more than one unit of general local government? These needs must be described

by CDBG eligibility category, reflecting the needs of persons or families for each type of activity.

Note: these are all types of needs that can be selected when setting up priority needs in SP-25.

Yes No Does the grantee describe the rationale for establishing the allocation priorities given to each category of priority needs, particularly among extremely low-income, low-income and moderate-income households?

Yes No AFH Specific: Does the grantee include AFH-contributing factors associated with AFH goals it intends to undertake during the consolidated plan period?

Comments/Verification: _____

SP-30: Influence of Market Conditions §91.315(b)

Yes No Does the state indicate which market characteristics will influence the use of funds available for the following

- _____ Tenant Based Rental Assistance (TBRA)? The state should also specify the local market condition(s) that led to this choice
- _____ TBRA for non-homeless special needs? The state should also specify the local market condition(s) that led to this choice.
- _____ New Unit Production?
- _____ Rehabilitation?
- _____ Acquisition, including preservation?

Note: This section should explain how the characteristics of the housing market, the severity of housing problems and the needs of the extremely low-income, low-income, and moderate-income rents, persons at risk of homelessness, and homeless persons identified in accordance with 24 CFR 91.205 provide the rationale for establishing the allocation priorities and use of funds made available for these housing types.

Comments/Verification: _____

SP-35: Anticipated Resources §91.315(a)(4) & §91.320(c)(1,2)

In the chart provided, does the plan include the Annual Allocation, Program Income, Prior Year Resources, and Expected Amount Available for the remainder of the Con Plan for each identified funding source, (CDBG, HOME, HTF, ESG and HOPWA as appropriate, Section 8 funds, low income housing tax credits, and competitive McKinney-Vento Homeless Assistance Act funds) and other resources from private, state, and local sources that are reasonably expected to be made available to address the needs identified in the plan?

- Yes No Annual Allocation
- Yes No Program Income
- Yes No Prior Year Resources
- Yes No Expected Amount Available for remainder of Con Plan
- Yes No Does the plan explain how federal funds will leverage additional resources (private,

state and local funds), including a description of how match requirements will be satisfied?

Review match requirements:

Yes **No** CDBG: After the first \$100,000, admin expenses must be matched dollar for dollar.

Yes **No** HOME: 25% match on all expenditures except planning and admin, CHDO operating, CHDO capacity building, and CHDO project specific expenses when repayment is waived by the PJ under §92.301.

Yes **No** ESG: After the first \$100,000, all expenses must be matched dollar for dollar. Cash, non-cash, and program income must meet requirements of § 576.201.

Yes **No** If appropriate, does the plan describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan?

Yes **No** Did the plan describe the strategy to coordinate Low-Income Housing Tax Credits with the development of housing that is affordable to low-income and moderate-income families?

Note: This requirement can be met in a number of ways: by including the LIHTC as an additional funding source in the resources chart; by describing as part of the leveraging discussion in the first text box after the resources chart; by including in the "discussion" text box; or by adding an attachment in AD-25

Yes **No** CDBG-DR Specific: Does the plan include CDBG-DR as a source of funding if the community was a recipient of federal disaster assistance?

Note: Information entered on this screen will appear on the AP-15 screen. This information on the AP-15 screen is not editable. To change the AP-15, the grantee must edit the SP-35 screen first.

Comments/Verification: _____

SP-40: Institutional Delivery Structure §91.315(k)

Yes **No** Does the grantee explain the institutional structure, including businesses, developers, nonprofit organizations, philanthropic organizations, community and faith-based organizations, philanthropic organizations, the Continuum of Care, and public institutions, departments and agencies through which the grantee will carry out its housing, homeless, and community development plan? This should also include a brief summary of what the grantee will do to overcome these gaps.

Note: this can be accomplished by filling out the table in SP-40. All the organization types are options that can be selected when adding "responsible entities" to this table.

Yes **No** Does the plan assess the strengths and gaps in the delivery system? This should also include a brief summary of what the jurisdiction will do to overcome these gaps.

Yes **No** Border States Only: Does the plan assess the strengths and gaps in the institutional delivery structure working within Colonias?

Yes **No** Does the plan describe the extent to which services targeted to homeless person

and persons with HIV and mainstream services, such as health, mental health and employment services are made available to and used by homeless persons (particularly chronically homeless individuals and families, families with children, veterans and their families and unaccompanied youth) and persons with HIV within the jurisdiction?

Yes **No** Does the plan describe the strengths and gaps of the service delivery system for special needs population and persons experiencing homelessness, including, but not limited to, the services listed above?

Yes **No** Does the plan provide a summary of the strategy for overcoming gaps in the institutional structure and service delivery system for carrying out a strategy to address priority needs?

Comments/Verification: _____

SP-45: Goals §91.315(a)(4)

Note: To view information for each Goal, click on the “View Summary” button under the Goals Table. Information entered on this screen automatically transfers to the AP Goals Screens.

Yes **No** Has the grantee summarized the priorities and specific objectives, describing how funds that are reasonably expected to be made available will be used to address identified needs?

Yes **No** For each specific objective, has the grantee identified proposed accomplishments and outcomes the grantee hopes to achieve in quantitative terms over a specific time-period, or in other measurable terms as identified and defined by the grantee?

Yes **No** Does the plan include specific objectives that describe the proposed accomplishments that the grantee hopes to achieve?

Yes **No** Does the Community Development component of the plan state the grantee’s specific long-term and short-term community development objectives (including economic development activities that create jobs) that were developed in accordance with the primary objective of the CDBG program to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities, principally for low-income and moderate income persons?

Yes **No** Does the plan specify the number of extremely low, low, moderate, and middle income families, and homeless persons to whom the grantee will provide affordable housing as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership and as defined in 24 CFR 93.302 for rental housing and 24 CFR 9.304 for homeownership over a specific time-period?

Note: The grantee should estimate the number of renter and owner households to whom the jurisdiction will provide affordable housing assistance separately for homeless persons and each income group. Other units assisted that do not meet the definition of “affordable housing” in the HOME regulations at 24 CFR 92.252 for rental housing or in the HTF regulations at 24 CFR 93.302 for rental housing may be discussed separately.

Yes **No** CDBG-DR Specific: Does the plan reflect disaster recovery goals (including affordable housing goals) if applicable to be accomplished with CDBG-DR funding?

Note: This can be done by either 1) creating one goal that will encompass all accomplishments anticipated to result from the CDBG-DR program during the Strategic Planning Period, or 2) by folding anticipated CDBG-DR accomplishments into other program goals on this screen.

Yes **No** AFH-Specific: Does the grantee include all goals identified in the AFH that are intended to be initiated or completed during the consolidated plan period.

Note: Collaborative Joint or Regional AFHs: Include only those AFH goals which the grantee is one of the responsible entities rather than all goals listed in the AFH.

Yes **No** AFH-Specific: Does the grantee include the associated metrics, milestones, strategies and actions for all AFH goals.

Comments/Verification: _____

SP-50: Public Housing Accessibility & Involvement §91.315(c)

Yes **No** If required by a Section 504 Voluntary Compliance Agreement, does the plan describe the need to increase the number of accessible units?

Yes **No** If the state has a state housing agency administering public housing funds, does the Consolidated Plan describe the state’s activities to encourage public housing residents to become more involved in management and participate in homeownership?

Yes **No** If there is a troubled housing authority located within the jurisdiction, does the plan describe how the jurisdiction will provide financial or other assistance to improve the PHAs operations and remove the “troubled” designation?

Comments/Verification: _____

SP-55: Barriers to Affordable Housing §91.315(h)

Yes **No** Does the plan describe the grantee's strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing as identified in the needs assessment section?
Note: The text on this screen under the heading “Barriers to affordable housing” is a read-only copy of the discussion of barriers to affordable housing on MA-40. It is provided here for reference to assist grantees when they discuss strategies to remove or ameliorate these barriers.

Comments/Verification: _____

SP-60: Homelessness Strategy §91.315(d)

Yes **No** Does the plan describe the grantee's strategy for reducing and ending homelessness through reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs?

Yes **No** Does the plan describe the grantee's strategy for reducing and ending homelessness through addressing the emergency shelter and transitional housing needs of homeless persons?

Yes **No** Does the plan describe the grantee's strategy for reducing and ending homelessness through helping homeless persons (especially persons that are chronically homeless individuals and families, families with children, veterans, and their families and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again?

