City of San Marcos
Community Development Block Grant – Coronavirus Response (CDBG-CV)
2020 Public Services Application

City of San Marcos

Planning and Development Services Department

630 East Hopkins

San Marcos TX 78666

https://www.sanmarcostx.gov/3065/CDBG-Action-Plans

For more information: Carol Griffith 512.393.8147 cgriffith@sanmarcostx.gov

APPLICANT INSTRUCTIONS

Persons with limited English proficiency may request assistance by contacting the City at 512-393-8250. (Las personas con habilidad limitada de Inglés puede solicitor la asistencia poniéndose en contacto con la Ciudad en 512-393-8250.)

Thank you for your interest in the City of San Marcos' Community Development Block Grant - Coronavirus Response (CDBG-CV) program. The City will receive $425,261 for immediate use upon acceptance of the City's Action Plan by the US Department of Housing and Urban Development (HUD).

Applications may be submitted by for-profit entities, non-profit organizations, government agencies, and City departments; the City is not accepting applications from individuals who need personal housing or other financial assistance. Applications should be for the creation of a program or project that provides assistance to individuals or businesses.

The City of San Marcos does not discriminate on the basis of disability in the admission or access to its services, programs, or activities. Individuals who require auxiliary aids and services for this meeting should contact the City of San Marcos ADA Coordinator at 512-393-8000 (voice) or call Texas Relay Service (TRS) by dialing 7-1-1. Requests can also be faxed to 512-393-8074 or sent by e-mail to ADArequest@sanmarcostx.gov.

APPLICATION INFORMATION

2020 Application Period: May 1, 2020-May 20, 2020

APPLICATION SUBMISSION DEADLINE IS MAY 20, 2020 AT 5:00 P.M.

Submit one signed application electronically to: Carol Griffith, cgriffith@sanmarcostx.gov

Please call to verify your application has been received: Carol Griffith 512-393-8147. *I am currently teleworking; please leave a voicemail and I will be notified.*

PROJECT ELIGIBILITY

Organizations may propose more than one program or project in separate applications.

CDBG-CV Requirements

CDBG-CV funds must meet typical CDBG requirements and must be used to prevent, prepare for, and respond to coronavirus, which can include responding to the economic effects as well as the health impacts of the COVID-19 pandemic. Please note that it has now been determined that up to 100% of the funds can be used for Public Services.

HUD has provided the attached Quick Guide to CDBG Eligible Activities to Support Infectious Disease Response. Additional resources will continue to be posted to www.hudexchange.info/programs/cdbg/disease/.

Proposed programs and projects will be added to the 2019-2020 CDBG Action Plan so the funds can be used as soon as possible after a required five day comment period and approval by the San Marcos City Council and HUD.

High Priority Needs

Proposed projects must address one of the High Priority Needs stated in the 2015-2019 Consolidated Plan. It is anticipated that Economic Development will be added as a High Priority Need category through an amendment on June 2, 2020 so applications will also be accepted in that category:

- Public Services
- Economic Development
- Affordable Housing
- Public Facilities/Infrastructure/Transportation
- Clearance Activities
- Program Administration

Not everything in these categories can be funded through CDBG. Please refer to the Guide to National Objectives and Eligible Activities for CDBG Entitlement Communities for descriptions of projects that can be funded through CDBG. It can be found at the following link: https://www.hudexchange.info/resource/89/community-development-block-grant-program-cdbg-guide-to-national-objectives-and-eligible-activities-for-entitlement-communities/

National Objectives

All funded projects must also meet one of the three CDBG program National Objectives:

- Benefit low to moderate income individuals or families
- Eliminate slum or blight
- Urgent Need (such as disaster recovery)

City of San Marcos Human Services Funding:

It is the City's policy to fund programs from only ONE city funding source. For example, if you apply for CDBG-CV funds for a program, you cannot apply for City of San Marcos Human Services funding for the same program.

Use of Funds to Support COVID-19 Response

Organizations may propose more than one program or project in separate applications.

CDBG-CV funding is particularly geared toward supporting low-to-moderate income people who have been impacted by the COVID-19 pandemic.

For the City of San Marcos, the following programs listed in the Quick Guide may be of particular benefit:

1. Provision of assistance to private, for-profit entities when appropriate to carry out an economic development project, such as:
    - Preventing job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low to moderate income persons.
    - Providing technical assistance, grants, loans and other financial assistance to establish, stabilize and expand microenterprises that provide medical, food delivery, cleaning and other services to support home health and quarantine.
2. Provision of new or quantifiably increased public services, such as the following.
    - Delivering meals on wheels to quarantined individuals or individuals who need to maintain social distancing due to medical vulnerabilities.
    - Providing equipment, supplies and materials necessary to carry out a public service.

Do not let this list limit your ideas, however! Please be creative! You may be in a position to know best about a need that is particularly suited to this funding. What use of these funds will have the greatest benefit for San Marcos?

Applications are Public Records

Once an application is submitted to the City, it becomes a public record and as such is open for public review. All or part of the application may be posted on the City's webpage and included in City Council packet materials. Please keep this in mind when submitting personal information for your staff, board, or clients.

Application Calendar and Citizen Participation

The City of San Marcos values the input of its citizens and offers the following opportunities to participate in the deliberation on the best uses of the CDBG-CV funding . Scheduled dates and venues are subject to change. The hearing and funding allocation may be held virtually due to the current status of the COVID-19 pandemic.

Please check the website https://www.sanmarcostx.gov/3065/CDBG-Action-Plans for the latest information.

- Public Hearing to review applications and receive citizen comments – **June 2, 2020 at the City Council meeting**
- Public comment period on the proposed CDBG-CV programs and projects – **June 7-13, 2020**

- City Council CDBG-CV funding allocations– **June 16, 2020 at the City Council meeting**

FUNDING AWARDS

Submitting a complete application does not guarantee that your request will be funded. The CDBG-CV grant can fund only the actual, allowable, and reasonable costs of a proposed project, and requests for funding generally exceed the amount of funding available. Funding allocations are decided by the City Council, subject to HUD approval.

