

REDWOOD CITY



**COMMUNITY DEVELOPMENT
BLOCK GRANT**

**SUBRECIPIENT
GRANT SETUP WORKBOOK**

FY 2009/2010



INDEX OF SUBRECIPIENT GRANT REPORTING, INSTRUCTIONS & FORMS

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SUMMARY OF GRANT SET UP REQUIREMENTS CDBG & HOME Program Funding

The instructions in this handbook are specific to the requirements for your grant with the City of Redwood City. Please make sure all persons in your organization responsible for administering your grant from the City has a copy of these instructions.

The first obligation of a Subrecipient is to know how to set up your federal grant and know what is required in the funding agreement. The second obligation is the willingness and ability to comply with reporting requirements necessary to access your grant funds.

Do not enter into any contracts and do not authorize any construction work or capital purchases relating to these grant funds until you have an executed funding agreement. You do not have access to your funds until there is a fully executed funding agreement approved by City Council.

I. FOUR STEPS FOR SET UP

There are four (4) Basic Steps to setting up your grant.

1. **Establishing Contract Objectives:** Worksheet for Exhibit B will be emailed to you and must be completed and returned to the City by email within five (5) days of receipt of these instructions. The Worksheet for Exhibit B will be blank for you to insert your contract objectives.

Contract objectives are the tasks you will complete during the project term. Objectives must be specific, measurable, achievable, realistic, and attainable in a reasonable amount of time. The Objective must describe what you will do, under what conditions, to how many, by when, and how you will know if you achieve the objective. Objectives should be clear enough for the City to monitor and determine whether or not you are in compliance with your contract conditions. **Remember that your contract objectives are the reason you are receiving the funds.**

Criteria to use when writing objectives:

- Be results-oriented—rather than describing activities, objectives should have a definite end and produce outcomes projected in our Consolidated Plan. Indicate which local Consolidated Plan performance outcomes your activity meets (refer to the City's Performance Outcome Plan attached at the back of this workbook)
- Be specific – outcomes should be tied to the federal objectives that will be accomplished.

- Be measurable – by either qualitative or quantitative methods
- Be challenging – but attainable within the stated time frame.
- Link Objectives to anticipated Outcomes

Select ONE primary objective and insert into the first section of the worksheet. You may insert more as applicable in the second section of the worksheet. Choose all that are applicable to the objective(s) you selected according to the Consolidated Plan priorities below.

PRIORITY # 1: Promote affordable housing for all populations by increasing the number of affordable, accessible, decent safe and sanitary, and ownership units for low and moderate income households.

PRIORITY # 2: Provide public service activities that help to reduce poverty, prevent homelessness, and provide intervention programs that meet basic human needs and assists special needs populations.

PRIORITY # 3: Implement non-housing community development activities to provide economic and physical improvements and facilities for social programs in low income neighborhoods.

2. **Specify Project Budget by Line Item:** Worksheet for Exhibit A will be emailed to you and must be completed and returned to the City by email within five (5) days of receipt of these instructions. The Worksheet for Exhibit A will be blank for you to insert your project line item budget. NOTE: The total should be the amount of the grant funds.

The project line item budget Worksheet A should identify specific work items to be accomplished and the cost for that item. The project budget should be simple and easy to determine when a cost is related to a task. While some items can be combined, it is important to be able to see exactly what you are billing for. Grants are limited to 20% of program cost.

You are encouraged to select a limited number of line items that makes the most effective use of your grant funds while creating the least amount of paperwork for you when requesting reimbursement. **Too many line items simply create additional work. Think in terms of how many pieces of paper will have to be submitted as backup documentation.** For example: Wages and benefits = 1 Payroll Distribution Report. Accounting fees, rent, janitorial services, extermination, utilities, insurance, office supplies, phone bill & copies = 9 + different documents.

3. **Provide Insurance endorsements:** Selected organizations only. If your activity involves physical construction or acquisition of materials for construction, you may be required to provide insurance endorsements showing City as additional insured. Your funding agreement will indicate whether or not you are required to provide insurance.
4. **Getting Your Funding Agreement:** The City will prepare 2 copies of your 2009-10 funding agreement that need to be signed by your Executive Director. City Staff will contact you to schedule an appointment for your Executive Director to come to City Hall to sign the agreements.

City Staff will schedule Council approval of your funding agreements at the earliest date possible and will notify you when they have been approved. Follow Steps 1-4 to assure you submit a complete set-up package so that your funding agreement can be finalized. Keep in mind you do not have access to your funds until you have met these steps.