Yes **No** Does the grantee describe the strategy for reducing and ending homelessness through to helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families who are likely to become homeless after being discharged from publicly funded institutions and systems of care or those receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs?

Comments/Verification: _____

SP-65: Lead-Based Paint Hazards §91.315(i)

Yes **No** Does the plan outline the actions to address lead based paint hazards and increase access to housing without lead based hazards?

Yes **No** Does the plan discuss how the plan for reduction of lead-based paint hazards will be integrated into housing policies and programs?

Comments/Verification: _____

SP-70: Anti-Poverty Strategy §91.315(j)

Yes **No** Does the plan describe the grantee's goals, programs, and policies for reducing the number of poverty level families?

Yes **No** Does the plan describe how the grantee's goals, programs and policies for producing and preserving affordable housing will be coordinated with other programs designed to serve persons at the poverty level (such as TANF and employment training programs)?

Comments/Verification: _____

SP-75: Colonias Strategy Section 916 of the NAHA of 1990 & HUD Notice CPD 11-001

Note: A Colonia is defined as any identifiable community in the United States–Mexico border regions of Arizona, California, New Mexico, and Texas that has inadequate sewage systems, no potable water supply, and a shortage of decent, safe, and sanitary housing. The border region includes the area within 150 miles of the U.S.–Mexico border excluding metropolitan statistical areas with populations exceeding one million. Texas, Arizona, California, and New Mexico set aside up to 10 percent of their state CDBG funds to be spent in Colonias communities. The set-aside funds are used for all CDBG-eligible activities that meet the needs of Colonias. Common uses of these funds include water system and sewer improvements and housing assistance.

Yes **No** Does the plan describe what strategy the state will employ to address

Yes **No** Does the plan describe what strategy the state will employ to remove or minimize public policies that adversely impact affordable housing within the Colonias?

Yes **No** Does the plan describe what strategy the state will employ to address those public policies that create barriers to affordable housing including substandard housing within the Colonias?

Yes **No** Does the plan describe the efforts the state will employ to reduce the number of families living at or below poverty-level through targeted goals, specific programs, and policies within the Colonias? The state should indicate how the number of poverty-level families will be reduced, including more description than just services or benefits provided.

Yes **No** Does the plan describe how the jurisdiction will coordinate its actions with other program services in order to increase production and preservation of affordable housing?

Comments/Verification: _____

SP-80: Monitoring §91.330

Yes **No** Does the plan describe the standards and procedures that the grantee will use to monitor activities carried out in furtherance of the plan and ensure long-term compliance with requirements of the programs involved, including the comprehensive planning requirements?

Yes **No** AFH- Specific: Do the standards and procedures to monitor activities carried out include strategies and actions that address the fair housing issues and goals identified in the AFH?

Comments/Verification: _____

Action Plan (AP) Screens §91.320

The first-year action plan is a part of the consolidated plan set-up in IDIS. The grantee should not submit a separate stand-alone action plan. If they do, so return the stand-alone plan to the grantee. Instead, the grantee should complete the action plan (AP) screens appearing below the strategic plan (SP) screens in the consolidated plan. This is the Year 1 action plan.

AP Screens contain prepopulated field containing information entered by the state in the NA, MA and SP screens. To change prepopulated information in AP screens, the state must first update their NA, MA, or SP screen.

AP-15: Expected Resources §91.320(c)(1,2)

In the chart provided, does the plan include the Annual Allocation, Program Income, Prior Year Resources, and Expected Amount Available for the remainder of the Con Plan for each identified funding source, (CDBG, HOME, ESG and HOPWA as appropriate, Section 8 funds, low income housing tax credits, and competitive McKinney-Vento Homeless Assistance Act funds) and other resources from private, state, and local sources that are reasonably expected to be made available to address the needs identified in the plan?

Yes **No** Annual Allocation

Yes **No** Program Income

Yes **No** Prior Year Resources

Yes **No** Expected Amount Available for remainder of Con Plan

Yes **No** Does the plan explain how federal funds will leverage additional resources (private, state and local funds), including a description of how match requirements will be satisfied?

Review match requirements:

Yes **No** HOME: 25% match on all expenditures except planning and admin, CHDO operating, CHDO capacity building, and CHDO project specific expenses when repayment is waived by the PJ under §92.301.

Yes **No** ESG: 100% match on all expenditures must be provided after the date that HUD signs the grant agreement. Cash, non-cash, and program income must meet requirements of § 576.201.

Yes **No** If appropriate, does the plan describe publicly owned land or property located within the jurisdiction that may be used to address the needs identified in the plan?

Yes **No** CDBG-DR Specific: Does the plan include CDBG-DR as a source of funding if the community was a recipient of federal disaster assistance?

Comments/Verification: _____

AP-20: Annual Goals & Objectives §91.320(c)(3) & (e)

Yes **No** Does the plan contain a summary of the annual objectives the grantee expects to achieve during the forthcoming program year? *Note: Annual goals are a subset of the Strategic Plan goals described in SP-45*

Yes **No** Does the plan include outcome measures for activities included in the AP in accordance with guidance issued by HUD? For the CDBG program, this would include activities that are likely to be funded because of the implementation of the state’s method of distribution.

Yes **No** CDBG- DR Specific: Does the plan include annual goals for activities that received CDBG-DR funding if the community received federal disaster assistance?

Yes **No** AFH Specific: Does the grantee specify one-year goals that will address fair housing goals identified in the AFH?

Comments/Verification: _____

AP-25: Allocation Priorities §91.320(d)

Yes **No** Based on the table provided, does the plan describe funding allocation priorities?

Yes **No** Does the description indicate the reasons for the allocation priorities and how the proposed distribution of funds will address the priority needs and specific objectives described in the Consolidated Plan?

Yes **No** CDBG-DR Specific: If the community received federal disaster funds, does the plan reference CDBG_DR allocation priorities in the text box on this screen and provide a link to the state's website where it's CDBG-DR Action Plan is posted as a resource for parties that wish to find out more?

Comments/Verification: _____

AP-30: Method of Distribution §91.320(d) and (k)

Yes **No** Does AP provide description of the state's method for distributing funds to local governments and nonprofit organizations to carry out activities, or the activities to be undertaken by the state, using funds that are expected to be received under formula allocations (and related program income) and other HUD assistance during the program year?

Yes **No** Does each method of distribution include a description of all the criteria that will be used to select applications and the relative importance of these criteria?

Yes **No** CDBG-only: If only summary criteria were described, how potential applicants can access application manuals or other state publications describing the application criteria?

Yes **No** ESG only: A description of the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government and non-profit organizations, including community and faith-based organizations?

Yes **No** HTF Only Beginning with FY2018 Plans: A summary of the method for distribution funds, application requirements and criteria that will be used to select applications and the relative importance of these criteria? The grantee's full method of distribution can be evaluated using their HTF Allocation Plan in Section AP-90 or AP-91.

Yes **No** HOPWA Only: The method describes selecting project sponsors, including providing full access to grassroots, faith-based and other community based organizations?

Yes **No** The method describes how resources will be allocated among funding categories?

Yes **No** The method describes threshold factors and grant size limits?

Yes **No** There is a clear description of the outcome measures expected because of the method of distribution.

Yes **No** Do the methods of distribution on this screen provide sufficient information so that units of general local government will be able to understand and comment on them? Able to understand what criteria and information their application will be judged? Able to prepare responsive application?

Note: The method of distribution may provide a summary of the selection criteria provided that all criteria is summarized and the details are set forth in application manuals or other official state publications that are widely distributed to eligible applicants. HUD may monitor the method of distribution as part of its audit and review responsibilities, as provided in Sec. 570.493(a)(10) in order to determine compliance with program requirements.

Comments/Verification: _____

AP-35: Projects

The questions on this screen must be answered; however, activity level detail is not required in a state CDBG grantee's annual action plan. Projects provided should align with the state's method of distribution. Once the state has made awards to units of general local government in accordance with the method of distribution and reported those awards as activities in IDIS, the state must ensure that these activities are associated with the appropriate project in the eCon Planning Suite. Failure to do so will result in inaccurate information downloading into the CAPER document.

Yes **No** Does the plan describe the reasons for the allocation priorities and any obstacles to addressing underserved needs?