AVAILABILITY OF FUNDS

Funds awarded for CDBG-CV will be available as soon as City Council and HUD approvals have been received and any necessary environmental review has been completed. The organization's Subrecipient Agreement with the City must be fully executed prior to the expenditure or commitment of program funds. The appropriate level of environmental review must be completed by Community Initiatives Division staff before any funds are expended or obligated. Environmental reviews typically take 45 to 60 days to complete for small construction projects and about 15 days for projects that are not likely to have a physical impact on the environment. **No reimbursement will be possible for goods purchased or contracts executed prior to meeting these requirements.**

ORGANIZATION ELIGIBILITY REQUIREMENTS

- Organizations applying for Public Services funding can be a public or private non-profit agency, a for-profit entity, a public housing authority, a City of San Marcos department, or other government entity.
- Non-profit agencies must be established, operating agencies as evidenced through documentation required in the application. Exhibits to show tax exempt status are required.
- Faith based agencies are eligible to apply on the same basis as other non-profit organizations. However, CDBG funds cannot be used to support worship, proselytizing, or religious instruction. Religious activities must be offered separately, in time or location, from the CDBG-CV supported activity. Participation in the religious activity must be voluntary for the beneficiaries of the CDBG-CV-funded project. Projects operated by faith-based agencies must be available to all community members and not restricted to the organization's membership or congregation.

NON-DISCRIMINATION AND ACCESSIBILITY

Each agency receiving CDBG-CV funds must

- Provide assurance that it will conduct its business in compliance with the non-discrimination requirements of the County, State, and Federal governments as applicable.
- Have Equal Opportunity in Employment policies.
- Agree to comply with Title VI of the Civil Rights Act of 1964 as amended, Title VIII of the Civil Rights Act of 1968 as amended, Section 104(b) and Section 109 of Title I of the Housing and Community Development Act of 1974 as amended, Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Executive Order 11063 as amended by Executive Order 12259, and Executive Order 11246 as amended by Executive Orders 11375, 11478, 12107 and 12086.

FINANCIAL CAPACITY AND AUDITING REQUIREMENTS

The *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* issued by the federal Office of Management & Budget (OMB) requires that any organization that expends $750,000 or more in federal financial assistance in a fiscal year must secure an annual audited financial statement.

The City has established the following financial statement requirements for organizations assisted with CDBG-CV program funds, based on the total assets of the applicant. The term "total assets" is defined to mean the total amount of liquid assets that is documented to be available to the Subrecipient at the time the funding is approved.

A. CPA preparation of financial records is not required if the Subrecipient has total assets of $15,000 or less in value;

B. A compiled financial statement is required if Subrecipient has total assets greater than $15,000 and less than or equal to $100,000 in value.

C. A reviewed financial statement is required if Subrecipient has total assets greater than $100,000 and less than or equal to $200,000 in value.

D. An audited financial statement is required if Subrecipient has total assets of more than $200,000 in value. (In an "Audited" statement a CPA provides an in-depth study of the records, organizes them into a statement, and issues an opinion to their validity.)

Organizations receiving CDBG-CV funds must submit the required financial statement which has been prepared by a Certified Public Accountant to the City within nine months from the organization's fiscal year end and not more than 30 days after the organization's receipt of the statement.

Insurance and Bonding

Agencies receiving CDBG-CV funding must provide Workers' Compensation Insurance coverage for all of its employees involved in the performance of the funded project. At the time of contract signing, funded agencies must provide evidence of insurance including, but not limited to, multi-peril property and liability, worker's compensation, automobile liability, and other coverage as deemed necessary by the City. In addition, upon funding the City of San Marcos, Officers, Employees and agents must be added as additional insured to the policy.

Project Implementation Schedule and Performance Measurement Goals

Performance measurement is an effective management technique that enables those who receive grant funds (Subrecipients) and the City to analyze the benefits of their investments. It is a mechanism that tracks the progression of projects and evaluates their overall effectiveness and success in meeting project goals. **One of the most important overall goals in planning a CDBG-CV project is the completion of the project in a timely manner.**

The City is monitored by HUD to ensure that the CDBG-CV grant program has benefited low-to-moderate-income families; one success measurement that the City must meet is the expenditure of its program funds in a timely manner. The City must take into account the project schedules for each project that is proposed to ensure that the overall CDBG-CV program will comply with its federally mandated timeliness ratio. Thus, it is critical that each applicant accurately forecasts the time that will be involved in completing each step of a proposed project.

Please use the format included in this application to outline the expected Implementation Schedule for your project. This document will be incorporated into the Subrecipient Agreement for funded projects. The City will monitor the performance of Subrecipients against the goals and performance standards established by this document. Substandard performance as determined by the City will constitute noncompliance with the Subrecipient Agreement. If action to correct such substandard performance is not taken by the Subrecipient with a reasonable period of time after notification by the City, contract suspension or termination processes may be initiated.

Notes For Organizations Receiving Federal Funds

Subrecipient Registration Requirements:

- Organizations receiving CDBG-CV funding (Subrecipients) must obtain a Dun and Bradstreet Data Universal Numbering System (DUNS) number. If you do not have a DUNS number, go to http://fedgov.dnb.com/webform to register.
- Funded applicants must also have an active registration with System of Award Management (SAM). To register with SAM, go to www.sam.gov to register. You must have a DUNS number prior to registering with SAM. Subrecipients must provide proof of SAM registration prior to the execution of a Subrecipient Agreement. This is required when federal funds are being utilized. Any contractors/service providers hired for the CDBG-CV programs must also have an active registration with SAM prior to start or expenditure of funds.

INCOME LIMITS

Income limits are established by HUD on an annual basis for the purpose of establishing CDBG-CV grant eligibility. The limits are based on household size. Income is calculated for every adult 18 and older residing in the household. HUD considers 80% and below to be low income. San Marcos CDBG-CV Area Median Income (AMI) Limits are based on the Median Family Income for the Austin/Round Rock Metropolitan Statistical Area (MSA). The current Median Family Income for the Austin-Round Rock MSA is $97,600 which became effective April 8, 2020. The 2020 limits are expected to be released by HUD in the next few months.

