

# WEBINAR SERIES 1: RECORDKEEPING



## **CDBG, ESG, & HOME** *May 1, 2017*

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*Deputy Director*

Presented by:

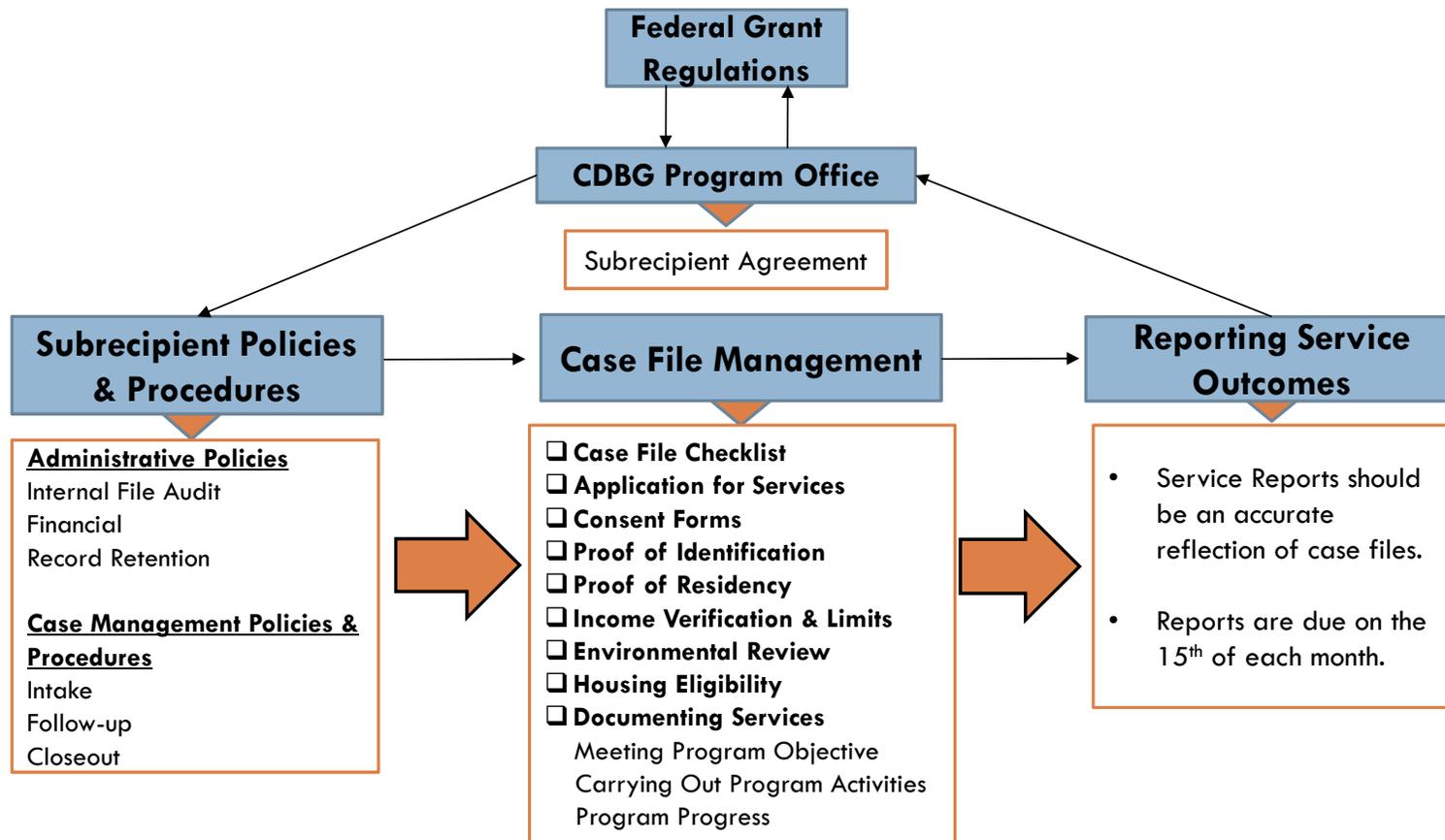
Cobb County CDBG Program Office

# Agenda

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- Welcome
- Recordkeeping Process Overview
- Case File Organization
- Documenting Eligibility
- Determining Income Eligibility
- Income Re-certification
- Environmental Reviews
- Housing Eligibility
- Documenting Services
- Monthly Reporting
- Resources
- Q & A