Yes **No** Did the state specify the activities it plans to undertake during the next year to address the housing and supportive service needs for persons who are not homeless but require supportive housing (frail elderly, elderly, persons with disabilities, persons with HIV/AIDS and their families, and public housing residents)?

Yes **No** AFH specific: AFH goals receiving CPD funds are documented as a project(s).

Yes **No** AFH Specific: Projects in AFH geographic priority areas are identified.

Note: These needs are described on SP-25. Activities planned to address these needs may also be addressed on AP-65 in the narrative text box. AP-35 describes the activities for the year including projects users plan to undertake relative to this requirement. This may also be included in the State's Method of Distribution.

Comments/Verification: _____

AP-40: Section 108 Loan Guarantees §91.320(k)(1)(ii)

Yes **No** Does the plan indicate if the state intends to help non-entitlements units of local government apply for Section 108 loans?

Yes **No** If so, does the plan describe available guarantee amounts?

Yes **No** If so, does the plan describe how applications will be accepted?

Comments/Verification: _____

AP-45: Community Revitalization Strategies §91.320(k)(1)(ii)

Yes **No** Does the plan indicate whether the state will allow units of general local government to carry out community revitalization strategies?

Yes **No** If so, does the plan describe the state's process and criteria for approving local governments' revitalization strategies?

Comments/Verification: _____

AP-48: Method Distribution for Colonias §91.320(d)&(k) and HUD Notice CPD 11-001

Note: The State should describe the method of distribution for Colonias if it is different from the MOD described on AP-30. If it is the same, the narrative should refer readers to the Method of Distribution description. State grantees that border Mexico (Texas, Arizona, California, and New Mexico) may set aside up to ten percent of their state CDBG funds for Colonias. A Colonia is defined as any identifiable community in the United States–Mexico border regions of Arizona, California, New Mexico, and Texas that has inadequate sewage systems, no potable water supply, and a shortage of decent, safe, and sanitary housing. The set-aside funds are used for all CDBG-eligible activities that meet the needs of Colonias. Common uses of these funds include water system and sewer improvements and housing assistance.

Yes **No** If the State has decided to set aside funds for Colonias, does it exceed the 10% threshold?

Yes **No** If the Method of Distribution is different for Colonias, did the State:

____ Describe the state program addressed by the Method of Distribution?

____ Describe all of the criteria that will be used to select applications and the relative importance of these criteria?

____ CDBG Only: If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria?

____ ESG Only: Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government and nonprofit organizations, including community and faith-based organizations?

____ HOPWA Only: Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations)?

____ Describe how resources will be allocated among funding categories?

____ Describe threshold factors and grant size limits?

____ What are the outcome measures expected as a result of the method of distribution?

Yes **No** Describe all the criteria that will be used to select applications and the relative importance of these criteria.

____ CDBG Only: If only summary criteria were described, how can potential applicants access application manuals or other state publications describing the application criteria?

____ ESG Only: Describe the process for awarding funds to state recipients and how the state will make its allocation available to units of general local government and nonprofit organizations, including community and faith-based organizations.

____ HOPWA Only: Identify the method of selecting project sponsors (including providing full access to grassroots faith-based and other community-based organizations).

Yes **No** Describe how resources will be allocated among funding categories.

Yes **No** Describe threshold factors and grant size limits.

Yes **No** What are the outcome measures expected as a result of the method of distribution?

Note: The term affordable housing shall be as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership. These estimates should not include the provision of emergency shelter, transitional shelter, or social services.

CDBG-DR Specific: The state must include annual goals for CDBG-DR funds; however they do not require that they include affordable housing goals in particular if the state does not select this as an activity.

Comments/Verification: _____

AP-50 Geographic Distribution §91.320(f)

For state grantees, the plan must describe the geographic areas of the state in which it will direct assistance during the ensuing program year and provide rationale for its priorities in allocating investment geographically.

Yes No Does the plan include a description of the geographic areas of the jurisdiction (including areas of low-income and minority concentration) where assistance will be directed?

Yes No If applicable, does the grantee estimate the percentage of funds they plan to dedicate to target areas?

Yes No Does the plan provide the rationale for the priorities for allocating investment geographically?

Comments/Verification: _____

AP-55 Affordable Housing §91.320(g)

Yes No Does the plan specify one-year goals for the number of households to be provided affordable housing through activities that provide rental assistance, production of new units, rehabilitation of existing units, or acquisition of existing units using funds made available to the grantee, including affordable housing goals to be accomplished with CDBG-DR funding if applicable?

Yes No CDBG-DR Specific: Does the grantee specify one-year goals for the number of homeless, non-homeless, and special needs households to be provided affordable housing units using funds made available to the grantee, including if applicable, affordable housing goals to be accomplished with CDBG-DR funding?

Note: The term affordable housing shall be as defined in 24 CFR 92.252 for rental housing and 24 CFR 92.254 for homeownership and as defined in 24 CFR 93.302 for rental housing and 24 CFR 93.304 for homeownership. These estimates should not include the provision of emergency shelter, transitional shelter, or social services.

CDBG-DR Specific: The grantee must include annual goals for CDBG-DR funds; however they do not require that they include affordable housing goals in particular if the grantee does not select this as an activity.

Comments/Verification: _____

AP-60: Public Housing §91.320(j)

Yes **No** Does the state describe actions it plans to take to address the needs of public housing?

Yes **No** Does the plan discuss actions planned to encourage public housing residents to become more involved in management and participate in homeownership?

Yes **No** If the public housing agency is designated as “troubled” by HUD, does the state must describe the manner in which it will provide financial or other assistance to improve its operations and remove the “troubled” designation?

Note: Consult with Public and Indian Housing representative to determine whether Public Housing Authority is designated as “troubled.” This is not required if the PHA’s service area is located entirely within the boundaries of the UGLG that must submit a consolidated plan to HUD.

Comments/Verification: _____

AP-65: Homeless & Other Special Need Activities §91.320(h)

Yes **No** Does the state describe its one-year goals and specific action steps for reducing and ending homelessness through:

- _____ Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs)
- _____ Addressing the emergency shelter and transitional housing needs of homeless persons
- _____ Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again?
- _____ Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals who are:
 - _____ Being discharged from publicly funded institutions and systems of care, such as health-care facilities, mental health facilities, foster care or other youth facilities, corrections programs and institutions?
 - _____ Receiving assistance from public or private agencies that address housing, health, social services, employment, education or youth needs?

Note: AP-65 does not specifically call out the needs described here or in §91.215(e). Users must discuss in the discussion text box. AP-35 describes the activities for the year, including projects users plan to undertake relative to this requirement. Additional annual goal information such as numeric/quantity etc. can be seen on the AP-20 screen by clicking “View” next to each individual goal on that screen or by clicking “View Summary” below the goal table on AP-20.

Comments/Verification: _____

AP-70: HOPWA Goals §91.320(k)(4)

Yes **No** Does the state directly administer HOPWA funds?

If no, AP-70 should not be included in their Con Plan template and the checklist elements in this section can be ignored.

Yes **No** Does the plan describe the state’s one-year goals for the number of households to be provided housing through the use of HOPWA for: Short-term rent, mortgage and utility assistance payments; Tenant based rental assistance; Units provided in permanent housing facilities developed, leased or operated with HOPWA funds; and Units provided in transitional short-term housing facilities developed, leased or operated with HOPWA funds?

Comments/Verification: _____

AP-75: Barrier to Affordable Housing §91.320(i)

Yes **No** Does the state describe actions it plans to take to remove or ameliorate the negative effect of public policies that serve as barriers to affordable housing? Such policies, procedures, and processes include but are not limited to: land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment. *Refer to the MA-40 and SP-55 screen in the strategic plan to determine if response is aligned with consolidated plan.*

Comments/Verification: _____

AP-80 Border States Only – Colonias Actions HUD CPD Notice 11-001

Yes **No** If applicable, does the plan discuss action the state plans to take to address obstacles to meeting undeserved needs in Colonias?

Yes **No** If applicable, does the plan discuss actions the state plans to take to reduce the number of poverty level families in Colonias?

Yes **No** If applicable, does the plan discuss actions the state plans to take to develop the institutional structure in Colonias?

Yes **No** If applicable, does the plan discuss actions the state plans to take to enhance coordination between public and private housing and social service agencies in Colonias?

Comments/Verification: _____

AP-85: Other Actions §91.320(j)

Yes **No** Does the plan discuss actions planned to foster and maintain affordable housing?