Family Size	**1 Person**	**2 Person**	**3 Person**	**4 Person**	**5 Person**	**6 Person**	**7 Person**	**8 Person**
80% AMI	$54,700	$62,500	$70,300	$78,100	$84,350	$90,600	$96,850	$103,100

PUBLIC SERVICES PROGRAM OR ACTIVITY ELIGIBILITY

ELIGIBLE PUBLIC SERVICE ACTIVITIES (24 CFR 570.201(E))

"Public Services" are non-construction social service activities in the community that benefit low- to moderate-income citizens. At least 51% of all program clients must be City of San Marcos residents and have a total family income that does not exceed 80% of the area median income as established by HUD for San Marcos.

CDBG-CV regulations allow the use of grant funds for a wide range of public service activities including, but not limited to:

- After school / child care
- Education programs
- Health services
- Recreation services
- Crime prevention, public safety
- Senior citizens services
- Homeless persons services
- Job Training
- Substance abuse programs

See the attached Quick Guide for additional information.

ELIGIBLE EXPENSES

Eligible expenses include but are not limited to labor, supplies, and materials as well as operation and maintenance of the portion of a facility in which the public service is located. This includes the lease of a facility, equipment, and other property needed for the public service and costs incurred for telephone services, postage, and computer use or access. Time sheets will be required to document salary costs. Travel and training expenses may be authorized by the City on a case-by-case basis.

INELIGIBLE EXPENSES

CDBG-CV funds may not be used to pay for food or meals for staff, fund raising, entertainment, alcoholic beverages, deposits on equipment, incentives to clients (such as gift cards or raffle prizes), or late fees or penalties. Costs of organized fund raising are not allowable. The purchase of equipment, fixtures, motor vehicles, furnishings, or other personal property that is not an integral, structural fixture is generally ineligible.

CLIENT INCOME VERIFICATION OPTIONS:

To be eligible for CDBG-CV assistance, a public service project must serve low-to-moderate income persons. Income limits are updated annually, usually in the spring. The City will post the new limits on its website when they become available and distribute the new limits to all Subrecipient organizations.

The type of income verification needed is determined by the project and the clients served; HUD allows each project to select one of three definitions of "income" to be used in calculating a potential client's eligibility to be considered low/mod. The project must use the same definition for all applicants. The primary difference in the definitions is the treatment of assets. City staff will work closely with all agencies that are selected for funding to determine which income definition should be used.

Documentation of the benefit to low and moderate income level persons is required of every project funded.

1. Limited Clientele: The public service activities must be offered to a particular group of low and moderate income residents in the entire community. Agencies will collect income data and demographic data for each recipient in the program as either Client Based or Presumed Benefit.

a. **Client Based:** Activities will be offered to all residents of a particular group of low-and-moderate income San Marcos residents. Income verification and residency are required along with other client statistics.

b. **Presumed Benefit:** Activities that exclusively serve a group of persons in any one or a combination of the following categories may be presumed to benefit a population in which at least 51% of the population is low-to-moderate income. Individual income verification is not required, although residency and other client statistics must be collected. The Presumed Benefit categories are:

a. Elderly persons (62 or older)	e. Battered spouses
b. Homeless persons	f. Abused children
c. Persons living with AIDS	g. Migrant farm workers
d. Illiterate persons (includes non-English speakers)	h. Severely disabled adults (Census Bureau definition)

Persons are classified as having a severe disability if they (a) used a wheel-chair or had used another special aid for six months or longer; (b) are unable to perform one or more "functional activities" or need assistance with an ADL or IADL; (c) are prevented from working at a job or doing housework; or (d) have a selected condition included autism, cerebral palsy, Alzheimer's disease, senility or dementia, or mental retardation. Also, persons who are under 65 years of age and who are covered by Medicare or who receive SSI are considered to have a severe disability.

For purposes of this definition, the term "functional activities" includes seeing, hearing, having one's speech understood, lifting and carrying, walking up a flight of stairs, and walking. An ADL is an "activity of daily living" which includes getting around inside the home, getting in or out of bed or a chair, bathing, dressing, eating, and toileting. An IADL is an "instrumental activity of daily living" and includes going outside the home, keeping track of money or bills, preparing meals, doing light housework and using the telephone.

2. Nature and Location: Activities must be of such nature and in such location that it may reasonably be concluded that the activity's clientele will primarily be low/mod income persons. For example, a day care center that is designed to serve residents of a public housing complex would qualify under this category. Individual income verification would not be required, although residency and other client statistics would be required. HUD must approve this method of income verification.

3. Area Benefit: An activity which is available to benefit all of the residents of a defined area which is primarily residential and where at least 51% of the residents are L/M income persons. This rarely applies to public service projects.

SUPPLEMENTAL ITEM CHECKLIST

CDBG-CV PROGRAM

DUE DATE: MAY 20, 2020

Submit one copy of the following items:

Required:

____ Board of Directors list including position/title on board.

____ Contact numbers for Board Chair or President and Treasurer.

____ Resolution or Board Minutes showing approval to submit an application and designation of person who will sign documents on behalf of the organization.

X____ Organization Chart

____ Articles of Incorporation

____ Bylaws

____ Tax Exempt Determination Letter (for non-profit organizations)

____ Organization's Current Budget (2019-2020) and Proposed Budget for next fiscal year

____ Most Recent audit or CPA prepared review.

____ Description of employees, board members, volunteers who will work with the project

____ Non-discrimination Policy Statement

If applicable:

____ Fee schedule or structure for the project proposed for funding

____ Copy of program application if one is used to select beneficiaries

____ Analysis of program or service expansion if this is not a new service.

____ Description of how beneficiaries will be selected (if not by application form)

____ Description of how applicant income will be determined if there are direct beneficiaries

____ Detailed explanation of any lawsuits, judgments, or bankruptcy proceedings

____ Job description for new positions expected to be filled using CDBG-CV funding

CITY OF SAN MARCOS
2020 CDBG-CV PUBLIC SERVICES APPLICATION

Due Date: May 20, 2020

I. APPLICANT CONTACT INFORMATION

Applicant Organization: City of San Marcos Office of Emergency Management

Contact Name: Rachel Ingle Telephone: 512-393-8482

Mailing Address: 630 E. Hopkins St, San Marcos, TX 78666

Physical Address, if different from mailing address: _____

Contact E-Mail Address: ringle@sanmarcostx.gov Web Address: _____

Who is authorized to execute program documents? Chase Stapp - Director of Public Safety

II. APPLICATION SUMMARY INFORMATION

Project Name: COVID-19 Community Recovery Program

Amount of CDBG-CV Funds Requested: $180,000.00

____

Project Location: City of San Marcos

Will all CDBG-CV funds for this project be expended by July 15, 2021? ____ Yes X No

If "No", what percent is expected to be completed by that date? 50%

III. Project Description

Program Summary

Briefly summarize the program for which CDBG-CV funding has been requested.

