

CDBG GRANT MANAGEMENT MANUAL WORKSHOP CHAPTER 21

Business Assistance Activity

California Department Of Housing And
Community Development

Presenters:

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HOUSEKEEPING

- ✦ **Today's Schedule – 9:00 a.m. - 4:30 p.m.**
- ✦ **Cell Phones – Vibrate Mode**
- ✦ **Rest Rooms**
- ✦ **Parking**
- ✦ **Questions are good**
- ✦ **Handouts in Folder**





INTRODUCTIONS

✧ WORKSHOP PRESENTER(S)

✧ CDBG STAFF

✧ AUDIENCE

- Your Name.
- Where you're from.
- What you do.
- How many years of CDBG ED experience.
- What you hope to learn from this workshop.



CDBG TRAINING PRE-TEST

- Please complete the Business Assistance Workshop Pre-Test.
- Keep the completed test available during workshop, as answers will be provide as topics are covered.
- Quiz will not be turned in but can be taken and used for future reference.



TODAY'S WORKSHOP

Reviewing Business Assistance (BA) Program Activity Chapter:

- Overview of BA Chapter Training
- Eligible Activities, Applicants and Costs
- National Objective Compliance
- Public Benefit Compliance
- CDBG Underwriting Compliance
- BA Program Administration
- OTC Project Application Process
- Project Files and Record Keeping
- Forms and Reports
- Loan Servicing
- Federal Overlays



CDBG TRAINING OVERVIEW

- This One Day Training ***Does Not*** Provide Details on Business Underwriting
- Department Can Provide Resources for Underwriting Training, Upon Request
- Risk Flows Downward from HUD, but Benefits Stay with Grantee



WHAT'S NEW FOR BA PROGRAM ACTIVITY

- BA has its own Chapter (21) in [Grants Management Manual](#)
- Department no longer reviews and approves Enterprise Fund, BA projects
- Grantee will certify BA loans, up to \$300,000
- Department has template BA program guidelines that must be used by grantees
- Department has support documents for BA program compliance



WHAT'S NEW FOR OTC PROJECT ACTIVITY

- OTC process has reduced steps in review process (see OTC flow chart)
- OTC projects are approved by Department's Internal Loan Committee
- OTC activity forms (three (3) different ones) are on current NOFA webpage
- OTC is included in Application Summary Forms
- No supplemental activities allowed under an OTC contract



CDBG FUNDING SOURCES FOR ECONOMIC DEVELOPMENT

➤ ITS ALL CDBG:

Department Grant Contract:

- Enterprise Fund Grant Award with or without Microenterprise Activity
- Supplemental Activity Approved by Department
- Program Income (PI) spent on EF Awarded BA program

Department Approved PI Waiver:

- PI Committed to a BA Program Under an Executed PI Reuse Agreement (limited term)

Department Approved PI RLF:

- PI restricted to a Revolving Loan Fund Under an Executed PI Reuse Agreement (long term)



CDBG Pre-Test Question #1

- **BA loans can only be made to private for-profit businesses.**

True or False?



CHAPTER 21 ELIGIBLE ACTIVITY

➤ HCDA Statute 105(a)(17):

- Direct Financial Assistance to a Private For-Profit Business, also referred to as Special Economic Development
- Under the States' Community Development Block Grant (CDBG) Program, unlike the Entitlement Program, if an activity does not fall within a category of explicitly authorized activities in the CDBG statute, the activity is considered ***ineligible***.
- *Activities assisted under this title may include only – Provision of assistance to private, for-profit entities, when the assistance is appropriate to carry out an economic development project (that shall minimize, to the extent practicable, displacement of existing businesses and jobs in neighborhoods)*



CHAPTER 21 ELIGIBLE ACTIVITY

➤ HDCA Statute 105(a)(17): *Continued*

Activity that:

- *creates or retains jobs for low- and moderate-income (LMI) persons;*
- *prevents or eliminates slums and blight;*
- *meets urgent needs;*
- *creates or retains businesses owned by community residents; and*
- *assists businesses that provide goods or services needed by, and affordable to, low- and moderate-income residents.*



SPECIAL ED ACTIVITY: TWO METHODS OF DISTRIBUTION

- **Enterprise Fund, Business Assistance (BA):**
 - ***Program*** Application Process (when award/approved no projects are identified)
 - Guidelines are required
 - No Business Technical Assistance Funding Available, unlike Microenterprise, the other eligible Enterprise Fund Activity



SPECIAL ED ACTIVITY: TWO METHODS OF DISTRIBUTION

➤ Economic Development, Over-the-Counter (ED OTC):

- Project application process (there is a defined project/business)
- First Come, First Service. *No Guidelines*
- Other eligible activities are allowed besides Special ED



CDBG Pre-Test Question #2

- **A business moving a 200 employee production facility from Reno, NV. to Oroville, CA would be eligible for CDBG funds, including relocation costs.**

True or False?