# Recordkeeping Process Overview



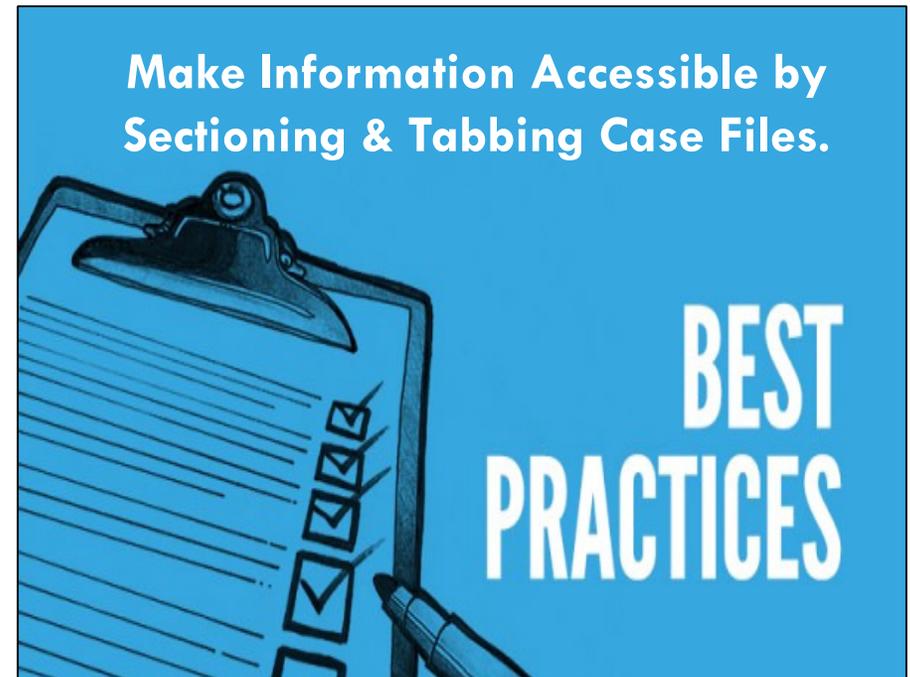
# Recordkeeping: Case File Organization

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- Case File Checklist
- Application for services
- Consent Forms
- Proof of Identification
- Proof of Residency
- Income Verification Documents
- Income Limits
- Environmental Review
- Housing Eligibility Documentation
- Additional Services Documentation

***Documents should be placed in order of checklist.***

***Separate case files by grant.***



# Documenting Eligibility

## Application for Services Minimum Requirements

- Intake Date
- Applicant Information:
  - Name, Address, Phone Number, DOB, SSN, Citizenship Status, Ethnicity/Race, Gender
- Household Member(s) Information:
  - Name, DOB, SSN, Relationship to Application
  - Intake Date
- Intake Worker Signature & Verification

# Documenting Eligibility

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- ❑ Proof of US Citizenship or Legally Admitted Alien
  - ❑ Copy of State Issued ID
  - ❑ Copy of Social Security Cards for all household members over age 6.
- ❑ Proof of Cobb County Residency
  - ❑ Copy of State Issued ID, Utility Bill, Current Check Stub
    - Must clearly show a Cobb County address
- ❑ Required consent by assistance applicants and participants [\(24 CFR Part 5, Subpart B\)](#)
  - ❑ Each member of the [family](#) of an [assistance applicant](#) or [participant](#) who is at least 18 years of age, and each [family](#) head and spouse regardless of age.
  - ❑ Required at initial evaluation & each recertification.