II. STARTING DELIVERY OF SERVICE

The Grant Year for 2009-2010 begins on July 1, 2009. The program year ends on June 30, 2010. Service Agreements may begin to incur costs as of July 1, but no funds are disbursed until Council approves the funding agreement. Capital project funding agreements will be taken to Council as the projects come on line and are "ready to go".

In your proposal for funding, you were required to indicate who your assistance would be provided to. The eligible options are:

A. Limited Clientele – There are 2 things to remember:

1. If you are assisting limited clientele, you must indicate whether the service you provide is to households (H) or people (P). You may choose only one. If the entire household benefits from the assistance, you must count by household. If you assist individuals who are not part of a family unit, then you should count by persons.
2. If you are assisting limited clientele, you must have an application process where you determine the client to be income eligible. If you do not have an application process, you are not in compliance with CDBG regulations. Refer to page 11 of this grant set-up handbook for instructions on how to assess client eligibility in federally funded programs.

B. Low Mod Housing – Counting by housing units is required when funding is applied to physical housing units. To qualify as low-mod housing, each unit involved must be either vacant or occupied by a low income household at the time of grant set-up or vacant units must be filled with a low income household after improvements are completed.

C. Low Mod Area - This type of project would be capital in nature and the improvement would be provided in a neighborhood where at least 51% of the residents are low income.

D. Low-Mod Jobs – In this type of project the benefit count is based on the number of jobs created. Jobs must be new, full time, permanent jobs that last more than one year. All persons assisted under this type of activity must complete an application and be determined income eligible. According to HUD rules, the number of jobs created/retained must be less than one job per \$35,000 of CDBG funds provided. If assistance is provided to micro business enterprises then no more than 20% of project cost may be paid from CDBG funds and no more than \$1,000 for each household assisted.

III. TIMELY EXPENDITURE REQUIREMENT

In order to meet HUD's "Timely Expenditures" Requirement, the City plans its accounting process to meet HUD's calculation requirement by May 1, 2010. The following will be

implemented at the subrecipient level (you are a subrecipient if you are receiving grant funds).

IV. HOW TO REQUEST PAYMENT

All CDBG subrecipients must bill the City in order to access funds from their grant. The City advances funds to subrecipients in order to expedite payments and then requests a drawdown from HUD to reimburse the City fund. This is how HUD keeps track of our Timely Expenditure Requirement and if you do not bill, the City cannot meet its drawdown requirement. Checks are available generally within 12-15 days from the date your payment is processed. Quarterly payment request forms will be customized for your specific activity after we receive your set-up worksheets described in Section 1 through 4 above.

- Exhibit A - Quarterly payment request forms record expenditures incurred by the organization for a given period.
 - Exhibit B - Direct Benefit Reports maintains data on direct beneficiaries who were assisted with the funds requested on Exhibit A.
- A. **Billing** – All subrecipients should submit **quarterly billings by hard copy with an original signature.** **The billing period for Public Service projects funded with CDBG or HOME shall be 10 months and final billing must be received no later than May 21, 2010.** All payment requests must be submitted on the form provided by the City and must include documentation of the expenses incurred for which reimbursement is being requested.

Each invoice must be consecutively numbered 1 through 4, accounting for each quarter as follows:

Quarter #1 – July, August, September

Quarter #2 – October, November, December

Quarter #3 – January, February, March

Quarter #4 – April, May, June. **(NOTE: This final billing is due no later than May 21, 2010)**

If a payment request is incorrect and contains errors, you will be asked to make corrections before it is processed. Once a payment request is paid, you may not go back and make changes to prior months billing. You must offset changes in future billings. **It is the responsibility of each organization to bill within the contract period by the final date specified. The City will not be responsible for you not drawing down by the deadline of May 21, 2010 (exception for construction projects).**

- B. **Quarterly Reporting** - Direct benefit reports are due quarterly and must be submitted **electronically** by email to redvreservations@redwoodcity.org. You must report the number of “unduplicated” households/persons assisted, their income

category, ethnicity, number of persons who are disabled, etc. as provided on form Exhibit B. The direct benefit report must also report the cumulative % of program goals met against the annual contract goals. Quarterly direct benefit activity forms are required as part of the supporting documentation of costs incurred. **Payment requests submitted without the direct benefit reports will not be processed.**

These forms are to be used to track income, race, disability, female headed household and male single parent household data from the clients that you will serve using CDBG funds. Instructions for completing these reports will be provided by the City via email once agreements are approved.