BA & OTC INELIGIBLE ACTIVITIES

➤ General Ineligible Activities:

- Not specified as eligible under Statute 105(a)
- Any Activities that pay for general conduct of government
- Any Activities that pay for partisan political activities
- Any Activities that pay for general promotion of the local community

➤ More Specific Ineligible Activities:

- Activities supporting a professional sports team
- Activities supporting a private recreational project, country club
- Activities that lead to relocation of jobs from one labor market area to another
- No housing activities



REVIEW OF ELIGIBLE BA APPLICANTS



For-Profit Business:

- Start up business, not operating yet
- Existing business, being acquired
- Existing business, expanding or being retained



Legally Operating Business:

- Sole Proprietorship
- Partnership
- Corporation



Status of Business:

- No Tax Unresolved Liens
- Not in Bankruptcy
- Not on Federal Debarred List
- Operations are Physically Located in Jurisdiction



REVIEW OF ELIGIBLE PROGRAM COSTS

➤ Activity Delivery (AD) Costs:

- Marketing and Loan Origination and Closing
- Loan Compliance Monitoring and Reporting
- These AD Costs are capped at 15% of the Loan Amount
- No AD Cost can be reimbursed with CDBG funds without a “project” being assisted



CDBG Pre-Test Question #3

➤ **Jurisdiction wishes to assist a business with a project expansion, which of the costs below are eligible for CDBG funding: (yes or no)**

- _____ Pay off credit card debt
- _____ Pay for remodel of commercial space
- _____ Pay for monthly operations costs
- _____ Pay wages of employees, including the owners



REVIEW OF ELIGIBLE PROJECT COSTS

➤ Eligible Loan Costs:

- *Escrow / Loan Closing Expenses*
- *Reimbursement of “approved” CDBG Loan Expenses*

➤ Ineligible Loan Costs:

- *Cash Income Payments or Pay off of Personal Debt or Credit Cards*
- *Research and Development or Public Improvements*
- *A project that is approved, and costs are paid to the business but it does not meet a National Objective.*



CDBG Pre-Test Question #4

➤ **When determining national objective for a BA activity, most projects will fall under which of these?**

- A) Meeting Urgent Need
- B) Elimination of Blight on a Spot Basis
- C) Creation of Jobs, provided primarily to LMI persons
- D) All of the above



NATIONAL OBJECTIVES

➤ Three National Objectives:

1. BENEFIT TO LOW- MODERATE INCOME PERSONS
 - Four Low/Mod Subcategories
 - Two Types of LMI Allowed under the Activity

2. ELIMINATION OF SLUMS OR BLIGHT
 - Two Slums or Blight Subcategories
 - Not allowed: Spot due to Federal, Area due to State

3. URGENT NEED:
 - Not eligible under normal CDBG NOFA
 - Handled when need is caused by immediate threat (i.e. earthquake, flood, fire, etc.)
 - Requires Department Approval



CDBG Pre-Test Question #5

- **Verifying that a business owner's household income is below 80% of median income allows a BA project to meet the national objective of LMI.**

True or False?



TWO NATIONAL OBJECTIVE STANDARDS FOR LOW-MOD INCOME (LMI) BENEFIT

➤ Two ways to meet LMI:

1. Creating or Retaining Job Positions Primarily for LMI persons (LMJ)
 - ✧ Project creates or retain job positions AND 51% jobs are LMI
2. Providing Goods or Services in a service area whose residents are primarily LMI persons (LMA)
 - ✧ Business service area must be over 51% LMI, per HUD data
 - ✧ Service area must be primarily residential

Note: An eligible project that does not meet a national objective is no longer eligible.



CDBG Pre-Test Question #6

- **Persons provided new job positions must have Part 5 income calculations done prior to hiring.**

True or False?



