

Attachment 2
Summary of Changes

Purpose	Performance Measure or Standard		Where it is Found	
	Existing	Proposed	Existing	Proposed
Program Income (PI) Reuse Plan			Page 1	Page 1
Distribution of Program Income			Page 1	Page 1
Deposit into Revolving Loan Accounts				
Housing Rehabilitation	10% of non-SBRLF payments	67%	Page 3, #12	Page 2 of 34, #1 A
Homeownership Assistance	90% of non-SBRLF payments	0%	Page 4	Page 2 of 34, #1 B
Business Assistance	100% of SBRLF payments	33%	Page 5	Page 2 of 34, #1 C
Microenterprise Financial Assistance	-	0%		Page 2 of 34, #1 D
PI Waiver Activity				Page 2 of 34, #2
Committal to Funding Application			Page 2, #6	Page 2 of 34, #3
Augmenting Funding to An Awarded Activity/Project			Page 2, #6	Page 3 of 34, #4
Fund Program Income General Administration Activities	18%	17%	Page 2, #5	Page 3 of 34, #5
Non-Revolving Activities	Not to exceed 49%		Pages 3, 4 and 5	
Return to the Department			Page 2, #6	Page 3 of 34, #6
Administrative Process for Distribution of Program Income				
Governing Body Adoption			Page 3, #10	Page 3 of 34, #1
17% Set Aside for General Administration			Page 2, #5	Page 3 of 34, #1
PI Waiver Requests				Page 4 of 34, #2
Commitment to Open CDBG Contract			Page 2, #6	Page 4 of 34, #3
Use of General Administrative Funds				Page 4 of 34, #4
Return of PI to Department				Page 4 of 34, #5
Compliance with CDBG Citizen Participation Process			Page 2, #6 & Page 3, #9	Page 4 of 34, #6
Administration of Eligible Activities After Distribution				
RLA Administration				
Substantially Revolving		60%		Page 4 of 34, #1
Non-Revolving		40%	Pages 3, 4 and 5	Page 4 of 34, #1
Note: GA Costs				Page 5 of 34, #1 A
Substantially Expended		\$ 5,000		Page 5 of 34, #1 B
Transfer between RLAs				Page 5 of 34, #1 C
Location of RLA funded activities				Page 5 of 34, #1 D
Program Guidelines required				Page 5 of 34, #1 E
PI Reuse Plan Approval			Page 3, #11	Page 5 of 34, #1 F
RLA reporting requirements			Page 3, #9	Page 5 of 34, #1 G
Activity Delivery cost eligibility				Page 6 of 34, #1 H
Eligible RLA Activities				
Housing Rehabilitation			Page 3, #12	Page 6 of 34, #2 A
No more than 5-units allowed				Page 6 of 34, #2 A
Homeownership Assistance			Page 4	Page 6 of 34, #2 B
Business Assistance			Page 5	Page 7 of 34, #2 C
Microenterprise Financial Assistance				Page 7 of 34, #2 D

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	Performance Measure or Standard		Where it is Found	
	Existing	Proposed	Existing	Proposed
Administration of Non-RLA Income Expenditures				
Program Income Waiver Eligible Activities				Page 8 of 34, #3 A
Public Hearing required				Page 8 of 34, #3 A.1
HCD approval required				Page 8 of 34, #3 A.2
Reporting required				Page 8 of 34, #3 A.3
No commitment of future PI				Page 8 of 34, #3 A.4
Limit of 2 open PI Waivers				Page 8 of 34, #3 A.5
Program Income Committed in an Annual Grant Application & Included in an Open Grant Agreement				Page 9 of 34, #3 B.
No commitment of future PI				Page 9 of 34, #3 B.1
Expended first			Pages 4 & 5	Page 9 of 34, #3 B.2
Subject to grant terms and conditions				Page 9 of 34, #3 B.3
Reporting required				Page 9 of 34, #3 B.4
Program Income Added to an Existing Open Grant				Page 9 of 34, #3 C
HCD approval required				Page 9 of 34, #3 C.1
No commitment of future PI				Page 9 of 34, #3 C.2
Expended first			Pages 4 & 5	Page 9 of 34, #3 C.3
Subject to grant terms and conditions				Page 9 of 34, #3 C.4
Reporting required				Page 9 of 34, #3 C.5
Program Income General (PI GA) Cost Limitation and Activities				Page 9 of 34, #4
17% cap			Page 2, #5	Page 3 of 34, #5
Planning Activities			Page 2, #7	Page 10 of 34, #4 A
Loan Portfolio and Asset Management Policies and Costs			Page 2, #4	Page 10 of 34, #4 B
Jurisdictional Assertions and Certifications				
Requirements of Program Income				Page 11 of 34, #1
Definition of Program Income			Page 1, #3	Page 11 of 34, #2
Federal Nature of Program Income	\$25,000	\$35,000	Page 1, #3	Page 11 of 34, #3
Definition of Excessive Program Income				Page 11 of 34, #4
Reporting of Program Income			Page 3, #9	Page 11 of 34, #5
Duration of This Program Income Reuse Plan				Page 12 of 34, #6
Status of Program Income Upon Leaving State Non-Entitlement CDBG Program and Entering the CDBG Entitlement Program				
Elects to participate in Entitlement Grant Program				Page 13 of 34, # 6 A
Agrees to use PI in accord with Entitlement Program				Page 13 of 34, # 6 B
Use of IDIS				Page 13 of 34, # 6 C
HCD approval				Page 13 of 34, # 6 D
Status of Program Income Upon Entering the State Non-Entitlement CDBG Program from the CDBG Entitlement Program				
Continue to use Entitlement Program for program income				Page 13 of 34, #8. A
Retain PI and transfer to State CDBG Program				Page 13 of 34, #8. B
Amendment of PI Reuse Plan			Page 3, #11	Page 13 of 34, #9
Department Terms, Conditions and Authorization				
Authority & Purpose			Page 1, #1 & 2	Page 14 of 34, #1
Distribution for Reuse of PI				
Use PI only as approved by HCD				Page 14 of 34, #2 A