You may not request reimbursement of CDBG funds for households or persons assisted under a limited clientele activity unless you maintain case files establishing eligibility. Case files should contain an application for assistance and verification of income. *Household income applies to everyone living in the household who are employed, regardless of relationship, including people over the age of 18 who are not full time students.* Refer to Standard Documentation to Verify Income Eligibility on Page 11.

V. SPECIAL INSTRUCTIONS FOR BILLING & REPORTING BY PROJECT TYPE

Billings by Project Type:

A. Public Service Activity Agreement Review

No grant funds are permitted to be carried over from one program year to the next in this category. **Funds allocated to Public Service activities that are not drawn down as of May 21, 2010, will be reallocated to other non-public service activities.**

B. Community Development Projects /Improvements to Public Facilities

Capital projects involving construction may require prevailing wage construction agreements, along with federal requirements and prevailing wages to be paid on the project. Please contact the Housing and Economic Development Division Staff at 780-7290 and request a "Preconstruction Conference Handbook" to familiarize yourself with these requirements. If your project is ready to start bidding, ask the City Housing Staff for "Federal Bid Documents" which includes a wage decision for your bid package before you talk to contractors. Reimbursement for capital projects can only be made after Council approval of a funding agreement and after contractor has complied with prevailing wage requirements. **You will lose your grant if you authorize construction without meeting bid requirements for prevailing wages, or if environmental reviews have not been completed.**

C. Housing Projects

Housing Acquisition agreements will generally be approved just prior to the closing of the escrow process and funds deposited directly with the Title Company handling the acquisition transaction. **The organization should have already met with neighborhood associations and citizens in the project area to resolve any concerns prior to requesting a funding agreement to be approved by Council.**

Environmental review clearances and removal of grant conditions may be required before disbursement of funds can occur. Make sure you have coordinated the close of escrow with City Staff around these requirements.

D. **Housing Rehabilitation Projects**

Loan documents will be provided after approval by the City Council or Home Improvement Loan Committee (depending on funding source). Environmental reviews are completed by Staff or a consultant prior to loan closing.

Reporting by Project Type:

A. **Housing Construction/Acquisition/Rehabilitation:**

If you acquire or build housing, or build or rehabilitate a public facility for a limited clientele, you must submit reports quarterly beginning on the date following the close of escrow, and continuing through June 30, 2010. You are thereafter required to submit annual reports for the specified term of the agreement (the term of the promissory note for housing and five years for limited clientele public facilities).

B. **Non-Housing Community Development:**

These projects are selected according to area benefit, where a significant portion of the population have household incomes at or below median income. No statistical beneficiary reports are required; however, at the conclusion of the project, the sponsoring organization is required to submit a narrative report defining how the improvements is changing or will change the quality of life for the targeted population and describing the performance outcomes achieved. Your grant will be completed at that point and no further grant close out procedures will be required.

C. **Reporting Beneficiaries on Capital Projects for Limited Clientele:**

If your project was a capital activity that created or improved a facility occupied primarily by low income recipients, and beneficiaries cannot be counted until the activity is completed, you will begin submitting Direct Benefit reports as of the month when the project was placed in service.

For Example, you were funded to build a pre-school facility for low-income children. Your contract began July 1 and the facility was completed the following January. In this case, you must begin submitting Direct Benefit Reports as of January when the facility began serving eligible clients.

VI. ANNUAL REPORT

All Programs or Projects receiving funds must submit an annual narrative report by July 15, 2010 even if no activity was conducted nor funds expended. **The total number of beneficiaries reported in the narrative report must be the same number that you reported on the direct benefit report you submit for the fourth quarter, which includes a cumulative total.** This report should be submitted along with your annual narrative report on July 15, 2010.

Narrative Report: The report should address your program's progress during the fiscal year and should contain information on needs and issues, collaboration, and other performance information which cannot be provided in the benefit report, such as services provided by telephone or in group situations where income eligibility could not be established. This report should also address any other forms of assistance to clients which could not be captured in the benefit reports and must respond to specific questions listed in these instructions, along with specific administrative and long range planning information relating to program strengths and weaknesses. No format for this report is provided other than the order of the discussion items as follows:

The narrative should include discussions on:

1. How you met or exceeded your contract goals or reasons why you were unable to meet the goals specified in the agreement.
2. Any program changes or administrative problems encountered during the grant period.
3. The specific Performance Outcomes your program achieved and performance indicators used to make this determination based on the City's Performance Measures Plan adopted in the Consolidated Plan for 2005-2010 (Refer to the Performance Measures Plan attached at the end of this workbook and HUD's Performance Outcome Chart). This discussion should include transition/intervention data to describe what happened to the beneficiaries after they received services (i.e., shelter, homeless intervention, and anecdotal discussion on facilitation of independent living and stabilization of households.
 - a. Discussion on Fair Housing efforts made or taken to ensure equal opportunity and access to services to a diverse population, including reasonable accommodations made for clients with disabilities.
 - b. Discussion on beneficiaries assisted including disproportionate needs by income group and race. This discussion should also include the number of female headed households assisted, and the number of persons with disabilities served.
 - c. Capital related activities should discuss neighborhood demographics of the areas in which the capital project was completed or other demographic information on the special needs group assisted. Census data can be obtained from the City to assist you in preparing this discussion.
4. Discuss the collaborative efforts you have undertaken to maximize your resources. Give one animated example of how you saved funding by collaborating with another organization serving the same clients. Identify fund sources and amounts of funding leveraged using the sample chart below:

FUND SOURCE	AMOUNT LEVERAGED
CDBG Funds	\$
HOME Funds	\$
Other Federal Funds	\$
State Funds	\$
Local Funds	\$
Private Funds	\$
Other Funds	\$
Total	\$

5. Your narrative report should close with your observations regarding changing needs, unmet needs, and supply/demand for services by your client population.

This information will provide the Housing and Human Concerns Committee with a starting place to identify unmet needs which should be addressed during the next funding allocation period (in order to amend our Consolidated Plan priorities to reflect unmet needs). **If you have identified an unmet need and propose to address it in next year's funding round, please discuss your intention and actions you propose to take to address the issue.**

If your program or activity made no expenditures and provided no benefit, your annual narrative report should address the following:

1. Status of project.
2. Why funds have not been expended.
3. When the project or activity will be "ready to go."
4. Details regarding additional fundraising required to complete the project funding, if applicable, and status of fundraising efforts.
5. Timelines for expenditures – specifically when funds will be drawn down.¹

VII. ENVIRONMENTAL REQUIREMENTS

If your program involves any level of modifications or repairs, your contract will require compliance with environmental requirements for each residence assisted. City Housing Staff will be assigned to assist you with this requirement. If your activity falls under the City's Programmatic Agreement with the State Historic Preservation Office, your funding agreement will contain an Exhibit C which must be completed for each dwelling assisted. Otherwise, the City will conduct National Environmental Protection Act (NEPA) reviews for funding

¹ This information is used to fund alternative projects if the original project cannot proceed within this program year.

agreements. You may be required to provide information during this review process. Projects requiring Notice of Finding require a Request for Release of Funds (RROF) on some projects by HUD before entering into a funding agreement with the City. You will be advised if your project is subject to this requirement.

VIII. MONITORING

The City will monitor at least 25% of the subrecipients funded each year. On the visit, we will be looking at financial and program activity; may want to interview program participants and will randomly select clients from the program benefit activity reports. Site visits may include a member of the Housing and Human Concerns Committee or a representative from the U.S. Department of Housing & Urban Development. More visits may be made to new subrecipients to provide technical assistance as needed. These reviews will be scheduled so as to be least disruptive to the organization.

Monitoring visits may be scheduled in one of 4 ways:

1. Housing and Human Concerns Committee (HHCC) site visits.
2. Staff file review.
3. HUD representatives may visit subrecipients as part of their monitoring of the City's compliance with federal regulations.
4. A combination of all of the above.

Basic Monitoring

Monitoring will generally be based on random selection of payment requests to review financial compliance and appropriate use of funds, site visits to physical projects, and performance hearings where beneficiaries of programs are invited to meet with the HHCC and Staff to discuss the impact of CDBG and HOME funded programs and activities.

Limited Review

Limited reviews are normally conducted with an organization that has experienced some problem in complying with CDBG and HOME regulations. Past examples of limited reviews include an organization's pattern of submitting incorrect payment requests, reviewing incorrect benefit reports (when counts by person and by household are mixed within a program year), or some other overall concern about a program weakness that should be changed. For example, a program determined to be not cost effective may be asked to review their program format and make revisions that would increase the scope of service to respond to the concern.

IX. AUDIT REQUIREMENT

All subrecipients are required to submit copies of fiscal audits to the City for each year in which a federal grant is provided and those subrecipients who receive over \$500,000² are required to have completed single audits at the end of each federal grant period.