MEETING THE NATIONAL OBJECTIVE OF LOW-MOD INCOME JOBS (LMJ) CREATION

➤ Identify LMJ Benefit:

At BA application stage, business will confirm that proposed job positions can be provided to LMI persons (51% Minimum)

- Business will also confirm substantial benefit for local residents

➤ Verify LMJ Benefit:

After BA loan underwriting for public benefit and six underwriting standards, then Grantee will have staff or third party obtain self-certifications of the new LMJ positions (51% Minimum)

➤ Secure Legal Obligation for LMJ Benefit:

After BA loan is approved, Grantee will have business execute loan agreements requiring the new LMJ positions (51% Minimum)



CDBG Pre-Test Question #7

➤ **When documenting LMJ for a business retention project, BA self-certification of income forms are used at what point during the loan process?**

- A) After assistance is provided
- B) Before assistance is provided
- C) Before and After assistance is provided



MEETING THE NATIONAL OBJECTIVE OF LOW-MOD INCOME JOBS (LMJ) RETENTION

➤ Restriction on Retention LMJ:

At BA application stage, business must document compliance with “but for” rule...

- ✧ “**But For**” the investment of CDBG loan funds, the business will close or jobs positions will be lost.
- ✧ Business must publicly notice this or make it known to employees
- ✧ Business must provide evidence that jobs will be lost (outside regulatory forces or internal financial imbalance)



MEETING THE NATIONAL OBJECTIVE OF LOW-MOD INCOME JOBS (LMJ) RETENTION

➤ Identify LMJ Retention Eligibility:

At BA application stage, business will confirm that proposed job positions can be retained and that over half are occupied by LMI persons (51% Minimum)

➤ Secure Legal Obligation for LMJ Benefit:

After BA loan is approved, Grantee will have business execute loan agreements requiring retention of LMJ positions (51% Minimum)



MEETING THE NATIONAL OBJECTIVE OF LOW-MOD INCOME AREA (LMA)

➤ Projects Proposing LMA Benefit:

At BA application stage, grantee must verify the business' service area.

Grantee must verify that:

- ✧ Service Area of Business is within Jurisdictional Boundary
- ✧ Verifying Service Area is Primarily Residential
- ✧ Verifying that Service Area is LMA, per HUD data

Grantee Documents National Objective Prior to Award of Loan Funds:

Note: Limited to business that provide goods or services to low/mod individuals and families.



CDBG Pre-Test Question #8

- **A BA Project That Does *not* Provide any Public Benefit (Jobs or Goods or Services) can still meet LMI national objective.**

True or False?



TWO PUBLIC BENEFIT STANDARDS: FOR LMJ & LMA

➤ Required Per: 24 CFR 570.482(f):

- A quantifiable standard for what constitutes reasonable public benefit for special economic development activities
- It is different from but connected to national objective standards, i.e. LMJ is connected to public benefit standards of job creation / retention.

➤ Public Benefit Helps:

- To provide a **cap** amount on financial assistance
- To ensure that public subsidies generate positive improvements in the grantee's communities

➤ Public Benefit is NOT an Eligibility Standard:

- Public Benefit Standard is required to be measured before and after CDBG assistance, but if proposed amount of public benefit does not match actual provided after CDBG funding, then the project is still an eligible BA activity



CDBG Pre-Test Question #9

- **The BA applicant proposes to hire 20 new job positions for the holiday season, November and December; these workers are considered part time employees under State Reg. definition.**

True or False?



MEETING PUBLIC BENEFIT OF PROVIDING JOBS (Created or Retained)

➤ **Proposed Job Positions:**

At BA application stage, business must document proposed number of permanent full time equivalent (FTE) job positions created or retained as a result of CDBG investment

- ✧ Use Department's Job Tracking Form to list existing employees
- ✧ Verifying new / retained job positions in future cash flows
- ✧ Determine individual / aggregate benefit amounts

➤ **Actual Job Positions:**

After ED loan funding, grantee tracks new or retained job positions

- ✧ Using Department's Job Tracking Form
- ✧ Verifying eligibility of job (FTE, permanent, eligible, etc.)
- ✧ Including all new hires resulting from CDBG funding



INDIVIDUAL AND AGGREGATE SUBSIDY LIMITS FOR PUBLIC BENEFIT OF JOBS (CREATED OR RETAINED)