# Determining Income Eligibility

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- Income Documentation for all household members over the age of 18 is required.
  - Inclusions: Earned Income, Interest/Dividend Income, Pension/Retirement Income, Unemployment & Disability Income, TANF/Public Assistance, Alimony/Child Support Income, Armed Forces Income
  - Exclusions: Income of Children, Inheritance/Insurance Income, Medical Expense Reimbursements, Income of Live-In Aides, Student Financial Aid, Armed Forces Hostile Fire Pay

Regulation: Anticipated annual income of all adults in the family should be determined by using [24 CFR 5.609](#) definition of annual income.

# Determining Income Eligibility

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## □ Sources of Income Verification

### ▣ Third Party

*Requests for verification from third parties must be accompanied by a Consent to Release form.*

- Written – a certified letter verifying the source of income.
- Oral – For all oral verification, file documentation must include facts, time and date of contact, and name and title of third party.

### ▣ Source Documents Provided by Applicant

*Examples: W-2 forms, paycheck stubs, award letters, pension account statements, 1040 form.*

### ▣ Self Declaration

*Not always appropriate.*

# Determining Income Eligibility

## □ Sources of Income Verification Examples:

Factor to be Verified	Third Party		Documents Provided by Applicant	Self-Declaration
	Written	Oral		
Full-time student status (of family member 18 or older, excluding head, spouse, or foster children).	Verification from the Admissions or Registrar's Office or dean, counselor, advisor, etc., or from VA Office.	Telephone or in-person contact with these sources documented in file	School records, such as paid fee statements that show a sufficient number of credits to be considered a full-time student by the educational institution attended.	<b>Not Applicable</b>
Self-employment, tips, gratuities, etc.	<b>Not Applicable</b>	<b>Not Applicable</b>	Form 1040/1040A showing amount earned and employment period	Notarized statement or affidavit signed by applicant showing amount earned and pay period.

# Determining Income Eligibility

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- Calculating Income
  - ▣ Analyze hourly, weekly or monthly income information as appropriate to calculate the annual income. Must include overtime pay.
  - ▣ Compare against Area Median Income (AMI)
  - ▣ Keep documentation in case file for both accepted and denied program participants
  - ▣ Earned income is projected for the next 12 months
  - ▣ Subrecipients may use the HUD Income Calculator found at:  
<https://www.hudexchange.info/incomecalculator>  
(Registration Required)

# Determining Income Eligibility

Use the Income Limits at the time of certification, not at the time of application.

- CDBG: <https://www.huduser.gov/portal/datasets/il/il2017/2017summary.odn>

CDBG MAXIMUM HOUSEHOLD INCOME LIMITS  
FY2017 Income Limits  
Effective: April 14, 2017

FAMILY SIZE	EXTREMELY LOW	VERY LOW INCOME 50%	LOW INCOME 80%
1	\$14,650	\$24,400	\$39,050
2	\$16,750	\$27,900	\$44,600
3	\$20,420	\$31,400	\$50,200
4	\$24,600	\$34,850	\$55,750
5	\$28,780	\$37,650	\$60,250
6	\$32,960	\$40,450	\$64,700
7	\$37,140	\$43,250	\$69,150
8	\$41,320	\$46,050	\$73,600

Source: U. S. Department of Housing and Urban Development (HUD) [www.huduser.gov](http://www.huduser.gov)

**Each time income is certified print the limits, identify the household income, and place it in client file.**

# Determining Income Eligibility

Use the Income Limits at the time of certification, not at the time of application.