All subrecipients shall comply with the requirements and standards of OMB Circular No. A-122, "Cost Principles for Non-Profit Organizations," (Attachment A, B, C, F, H, N and O). Copies are available for download at: http://www.whitehouse.gov/OMB/circulars/a122/a122_2004.html. The City will continue to require copies of audited financial statements as part of the grant application process.

² If a CDBG or HOME grant to a single subrecipient equals or exceeds \$500,000 allocated by entitlement jurisdictions in San Mateo County, a Single Ace Audit is required.

X. CONTRACT SUSPENSION

In the event of a disaster, the City may be given authority by HUD to reprogram funds to provide emergency assistance. If your program provides housing, your contract would probably be increased and you might be called upon to provide disaster assistance. For service contracts which do not directly provide housing, your funds may be reprogrammed. This may be only for an interim period, or if appropriate, it might eliminate your program funding for the remaining part of the fiscal year. You should not be overly concerned about the possibility in any case, as no one can predict whether a disaster might occur.

XI. HOW TO ASSESS CLIENT ELIGIBILITY IN FEDERALLY FUNDED PROGRAMS

Subrecipients of Community Development Block Grant funds that provide direct service to clients must have an application process to verify client eligibility. The only exception is Fair Housing Counseling because discrimination is illegal, regardless of the income of the person who has experienced the differential treatment.

- Every client that you count under this grant/loan must provide you with proof of income to verify that their household income does not exceed the low income limit for their family size.
- Household income is defined as income of each and every person who resides in a housing unit, whether or not they are related to each other. This will include persons over the age of 18 who are employed and are not full time students.

During monitoring, income verification documents will be reviewed for compliance with this requirement. The City does not accept self certification as a means of verifying income eligibility; however, income eligibility determinations made for federally funded programs where the income threshold is lower than income requirements for CDBG (i.e. U.S. Department of Agriculture) will be accepted. The funded organization must determine which clients are being counted as assisted under the federal grant. (Keep in mind that City grant represents only 20% of the organization's program budget; therefore, 100% of an organization's clients are not assisted with CDBG funds.)

A. STANDARD DOCUMENTATION TO VERIFY INCOME ELIGIBILITY

1. Most recently filed Federal Form 1040 (previous two years if applicant is self-employed)
2. Copies of AFDC award letters
3. Copies of Social Security and/or SSI award letters
4. Most recent payroll check stub, three stubs for any separate months of the

previous six months, if

- a. applicant income for previous year's Form 1040 is above 80% of median but,
 - b. income on current pay stubs is significantly lower and applicant would qualify this year.
5. Most recent W-2
 6. Schedule of cash payments received, even if such payments were not reported to the IRS and taxes were not paid accordingly.

The preferred documentation for employed clients is tax returns. For those clients on fixed incomes (SS, SSI, and AFDC), #2 and 3 are preferred if tax returns are not filed. The most recent income limits provided by HUD as of May 2008 are as follows and is your guide to determining client eligibility until further notice.

B. INCOME GUIDELINES

MEDIAN INCOME = \$96,800

2009 SAN MATEO COUNTY INCOME LIMITS								
(Effective 4/2009)	as defined by HUD and the State of California							
	-----INCOME LIMITS BY FAMILY SIZE-----							
Income Category	1	2	3	4	5	6	7	8
Extremely Low*	\$23,750	\$27,150	\$30,550	\$33,950	\$36,650	\$39,350	\$42,050	\$44,800
Very Low*	\$39,600	\$42,250	\$50,900	\$56,550	\$61,050	\$65,600	\$70,100	\$74,650
HOME limit*	\$47,520	\$54,300	\$61,080	\$67,680	\$73,260	\$78,720	\$84,120	\$89,580
Low *	\$63,350	\$72,400	\$81,450	\$90,500	\$97,700	\$104,950	\$112,200	\$119,450
Median**	\$67,750	\$77,450	\$87,100	\$96,800	\$104,550	\$112,300	\$120,050	\$127,800
Moderate**	\$81,300	\$92,900	\$104,550	\$116,150	\$125,450	\$134,750	\$144,050	\$153,300