➤ **Individual Limit:**

- Current State CDBG Regulations Limit this to \$35,000 per FTE Job
- Federal Limit is set at \$50,000 per FTE Job
- National Average is reported to be approx. \$10,000 per FTE Job

➤ **Aggregate Limits:**

- Current State CDBG Regulations Limit this to \$35,000 per FTE Job
- Federal Limit is set at \$35,000 per FTE Job
- Department must report annual aggregate standard for all state grantees



MEETING PUBLIC BENEFIT OF PROVIDING GOODS OR SERVICES

➤ **Proposed Goods or Services:**

At BA application stage, business must document that they provide needed goods or services in the community that is benefiting

- ✧ Must be open to all
- ✧ Must be a needed good or service to LMI persons
- ✧ Determine individual / aggregate benefit amounts



CDBG Pre-Test Question #10

- **A business meeting the national objective of LMA will have their loan capped based on which public benefit level?**
- A) \$35,000 per job retained
 - B) \$1,000 per person in business service area
 - C) \$35,000 per LMI person in business service area
 - D) \$1,000 or \$350 per LMI person in business service area



INDIVIDUAL AND AGGREGATE SUBSIDY LIMITS FOR PUBLIC BENEFIT OF PROVIDING GOODS OR SERVICES

➤ Individual Limit:

- Federal Limit is set at \$1,000 per LMI Person in service area

➤ Aggregate Limit:

- Federal Limit is set at \$350 per LMI Person in service area
- Department must report annual the aggregate standard for all state grantees



SIX UNDERWRITING STANDARDS FOR BA PROJECT

➤ CDBG Six Underwriting Standards:

State regulations require compliance with six underwriting standards that give public underwriters a good framework for lending public funds. These guidelines allow communities some flexibility but help ensure that public investments are utilized judiciously.

These underwriting standards are:

- ✧ Document that all project costs are reasonable
- ✧ Document all sources of project funding are in place
- ✧ Document CDBG funds are not substituted for non-federal funds
- ✧ Document that project is financially viable
- ✧ Document that owner's return on investment (ROI) is not excessive
- ✧ Document that CDBG funds are disbursed on a pro-rata basis



PROJECT UNDERWRITING

➤ What is Underwriting?

Underwriting is the disciplined process an analyst pursues in determining **risk**, in establishing procedures which enable a lender to take only "reasonable" risks, and in evaluating **rewards** so that they are commensurate with the risks incurred.



CDBG VS. PRIVATE LENDING UNDERWRITING

- Compliance regulations
- Zero cost of capital
- Focus on national objective, i.e. jobs **(Risk)**
- Cash flow lending
- Concern with business ROI
- Compliance w/ state & federal lending laws
- Cost of capital ?
- Focus on lenders ROI
- Asset backed lending
- Loan repayment **(Risk)**



SIX UNDERWRITING STANDARDS

➤ Analysis of Reasonableness of All Project Costs:

- Finalize Scope of Work and Budget
- Break Down Each Cost Item
- Verify Proposed Costs



SIX UNDERWRITING STANDARDS

➤ Analysis of All Committed Funding Sources:

- Finalize Sources and Uses Chart
- Break Down Each Funding Source
- Obtain Commitments & Verifications



SIX UNDERWRITING STANDARDS

- **Analysis CDBG Substitution for Non-Federal Funds:**
 - Evaluate Private Funding Availability
 - Evaluate Levels of Private Funding
 - Evaluate Availability of Owner Equity



SIX UNDERWRITING STANDARDS

➤ Analysis of Project Financial Viability:

- Historic Performance and/or Future Financial Potential
- Business Credit review and Operating Ratios
- Collateral and Security Availability
- Owner's Personal Credit Review and Financials
- Owner's Capacity to Execute
- Market Analysis to Substantiate Future Growth
- Financial health of other businesses of owner(s)



SIX UNDERWRITING STANDARDS

➤ Analysis of Reasonableness of Return on Investment (ROI):

- Amount of Owner's Equity Investment
- Comparison of Project's Future Financials with and without CDBG funding
- Comparison of Project's ROI to Comparable Business types via Industry Standards



SIX UNDERWRITING STANDARDS FOR BA PROJECT

- **Analysis of Disbursement of CDBG Funds on A Pro Rata Basis:**
 - Review Project Development Timeline with Payment of Project Costs
 - Determine when CDBG Project Costs need to be Funded
 - Work with other Project Funders to Ensure CDBG funding is Not Substantially Paid Out Prior to Other Funding Sources