COVID-19 Community Recovery Program is a community-based initiative designed by the San Marcos - Hays County Recovery Task Force (Task Force). The program has three primary goals; to ensure that our communities reopen safely, to facilitate sustainable economic recovery, to assist the school districts in the safe reopening of their campuses, and to outreach and communicate preparedness strategies within the community's vulnerable populations. The lead local agency for the Community Recovery Program is the San Marcos Office of Emergency Management (OEM), whose primary mission is to create a culture of preparedness that enables the community to be resilient in the face of natural and man-made hazards. Local government partners and community stakeholders have been actively participating in the Community Recovery process.

Undoubtedly, the Coronavirus disease 2019 (COVID-19) has caused outsize harm to all people, both in terms of physical health and the potential for economic downturn. But population groups such as the economically disadvantaged, older people, people with disabilities, people experiencing homelessness, and other vulnerable groups are disproportionately harmed by the COVID-19 pandemic. These populations already suffer from lack of access to health resources and basic

Use of Funds

How will the funds be used?

The requested funds will be used to fund one (1) full-time position, for two (2) years, with responsibilities in facilitating and coordinating the COVID-19 Community Recovery Program. Activities the Recovery Specialist may conduct include:

- Assisting the community in developing long term recovery planning strategies and support these processes by offering advice, research, facilitation, plan development and editing, regulation development and editing, resource linkages, and process and implementation support;
- Supporting the community's long-term community and economic recovery planning by working with other state agencies and federal partners;
- Provide educational workshops and materials for all businesses and residents on community and economic preparedness, disaster recovery, and hazard planning
- Participate in and facilitate local and state recovery meetings; and
- Research and advise on community and economic recovery planning and long-term community recovery best practices.

COVID-19 Pandemic Impact:

Summarize how this project directly addresses an impact from the current COVID-19 pandemic:

The COVID-19 Community Recovery Specialist will facilitate community collaboration by bringing together businesses, governments and community leaders throughout the community to create and implement a recovery plan that will:

- Assist economic recovery while minimizing the risk of unnecessary spread of COVID-19 in the community while creating sustainable plans that guide business decisions about future restrictions that may become necessary in the event of a new outbreak of COVID-19 or other communicable disease.
- Provide information and resources to community members to aid them in their individual recovery, while limiting the spread of COVID-19 and provide a variety of information and resources so that community members are well-equipped in the event of a new outbreak of COVID-19 or other communicable disease.
- Develop plans for implementing health and safety measures for schools that support the safe resumption of face-to-face classes while monitoring and remediating again the spread of COVID-19.

ACCOMPLISHMENTS

Once the project is completed, how can its success be measured?

Once complete, the Recovery Program will be able to measure success based on:

- The number of small business that were able to reopen partially or fully.
- The number of people within the community engaged with information and resources to better prepare and recover from future infectious/communicable disease pandemics.
- The number of plans developed to address school health and safety measures and the number of staff, students, and parents educated on the plans for awareness.
- The number of local government and departments reopened with staff trained in health and safety measures, and new and/or updated continuity plans for future infectious/communicable disease pandemics.

TYPE OF PUBLIC SERVICE **(choose all that apply)**

____ 05A Senior Services

____ 05B Handicapped Services

____ 05C Legal Services

____ 05D Youth Services

____ 05E Transportation Services

____ 05F Substance Abuse Services

____ 05G Battered and Abused Spouses Services

____ 05H Employment Training

____ 05I Crime Awareness

____ 05J Fair Housing Activities

____ 05K Tenant/Landlord Counseling

____ 05L Child Care Services

____ 05M Health Services

____ 05N Abused and Neglected Children Services

____ 05O Mental Health Services

____ 05P Screening for Lead Paint/Lead Hazards

____ 05Q Subsistence Payments

____ 05R Homeownership Assistance (Not Direct)

X Other: COVID-19 Disaster Recovery

PROGRAM INFORMATION

1. Program eligibility (please select one):
   a. X This is a new program.
   b. _____ This is an existing program that: (select one of the following)

      _____ Has previously received CDBG funding and the amount requested for this year is the same or less than previous funding; or

      _____ will expand to serve more beneficiaries or to provide more services if the CDBG-CV funding as requested is approved. *Please attach an analysis that details how the program or service will be expanded, how many new beneficiaries will be served by the expansion, and how this number was determined.*

2. Programs receiving funding from the City at this time (during the current program year):
   a. How much CDBG funding was awarded? N/A
   b. Is this program receiving any other City of San Marcos sources? No
   c. If yes, how much was received and from what source? N/A
3. Is there a fee to clients to participate in the program? _____ Yes x No

   If yes, please provide fee structure.
4. Describe the days and hours of operation of the program: _____

   COVID-19 Community Recovery Program will be operational M-F 8:00am - 5:00pm

IV. Program Beneficiaries

Applicant must be able to document that at least 51% of the beneficiaries have an annual income that is at or below 80% of the Area Median Income and are San Marcos residents.