- HOME: <https://www.hudexchange.info/programs/home/home-income-limits/>

Family Size	Extremely Low 30%	Very Low Income 50%	Moderate Income 60%	Low Income 80%
1	\$14,200	\$23,650	\$28,380	\$37,800
2	\$16,200	\$27,000	\$32,400	\$43,200
3	\$18,250	\$30,400	\$36,480	\$48,600
4	\$20,250	\$33,750	\$40,500	\$54,000
5	\$21,900	\$36,450	\$43,740	\$58,350
6	\$23,500	\$39,150	\$46,980	\$62,650
7	\$25,150	\$41,850	\$50,220	\$67,000
8	\$26,750	\$44,550	\$53,460	\$71,300

**Each time income is certified print the limits, identify the household income, and place it in client file.**

# Determining Income Eligibility

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## □ CDBG

Benefit to Low/Moderate Income Persons/Households/Families

- At least 51% of beneficiaries must be low or moderate incomes persons

## □ HOME

Tenant-based Rental Assistance and Rental Units [24 CFR 92.216](#)

- At least 90% of families living in HOME-assisted rental units or receiving rental assistance must be families whose annual incomes do not exceed 60% of the Area Median Income (AMI)
- Additional Rent Limitations [\[24 CFR 92.252\(b\)\]](#)In rental projects with 5+ units, at least 20% of households must have incomes not exceeding 50% AMI

For all other projects:

- Beneficiaries' incomes must not exceed 80% of the AMI

# Determining Income Eligibility

- ESG: [https://www.huduser.gov/portal/datasets/il.html#2017\\_data](https://www.huduser.gov/portal/datasets/il.html#2017_data)

Select the “Data” tab, then, scroll down to the 5th section labeled “HUD 30% Income Limit for ALL Areas.”

- **Eligible Prevention clients must have a calculated income below 30% AMI.**

Income eligibility does not need to be assessed for program participants being assisted under the Street Outreach component, the Emergency Shelter component, or at initial intake for the Rapid Re-Housing component.

ESG 30% LOW INCOME LIMITS Effective: April 14, 2017									
THIRTY PERCENT INCOME LIMITS STATE: GEORGIA		-----30% L O W I N C O M E L I M I T S-----							PAGE 22
	MEDIAN	1 PERSON	2 PERSON	3 PERSON	4 PERSON	5 PERSON	6 PERSON	7 PERSON	8 PERSON
Atlanta-Sandy Springs-Roswell, GA MSA Atlanta-Sandy Springs-Roswell, G69700		14650	16750	18850	20900	22600	24250	25950	27600

**Each time income is certified print the limits, identify the household income, and place it in client file.**

# Income Re-Certification

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## ▣ CDBG

- Recertify each time a client receives a new service, income must be verified.

## ▣ HOME

- Recertify income every six (6) months until the client has been served.

# Re-Certification

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## □ ESG

Occurs **90 days** after program enrollment date and **annually** for those enrolled in program 1 year after initial enrollment date.

### **Rapid Re-Housing**

- 90 Day re-certification determines that the household:
  - Is at or below 50% AMI
  - Is at risk of returning to homelessness
  - Lacks the financial resources and support networks needed to obtain housing or remain in their housing

**For Rapid Re-Housing Annual Certifications, Households must have an income below 30%AMI**

### **Prevention**

- 90 day re-certifications determines that the household:
  - Is below 30% AMI
  - Remains at-risk of homelessness
  - Lacks the financial resources and support networks needed to remain in their housing

**A fourth month of assistance cannot be issued until re-certification is complete.**

# Environmental Reviews

Agencies should submit an Environmental Review Request form for the following types of projects:

- **Down Payment Assistance (DPA)**
- **Tenant Based Rental Assistance (TBRA)**
- **Acquisition**
- **Demolition**
- **New Construction**
- **Rehabilitation**



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www.cobbcounty.org/cdbg



**Kimberly Roberts**  
Managing Director

**REQUEST FOR ENVIRONMENTAL REVIEW**

SUBRECIPIENT MAY NOT UNDERTAKE ANY ACTIVITY WITH HUD OR NON-HUD FUNDS WITHOUT A COMPLETED ENVIRONMENTAL REVIEW.