OVERVIEW OF ED PROJECT FUNDING PROCESS

- **Identify Need & Use of Funds:**
 - BA Loan Application Reviewed for Funding Need / Gaps
 - Review Project for Required Federal Overlay Compliance
- **Determine CDBG Eligibility of Project:**
 - Eligible Activity and Project Costs
 - Eligible Public Benefit and Six Underwriting Standards
- **Determine National Objective of Project:**
 - Eligible LMJ Standard
 - Eligible LMA Standard
- **Finalize Project Underwriting & Approve Loan:**
 - Eligible Activity and Costs
- **Job Tracking, Project Close-out and Loan Monitoring:**
 - Disburse Funds for Reimbursement of Eligible Costs
 - Track jobs and LMJ for Project Completion
 - Collect loan payments and service loan



BA PROGRAM ADMINISTRATION

➤ Required Actions:

- ✧ Develop and approve BA program guidelines and loan servicing policies / procedures
- ✧ Develop Org Chart: Who Will Do What?
- ✧ Develop BA loan documents and forms.
- ✧ Meet General Condition items on BA activity list.

➤ Suggested Actions:

- ✧ Perform market analysis of need for BA program in the community and identify expected outcomes.



CDBG Pre-Test Question #11

- **A Jurisdiction MUST include LMA and LMJ retention standards in their BA guidelines to obtain Department approval.**

True or False?



BA PROGRAM ADMINISTRATION

Program Guidelines Design:

- ✧ Decide if BA program should be limited to just LMJ creation.
- ✧ For county only, decide if the program service area will include non-entitlement cities (with their approval).
- ✧ Determine if jurisdiction will have additional underwriting standards beyond HUD six standards.
- ✧ Determine BA loan approval process (loan committee or single staff approval).
- ✧ Develop Loan Collection Process.



CDBG Pre-Test Question #12

- **A Jurisdiction will use the Department's BA Loan Certification form for a project receiving \$5,000 in activity delivery funds, and loan funds of \$200,000 from an open grant contract and \$110,000 of local program income.**

True or False?



BA PROGRAM ADMINISTRATION

➤ **Project Approval and Certification:**

- Jurisdiction certifying a loan means the loan complies with all CDBG programmatic and underwriting requirements, and all applicable local, state and federal laws
- The jurisdiction can certify a CDBG loan up to \$300,000
- The grantee's representative(s) and program operator have reviewed the BA loan package and understand what is required to certify CDBG loans

The jurisdiction's staff or its program operator are still encouraged to consult with HCD staff for guidance on compliance & underwriting issues as needed.



ED OTC APPLICATION PROCESS

➤ Application Actions:

- ✧ Submit Project Inquiry Form
- ✧ Obtain Invitation Letter From Department
- ✧ Department conducts site visit meeting
- ✧ Complete OTC Application in Conformance with CDBG Standards with Guidance from Department
- ✧ Hold Public Hearings for Public Participation
- ✧ Submit Full Application with Resolution
- ✧ Department holds ILC and Issues Award Letter and Contract

➤ Actions After OTC Award:

- ✧ Clear OTC General Conditions (and any Special Conditions) and Implement Project



REVIEW OF BA SUPPORT DOCUMENTS

➤ Required Forms & Reports:

- ✧ BA Loan Certification
- ✧ Project Setup/Completion Report
- ✧ BA Self Certification of Income
- ✧ Disclosure of No Job Pirating
- ✧ Job Tracking Form

➤ Sample Forms:

- ✧ NEPA Certification
- ✧ Conflict of Interest Certification



CDBG ED PROJECT FILE AND RECORD KEEPING

➤ Program Files and Records:

- ✧ Closed ED project files must be kept by grantee and made available for Department Monitoring.
- ✧ **All** BA applications must be kept for analysis of fair lending and equal opportunity compliance.
- ✧ ED original loan documents must be kept in fire proof locked storage.
- ✧ Public records requests for ED project files will only provide non-confidential information, per federal and state law.