1. **Maximum affordable rent based on 30% of monthly income and all utilities paid by landlord. (Utility allowance for tenant-paid utilities established by County of San Mateo Housing Authority Section 8 Program unless further adjusted by HUD).**
NOTE: limit rent set at lower of (a) 30% of 60% AMI; or (b) FMR (HUD;s Fair Market Rent). For 2009, the FMR for Studio is the lower rent.
2. **The following is the assumed family size for each unit:**
Studio : 1 1-BR : 2 2-BR : 3 3-BR : 4.5 4-BR : 6
- * **Income figures provided by HUD for all San Mateo County federal entitlement programs (CDBG, HOME, ESG)**
- ** **Income figures provided by State of California HCD - You should verify the income figures in use for each specific program.**
- *** **Maximum Fair Market Rents are available by Fund Source. Current HOME or FMR Rents applicable to your specific activity may be requested from the City at the time you place your project in service.**

C. METHOD FOR DETERMINING SERVICE AREA

You must have a method of determining service area to assure that the clients that you are serving are, in fact, residents of Redwood City incorporated limits. **Census Tract #'s 6105 and 6106 are located in unincorporated San Mateo County and are not in the City's service area.** It is recommended that if you do not have a Census Tract Book that you contact the City Housing Staff to confirm whether a client is within the City's service area by giving the specific address of the client to be served. Costs will be disallowed if clients are reported that live outside the service area. Eligible Census Tracts in Redwood City are 6097, 6098, 6099, 6100, 6101, 6102, 6103, 6104, 6107, 6108, 6109, 6110, 6111, 6112 and 6113.

Persons with Disabilities – The Office of Fair Housing and Equal Opportunity requires Grantees to report on the number of persons with disabilities who were assisted with CDBG and/or HOME funds. This is a new requirement, therefore, your intake Staff must remember to ask the client at intake if they are to be listed as a person with disabilities. Organizations are not required to ask any client anything about their disabilities as a condition of receiving service. You are only being asked to count the number of persons you assist that include people with disabilities.

Other Clarifications

- You may not count as beneficiaries any individual or household assisted for whom you have not maintained a case file containing an application for assistance and income verification. This is a contract requirement and a condition of receiving funds. The choice of who is reported is exclusively up to the organization providing service, but you must maintain case files for limited

clientele assistance.

If your organization (or your client) is uncomfortable answering questions about race, federal funding is probably not the best fund source for your program. Allocations of CDBG & HOME funds are made partially based on the number of low income and minority households residing within our jurisdiction. Tracking race data on households assisted is important. If after a few months of service, your clients do not look proportionally like the makeup of Redwood City, please contact the Housing Staff for assistance in marketing and outreach efforts for your program. These changes are an attempt to better document housing assistance needs for Consolidated Plan reports and other federal reporting requirements.

XII. PERFORMANCE MEASURES

Please review the City's Performance Measures Plan when you are ready to complete your annual narrative report. Make reference to the inputs and outcomes on the City's plan and discuss how your program achieves some or many of the outcomes from the City's plan. A copy is attached at the end of the Grant Set Up workbook.

XIII. REASONABLE ACCOMMODATIONS

From time to time, special assistance may be required in order to assist clients with disabilities. Please refer to the City's Reasonable Accommodations Policy and forms to request such assistance. You are requested to advise clients who need a reasonable accommodation of this policy and provide them with the forms to make the request. A copy is attached on the following pages.

CITY OF REDWOOD CITY



XIV REASONABLE ACCOMMODATIONS POLICY

POLICY(3/14/1991)

It is the policy and practice of the City of Redwood City to comply fully with Section 504 of the Fair Housing Amendments Act (PL 100-430), other applicable local, state, and federal laws to assure equal opportunity and equal access for all disabled users of City programs, services, and facilities. The City shall implement this Reasonable Accommodations Policy in programs and services provided by administrators of Community Development Block Grant (CDBG) and other applicable federal funding and shall require non-profit organizations receiving such funding to identify their Reasonable Accommodations Policy at the time of application for funding.

For purposes of this policy, the term disability means with respect to an individual: (A) a physical or mental impairment that substantially limits one or more major life activities; (B) a record of such an impairment, or; (C) being regarded as having such an impairment.

Reasonable Accommodations shall be defined as any physical improvement, program flexibility, or any other modification or adjustment necessary to allow a person with disabilities the same equal opportunity to programs and services being funded by CDBG or other federal funds as available to non-disabled persons.

The City's policy shall be neither exhaustive nor exclusive and shall rely upon requests from persons with disabilities and organizations serving persons with disabilities to request such accommodations as needed. The City shall provide REQUEST FOR REASONABLE ACCOMMODATIONS forms to each organization funded with federal funds. Where disabled persons with mobility problems cannot go to the service location, the service provider shall go to the disabled person to assist them in applying for services and accommodations. In this case, organizations may bill the City for transportation costs related to providing reasonable accommodations from their CDBG grant.