**Date of Request:** \_\_\_\_\_ **Name and Agency:** \_\_\_\_\_

**Funding Source:**  CDBG  HOME  ESG

**Property Address:** \_\_\_\_\_

**Project Description:** \_\_\_\_\_

**Project budget:** \$ \_\_\_\_\_

**PROPOSED PROJECT DESCRIPTION:**

DPA  TBRA  Supportive Services  Operating Costs  Acquisition (Property)

Demolition  New Construction  Rehabilitation

Is this vacant/undisturbed land?  Yes  No

If existing property: # Bedrooms: \_\_\_\_\_ # Baths: \_\_\_\_\_ Sq. Ft.: \_\_\_\_\_ Year Built: \_\_\_\_\_

If proposed activity results in ground disturbance, please provide a description (include a description of all horizontal and vertical ground disturbance, such as haul roads, cut or fill areas, excavations, landscaping activities, ditching, utility burial, grading, water tower construction, etc., as applicable): \_\_\_\_\_

If new construction: # Bedrooms: \_\_\_\_\_ # Baths: \_\_\_\_\_ Sq. Ft.: \_\_\_\_\_

**REQUIRED ATTACHMENTS (FOR ACQUISITION, DEMOLITION, NEW CONSTRUCTION, REHABILITATION)**

Detailed scope work

Site Plan

Photographs of the property, include views of the front, back, right, left and property to the left, right, across the street and street views left and right

Soil Surveys, if completed

# Housing Eligibility

## □ HOME

- Property Standards
  - Habitability Inspection Checklist (HQS Form)
  - Lead Based Paint Requirements & Disclosures
- Rental Unit Characteristics
  - Landlord Verification of Ownership [warranty deed, insurance policy]
  - Allowance for Utilities and other services
  - Rent Reasonable Valuation & Fair Market Rent Limits

### HOME Program Rent Limits

*Effective: June 6, 2016*

The high rent limit is the most rent that can be charged per unit [minus utility adjustment]. No more than 80% of the units can be at this limit. The low rent limit is the most rent that can be charged per unit [minus utility adjustment]. At least 20% of the units must be at this level.

# of Bedrooms Limit	High Rent Limit	Low Rent Limit
	80% of Units	20 % of Units
0	\$764	\$607
1	\$820	\$650
2	\$949	\$780
3	\$1,175	\$901
4	\$1,291	\$1,005
5	\$1,407	\$1,109
6	\$1,522	\$1,212

# Housing Eligibility

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- ESG
- ▣ Rapid Re-Housing & Homelessness Prevention
  - Fair Market Rent (FMR) Limits
  - Rent Reasonableness Valuation
  - Minimum Habitability Standards Inspection
- ▣ Lead-Based Paint Standards
  - Lead Screening Worksheet
  - Visual assessments are required for **ALL** units receiving financial assistance if constructed before 1978, and children under 6 or pregnant women will live there.
  - Become a HUD certified visual inspector by completing an online course at the following web address:  
<http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>

# Documenting Services

## Meeting Program Objective & Carrying Out Program Activities

### ➤ **CDBG**

*Subrecipient must keep records which provide a full description of:*

- ❑ Location of Activity
- ❑ Amount of CDBG funds budgeted, obligated, & expended for the Activity
- ❑ Any records pertaining HUD's crosscutting requirements, as applicable, such as: Davis Bacon Payroll, Procurement, Displacement, Relocation, Real Property Acquisition