A. Presumed Benefit: See definition above of "Presumed Benefit".

1. Will all of the program's beneficiaries in a Presumed Benefit Category? ____ Yes or X___ No

   If "yes", list the categories: N/A

2. How many persons in each presumed category are proposed to be assisted if funding is received?

Abused Children	Elderly Persons	Battered Spouses	Homeless Persons	Severely Disabled Adults	Illiterate Adults	Persons living with AIDS
N/A	N/A	N/A	N/A	N/A	N/A	N/A

3. If this program was carried out the previous full program year (10/1 – 9/30), how many persons were served in each presumed category:

Abused Children	Elderly Persons	Battered Spouses	Homeless Persons	Severely Disabled Adults	Illiterate Adults	Persons living with AIDS
N/A	N/A	N/A	N/A	N/A	N/A	N/A

B. Beneficiaries who are not considered "Presumed"

1. How many persons are proposed to be assisted if funding is received? 51%

   If this program was carried out the previous program year (10/1 – 9/30), how many persons were served?

   N/A

2. What percentage of persons proposed to be assisted are expected to be low/mod? 100%
3. What percentage of persons proposed to be assisted are expected to be San Marcos residents? 100%
4. How do you propose to document the income of the beneficiaries? (check all that apply)

   X_____ Evidence that the child is approved for free or reduced lunch

   X_____ Evidence that the family lives in housing sponsored by the Housing Authority

   X_____ Evidence that the family is WIC approved

   _____ Income documentation using one of the 3 HUD approved methods

   _____ Self-certification, with income verification required of 20% of certifications

   _____ Other, describe:

VI. LINE ITEM BUDGET

Please use the following format to present your proposed line item budget. Secured funds are funds on-hand, pledged, or awarded. Following the Line Item Budget, please complete the Supplemental Budget Form – Use of Other Resources. Funds and costs, as outlined on the Sources and Uses of Funds form, may ***not*** *be spent or incurred prior to a contract award date from the CDBG-CV Program. Supporting documentation may be attached as an Appendix.*

Expense Category	Total Program Budget	CDBG-CV Portion	Other Funding Source	Other Funds Amount
Personnel Services				
Salaries	$130,000	100%		
Fringe Benefits	$32,500	100%		
Supplies				
Office Supplies	$2,500	100%		
Program Supplies	$2,500	100%		
Client Materials	$1,500	100%		
Operating				
Training	$5,000	100%		
Insurance				
Utilities/Rent/Mortgage				
Other (please specify)				
Office Equipment	$2,000	100%		
Uniforms	$2,000	100%		
Information Technology	$2,000	100%		
Total	$180,000			

Please provide an explanation for any unusual budget expenditures listed in the line item budget above.

This total funding request will be used to fund the position for two (2) years.

VII. Projected Implementation Schedule with Performance Goals

Projected Start Date: 10/1/2020

Projected Completion Date: 09/30/2022

Activity Description	Start Month/Year	End Month/Year	Performance Measurement Goal
Example: Hiring New Staff Member	*October 2019*	*December 2019*	*Employment process complete*
Hiring New Staff Member	July 2020	October 2020	Employment Process Complete
Coordination and Facilitation of Taskforce meetings	October2020	September 2022	Identification of activities for Coordinator
Recovery Training	October 2020	September 2022	Number of participants
COVID Recovery Outreach	October 2020	September 2022	Number of citizens engaged in outreach

VIII. Organization Information

Required Attachments

____ Organizational Chart

____ Articles of Incorporation

____ Proof of Tax Exempt status

____ Board Minutes and Resolution authorizing application submittal and specifying who will sign documents. *(The organization's governing board must approve the submittal of this funding application and designate a person who is authorized to execute program documents.)*

X____ A listing of key staff and employees who will work directly with the proposed program, their primary job duties, and other pertinent information relating to your proposed project.

X____ If CDBG-CV funds will be used to hire new personnel, please provide a brief job description of the proposed position(s).

Background Information

1. Organization Type:

   ____ 501(c) Non-Profit Corporation ____ Public Corporation X____ Government Entity

   Other: _____

2. Name and title of Board of Directors chair or president: Jane Hughson, Mayor
3. How many years has your organization been in business? 169
4. Organization's Taxpayer Identification Number (EIN): 74-6002238
5. Organization's Dun and Bradstreet DUNS Number: 069462869
6. Is organization currently registered in the federal System for Award Management (SAM)? x____ Yes _____ No

Financial Information

1. What is the date of your fiscal year end? 9/30/2020
2. Does your organization have a purchasing policy? X____ Yes _____ No
3. Has your organization currently or within the past five years had any litigation that is pending or has been resolved?
   x____ Yes _____ No

   If "Yes", please attach a summary of the litigation and its status; including any outstanding judgments.
4. Has your organization filed a petition for bankruptcy or has a petition for bankruptcy been filed against your organization? _____ Yes x____ No

   If "Yes", please attach an explanation that includes the current status.
5. During the last fiscal year did your organization spend $750,000 or more in Federal financial assistance?

   X____ Yes _____ No
6. What level of financial review does your organization obtain from an independent source? Select from the following options:

   X____ Single Audit X____ Audited Financial Statement

   ____ Reviewed Financial Statement ____ Compiled Financial Statement

   ____ No independent review ____ Other (describe):

7. What period was covered by your most recent financial review? October 1, 2018 - September 30, 2019
8. Has your organization received City of San Marcos funding in the past two years? x ___ Yes ____ No

   If yes, please attach a short summary of the purpose and amount of City funding.

PERSONNEL AND POLICIES

1. Name and Title of your chief administrator Bert Lumbreras, City Manager

   Number of years in this position? 3
2. Total number of current employees at all locations 850
3. Total number of current employees who will be involved in this project 4
4. Total number of new employees expected to be hired for the project 1
5. Does your organization have a personnel policy manual? X ___ Yes ____ No

   Does it include a procedure for filing grievances? X ___ Yes ____ No

   Does it include a non-discrimination clause? X ___ Yes ____ No
6. Does your organization maintain a written code or standards of conduct that governs the performance of its officers, employees or agents engaged in the award and administration of contracts supported by Federal funds?