Where accommodations needed are physical in nature, City shall refer applicants to either its Home Improvement Loan Program or to the Housing Accessibility Modifications Program operated by the Center for the Independence of the Disabled, or any other service deemed appropriate to the individual accommodation being requested. City shall recognize that reasonable accommodations are specific to the needs of each individual, and that the applicant must participate in the determination of the appropriate accommodation. Every request for reasonable accommodation shall be given full consideration and the City shall coordinate resources necessary to achieve approval for each accommodation requested. An example of this may include approving costs above the average service level such as approving accommodations at \$2,000.00 when the program limits its grants to \$1,000.00. Physical accommodations will conform to Uniform Federal Accessibility Standards.

In the case of new construction of affordable housing units, 5% of all units in a development of 5 or

more multifamily units will be accessible for persons with physical disabilities. No less than 2% of these units must be adaptable for persons with visual or hearing disabilities. The units shall be specifically marketed to persons with disabilities with bona fide wheelchair users receiving first preference for the physically accessible units and documented evidence of hearing or vision impaired disabilities for the units constructed as adaptable for hearing and vision impaired.

Reasonable accommodations may be requested by a homeowner, tenant, landlord in behalf of a tenant, or non-profit organization providing other services to the person with disabilities. The initial request for reasonable accommodations may be submitted to the City's 504 Coordinator in letter form. However, the City reserves the right to request additional information regarding the accommodations (identical to information requested on City's form) to be made in order to identify life threatening and time sensitive repairs from those that are not immediate. City is expected to respond to each request within 72 hours or 3 business days from the date the request is made. Emergency requests will be addressed immediately upon receipt of the request.

In cases where the City cannot provide the accommodations being requested, applicant or referring agency will receive a response from the City identifying why assistance cannot be made and offering a referral to some other appropriate agency. The City will utilize whatever resources are available in order to quickly respond to all requests for reasonable accommodations. Referring agencies may refer their clients but not their employees, unless the employee is also a client with disabilities who is receiving services funded under CDBG or other federal funds allocated by the City.

It is the obligation of the person with disabilities to request a reasonable accommodation. If a reasonable accommodation is requested and granted, but the disabled person decides to refuse the accommodation, the City will make every effort to offer an alternative method of accommodation, up to and including allowing the individual to share or pay for expenses that would allow the preferred accommodation to be made (i.e., Shared Driveway and Sidewalk Repair Program).

Reasonable Accommodations Request – Undue Hardship Limitation

The City of Redwood City will attempt to grant every reasonable accommodation requested; however, certain requests may impose an undue hardship and cannot be accommodated. If the reasonable accommodation would pose an undue hardship, the City must consider whether there are alternative accommodations that would not pose such a hardship.

An Undue Hardship is an action that requires significant difficulty or expense in relation to the size and funding allocated to the City or a program, the resources available, and the nature of the assistance being requested.

An undue hardship must always be determined on a case by case basis. The nature of an undue hardship includes any action that is unduly costly, extensive, substantial, or disruptive that would fundamentally alter the nature or operation of the program. For example, a homeless person with disabilities may be referred to another accessible shelter rather than trying to alter the inaccessible shelter for a short term stay. Additional accommodations may also be necessary such as transportation to shelters located in an adjacent community.

Structural changes involving altering structural bearing walls may be considered as an undue hardship. A reasonable accommodation may mean an undue hardship due to cost; however, the accommodation may be considered as part of the Home Improvement Loan Program where the scope of work is wider and more funds are available to pay these costs. In the case of a homeowner who is disabled, the Home Improvement Loan Program may choose to make a deferred loan secured against the property for the life of the disabled person or upon sale or transfer of the property, whichever comes first in order to protect the disabled homeowner.

Reasonable Accommodations Request – Appeals Process

Applicants who are denied a reasonable accommodation deemed to be an undue hardship, or feel that full consideration was not given to their specific needs may appeal the decision to a 504 Review Panel within 30 days from the date they were denied a reasonable accommodation. The Appeals Review Panel is made up of the following representatives:

Section 504 Coordinator
Representative from the Center of the Independence of the Disabled
Chair of the Housing and Human Concerns Committee
Member of City's current contracting Fair Housing Agency
Representative from the referring Agency or other such agency that will advocate for the disabled applicant.