Yes **No** Does the plan discuss actions planned to reduce lead-based paint hazards?

Yes **No** Does the plan discuss actions the state plans to take to reduce the number of

Yes **No** Does the plan discuss actions the state plans to take to develop the institutional structure?

Yes **No** Does the plan discuss actions the state plans to take to enhance coordination between public and private housing and social service agencies?

Note: With respect to economic development, the plan should describe actions that will take place to enhance coordination with private industry, businesses, developers, and social services agencies.

Comments/Verification: _____

AP-90: Program-Specific Requirements – CDBG §91.320(k)(1)

Yes **No** Does the plan identify program income that is available for use to be included in projects to be carried out as described on this screen?

Yes **No** Does the plan describe the estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income?

Yes **No** Does the plan identify the amount of urgent need activities?

Comments/Verification: _____

AP-90: Program-Specific Requirements - HOME §91.320(k)(2)

Yes **No** Does AP provide for engaging in forms of investment which are not described in §92.205?

Yes **No** Does the plan provide a description of the guidelines for resale or recapture that ensure the affordability of units acquired with HOME funds §91.254(a)(4).

Yes **No** Does the State describe plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds, including a description of the refinancing guidelines required that will be used under §92.206(b)?

Note: HUD specific written approval to the jurisdiction is required for other forms of investment, as provided in §92.205(b). Approval of the con plan or action plan under §91.500 or the failure to disapprove the con plan or action plan does not satisfy the requirement for specific HUD approval for other forms of investment and for resale or recapture provisions.

Yes **No** The requirements for describing the conditions under which the state will refinance existing debt include: (91.320(k)(2)(iii)(A)-(F)

_____ Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and

- _____ refinancing.
- _____ Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
- _____ State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both
- _____ Specify the required period of affordability, whether it is a minimum 15 years or longer.
- _____ Specify whether the investment of HOME funds may be state-wide or limited to a specific geographic area, such as a community identified in a neighborhood revitalization strategy under 24 CFR 91.315(g) or a federally designated Empowerment Zone or Enterprise Community
- _____ State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including the CDBG program.

Note: The items listed under §91.320(k)(2)(iii)(A-F) are not explicitly stated on this screen. Given the amount of information requested here, grantees may wish to attach separate documents.

Yes **No** If the State intends to use HOME funds for homebuyer assistance or for rehabilitation of owner-occupied single family housing and does not use the HOME affordable homeownership limits for the area provided by HUD, did it determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 92.254(a)(2)(iii).

Note: Documentation related to this requirement should be included with any other "Grantee Specific Appendices" under attachments on AD-25.

Yes **No** Did the State describe eligible applicants (e.g., categories of eligible applicants), its process for soliciting and funding applications or proposals (e.g., competition, first-come first-serve) and where detailed information may be obtained (e.g., application packages are available at the office of the jurisdiction or on the jurisdiction's Web site).

Note: Documentation related to this requirement should be included with any other "Grantee Specific Appendices" under attachments on AD-25. If not attached, where in the plan was this described?

Yes **No** If the State planned to limit the beneficiaries or give preferences to a particular segment of the low-income population, was a description of that limitation or preference described in the action plan?

Note: Documentation related to this requirement should be included with any other "Grantee Specific Appendices" under attachments on AD-25. If not attached, where in the plan was this described?

Any limitation or preference must not violate nondiscrimination requirements in 24 CFR 92.350, and the participating jurisdiction must not limit or give preferences to students. A limitation or preference may include, in addition to targeting tenant-based rental assistance to persons with special needs, as provided in 24 CFR 92.209(c)(2), limiting beneficiaries or giving preferences to such professions as police officers, teachers, or artists. The PJ must not limit beneficiaries or give a preference to all employees of the jurisdiction. The PJ may permit rental housing owners to limit tenants or give a preference in accordance with 24 CFR 92.253(d) only if such limitation or preference is described in the action plan.

Comments/Verification: _____

AP-90: Program-Specific – HOME Resale and Recapture Provisions

Note: Approval of the consolidated plan or action plan under §91.500 or the failure to disapprove the consolidated plan or action does not satisfy the requirement for specific HUD approval for resale or recapture guidelines.

General Review Criteria

A1: If the PJ proposes to use any HOME funds for assisting homebuyers (whether through down payment assistance, new construction or rehabilitation), does the Annual Action Plan include resale or recapture provisions?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: PJs must submit resale or recapture provisions to HUD for review and approval before using any HOME funds for this purpose. HUD must determine that the provisions meet the requirements established in 24 CFR 92.254(a) (5) (i) and (ii).

Field Office Action: If yes, continue to Question A2. If no, you must contact the PJ and ask that it submit the resale and/or recapture provisions before the end of the 45-day Annual Action Plan review period or you must inform the PJ in writing in the Annual Action Plan approval letter that it may not use any HOME funds for homebuyer assistance until it has submitted and HUD has approved the resale and/or recapture provisions to be used.

A2: If the PJ will use subrecipients, State recipients, urban county or consortium members, CHDOs or other entities to provide the homebuyer assistance, did the state submit the resale or recapture provisions to be used by these entities submitted to HUD for review and approval as part of the Annual Action Plan?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: All resale or recapture provisions to be used in a PJ's program must be reviewed and approved by HUD before the PJ can use any HOME funds for homebuyer projects using those provisions.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it submit the resale and/or recapture provisions to be used by one or more of these entities before the end of the 45-day Annual Action Plan review period. If this is not possible or the PJ fails to respond or submit an acceptable revision, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and the entity may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale and/or recapture provisions to be used.

A3: If the PJ proposes to use more than one set of provisions (e.g., both resale and recapture, different sets of recapture provisions), does the Annual Action Plan provide an explanation of the circumstances under which each form will be used?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: For example, a PJ may use recapture provisions for its HOME downpayment assistance program, but impose resale provisions on homebuyer units newly constructed with HOME funds by its CHDO. The Annual Action Plan must explain when it will use each set of provisions.

Field Office Action: If yes or N/A, proceed with your review. If no, you must contact the PJ and ask that it revise its discussion of its resale and/or recapture provisions to include an explanation of the circumstances under which each set of provisions will be used before the end of the 45-day Annual Action Plan review period. If this is not possible or the PJ fails to respond or submit an acceptable revision within the review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale and/or recapture provisions to be used.

Recapture Provisions

Recapture Provisions permit the HOME-assisted homebuyer to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. The PJ imposes recapture provisions by written agreement and by recorded lien. In the event of a voluntary or involuntary sale during the period of affordability, the PJ must recapture the amount specified under its recapture provisions.

B1: Do the provisions reflect one of the following models?

- 1. PJ recaptures entire amount;
- 1. Pro rata reduction of recapture amount during affordability period;
- 2. Owner recovers entire investment (down payment and capital improvements) before PJ recaptures HOME investment;
- 3. Shared net proceeds in event of insufficient net proceeds;
- 4. PJ-developed or modified provisions.

Yes No Verification found on page/screen

Comments/Basis for Conclusion (Please Specify which Model):

Explanation: The HOME regulations at 24 CFR 92.254(a)(5)(ii)(A) list four acceptable recapture models and permit PJs to adopt, develop or modify their own recapture requirements for HUD approval.

B2: Are the provisions described in adequate detail for the HUD Reviewer and interested members of the public to understand the PJ’s method for recapturing funds?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The Annual Action Plan must describe the recapture provision(s) to be used in sufficient detail for HUD and the public to understand which provisions it has chosen and how they will be implemented. Provisions that simply cite or repeat HOME regulations are not acceptable. The provisions must be described in the Annual

Action Plan. Similarly, if the PJ has developed its own provisions or made modifications to the regulatory models, it must describe those provisions in sufficient detail.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its discussion of its recapture provisions to include sufficient detail to permit HUD and the public to understand the recapture requirements being adopted. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

B3: Do the provisions indicate that the amount subject to recapture is the direct subsidy received by the homebuyer?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Direct subsidy includes HOME investment that enabled the homebuyer to purchase the property. This includes down payment assistance, closing costs or other HOME assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and a reduced sales price attributable to HOME development assistance. Development subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) cannot be subject to recapture since the homebuyer did not realize a direct benefit from these funds.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its recapture provisions to state that only direct subsidy to the homebuyer is subject to recapture. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

B4: Do the provisions limit the amount to be recaptured to the net proceeds available from the sale?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The net proceeds are the sales price minus loan repayment (other than HOME funds) and closing costs. The PJ must limit the amount subject to recapture to the net proceeds available from the sale. This limitation applies to all units regardless of the type of recapture provisions used or to the nature of the sale (voluntary sales including short sales, and involuntary sales including foreclosures). Any recapture provisions that do not explicitly include this limitation are unacceptable and cannot be approved.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its recapture provisions to state that its recapture provisions limit the amount to be recaptured to the net proceeds of the sale. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its recapture

provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the recapture provisions to be used.