# Documenting Services

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## ➤ HOME

### ➤ Acquisition & Down Payment Assistance

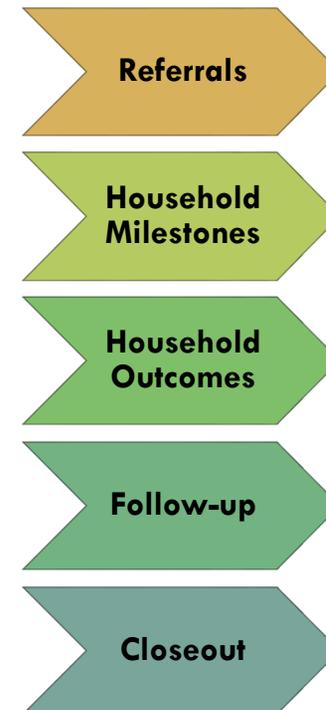
- Settlement Statement
- Purchase Agreement
- URA Contract Addendum
- Appraisal
- Project Underwriting Documentation

### ➤ Rehabilitation Projects

- Final Affidavit & Release of Contractor Liens
- Approved Change Orders
- Final Property Lien
- Inspection Report
- Project Underwriting Documentation

### ➤ TBRA

- Program Participant Agreement
- Certificate of Program Eligibility
- Lease Agreement & HUD Addendum



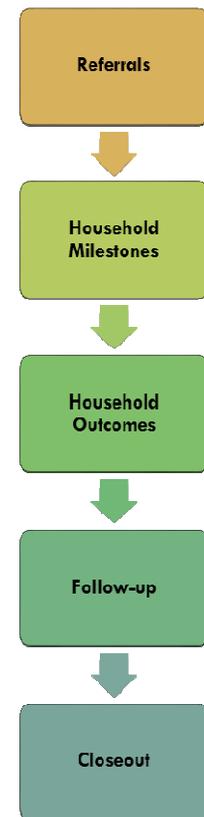
# Documenting Services

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## ➤ ESG

*Agencies must certify that each ESG client meets the definition of homeless or at-risk of homelessness:*

- Homeless Certification
  - At-Risk of Homelessness Certification
  - Self-Certification of Homelessness, At-Risk of Homelessness, or Fleeing Domestic Violence
- Case Management Standards
- Housing stability plan
  - Monthly meetings with the case manager
  - Referrals to mainstream and other resources are required



# Monthly Reporting

## CDBG Monthly Services Report

- ❑ Due to CDBG Program Office by the 15<sup>th</sup> of the each month by email.
- ❑ Report should list total CDBG eligible persons served in the current month & total CDBG eligible persons during the grant period.
  - The total number of CDBG-Eligible persons served during the grant period should **always exceed 51%** or more.
- ❑ Must submit reports for five (5) years

*Monthly Reports should always reflect the number of client files maintained.*

Month/Year of this Report:				
Agency Name:				
Activity Name:				
Person Submitting Report:		Date Submitted:		
<b>NEW PERSONS SERVED THIS MONTH</b>				
<small>Note: All persons served are to be reported only during the 1<sup>st</sup> month they are served during the January - December Program Year and not reported again during that Program Year.</small>				
1. <b>New Persons Served - Listed By Income Groups - Percentages of Median Family/Household Income</b>			<b>Total Number of Persons Served</b>	
A. New persons served [Extremely Low Income - 0%-30% Median Family/Household Income]				
B. New persons served [Very Low Income - 31%-50% Median Family/Household Income]				
C. New persons served [Low Income - 51%-80% Median Family/Household Income]				
D. Total of lines A-C				
E. New persons served [Over 80% Median Family/Household Income/NON-CDBG ELIGIBLE]				
F. Total of lines D and E				
G. Calculate % of CDBG eligible persons- Line D divided by Line F				
2. <b>Number of New Persons Served - As Identified by Each Individual - Listed by Race/Sex/Ethnicity</b>				
<b>Race by Gender</b>		<b>Male</b>	<b>Female</b>	<b>Total</b>
White				
Black/African-American				
Asian				
American Indian/Alaskan Native				
Native Hawaiian/Other Pacific Islander				
American Indian/Alaskan Native & White				
Asian & White				
Black/African-American & White				
American Indian/Alaskan Native & Black/African-American				
Other Multi-Racial				
<b>Totals</b>				
<b>Race by Ethnicity</b>		<b>Hispanic or Latino</b>	<b>Non-Hispanic or Non-Latino</b>	<b>Total</b>
White				
Black/African-American				
Asian				
American Indian/Alaskan Native				
Native Hawaiian/Other Pacific Islander				
American Indian/Alaskan Native & White				
Asian & White				
Black/African-American & White				
American Indian/Alaskan Native & Black/African-American				
Other Multi-Racial				
<b>Totals</b>				
3. <b>Number of New Female-Headed Households Served This Month</b>				
4. <b>Presumed Benefit Groups Served - Use Only the Category Used to Qualify Your Activity for CDBG funding</b>				
Elderly - Age 62 and Older - Number of New Persons Served				
Adults With Disabilities - Number of New Persons Served				
Homeless Persons - Number of New Persons Served				
Abused Spouses - Number of New Persons Served				
Abused/Neglected Children - Number of New Persons Served				
<b>Totals</b>				