CDBG Pre-Test Question #13

- **After a project is completed and closed out with the Department, what further actions are needed of the Jurisdiction?**
- A) Collect regular loan payments
 - B) Verify annually that insurance is in place and loan conditions are being met
 - C) Send out IRS interest statements
 - D) Verify jobs are in place annually



CDBG ED LOAN SERVICING

➤ Managing an ED Loan Portfolio:

- ✧ ED loans are performing, so loan collection system is needed with annual budget for staff time and costs.
- ✧ CDBG GA funds can pay for loan servicing costs but are limited (GA is not always available, i.e. RLF's).
- ✧ Annual loan reviews need to be done.
- ✧ Grantee must have “political will” to enforce loan agreements and foreclose / collect assets for non-payment.
- ✧ Grantees are not required to foreclose on a business for repayment to Department for ineligible BA projects, but if no collection from business, then grantee must use local general funds for BA repayment to Department.
- ✧ BA loans cannot be “converted” into grants to save grantee work on loan servicing.



TIME FOR A BREAK...

Please return in 10 minutes...



SHARK TANK EXERCISES

Review of ED Project proposals...



FEDERAL OVERLAYS

✓ Federal Requirements:

- ✧ National Environmental Policy Act (NEPA) Compliance
- ✧ Uniform Relocation Act (URA) – Real Property Acquisition and Displacement / Relocation Review
- ✧ Federal Labor Standards/Prevailing Wage
- ✧ Equal Opportunity Nondiscrimination Laws
- ✧ Federal Procurement Compliance
- ✧ Debarment and Suspension



CDBG Pre-Test Question #14

- **A business using CDBG funds to do tenant improvement on an existing commercial space will require the which of following federal overlay compliance actions?**
- A) NEPA review record, Categorically Excluded Not Subject to 58.35
 - B) Provide Acquisition Notice to Seller
 - C) Ensure Labor Standards Officer for prevailing wage monitoring
 - D) Ensure federal procurement standards met for construction



FEDERAL OVERLAYS

✓ NEPA COMPLIANCE

CDBG Activities must have NEPA clearance
(even General Admin).

Grantee must:

- Review NEPA timing for EACH
- activity proposed.
- Aggregate scope of work for each proposed activity.
- Determine level of review required for each activity based on scope of work.
- Assign proper person for NEPA review.





FEDERAL OVERLAYS

✓ NEPA COMPLIANCE: continued

- ✧ Beware of Choice-Limiting Actions! Do not commit CDBG and non-CDBG funds to a project prior to release of funds authorization.

- ✧ The closer you are to signing a contract prior to NEPA review, the closer you are to choice-limiting action.



FEDERAL OVERLAYS

✓ NEPA COMPLIANCE: continued

Examples of choice-limiting actions prior to NEPA:

- ✧ Site Grading Clearance or Demolition
- ✧ Signed Purchase or Lease Agreement
(Option Agreement is generally ok.)
- ✧ Signed Construction Agreement
- ✧ Loan Closing



FEDERAL OVERLAYS

✓ URA - Relocation/Anti-Displacement:

- ✧ All CDBG activities are subject to relocation laws.
- ✧ Review relocation impacts for each activity proposed prior to application submittal.
- ✧ Review initial actions for activities with relocation.
- ✧ Plan and budget for relocation actions as part of activity implementation.



FEDERAL OVERLAYS

✓ Labor Standards Requirements:

- ✧ Comply with Prevailing Wage;
- ✧ Applies to CDBG funded construction activities;
 - \$2,000 trigger for Public Improvement and Public Facilities
 - 8 project units for the same site for housing

- ✧ Review activity for compliance prior to application submittal (take cost into account);
- ✧ Plan for proper wage monitoring in activity design and execution;
- ✧ Work with CDBG staff to ensure compliance.



FEDERAL OVERLAYS

✓ Nondiscrimination Laws:

- ✧ Fair Housing
- ✧ Equal Opportunity and Non-discrimination
- ✧ Limited English Proficiency (LEP) Guidelines
- ✧ Section 504 Compliance / Section 3



FEDERAL OVERLAYS

✓ Federal Procurement Compliance:

Refer to 24 CFR 85.36 Procurement & Management Memo 13-05 and 14-06

✧ 4 Methods of Procurement

- Small Purchase
- Sealed Bids
- Competitive Proposals
- Non-Competitive (Sole Source)

✧ Conflict of Interest

✧ Documentation of procurement history

Please fill out the Workshop Evaluation Form

THANK YOU

2015 CDBG BA Chapter Workshop



Time to Start Making CDBG ED Loans



2015 CDBG BA Chapter Workshop

