

HOME & CDBG Triggers*

PROJECT TYPE	REQUIREMENT	TRIGGER	DOCUMENTATION REQUIRED
All CDBG & HOME Activities	Income Eligibility	Use of CDBG & HOME funds	Proof of income and assets and other documentation depending on which HUD approved method used to calculate.
All CDBG & HOME Activities	Within boundaries of PJ (City of Missoula)	Use of CDBG & HOME funds	If serving a larger population, there must be a substantial financial contribution from the contiguous jurisdiction.
All CDBG & HOME Activities	Timeliness	Use of CDBG & HOME funds	CDBG: Subrecipient must carry out its program in a timely manner, as measured by the rate of expenditure of funds. HOME: funds for a given program year must be committed to a HOME project within two years of signing the written agreement.
All CDBG & HOME Activities	Quarterly & Annual Reports	Use of CDBG & HOME funds	The participating Subrecipients will be required to provide to the city quarterly reports of program progress and accomplishments. In addition, they will be required to conduct annual recertification of all homebuyers participating in the program to verify occupancy and household income.
All CDBG & HOME Activities	Environmental Release of Funds	Use of CDBG & HOME funds	ERR - All projects/programs need to be reviewed for compliance.
All CDBG & HOME Activities	Procurement policies	Use of CDBG & HOME funds for services or to purchase products	Generally speaking: 3 quotes; proof of contractor eligibility to work in the city & on federal contracts; Cost reasonableness; some projects have more requirements Methods of Procurement
Construction, Rehabilitation, demolition, modifications to real property	Davis Bacon and Related Acts (DBRA)	\$2,000 or more of Federal funds	BID docs including DB Rate req's; Project wage sheets, Weekly payrolls, notification of work dates to set up employee interviews, etc.. DB applies to ENTIRE project-not just fed funded portion.
Housing projects of any kind	Lead Safe Housing Rule	Properties built before 1978 & compliance is based on dollar amount of assistance	Lead Safe Checklist, Lead Safe Applicability form, and required attachments. Rehab: Under \$5,000 safe work practices and stabilization if lead disturbed; \$5,001-\$25,000- Clearance, notice to home owners; Full abatement over \$25,000. Acquisition: Lead hazard assessment, deteriorated paint must be stabilized prior to occupancy, safe work practices and clearance required.
Acquisition or rehab of Real Property	Real Property 200.311	Activities involving the purchase or improvements of real property	Real property will be used for the originally authorized purpose as long as needed for that purpose, during which time the non-Federal entity must not dispose of or encumber its title or other interests. Change of use requires City and HUD approval and must comply with public notification procedures. Properties no longer meeting a national objective or not approved for change of use require repayment and/or other default terms as indicated in the written agreement.

Construction, demolition, rehab of housing or public facilities, infrastructure, etc.	Section 3	\$200,000 combined on applicable activities	Implementing procedures to notify Section 3 residents & business concerns about training, employment, & contracting opportunities generated by Section 3 covered assistance. Documenting and reporting labor hours working on Section 3 projects, meeting established benchmarks or providing evidence of qualitative efforts.
Acquisition of Real Property and/or displacement of persons from their homes, businesses, or farms	URA & Section 104	Activities involving the acquisition or improvements of real property and/or the displacement of persons from their homes, businesses, or farms	Three notices must be issued to eligible persons, including those temporarily displaced. Substantial recordkeeping must be maintained, including but not limited to, names & addresses of those displaced, records of referrals to comparable replacement dwellings, date of site control.
HOME Homebuyer activities	Resale/Recapture	Any homebuyer activities funded in whole or part with HOME funds; triggered upon sale or transfer of property.	Lien documents, deed restrictions, covenants with the land or similar mechanism will be used to guarantee the period of affordability and resale/recapture provisions.
All CDBG Activities	Duplication of Benefits	Use of CDBG funds	A duplication of benefits (DOB) occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance. Reviewing and affirming duplication has not occurred is required.
Housing projects of any kind	Fair Housing	Use of CDBG & HOME funds	To be in compliance, the grantee must adhere to all the basic tenets of fair housing and equal opportunity regulations. To demonstrate support for ensuring these tenets, grantees must endorse in attitude and deed all regulations for fairness in the provision of HUD funded programs and projects.
All CDBG & HOME Activities	Record Retention	Use of CDBG & HOME funds	Generally, records must be kept for five years after project completion or end of period of affordability.
All CDBG & HOME Activities	Monitoring	Use of CDBG & HOME funds	HOME: Must monitor compliance with program rules and terms of written agreement. Must monitor rental properties during period of affordability. CDBG: Must document compliance with national objective and terms of written agreement. Some projects are required to meet change of use restrictions.

Housing projects of any kind	Period of Affordability	Use of CDBG & HOME funds	Assisted projects carry rent and occupancy restrictions for varying lengths of time, depending on the average amount of funds invested. Lien documents, deed restrictions, covenants with the land or similar mechanism will be used to guarantee the period of affordability.
All HOME Activities	Underwriting & Subsidy Limits	In general, underwriting and subsidy layering is required for all HOME-assisted projects except for HOME-assisted homeowner rehabilitation that does not involve an amortizing loan that the homeowner will pay back.	The City will require that Subrecipients submit all relevant documentation in order to complete this underwriting and subsidy layering review.
HOME rental activities	Tenant Selection & Protection	Use of HOME funds for rental projects.	Written tenant selection plan, 1 year leases not including
Construction, demolition, rehab of housing or public facilities, infrastructure, etc	Property Standards	Use of CDBG & HOME funds	All assisted housing, including homeownership and rental housing, must maintain the housing in compliance with all applicable State and local housing quality standards (HQS) and code requirements
HOME rental activities	Cost Allocation	Use of HOME funds for rental projects.	PJs are required to document the results of the cost allocation in the project file and to include calculations that support those results. After the project is completed and all costs are known, the PJ is to charge only the actual costs of the HOME units to the HOME grant.

* **This is meant as a starting point only.** All guidelines, requirements, and triggers are set by HUD and are subject to change. Please see the [HUD Exchange](#) for additional information, or reach out to your [Grants Administrator](#).