# Monthly Reporting

## HOME Monthly Service Report

- ❑ Due from **ALL** funded entities on the 15<sup>th</sup> of each month.
- ❑ For example, June Report is due July 15<sup>th</sup>
- ❑ Report should list total HOME eligible persons served in the current month & total HOME eligible persons during the grant period.

*Monthly Reports should always reflect the number of client files maintained.*

**Cobb County HOME Program Monthly Report**

Subrecipient/CHDO Name: _____ Report for the Period (month/year): _____ Name of Person Submitting Report: _____ Date Report Submitted: _____	Submit Completed Report To: Cobb County CDBG Program Office 192 Anderson Street, Suite 150 Marietta, GA 30060 FAX: 770-528-1486
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**PART I: New Persons Served This Month**

*Note: Persons served are to be reported only during the first month they are served during the Program Year, and not reported again during that Program Year.*

1. New Persons Served - By Income Group - Percentages of Median Family/Household Income	Number of Persons Served	Year To Date Total
A. New persons served [Extremely Low Income - 0%-30% Median Family/Household Income]		
B. New persons served [Very Low Income - 31%-50% Median Family/Household Income]		
C. New persons served [Low Income - 51%-80% Median Family/Household Income]		
D. New persons served [Over 80% Median Family/Household Income]		
E. Total New persons served		

**2016 HOME Program Income Limits Effective June 6, 2016**  
\*Income of all persons living in the household  
 Source: U. S. Department of Housing and Urban Development (HUD) [www.huduser.gov](http://www.huduser.gov)

Family Size	Extremely Low 30%	Very Low Income 30%	Moderate Income 60%	Low Income 80%
1	\$14,200	\$23,650	\$28,380	\$37,800
2	\$16,200	\$27,000	\$32,400	\$43,200
3	\$18,250	\$30,400	\$36,480	\$48,600
4	\$20,250	\$33,750	\$40,500	\$54,000
5	\$21,900	\$36,450	\$43,740	\$58,350
6	\$23,500	\$39,150	\$46,980	\$62,650
7	\$25,150	\$41,850	\$50,220	\$67,000
8	\$26,750	\$44,550	\$53,460	\$71,300

2. Number of New Persons Served - By Race/Sex/Ethnicity						
A. Single Race - As Identified by Each Individual - Number of New Persons Served						
Race	Male	Female	Hispanic or Latino	Non-Hispanic or Non-Latino	Year To Date Total	
White						
Black/African-American						
Asian						
American Indian/Alaskan Native						
Native Hawaiian/Other Pacific Islander						
Totals						
B. Multi-Race - As Identified By Each Individual - Number of New Persons Served						
Race	Male	Female	Hispanic or Latino	Non-Hispanic or Non-Latino	Year To Date Total	
American Indian/Alaskan Native & White						
Asian & White						
Black/African-American & White						
American Indian/Alaskan Native & Black/African-American						
Other Multi-Racial						
Totals						