   X ___ Yes ____ No
7. Separation of duties for financial transactions regarding this project (respond with job title):
   a. Who will approve payment of incurred expenses? Chase Stapp, Director of Public Safety
   b. Who will actually prepare the payment check? City of San Marcos Finance Department
   c. Who will sign checks paying project expenses? City Manager/Assistant City Manager
   d. Who posts the transaction to your financial records? City of San Marcos Finance Department
   e. Who reconciles monthly bank statements? City of San Marcos Finance Department

ACCESSIBILITY OF PROGRAMS AND SERVICES

1. Are all facilities to be served by the program ADA Accessible? x ___ Yes ____ No
2. Do you have a Section 504 (ADA) Self-Evaluation on file? x ___ Yes ____ No
3. How will you provide services to persons with Limited English proficiency? _____

   City established translation and/or interpretation services

INSURANCE, BONDING, AND WORKER'S COMPENSATION

1. Does your organization have liability insurance coverage? x ____Yes _____No
2. If yes, in what amount? On City Records (Contact Cindy Conyers)
3. Does your organization pay worker's compensation in accordance with Federal and state laws?

   x ____Yes_____ No _____ N/A
4. Does your organization have fidelity bond coverage for principal staff members who handle the organization's accounts? x ____ Yes _____ No
5. Will vehicles owned by the organization be used in conjunction with the proposed project?

   x ____ Yes _____ No
6. If yes, what level of liability insurance is maintained on the vehicles? On City Records (Contact

IX. CONFLICTS OF INTEREST (24 CFR 570.611; 24 CFR 85.36; AND 24 CFR 84.42)

Two sets of conflict of interest provisions apply to activities carried out with CDBG-CV funding. The first set, applicable to the procurement of goods and services by subrecipients *(funded applicants),* is the procurement regulation found in the *Uniform Administrative Requirements, Cost Principles and Audit Requirement for Federal Awards as codified in Title 2, Part 200 of the Code of Federal Regulations.* The second set of provisions is located at 24 CFR 570.611(a)(2).

With respect to procurement activities, the subrecipient must maintain written standards of conduct governing the performance of its employees engaged in the award and administration of contracts. At a minimum, these standards must:

1. Require that no employee, officer, or agent may participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict would be involved. Such a conflict would arise when any of the following parties has a financial or other interest in the firm selected for an award:
    - An employee, officer, or agent of the subrecipient;
    - Any member of an employee's, officer's, or agent's immediate family;
    - An employee's, agent's, or officer's partner; or
    - An organization which employs or is about to employ any of the persons listed in the preceding sections.
2. Require that employees, agents, and officers of the subrecipient neither solicit nor accept gratuities, favors, or anything of value from contractors or parties to sub-agreements. However, subrecipients may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.
3. Provide for disciplinary actions to be applied for any violation of such standards by employees, agents or officers of the subrecipient.

With respect to all other CDBG-CV-assisted activities, the general standard is that no employee, agent, or officer of the subrecipient who exercises decision-making responsibility with respect to CDBG-CV funds and activities is allowed to obtain a financial interest in or benefit from CDBG-CV activities, or have a financial interest in any contract, subcontract, or agreement regarding those activities or in the proceeds for the activities. Specific provisions include that:

- The requirement applies to any person who is an employee, agent, consultant, officer, or elected or appointed official of the City, a designated public agency, or a subrecipient, and to their immediate family members and business partners.
- The requirement applies to such persons during their tenure and for a period of one year after leaving the grantee or subrecipient organization.
- Upon written request, exceptions may be granted by HUD on a case-by-case basis.

CONFLICT OF INTEREST QUESTIONNAIRE

NOTE: For the purpose of this form, a "covered person" includes any person who is an employee, agent, consultant, officer or elected or appointed official of the City of San Marcos, your organization, or any designated public agency.

Name of Organization: San Marcos Office of Emergency Management

1. Does your organization maintain a written code or standards of conduct that governs the performance of its officers, employees or agents engaged in the award and administration of contracts supported by Federal funds?

   Yes X_____ No _____ If "No" is checked, please explain how you will comply with this requirement:

   _____

2. Are any of your Board Members or employees that are responsible for carrying out this project or members of their immediate families or their business associates also:

   a. Employed by the City of San Marcos? Yes _____ No X_____

   b. Members of or closely related to members of the San Marcos City Council? Yes _____ No X_____

   c. Members of or closely related to an employee of the City of San Marcos? Yes _____ No X_____

   d. Current beneficiaries or related to beneficiaries of the project for which funds are requested?

      Yes _____ No X_____

   e. Paid providers of goods or services to the program or having other financial interest in the program or related to such individuals? Yes _____ No x_____

3. For **each** relationship described above, please answer the following questions: (attach additional page if necessary)

   a. Name of employee or official: _____

   b. Is this person receiving or likely to receive taxable income from your organization?

      Yes _____ No _____

   c. Is your organization receiving or likely to receive taxable income from or at the direction of the employee or official AND the taxable income is not from the City of San Marcos?

      Yes _____ No _____

   d. Is your organization affiliated with a corporation or other business entity in which the employee or official serves as an officer or director, or holds an ownership interest of 10% or more?

      Yes _____ No _____

4. Describe any other affiliation or business relationship that might cause a conflict of interest with respect to CDBG-CV funds and activities.

   N/A

5. Will any of your organization's employees, officers, board members, or members of their immediate family or business partners have a financial interest in any contract, subcontract, or agreement regarding CDBG-CV funded activities?

   Yes _____ No X_____. *If yes, please attach an explanation.*

X. Applicant Assurances and Certifications

The applicant hereby assures and certifies with respect to this project or program, by the submission of this application, that the following are true statements:

1. It possesses legal authority to apply for the grant and to finance the proposed request; that a resolution, motion or similar action has been duly adopted or passed as an official act of the applicant's governing body, authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the applicant to act in connection with the application and to provide such additional information as may be required.
2. It will comply with the Uniform Administrative Requirements, Cost Principles and Audit Requirement for Federal Awards as codified in Title 2, Part 200 of the Code of Federal Regulations (UAR) and agrees to adhere to the accounting principles and procedures required therein, utilizing adequate internal controls and maintaining necessary source documentation for all costs incurred.
3. If it expends $750,000 or more of federal funds in a fiscal year, it will comply with the Single Audit Act of 1984.
4. It will comply with the provisions of Executive Order 11988, relating to evaluation of flood hazards, and Executive Order 11990, relating to protection of wetlands. It will comply with the flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973, Public Law 93-234, 87 Stat. 975, and approved December 31, 1976. Section 102(a).
5. It will have sufficient funds available or the ability to obtain the non-federal share of the cost for construction projects. Sufficient funds will be available when construction is completed to assure effective operation and maintenance of the facility for the purposes constructed.
6. It will give the City and the Comptroller General, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the grant.
7. It will cause work on the project to be commenced within a reasonable time after receipt of notification from the City that funds have been approved and that the project will be performed to completion with reasonable diligence.
8. It will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and in accordance with Title VI of that Act, no person in the United States shall, on the ground of race, color, or national origin, be excluded from participation in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the applicant receives federal financial assistance and will immediately take any measures necessary to effectuate this agreement.
9. It will comply with the requirements of Title II and Title III of the Uniform Relocation Assistance and Real Property Acquisitions Act of 1970 (P.L. 91-646), which provides for fair and equitable treatment of persons displaced as a result of federal and federally-assisted programs.
10. It will comply with the provisions of the Hatch Act, which limit the political activity of employees.
11. It will comply with the minimum wage and maximum hours provisions of the Federal Fair Labor Standards Act as they apply.
12. It will insure that the facilities under its ownership, lease or supervision which shall be utilized in the accomplishment of the project are not listed on the Environmental Protection Agency's (EPA) list of Violating Facilities and that it will notify the city/federal grantor agency of the receipt of any communication from the Director of the EPA Office of Federal Activities indicating that a facility to be utilized in the project is under consideration for listing by the EPA.
13. It will assist the city/federal grantor agency in its compliance with Section 106 of the National Historic Preservation Act of 1966 as amended (16 U.S.C. 470), Executive Order 11593, and the Archeological and Historic Preservation Act of 1966 (16 U.S.C. 469a-1 et seq.).

14. It will comply with Texas Civil Statutes, Article 5996a, by insuring that no officer, employee, or member of the applicant's governing body or of the applicant's contractor shall vote or confirm the employment of any person related within the second degree by affinity or third degree by consanguinity to any member of the governing body or to any other officer or employee authorized to employ or supervise such person. This prohibition shall not prohibit the employment of a person who shall have been continuously employed for a period of two years prior to the election or appointment of the officer, employee, or governing body member related to such person in the prohibited degree.

15. It will insure that all information collected, assembled or maintained by the applicant relative to this project shall be available to the public during normal business hours in compliance with Texas Civil Statutes, Article 6252-17a, unless otherwise expressly provided by law.

16. It will conduct and administer the program in conformity with the Fair Housing Act (42 USC Section 3901 et. Seq.) and that it will affirmatively further fair housing.

17. It will minimize displacement of persons as a result of activities assisted with CDBG-CV funds. In the event that displacement of residential dwellings will occur in connection with a grant-assisted project, it will follow a residential anti-displacement and relocation assistance plan as specified by the City of San Marcos.

18. It certifies that it is not now, nor has it ever been, on the Federal List of Debarred Contractors.

19. It will not attempt to recover any capital costs of public improvements assisted in whole or in part with such funds by assessing any amount against properties owned and occupied by persons of LMI, including any fee charged or assessment made as a condition of obtaining access to such public improvements unless (a) such funds are used to pay the proportion of such fee or assessment that related to the capital costs of such public improvements that are financed from revenue sources other than such funds; or (b) for purposes of assessing any amount against properties owned and occupied by persons of moderate income, applicant certifies that it lacks sufficient funds under this contract to comply with the requirements of clause (a).

20. It agrees to comply with the requirements of Title 24 of the Code of Federal Regulations, Part 570 (the U.S. Housing and Urban Development regulations concerning Community Development Block Grants (CDBG)) including subpart J and subpart K of these regulations, except that (1) the Agency does not assume the recipient's environmental responsibilities described in 24 CFR 570.604 and (2) Agency does not assume the recipient's responsibility for initiating the review process under the provisions of 24 CFR Part 52. Agency also agrees to comply with all other applicable Federal, State, and local laws, regulations, and policies governing the funds provided. Agency further agrees to utilize funds available to supplement rather than supplant funds otherwise available. Agency shall comply with all applicable Federal laws, regulations, and requirements, which include compliance with the provisions of the HCD Act and all rules, regulations, guidelines, and circulars promulgated by the various Federal departments, agencies, administrations, and commissions relating to the CDBG-CV Program. The applicable laws and regulations include, but are not limited to:

    - 24 CFR Part 570;
    - 24 CFR Parts 84 and 85;
    - The Davis-Bacon Fair Labor Standards Act;
    - The Contract Work Hours and Safety Standards Act of 1962;
    - Copeland "Anti-Kickback" Act of 1934;
    - Sections 104(b) and 109 of the Housing and Community Development Act of 1974;
    - Section 3 of the Housing and Urban Development Act of 1968;
    - Equal employment opportunity and minority business enterprise regulations established in 24 CFR part 570.904;
    - Non-discrimination in employment, established by Executive Order 11246 (as amended by Executive Orders 11375 and 12086);
    - Section 504 of the Rehabilitation Act of 1973 Uniform Federal Accessibility Standards;
    - The Architectural Barriers Act of 1968;
    - The Americans with Disabilities Act (ADA) of 1990;
    - The Age Discrimination Act of 1975, as amended;

- National Environmental Policy of 1969 (42 USC 4321 et seq.) as amended;
- Lead Based paint regulations established in 24 CFR Parts 35, 570.608, and 24 CFR 982.401;
- Asbestos guidelines established in CPD Notice 90-44;
- HUD Environmental Criteria and Standards (24 CFR Part 51);
- The Energy Policy and Conservation Act (Public Law 94-163) and 24 CFR Part 39
- Flood Disaster Protection Act of 1973;
- Colorado House Bill 06-1023 and 06-1043;
- Procurement Standards (2 CFR 200.322);
- Rights to Inventions Made Under a Contract or Agreement (37 CFR 401.2 (a));
- Energy Efficiency (2 CRF Part 200 Appendix II); and
- Recycling (2 CFR Part 200 Appendix II).

CERTIFICATIONS REGARDING LOBBYING:

21. No federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with the awarding of any federal contract, the making of any federal grant, the making of any federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any federal contract, grant, loan, or cooperative agreement.