The 504 Review Panel will make a recommendation to the Housing and Human Concerns Committee (HHCC). The Housing and Human Concerns Committee may make recommendations to Council based on the recommendation of the 504 Panel. In this case, the HHCC may also recommend to Council the funding needed to carry out the accommodation.

The HHCC may also refer the 504 Panel's recommendation to the Peninsula Conflict Resolution Center (PCRC) and subsequently refer PCRC's recommendation to Council for approval.

If no resolution is achieved through either of the above mentioned process, the Applicant may appeal to the City Council and the exhaust any remedies available under State or Federal law. The appeals process is intended to help identify an appropriate solution if the original request cannot be realized.

At any time during the process of requesting a Reasonable Accommodation, Applicants may also contact the following agencies for information regarding their rights and responsibilities:

Center for Independence of the Disabled
1515 S. El Camino Real – Suite #400
San Mateo, CA 94402
Telephone: (650) 645-1780

Project Sentinel
525 Middlefield Road – 2nd Floor
Redwood City, CA 94063
Telephone: (650) 421-0596
Toll-free: (888) 325-7468

State of California
Department of Fair Employment and Housing
San Francisco District Office
455 Golden Gate Avenue, Suite 7600
San Francisco, CA 94102-6073
Telephone (415) 703-4175
Toll-free (800) 884-1684

U. S. Department of Housing and Urban Development
Office of Fair Housing and Equal Opportunity
451 Seventh Street, SW, Room 5204
Washington, D.C. 20410-2000
Toll-free: (800) 669-9777

APPLICATION FOR REASONABLE ACCOMMODATIONS

Date of Request: _____

Applicant Name: _____

Referred by: _____
(If request is being made on behalf of client, list both name of applicant to be assisted and name of organization making referral; indicate if follow-up should be made to referring organization or directly to applicant requesting assistance.)

Nature of disability: (check all that apply)
Physical Mental Developmental Vision Hearing Other

Nature of Accommodations being requested:²

If physical improvements are required, has applicant received permission from the landlord? Yes
No

Timing for Improvements: Will accommodations requested correct health and safety issues for applicant? Yes No

Are improvements requested needed immediately? Yes No

If Landlord has made improvements on behalf of applicant and this request is for reimbursement of such improvements, provide name and address to whom and where payment should be made:

_____ Payment authorized from Program Grant. (Name of Program)

_____ Reimbursement authorized from Housing Accessibility Modifications Program.

Do not write below this line. For Section 504 Coordinator Use only,
.....

Disposition: _____ Accommodation approved.
 _____ Accommodation Denied. (See Denial Letter and complete Undue Hardship Limitation Form 2 (to be completed by 504 Coordinator).
 _____ Alternate Referral. (See Referral Letter.)

² Attach separate page as necessary to describe the nature of accommodations being requested.

Undue Hardship Limitation Analysis
(to be completed by Section 504 Coordinator)

Applicant: _____

Referring Agency: _____

- a. Nature of Accommodations _____

- b. Actual or estimated cost _____
- c. Amount of funding allocated (to the program or project from which this accommodation is being requested). _____
- d. Impact of this accommodation in the program or project from which the accommodation is being requested. _____

- e. The overall financial resources of the organization carrying out the program and or project where the accommodation is being requested. _____

- f. The type of accommodation being requested relative to the structure of the program or project where the accommodation is being requested. _____

Disposition: Based on the above factors, the requested accommodation has been determined to present an undue hardship to the program or project for reasons noted in:

Check all that apply. a b c d e f

Alternatives: Based on the factors considered above, an alternate recommendation is: (check one)
 available to applicant would not meet applicant's needs

Referrals: An alternative accommodation can be made by _____.
Contact information for alternative accommodation.

CITY OF REDWOOD CITY



Reasonable Accommodations Disposition Form

To: _____
Applicant Date

Applicant's Address: _____

SUBJECT: STATUS OF REQUEST FOR REASONABLE ACCOMMODATIONS

Program/Project Name: _____

Your request for a Reasonable Accommodation in the above named Program/Project has been reviewed and the following determination has been made:

Request is Approved.

Instructions on Next Step: _____

Request has been Denied due to the reason(s) listed below; however, we would like to meet with you and your representative to further discuss the following Alternative Accommodations:

Reason for Denial: _____

Alternative Accommodations Proposed: _____

Request has been Denied due to the following reasons: (If based on Undue Hardship, submit copy of the Undue Hardship Limitation Analysis to applicant with this form.