Resale Provisions

Resale Provisions preserve the affordability and availability of the HOME-assisted homebuyer unit to low-income households for the entire period of affordability. The PJ controls the resale price by establishing an objective methodology for determining what is a fair return to the original homebuyer, in an effort to make the property affordable to a reasonable range of low-income homebuyers. If the established resale price is not affordable to the subsequent low-income homebuyer, the PJ may be required to provide additional assistance to that homebuyer – but may not adjust the resale price as a result.

C1: Does the resale provision limit resale of the property during the HOME period of affordability only to a buyer whose family qualifies as a low-income family?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Resale provisions that permit resale of a HOME-assisted unit to a subsequent homebuyer who is not low-income – regardless of the circumstance – are not acceptable. Resale provisions that provide a recapture option to facilitate sale to a subsequent buyer who is not income-eligible (i.e., resale/recapture hybrids) are not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provision to state that the housing may only be resold to a family that qualifies as low-income. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

C2: Does the provision contain a specific definition of “fair return on investment?”

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision describes in detail what return homebuyers can expect if they sell their unit during the period of affordability. The PJ is expected to identify an objective standard or index that will determine “fair return” on resale. (See C3)

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provision to include a definition of “fair return on investment.” If this is not possible or the PJ fails to respond or

submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used

C3: Is fair return based upon an objective index or standard?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: An objective standard or index is concrete and publicly accessible and can be easily measured at the time of original purchase and at resale. Examples include: a percentage of the change in median sales prices over the period of ownership, the percentage change in area median income over the period of ownership, and the percentage change in the Consumer Price Index over the period of ownership. In depressed or declining markets, a loss on investment can constitute a fair return. A standard that ties the return to the original homebuyer to the price that a specific homebuyer or a defined group of low-income homebuyers are able to pay *does not* constitute fair return and is not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provisions to specify the standard or index that will be applied upon resale to provide a fair return to the homebuyer. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

C4: Does the basis upon which fair return is calculated include the homebuyer's original investment in the property and the increase in market value attributable to homebuyer investments in or capital improvements to the property?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision must specifically state that the basis for calculating fair return is the original investment by the homebuyer and specific types of upgrades or additions that will add value to the property. (Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value). The provision must address the types of changes that it will or will not include in that basis.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise its resale provisions so that homebuyer investment includes both the homebuyer-provided down payment and homebuyer-financed improvements that would increase the value of the home. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any

activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

Presumption of Affordability

D1: If the PJ plans to use a presumption of affordability instead of enforcement mechanisms to meet the resale requirement, does the resale provision identify specific neighborhoods that will be subject to the presumption of affordability?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: A presumption of affordability cannot be sought or approved for an entire PJ. The presumption can only be made on a neighborhood basis.

Field Office Action: If yes, proceed with your review. If the presumption is not neighborhood or neighborhood(s)-specific, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD's approval at any time during the program year. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the resale provisions to be used.

D2: If this is a new request or renewal of a presumption issued previously, does the PJ submit a recent market analysis for each neighborhood for which approval of the presumption of affordability is sought?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The PJ must submit a separate market analysis for each neighborhood for which it seeks approval of a presumption of affordability, except that it can perform a combined market analysis for a limited number of contiguous neighborhoods that are similarly situated with respect to demographic profile, housing market, and economic conditions. The analysis must be recent (performed within the last 12 months).

Field Office Action: If yes, proceed with your review. If the PJ did not submit a market analysis, did not submit analyses for all neighborhoods, or submitted analyses that were not completed within the last 12 months, you must contact the PJ and ask that recent market analyses supporting the presumption be submitted. If the analyses are not submitted timely, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD's approval at any time during the program year.

D3: If the market analysis was originally submitted with a previous year's Annual Action Plan, does the Plan indicate that the PJ has determined that an updated analysis is not warranted by any changes in the neighborhood's market conditions?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: If the PJ becomes aware that significant changes in a neighborhood’s market conditions since the preparation of market analysis make continuation of the presumption of affordability inappropriate, it must indicate that in its Annual Action Plan. The PJ must indicate in the Annual Action Plan that, in the absence of significant changes, it is continuing its use of the presumption of affordability for another program year.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and ask that it revise and include this information in the presumption section of its Annual Action Plan before continuing your review. If this is not possible or the PJ fails to respond or submit an acceptable revision within the 45-day review period, you must inform the PJ in the Annual Action Plan approval letter that HUD is disapproving its presumption of affordability and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the PJ has submitted and HUD has approved the presumption of affordability.

D4: Does the market analysis include the following:

1. **An evaluation of the location and characteristics of the housing and residents in the neighborhood (e.g., sale prices, age and amenities of the housing stock, incomes of residents, percentage of owner-occupants) in relation to housing and incomes in the housing market area?**

2. **An analysis of the current and projected incomes of neighborhood residents for an average period of affordability for homebuyers in the neighborhood that supports the conclusion that a reasonable range of low-income families will continue to qualify for mortgage financing?**

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The market analysis, which can included a combined market analysis for a limited number of contiguous neighborhoods that are similarly situated with respect to demographic profile, housing market, and economic conditions, must contain this evaluation and the analysis of the data must support the conclusion that a reasonable range of low-income families will continue to qualify for mortgage financing.

Field Office Action: If yes, proceed with your review. If no, you must contact the PJ and request that an acceptable market analysis be submitted. If the analysis is not submitted timely, you must reject the presumption, and prohibit the PJ from using any HOME funds without imposing either resale or recapture requirements. The PJ may resubmit a new presumption request for HUD’s approval at any time during the program year.

D5: Does the information presented in the market analysis support the PJ’s conclusion that the following conditions are likely to be met in the event of a resale of the HOME-assisted housing located in the neighborhood during the affordability period without the imposition of enforcement mechanisms by the PJ:

- the housing will be available and affordable to a reasonable range of low-income homebuyers;
- a low-income homebuyer will occupy the housing as a principal residence; and
- The original owner will be afforded a fair return on investment?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The market analysis must support the conclusion that housing may be presumed to meet the resale restrictions. If the analysis is flawed or does not support this conclusion, the HUD Field Office must disapprove the presumption of affordability.

Field Office Action: If yes and all other requirements related to the presumption have been met, you may approve the presumption of affordability. If no, you must reject the presumption of affordability and require the use of approved resale or recapture provisions in the neighborhood(s).

Based on my review of the Plan against the regulations, I have determined the Plan is:

AP-90: Program-Specific Requirements – ESG §91.320(k)(3)

Yes **No** Does the state include its written standards for providing ESG assistance OR describe its requirements for its subrecipients to establish and implement written standards for providing ESG assistance? See 24 CFR 576.400(e)(2) and (e)(3) for the minimum standards.

Yes **No** If the Continuum of Care for the jurisdiction has established a centralized or coordinated assessment system that meets HUD requirements, Does the state describe that system?
Note: The requirements for using a centralized or coordinated assessment system, including the exception for victim service providers, are set forth under 24 CFR 576.400(d).

Yes **No** Does the state identify its process for making sub-awards and describe how the state intends to make its allocation available to units of general local government and/or private nonprofit organizations?

Yes **No** Does the state describe its performance standards for evaluating SG activities?

Comments/Verification: _____

AP-90: Program-Specific Requirements – HOPWA §91.320 (k)(4)

Yes **No** HOPWA Specific: Does the action plan identify the method for selecting project sponsors (including providing full access to grassroots faith-based and other community organizations)? *Note: Due to a system error, this element is omitted from the template. HOPWA states should therefore add a text box at the end of this screen to enter this information.*

Comments/Verification: _____

AP-90 & AP-91 Program-Specific Requirements – HTF §91.320(k)(5)

*HTF specific requirements – This section does not apply for FY17 plans.
This section only applies to plans submitted on or after January 1, 2018. HUD will release new HTF screen enhancements for FY18.*

If the grantee or state agency does not directly administer its HTF funds, this HTF checklist elements can be ignored.