<b>3. Number of New Female-Headed Households Served This Month</b>	<b>Year to Date Total</b>
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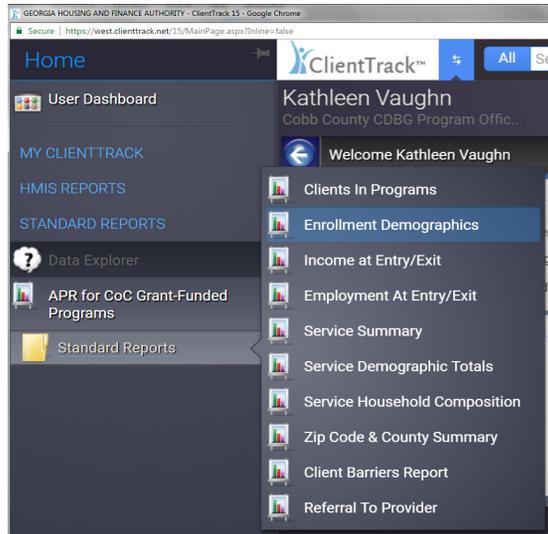


# Monthly Reporting

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## ESG ClientTrack Standard Report “Enrollment Demographics”

## Expand Each Section Before Exporting



### Report Settings

Predefined Date Range – Previous Month

Report Type – Begin Enrollment

The screenshot shows the 'Enrollment Demographics' report for the period 3/1/2017 to 3/31/2017. The report criteria are: Organizations: My Training Organization, Programs: My Training Org ESG - Shelter, and Age Range: 0-17,18-45,46-62,63. The report displays a table with demographic data, comparing unduplicated and duplicated client counts and percentages across various categories.

	Unduplicated		Duplicated	
	#	%	#	%
<b>Race</b>	29	100.000%	29	100.000%
American Indian or Alaska Native	4	13.793%	4	13.793%
Asian	2	6.897%	2	6.897%
Black or African American	4	13.793%	4	13.793%
Multi-Racial	9	31.034%	9	31.034%
White	10	34.483%	10	34.483%
<b>Ethnicity</b>	29	100.000%	29	100.000%
<b>Gender</b>	29	100.000%	29	100.000%
<b>Age Range</b>	29	100.000%	29	100.000%
<b>Religion</b>	29	100.000%	29	100.000%

ClientTrack™ Reports Page 1 of 1 3/29/2017 11:06 AM

*Monthly Report should always reflect the number of client files maintained.*

# Monthly Reporting

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## **ESG Prevention & Rapid Re-Housing Components**

For each NEW Client, submit the following:

- ❑ Housing Status Documentation & Certification
- ❑ Habitability Checklist
- ❑ Lead-Based Paint Documentation (if applicable)
- ❑ Client-Landlord Lease
- ❑ Agency-Landlord Lease
- ❑ Client application - Agency application
- ❑ Income Verification Documentation with the Income Calculation
- ❑ Fair Market Rents (FMRs) & Rent Reasonableness determination
- ❑ HMIS Consent Form

# Technical Assistance

The Cobb County CDBG Program Office is committed to ensuring your organization's project is successful.

Please contact us with any questions you have or to set up any technical assistance needed.

# Resources

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- ❑ CDBG Program Office Website

  - [www.cobbcounty.org/cdbg](http://www.cobbcounty.org/cdbg)

  - ❑ **Sources of Income Verification**

- ❑ HUD Exchange

  - ❑ **Building HOME: A HOME Program Primer - Training Manual and Slides**

  - <https://www.hudexchange.info/resource/2368/building-home-a-home-program-primer/>

  - ❑ **CDBG Desk Guide**

  - [https://www.hudexchange.info/resources/documents/CDBG\\_Guide\\_National\\_Objectives\\_Eligible\\_Activities.pdf](https://www.hudexchange.info/resources/documents/CDBG_Guide_National_Objectives_Eligible_Activities.pdf)

# CDBG Program Office Contacts

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