22. If any funds other than federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a member of Congress, an officer or employee of Congress, or an employee of a member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit standard form – "Disclosure Form to Report Lobbying", in accordance with its instructions.

23. The undersigned shall require that the language of this certification be included in the award documents for all sub-awards at all tiers (including subcontracts, sub-grants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

GENERAL CERTIFICATIONS:

25. The information, exhibits, and schedules contained in this application are true and accurate statements and represent fairly the financial condition of our organization;

26. Our organization is eligible to receive federal funding and has not been placed in a debarred or otherwise ineligible status under the provisions of CFR Part 24;

27. Our organization prohibits discrimination in accordance with Title VI of the Civil Rights Act of 1964; and,

28. Our governing body has duly authorized submission of this document. If funded, we agree to comply with the procedures outlined in the "Playing by the Rules" handbook that will be supplied by the City of San Marcos.

I, the duly authorized representative of the applicant organization, certify that the foregoing statements are true to the best of my knowledge and belief:

CERTIFIED BY:

Signature: Chase Stapp Digitally signed by Chase Stapp Date: 2020.05.20 14:58:36 -05'00' Date Signed: 05/20/2020

Printed Name: Chase Stapp Title: Director of Public Safety

Organization Name: City of San Marcos, Office of Emergency Management

Quick Guide to CDBG Eligible Activities to Support Infectious Disease Response
March 19, 2020

Grantees should coordinate with local health authorities before undertaking any activity to support state or local pandemic response. Grantees may use Community Development Block Grant (CDBG) funds for a range of eligible activities that prevent and respond to the spread of infectious diseases such as the coronavirus disease 2019 (COVID-19).

Examples of Eligible Activities to Support Infectious Disease Response

For more information, refer to applicable sections of the Housing and Community Development Act of 1974 (for State CDBG Grantees) and CDBG regulations (for Entitlement CDBG grantees).	
Buildings and Improvements, Including Public Facilities	
Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. *See section 105(a)(2) (42 U.S.C. 5305(a)(2)); 24 CFR 570.201(c).*	Construct a facility for testing, diagnosis, or treatment.
	Rehabilitate a community facility to establish an infectious disease treatment clinic.
	Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.
Rehabilitation of buildings and improvements (including interim assistance). *See section 105(a)(4) (42 U.S.C. 5305(a)(4)); 24 CFR 570.201(f); 570.202(b).*	Rehabilitate a commercial building or closed school building to establish an infectious disease treatment clinic, e.g., by replacing the HVAC system.
	Acquire, and quickly rehabilitate (if necessary) a motel or hotel building to expand capacity of hospitals to accommodate isolation of patients during recovery.
	Make interim improvements to private properties to enable an individual patient to remain quarantined on a temporary basis.
Assistance to Businesses, including Special Economic Development Assistance	
Provision of assistance to private, for-profit entities, when appropriate to carry out an economic development project. *See section 105(a)(17) (42 U.S.C. 5305(a)(17)); 24 CFR 570.203(b).*	Provide grants or loans to support new businesses or business expansion to create jobs and manufacture medical supplies necessary to respond to infectious disease.
	Avoid job loss caused by business closures related to social distancing by providing short-term working capital assistance to small businesses to enable retention of jobs held by low- and moderate-income persons.
Provision of assistance to microenterprises. *See section 105(a)(22) (42 U.S.C. 5305(a)(22)); 24 CFR 570.201(o).*	Provide technical assistance, grants, loans, and other financial assistance to establish, stabilize, and expand microenterprises that provide medical, food delivery, cleaning, and other services to support home health and quarantine.

Public Services (Capped at 15 Percent of the Grant, With Some Exceptions)[1]	
Provision of new or quantifiably increased public services. *See section 105(a)(8) (42 U.S.C. 5305(a)(8)); 24 CFR 570.201(e).*	Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
	Provide testing, diagnosis or other services at a fixed or mobile location.
	Increase the capacity and availability of targeted health services for infectious disease response within existing health facilities.
	Provide equipment, supplies, and materials necessary to carry-out a public service.
	Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.
Planning, Capacity Building, and Technical Assistance	
States only: Planning grants and planning only grants. *See section 105(a)(12).*	Grant funds to units of general local government may be used for planning activities in conjunction with an activity, they may also be used for planning only as an activity. These activities must meet or demonstrate that they would meet a national objective. These activities are subject to the State's 20 percent administration, planning and technical assistance cap.
States only: use a part of to support TA and capacity building. *See section 106(d)(5) (42 U.S.C. 5306(d)(5).*	Grant funds to units of general local government to hire technical assistance providers to deliver CDBG training to new subrecipients and local government departments that are administering CDBG funds for the first time to assist with infectious disease response. This activity is subject to the State's 3 percent administration, planning and technical assistance cap.
Entitlement only. data gathering, studies, analysis, and preparation of plans and the identification of actions that will implement such plans. *See 24 CFR 570.205.*	Gather data and develop non-project specific emergency infectious disease response plans.

Planning Considerations

Infectious disease response conditions rapidly evolve and may require changes to the planned use of funds:

- CDBG grantees must amend their Consolidated Annual Action Plan when there is a change to the allocation priorities or method of distribution of funds; an addition of an activity not described in the plan; or a change to the purpose, scope, location, or beneficiaries of an activity (24 CFR 91.505).
- If the changes meet the criteria for a "substantial amendment" in the grantee's citizen participation plan, the grantee must follow its citizen participation process for amendments (24 CFR 91.105 and 91.115).

Resources

The Department has technical assistance providers that may be available to assist grantees in their implementation of CDBG Funds for activities to prevent or respond to the spread of infectious disease. Please contact your local CPD Field Office Director to request technical assistance from HUD staff or a TA provider.

- Submit your questions to: CPDQuestionsAnswered@hud.gov
- COVID-19 ("Coronavirus") Information and Resources: https://www.hud.gov/coronavirus
- CPD Program Guidance and Training: https://www.hudexchange.info/program-support/

[1] Section 105(a)(8) of the Housing and Community Development Act of 1974, provides a different percentage cap for some grantees.