The HTF Allocation Plan must describe the distribution of the HTF funds, and establish the application requirements and the criteria for selection of applications submitted by eligible recipients that meet the state’s priority housing needs.

1. Yes No N/A Does the plan provide a description on how the grantee will distribute its HTF funds? The grantee must have identified at least one of the following:

- Applications submitted by eligible recipients
- Subgrantees that are State Agencies
- Subgrantees that are HUD-CPD entitlement grantees

2. Yes No N/A If distributing HTF funds through grants to subgrantees, does the plan describe the method for distributing HTF funds through grants to subgrantees and how those funds will be made available to state agencies and/or units of general local government? If not distributing funds through grants to subgrantees, ignore this element.

3. Yes No N/A If distributing HTF funds by selecting applications submitted by eligible recipients, does the plan describe the following:

- a. eligibility requirements for recipients of HTF funds (as defined in 24 CFR § 93.2)?
Yes No N/A
- b. the grantee’s application requirements for eligible recipients to apply for HTF funds?
Yes No N/A
- c. the selection criteria that the grantee will use to select applications submitted by eligible recipients?
Yes No N/A
- d. the grantee’s required priority for funding based on geographic diversity (as defined by the grantee in the consolidated plan)?
Yes No N/A
- e. the grantee’s required priority for funding based on the applicant's ability to obligate HTF funds and undertake eligible activities in a timely manner?
Yes No N/A
- f. the grantee’s required priority for funding based on the extent to which the rental project has Federal, State, or local project-based rental assistance so that rents are affordable to extremely low-income families?
Yes No N/A
- g. the grantee’s required priority for funding based on the financial feasibility of the project beyond the required 30-year period?
Yes No N/A
- h. the grantee’s required priority for funding based on the merits of the application in meeting the priority housing needs of the grantee (such as housing that is accessible to transit or employment centers, housing that includes green building and sustainable development features, or housing that serves special needs populations)?
Yes No N/A
- i. the grantee’s required priority for funding based on the extent to which the application makes use of non-federal funding sources?
Yes No N/A

Overall, Did the grantee describe eligible applicants (e.g., categories of eligible applicants), its process for soliciting and funding applications or proposals (e.g., competition, first-come first-serve) and where detailed information may be obtained (e.g., application packages are available at the office of the grantee or on the grantee’s Web site).

Note: The plan must describe all the elements above. If the grantee is not distributing funds by selecting applications submitted by eligible recipients, ignore these elements.

Comments/Verification: _____

4. Yes No N/A Does the plan specify if the grantee will require the applicant to include a description of the eligible activities to be conducted with HTF funds? If the grantee will not distribute funds by selecting applications submitted by eligible recipients, ignore this element.

5. Yes No N/A Does the plan specify if the grantee will require that each eligible recipient certify that housing units assisted with HTF funds will comply with HTF requirements?

6. Performance Goals Benchmarks:

Yes No N/A Did the plan provide for performance goals and benchmarks against which the grantee will measure its progress, consistent with the grantee’s goals established under 24 CFR 91.315(b)(2)? The grantee has met this requirement by including HTF in its housing goals in the housing table on the SP-45 Goals and AP-20 Annual Goals and Objective screens.

7. Maximum Per-unit Development Subsidy Amount:

Yes No N/A Does the plan establish the grantee’s maximum limitations on the total amount of HTF funds that can be invested per-unit for development of non-luxury housing? (The grantee can determine its own subsidy limits or adopt the limits used in other federal programs.)

Yes No N/A If the grantee developed its own subsidy limits:

- _____ Does the plan describe how the limits were established?
- _____ Are the limits reasonable?
- _____ Are the limits based on actual costs?
- _____ Are the limits adjusted for the number of bedrooms?
- _____ Are the limits adjusted for the geographic location of the project(s)?

Yes No N/A If the grantee determined that a single limit is appropriate for the entire state:
_____ Does the plan provide justification for why a single limit is appropriate?
_____ Is the justification provided acceptable?

Yes No N/A If the grantee adopted subsidy limits used in other federal programs:
_____ Are the limits a federal subsidy limit (i.e., HOME, LIHTC, or Public Housing’s TDCs)?
_____ Are the limits reasonable, based on actual costs, adjusted for the number of bedrooms and adjusted for the geographic location of the project(s)?
_____ Does the plan provide justification why another federal subsidy limit was adopted for the grantee’s HTF program?
_____ Is the justification provided acceptable?

8. Rehabilitation Standards:

Yes No N/A Submission of the grantee’s rehabilitation standards is required only if the grantee intends to use its HTF funds for the rehabilitation of housing. If the grantee will not undertake HTF-funded rehabilitation activities, you can ignore this element.

- _____ Does the plan contain rehabilitation standards that all HTF-assisted housing undergoing rehabilitation must meet at the time of project completion in accordance with § 93.301(b)?
- _____ Does the plan describe rehabilitation standards in enough detail on what work is required?
- _____ Does the plan describe rehabilitation standards in enough detail on how the work should be performed?
- _____ Does the plan describe rehabilitation standards in enough detail on what materials should be used?

Yes No N/A Do the rehabilitation standards address the following property standard requirements?

- _____ Health and safety?
- _____ Major systems?
- _____ Lead-Based Paint?
- _____ Accessibility?
- _____ Disaster Mitigation (where relevant)?
- _____ State and local Codes, Ordinances, and Zoning Requirements?
- _____ Inspectable Areas and Observable Deficiencies from HUD’s Uniform Physical Condition Standards identified by HUD as applicable to HTF-assisted housing?
- _____ Capital Needs Assessment (if applicable)

9. Resale or Recapture Guidelines:

Yes No N/A Does the plan provide a description of the guidelines that will be used for resale or recapture of HTF funds when used for homebuyer activities as required in 24 CFR 93.305(b)?

Note: Remember to complete the recapture/resale checklist below. Approval of the consolidated plan or action plan under §91.500 or the failure to disapprove the consolidated plan or action does not satisfy the requirement for specific HUD approval for resale or recapture guidelines.

10. HTF Affordable Homeownership limits:

Yes No N/A If the grantee intends to use HTF funds for homebuyer assistance and does not use the HTF affordable homeownership limits for the area provided by HUD, did it determine 95 percent of the median area purchase price and set forth the information in accordance with 24 CFR 93.305.

11. Grantee Limited Beneficiary or Preferences:

Yes No N/A If the grantee planned to limit the beneficiaries or give preferences to a particular segment of the extremely low- or very low-income population, was a description of that limitation or preference described in its consolidated plan or action plan?

Any limitation or preference must not violate nondiscrimination requirements in 24 CFR 93.350, and the grantee must not limit or give preferences to students. A limitation or preference may include limiting beneficiaries or giving preferences to such professions as police officers, teachers, or artists. The grantee may permit rental housing owners to limit tenants or give a preference in accordance with 24 CFR 93.303(d)(3) only if such limitation or preference is described in the action plan.

12. Refinancing of Existing Debt:

Yes No N/A Does the grantee describe plans for using HTF funds to refinance existing debt secured by multifamily housing that is rehabilitated with HTF funds, including a description of the refinancing guidelines required that will be used under § 91.320(k)(5)(viii) and § 93.201(b)?

The requirements for describing the conditions under which the grantee will refinance existing debt include:

- _____ Do the guidelines indicate that refinancing of existing debt is only eligible if it is necessary to reduce the overall housing costs and would result in the housing being more affordable and proportional to the number of the HTF-assisted units in the rental project?
- _____ Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
- _____ The proportional rehabilitation cost must be greater than the proportional amount of debt that is refinanced.

Note: The items listed under § 91.320(k)(5)(viii) and § 93.201(b) are not explicitly stated on this screen. Given the amount of information requested here, grantees may wish to attach separate documents.

HTF Resale/Recapture Requirements

General Review Criteria

A1: If the grantee proposes to use any HTF funds for assisting homebuyers (whether through down payment assistance, new construction), does the Annual Action Plan include resale or recapture provisions?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Grantees must submit resale or recapture provisions to HUD for review and approval before using any HTF funds for this purpose. HUD must determine that the provisions meet the requirements established in 24 CFR 93.305(b)(1) and (b2).