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	Existing	Proposed	Existing	Proposed
PI funded activities principally benefit Low/Mod-income persons or households				Page 14 of 34, #2 B
Sufficiency of Funds and Termination				Page 15 of 34, #3
Meeting National Objectives				
Benefit to HUD defined Low/Mod-income person or household defined			Pages 3, 4 & 5	Page 15 of 34, #4 A
Prevention or elimination of slums or blight				Page 15 of 34, #4 B
Microenterprise assistance activities				Page 15 of 34, #4 C
Inspections of Activities				
HCD right to inspect				Page 15 of 34, #5 A
Jurisdiction obligation to inspect and require correction if necessary				Page 15 of 34, #5 B
Insurance				Page 15 of 34, #6
Contractors and Subrecipients				
Federal debarment check required				Page 16 of 34, #7 A
Contractor defined				Page 16 of 34, #7 A.1
Subrecipient defined				Page 16 of 34, #7 A.2
Requirements for Agreements with contractors or subrecipients				
Compliance with all State and federal requirements of this Agreement				Page 16 of 34, #7 B.1
Maintenance of Workers' Compensation Insurance				Page 16 of 34, #7 B.2
Maintenance of unemployment, disability and liability Insurance				Page 16 of 34, #7 B.3
Compliance with Equal Opportunity Requirements				Page 16 of 34, #7 B.4
Contractor Requirements				
Perform in accord with federal, State, and local housing and building codes				Page 16 of 34, #7 C.1
Requirement for Performance and Payment Bonds or other HCD approved security				Page 16 of 34, #7 C.2
Subrecipient Requirements				
Records retention requirement				Page 17 of 34, #7 D.1
Permit audits				Page 17 of 34, #7 D.2
Obligations of the Jurisdiction with Respect to Certain Third Party Relationships				Page 17 of 34, #8
Periodic Reporting Requirements			Page 3, #9	
Semi-Annual PI Expenditure/Performance Report				Page 17 of 34, #9 A
Annual Federal Overlay Reporting				Page 17 of 34, #9 B
Wage Compliance Reports				Page 18 of 34, #9 C
Other Reports				Page 18 of 34, #9 D
Monitoring Requirements				Page 18 of 34, #10
Signs				Page 18 of 34, #11
Audit/Retention and Inspection of Records			Page 3, #9	
Maintain auditable record				Page 18 of 34, #12 A
HCD right to review records				Page 18 of 34, #12 B
Reimburse disallowed expenditures				Page 19 of 34, #12 C
HCD determination is final				Page 19 of 34, #12 D
Use of Federal Catalog Number 14.228 for State CDBG				Page 19 of 34, #12 E