Field Office Action: If yes, continue to Question A2. If no, you must contact the grantee and ask that it submit the resale and/or recapture provisions before the end of the 45-day Annual Action Plan review period or you must inform the grantee in writing in the Annual Action Plan approval letter that it may not use any HTF funds for homebuyer assistance until it has submitted and HUD has approved the resale and/or recapture provisions to be used.

A2: If the grantee proposes to use more than one set of provisions (e.g., both resale and recapture, different sets of recapture provisions), does the Annual Action Plan provide an explanation of the circumstances under which each form will be used?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: For example, a grantee may use recapture provisions for its HTF downpayment assistance program, but impose resale provisions on homebuyer units newly constructed with HTF funds by its recipient. The Annual Action Plan must explain when it will use each set of provisions.

Field Office Action: If yes or N/A, proceed with your review. If no, you must contact the grantee and ask that it revise its discussion of its resale and/or recapture provisions to include an explanation of the circumstances under which each set of provisions will be used before the end of the 45-day Annual Action Plan review period. If this is not possible or the grantee fails to respond or submit an acceptable revision within the review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its resale and/or recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the resale and/or recapture provisions to be used.

Recapture Provisions

Recapture Provisions permit the HTF-assisted homebuyer to sell their unit at any time during the period of affordability, to any willing buyer, and at the price the market will bear. The grantee imposes recapture provisions by written agreement and by recorded lien. In the event of a voluntary or involuntary sale during the period of affordability, the grantee must recapture the amount specified under its recapture provisions.

B1: Do the provisions reflect one of the following models?

- **Grantee recaptures entire amount;**
- **Pro rata reduction of recapture amount during affordability period;**
- **Owner recovers entire investment (down payment and capital improvements) before grantee recaptures HTF investment;**
- **Shared net proceeds in event of insufficient net proceeds;**
- **Grantee-developed or modified provisions.**

Yes No Verification found on page/screen

Comments/Basis for Conclusion (Please Specify which Model):

Explanation: The HTF regulations at 24 CFR 93.305(b)(2) list four acceptable recapture models and permit grantees to adopt, develop or modify their own recapture requirements for HUD approval.

B2: Are the provisions described in adequate detail for the HUD Reviewer and interested members of the public to understand the grantee’s method for recapturing funds?

Yes No N/A Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The Annual Action Plan must describe the recapture provision(s) to be used in sufficient detail for HUD and the public to understand which provisions it has chosen and how they will be implemented. Provisions that simply cite or repeat HTF regulations are not acceptable. The provisions must be described in the Annual Action Plan. Similarly, if the grantee has developed its own provisions or made modifications to the regulatory models, it must describe those provisions in sufficient detail.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its discussion of its recapture provisions to include sufficient detail to permit HUD and the public to understand the recapture requirements being adopted. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HTF funds to undertake any

activities related to homebuyer assistance until the grantee has submitted and HUD has approved the recapture provisions to be used.

B3: Do the provisions indicate that the amount subject to recapture is the direct subsidy received by the homebuyer?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Direct subsidy includes HTF investment that enabled the homebuyer to purchase the property. This includes down payment assistance, closing costs or other HTF assistance provided directly to the homebuyer and/or the difference between the fair market value of the property and a reduced sales price attributable to HTF development assistance. Development subsidies (i.e., the difference between the cost of producing the unit and the fair market value of the unit) cannot be subject to recapture since the homebuyer did not realize a direct benefit from these funds.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its recapture provisions to state that only direct subsidy to the homebuyer is subject to recapture. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the recapture provisions to be used.

B4: Do the provisions limit the amount to be recaptured to the net proceeds available from the sale?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The net proceeds are the sales price minus loan repayment (other than HTF funds) and closing costs. The grantee must limit the amount subject to recapture to the net proceeds available from the sale. This limitation applies to all units regardless of the type of recapture provisions used or to the nature of the sale (voluntary sales including short sales, and involuntary sales including foreclosures). Any recapture provisions that do not explicitly include this limitation are unacceptable and cannot be approved.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its recapture provisions to state that its recapture provisions limit the amount to be recaptured to the net proceeds of the sale. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its recapture provisions and it may not use any HOME funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the recapture provisions to be used.

Resale Provisions

Resale Provisions preserve the affordability and availability of the HTF-assisted homebuyer unit to very low-income households for the entire period of affordability. The grantee controls the resale price by establishing an objective methodology for determining what is a fair return to the original homebuyer, in an effort to make the property affordable to a reasonable range of very low-income homebuyers. If the established resale price is not affordable to the subsequent very low-income homebuyer, the grantee may be required to provide additional assistance to that homebuyer – but may not adjust the resale price as a result.

C1: Does the resale provision limit resale of the property during the HTF period of affordability only to a buyer whose family qualifies as a very low-income family?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: Resale provisions that permit resale of a HTF-assisted unit to a subsequent homebuyer who is not very low-income – regardless of the circumstance – are not acceptable. Resale provisions that provide a recapture option to facilitate sale to a subsequent buyer who is not income-eligible (i.e., resale/recapture hybrids) are not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its resale provision to state that the housing may only be resold to a family that qualifies as very low-income. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the resale provisions to be used.

C2: Does the provision contain a specific definition of “fair return on investment?”

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision describes in detail what return homebuyers can expect if they sell their unit during the period of affordability. The grantee is expected to identify an objective standard or index that will determine “fair return” on resale. (See C3)

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its resale provision to include a definition of “fair return on investment.” If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the resale provisions to be used

C3: Is fair return based upon an objective index or standard?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: An objective standard or index is concrete and publicly accessible and can be easily measured at the time of original purchase and at resale. Examples include: a percentage of the change in median sales prices over the period of ownership, the percentage change in area median income over the period of ownership, and the percentage change in the Consumer Price Index over the period of ownership. In depressed or declining markets, a loss on investment can constitute a fair return. A standard that ties the return to the original homebuyer to the price that a specific homebuyer or a defined group of low-income homebuyers are able to pay *does not* constitute fair return and is not acceptable.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its resale provisions to specify the standard or index that will be applied upon resale to provide a fair return to the homebuyer. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the resale provisions to be used.

C4: Does the basis upon which fair return is calculated include the homebuyer's original investment in the property and the increase in market value attributable to homebuyer investments in or capital improvements to the property?

Yes No Verification found on page/screen

Comments/Basis for Conclusion:

Explanation: The provision must specifically state that the basis for calculating fair return is the original investment by the homebuyer and specific types of upgrades or additions that will add value to the property. (Generally, replacing worn or dated components such as appliances or carpet would not be considered an improvement that adds value). The provision must address the types of changes that it will or will not include in that basis.

Field Office Action: If yes, proceed with your review. If no, you must contact the grantee and ask that it revise its resale provisions so that homebuyer investment includes both the homebuyer-provided down payment and homebuyer-financed improvements that would increase the value of the home. If this is not possible or the grantee fails to respond or submit an acceptable revision within the 45-day review period, you must inform the grantee in the Annual Action Plan approval letter that HUD is disapproving its resale provisions and it may not use any HTF funds to undertake any activities related to homebuyer assistance until the grantee has submitted and HUD has approved the resale provisions to be used.

Certifications			
<i>Note: Scanned copies of signed certifications can be attached in the AD-25 screen, though states must submit one original signed copy of the SF-424 and all certifications to HUD.</i>			
<p>Are the certifications for each program funded complete and accurate, where applicable:</p> <p>(a) <i>General</i></p> <ul style="list-style-type: none"> a. Affirmatively furthering fair housing? (See 24 CFR 570.904) b. *Anti-displacement and relocation plan? c. Anti-lobbying? d. Authority of state? e. Consistency with plan? f. *Acquisition and relocation? g. Section 3? <p><i>Note: The acquisition/relocation and the anti-displacement and relocation certifications are combined on the state's General Certification. This is the current certification available on the web for states. Notwithstanding the fact that they are combined under a single certification, they are still separate regulations and the checklist will identify them as two separate items.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>(b) <i>CDBG</i></p> <ul style="list-style-type: none"> a) Citizen participation? b) Consultation with local government? c) Community development plan d) Following a current consolidated plan? e) Use of funds (including years)? f) Excessive force? g) Compliance with anti-discrimination laws? h) Excessive force? i) Compliance with laws? <p><i>Note: The certification period for the CDBG program's overall benefit requirements must be consistent with the prior certification.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	
<p>(c) <i>ESG</i></p> <ul style="list-style-type: none"> a) Not less than 10 years – rehab <u>and</u> conversion? b) Not less than 3 years c) Providing shelter or services to homeless persons during period of ESG assistance? d) Renovation will result in safe and sanitary buildings? e) Recipients will provide housing assistance and supportive services? f) Match requirement? g) Confidentiality? h) Involvement of homeless individuals and families? i) Consistency with Con Plan? j) Discharge policy? 	<input type="checkbox"/>	<input type="checkbox"/>	
<p>(d) <i>HOME</i></p> <ul style="list-style-type: none"> a. TBRA is consistent w/Plan? b. Use for eligible activities? c. PJ will evaluate HOME assisted projects for appropriate financial assistance? 	<input type="checkbox"/>	<input type="checkbox"/>	
<p>(e) <i>HOPWA</i></p> <ul style="list-style-type: none"> 1) Meet urgent needs? 2) 3- or 10-year operation 	<input type="checkbox"/>	<input type="checkbox"/>	

HUD APPROVAL – 24 CFR 91.500(b)

The regulations at 24 CFR 91.500(b) state that HUD may disapprove a plan or a portion of a plan for the three following reasons:

- a) If it is inconsistent with the purposes of the Cranston-Gonzalez National Affordable Housing Act (NAHA);
- b) If it is substantially incomplete; or
- c) If certifications applicable to the CDBG program are not satisfactory to the Secretary in accordance with 570.304 or 570.485(c).

Disapproval for Inconsistency with NAHA – A plan may be disapproved if it is inconsistent with NAHA. A reviewer recommending disapproval for inconsistency with NAHA should show how the plan is inconsistent with the following purposes:

- helping families, not owning a home, to save for the down payment for the purchase of a home;
- retaining, where feasible, as housing affordable to low income families, those dwelling units provided for such purpose with federal assistance;
- extending and strengthening partnerships among all levels of government and the private sector, including for- and non-profit organizations, in the production and operation of housing affordable to low-and moderate-income families;
- expanding and improving federal rental assistance to very low-income families; or
- increasing the supply of supportive housing, which combines structural features and services needed to enable persons with special needs to live with dignity and independence.

Comments: _____

Substantial Incompleteness – The following are examples of consolidated plans or action plans that may be substantially incomplete:

- A plan that was developed without the required citizen participation or the required consultation;
- A plan that fails to satisfy all the required elements of the consolidated plan (i.e. did not meet a regulatory requirement of Part 91);
- A plan for which a certification is rejected by HUD as inaccurate after HUD inspected evidence and provided due notice, and opportunity for comment; and
- A plan that does not include a description of the manner in which the unit of general local government or state will provide financial or other assistance to a public housing agency if the public housing agency is designated as “troubled” by HUD.

Comments: _____

The chart below can be used to track plan status changes made during the review process:

<u>Date</u>	<u>Plan Status Changed From</u>	<u>Plan Status Changed To</u>	<u>User That Made the Change</u>	<u>Comments</u>

Based on my review of the Plan against the regulations, I have determined the Plan is:

Approved

Date plan approved: _____

Disapproved

Date plan disapproved: _____

Note: Written notification of disapproval must be communicated to the applicant in accordance with 24 CFR 91.500(c). **If disapproved**, provide documentation including dates and times on incompleteness determination, and discussions with state and Headquarters:

SIGNED:	
Reviewer: _____	Date: _____
Program Manager: _____	Date: _____
CPD Director: _____	Date: _____

Citation Requirement by eCon Planning Suite Screen

IDIS	IDIS Screen Name	State Citation	Entitlement Citation
ES-05	Executive Summary	91.300(c), 91.320(b)	91.200(c), 91.220(b)
PR-05	Lead & Responsible Agencies	91.300(b)	91.200 (b)
PR-10	Consultation	91.110, 91.300(b); 91.315(l)	91.100, 91.200(b), 91.215(l)
PR-15	Citizen Participation	91.115, 91.300(c)	91.105, 91.200(c)
NA-05	Overview	none	none
NA-10	Housing Needs Assessment	91.305 (a,b,c)	91.205 (a,b,c)
NA-15	Disproportionately Greater Need: Housing Problems	91.305 (b)(2)	91.205 (b)(2)
NA-20	Disproportionately Greater Need: Severe Housing Problems	91.305 (b)(2)	91.205 (b)(2)
NA-25	Disproportionately Greater Need: Housing Cost Burdens	91.305 (b)(2)	91.205 (b)(2)
NA-30	Disproportionately Greater Need: Discussion	91.305 (b)(2)	91.205 (b)(2)
NA-35	Public Housing	none	91.205 (b)(2)
NA-40	Homeless Needs Assessment	91.305(c)	91.205 (c)
NA-45	Non-Homeless Special Needs Assessment	91.305 (b,d)	91.205 (b,d)
NA-50	Non-Housing Community Development Needs	91.315(f)	91.215 (f)
MA-05	Overview	none	none
MA-10	Number of Housing Units	91.310(a)	91.210(a)&(b)(2)
MA-15	Cost of Housing	91.310(a)	91.210(a)
MA-20	Condition of Housing	91.310(a)	91.210(a)
MA-25	Public and Assisted Housing	none	91.210(b)
MA-30	Homeless Facilities	91.310(b)	91.210(c)
MA-35	Special Needs Facilities and Services	91.310(c)	91.210(d)
MA-40	Barriers to Affordable Housing	91.310(d)	91.210(e)
MA-45	Non-Housing Community Development Assets	91.315(f)	91.215 (f)
MA-50	Needs and Market Analysis Discussion	none	91.210(a)
SP-05	Overview	none	none
SP-10	Geographic Priorities	91.315(a)(1)	91.215(a)(1)
SP-25	Priority Needs	91.315(a)(2)	91.215(a)(2)
SP-30	Influence of Market Conditions	91.315(b)	91.215 (b)
SP-35	Anticipated Resources	91.315(a)(4), 91.320(c)(1,2)	91.215(a)(4), 91.220(c)(1,2)
SP-40	Institutional Delivery Structure	91.315(k)	91.215(k)
SP-45	Goals	91.315(a)(4)	91.215(a)(4)
SP-50	Public Housing Accessibility and Involvement	91.315(c)	91.215(c)
SP-55	Barriers to Affordable Housing	91.315 (h)	91.215(h)
SP-60	Homelessness Strategy	91.315 (d)	91.215(d)
SP-65	Lead Based Paint Hazards	91.315 (i)	91.215(i)
SP-70	Anti-Poverty Strategy	91.315 (j)	91.215(j)
SP-75	Colonias Strategy (States with Colonias Only)	NAHA Sec. 916	

IDIS	IDIS Screen Name	State Citation	Entitlement Citation
SP-80	Monitoring	91.330	91.230
AP-15	Expected Resources	91.320(c)(1,2)	91.220(c)(1,2)
AP-20	Annual Goals and Objectives	91.320(c)(3)& (e)	91.220(c)(3)&(e)
AP-25	Allocation Priorities (States Only)	91.320(d)	
AP-30	Method of Distribution (States Only)	91.320(d) and (k)	
AP-35	Projects	none	91.220(d)
AP-40	Section 108 Loan Guarantee (States Only)	91.320(k)(1)(ii)	none
AP-45	Community Revitalization Strategies (States Only)	91.320(k)(1)(ii)	none
AP-48	Method of Distribution for Colonias (States with Colonias Only)	91.320(d)&(k)	
AP-50	Geographic Distribution	91.320(f)	91.220(f)
AP-55	Affordable Housing	91.320(g)	91.220(g)
AP-60	Public Housing	91.320(j)	91.220(h)
AP-65	Homeless and Other Special Needs Activities	91.320(h)	91.220(i)
AP-70	HOPWA Goals	91.320(k)(4)	91.220 (l)(3)
AP-75	Barriers to Affordable Housing	91.320(i)	91.220(j)
AP-80	Colonias Actions (States with Colonias Only)	HUD Notice CPD 11-001	
AP-85	Other Actions	91.320(j)	91.220(k)
AP-90	Program Specific Requirements	91.320(k)(1,2,3)	91.220(l)(1,2,4)