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	Performance Measure or Standard		Where it is Found	
	Existing	Proposed	Existing	Proposed
HCD will not reimburse audit costs after deadline of this agreement				Page 19 of 34, #12 F
Jurisdiction covered by OMB A-133 Single Audit				Page 19 of 34, #12 G
Conflict of Interest of Members, Officers, or Employees of Contractors, Members of Local Governing Body, or other Public Waivers				Page 19 of 34, #13
Litigation				Page 19 of 34, #14
Agreement not invalid if one section is ruled invalid				Page 20 of 34, #15 A
Notice of Claim or Action				Page 20 of 34, #15 B
Lead-Based Paint Hazards			Page 3, #9	Page 20 of 34, #16
Prevailing Wages			Page 3, #9	
Prevailing wages required on construction work funded under this Agreement				Page 20 of 34, #17, A
Construction work defined				Page 20 of 34, #17, A
Compliance with State and Federal Laws and Regulations				
Comply with all State laws and regulations				Page 21 of 34, #18 A
Comply with all federal laws and regulations applicable to CDBG Program				Page 21 of 34, #18 B
Anti-Lobbying Requirement and Certification				
No federal funds used to influence this Agreement				Page 21 of 34, #19 A
Lobbying disclosure requirement				Page 21 of 34, #19 B
Bonus or Commission, Prohibition Against Payments of Citizen Participation				Page 22 of 34, #20
			Page 2, #6 & Page 3, #9	Page 22 of 34, #21
Clean Air and Water Acts				Page 22 of 34, #22
Conflict of Interest of Certain Federal Officials				Page 22 of 34, #23
Environmental Requirements			Page 3, #9	Page 22 of 34, #24
Equal Opportunity			Page 3, #9	
Civil Rights, Housing and Community Development, and Age Discrimination Acts Assurances				Page 23 of 34, #25 A
Rehabilitation Act of 1973 and the "504 Coordinator"				Page 23 of 34, #25 B
Training, Employment, and Contracting Opportunities for Business and Lower-Income Persons Assurance of Compliance				Page 23 of 34, #25 C
Assurance of Compliance with Requirements Placed on Construction Contracts of \$10,000 or More				Page 24 of 34, #25 D
Flood Disaster Protection				
Subject to Flood Disaster Protection Act of 1973				Page 24 of 34, #26 A
Mandatory purchase of flood insurance				Page 24 of 34, #26 B
Special flood hazard area provisions				Page 24 of 34, #26 C
Transferee and successors obligated				Page 24 of 34, #26 D
Federal Labor Standards Provisions			Page 3, #9	
Davis-Bacon Act				Page 25 of 34, #27 A
"Anti-Kickback Act of 1986"				Page 25 of 34, #27 B
Contract Work Hours and Safety Standards Act - CWHSSA				Page 25 of 34, #27 C
Title 29, Code of Federal Regulations CRF, Subtitle A, Parts 1, 3 and 5				Page 25 of 34, #27 D
Procurement			Page 3, #9	Page 25 of 34, #28
Non-Performance				Page 25 of 34, #29

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	Existing	Proposed	Existing	Proposed
Relocation, Displacement, and Acquisition			Page 3, #9	Page 26 of 34, #30
Uniform Administrative Requirements				Page 26 of 34, #31
Section 3				Page 26 of 34, #32
Affirmatively Furthering Fair Housing				Page 26 of 34, #33
General Contract Conditions				
Environmental Compliance			Page 3, #9	Page 27 of 34, #34 A
Acquisition/Relocation Compliance			Page 3, #9	Page 27 of 34, #34 B
Site Control				Page 27 of 34, #34 C
Funding Commitments and Project Cost Estimates				Page 27 of 34, #34 D
Activity Administration Documentation				Page 27 of 34, #34 E
Compliance with All Loans and/or Grant Agreements				Page 27 of 34, #34 F
Easements and Rights-of-Way				Page 27 of 34, #34 G
Section 504 Accessibility Requirements				Page 27 of 34, #34 H
Grantee's Data Universal Numbering System (DUNS)				Page 27 of 34, #34 I
Community Development Activity Conditions				
Homeownership Assistance				Page 30 of 34, #35 A
Housing Rehabilitation				Page 30 of 34, #35 B
Economic Development Activity-Specific Conditions				
Restrictions on CDBG-Assisted Public Property				Page 31 of 34, #36 A
Business Assistance Activity				Page 31 of 34, #36 B
Microenterprise Assistance Activities				Page 32 of 34, #36 C
Required Agreements for Assisted Businesses				
HCD approval required				Page 33 of 34, #36 D.1
Business reporting requirements				Page 33 of 34, #36 D.2
Businesses required to submit Data Universal Number				Page 33 of 34, #36 D.3
System number				
Community and Economic Development Planning Activities			Page 2, #7	
Non-Implementation Activity				Page 33 of 34, #37 A
Implementation Activity				Page 34 of 34, #37 B