



**City of Reading**  
**Community Development Policies and Procedures**  
**For HUD Program Planning, Funding, Spending, and Reporting**

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## Section I: Background Information

### **The United States Department of Housing and Urban Development (HUD) and the City of Reading**

HUD's mission is to create strong, sustainable, inclusive communities and quality affordable homes for all. HUD is working to strengthen the housing market to bolster the economy and protect consumers; meet the need for quality affordable rental homes; utilize housing as a platform for improving quality of life; and build inclusive and sustainable communities free from discrimination.

The City of Reading is an entitlement grantee, and the Community Development Office's Administration Division is responsible for administering HUD grant programs on behalf of the City. The mission of the Administration Division of the Community Development Office is to maximize and prioritize the use of resources to improve the quality of life of our constituents, and to nurture a business friendly climate that encourages and supports private investment, job creation and economic growth.

### **Entitlement Grantees**

Entitlement grants differ from competitive grants. As HUD entitlement grantees, certain jurisdictions are entitled to annual allocations of HUD program funding without having to submit a grant application. The City of Reading is a HUD entitlement grantee.

Eligibility for participation as an entitlement community is based on population data provided by the U.S. Census Bureau and metropolitan area delineations published by the Office of Management and Budget. HUD determines the amount of each entitlement grantee's annual funding allocation by a statutory dual formula. The amount of each entitlement grant is determined by statutory formula, which uses several objective measures of community need, including poverty, population, housing overcrowding, age of housing, and growth lag.

### **HUD Grant Programs**

The federal statutes set forth three basic goals for HUD Community Planning and Development programs under Title I of the Housing and Community Development Act of 1974, as amended. These goals are closely related to the major commitments and priorities of HUD. First, the programs are to provide decent housing; second, a suitable living environment; and, third expand economic opportunities. There are three major grant programs used by communities in an effort to meet these goals. They are the Community Development Block Grant (CDBG) Program, the HOME Investment Partnerships Program, and the Emergency Solutions Grant (ESG) program.

#### ***Community Development Block Grant (CDBG) Program***

The CDBG program provides annual grants on a formula basis to entitled communities to carry out a wide range of community development activities directed toward neighborhood revitalization, economic development, and improved community facilities and services.

### National Objectives

All CDBG activities must meet one of the following national objectives: benefit low- and moderate-income persons; aid in the prevention or elimination of slums and blight; or meet certain community development needs having a particular urgency.

### Examples of CDBG Projects

Some of the activities that can be carried out with community development block grant funds include the acquisition of real property; rehabilitation of residential and nonresidential properties; provision of public facilities and improvements, such as water and sewer, streets, and neighborhood centers; public services; clearance; homeownership assistance; and assistance to for-profit businesses for economic development activities.

The City has utilized CDBG funds for various activities over the past several years. Some of these activities include rebuilding playgrounds, making street and sidewalk improvements, providing funding for community police officers, funding recreation programs, and creating micro-enterprise grant and loan programs. A list of basic eligible CDBG activities may be found at 24 CFR § 570.201.

### ***HOME Investment Partnerships Program***

The HOME Investment Partnerships Program (HOME) provides formula grants to States and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

HOME funds are awarded annually as formula grants to participating jurisdictions (PJs). The program's flexibility allows States and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance or security deposits.

The program was designed to reinforce several important values and principles of community development:

- HOME's flexibility empowers people and communities to design and implement strategies tailored to their own needs and priorities.
- HOME's emphasis on consolidated planning expands and strengthens partnerships among all levels of government and the private sector in the development of affordable housing.
- HOME's technical assistance activities and set-aside for qualified community-based nonprofit housing groups builds the capacity of these partners.
- HOME's requirement that participating jurisdictions match 25 cents of every dollar in program funds mobilizes community resources in support of affordable housing.

### Eligible Activities

The City may choose among a broad range of eligible activities, using HOME funds to provide home purchase or rehabilitation financing assistance to eligible homeowners and new homebuyers; build or rehabilitate housing for rent or ownership; or for "other reasonable and necessary expenses related to the development of non-luxury housing," including site acquisition or improvement, demolition of dilapidated housing to make way for HOME-assisted development, and payment of relocation expenses. PJs may use HOME funds to provide tenant-based rental assistance contracts of up to 2 years if such activity is consistent with their Consolidated Plan and justified under local market conditions.

HOME-assisted rental housing must comply with certain rent limitations. HOME rent limits are published each year by HUD. The program also establishes [maximum per unit subsidy limits](#) and [maximum purchase-price limits](#).

A general list of eligible activities may be found at 24 CFR § 92.205.

### Eligible Beneficiaries

The eligibility of households for HOME assistance varies with the nature of the funded activity. For rental housing and rental assistance, at least 90 percent of benefiting families must have incomes that are no more than 60 percent of the HUD-adjusted median family income for the area. In rental projects with five or more assisted units, at least 20% of the units must be occupied by families with incomes that do not exceed 50% of the HUD-adjusted median. The incomes of households receiving HUD assistance must not exceed 80 percent of the area median. HOME income limits are published each year by HUD.

## ***Emergency Solutions Grant (ESG) Program***

The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families/individuals from becoming homeless.

### Eligible Activities

ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities (up to 7.5% of a recipient's allocation can be used for administrative activities). For specific uses and use restrictions, see 24 CFR part 576, subpart B.

### Eligible Beneficiaries

The minimum eligibility criteria for ESG beneficiaries are as follows: For essential services related to street outreach, beneficiaries must meet the criteria under paragraph (1)(i) of the "homeless" definition under § 576.2. For emergency shelter, beneficiaries must meet the "homeless" definition in 24 CFR 576.2. For essential services related to emergency shelter, beneficiaries must be "homeless" and staying in an emergency shelter (which could include a day shelter). For homelessness prevention assistance,

beneficiaries must meet the requirements described in 24 CFR 576.103. For rapid re-housing assistance, beneficiaries must meet requirements described in 24 CFR 576.104. Further eligibility criteria may be established at the local level in accordance with 24 CFR 576.400(e).

## **Section 2: Planning**

### **HUD Planning Requirements**

#### ***Consolidated Plan***

To receive its annual CDBG entitlement grant, a grantee must develop and submit to HUD its Consolidated Plan. The Consolidated Plan is a jurisdiction's comprehensive planning document and application for funding under the following Community Planning and Development formula grant programs: CDBG, HOME Investment Partnerships, and Emergency Solutions Grants (ESG).

The plan must be prepared in accordance with 24 CFR part 91. It must describe needs, resources, priorities and proposed activities to be undertaken with respect to HUD programs. In its Consolidated Plan, the city must identify its planned use of funds and the goals for these programs and for affordable housing. The goals will serve as the criteria against which HUD will evaluate a jurisdiction's performance under the Plan.

The Consolidated Plan must also include several required certifications, including that not less than 70 percent of the funds expended over a period specified by the grantee (not to exceed 3 years) must be used for activities that benefit low- and moderate-income persons. The grantee must also affirmatively further fair housing.

#### ***Annual Action Plan***

The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan.

The City's Annual Action Plan must be received by HUD 45 days in advance of the start of its Program Year. Therefore, since the City's Program Year begins on January 1<sup>st</sup>, the deadline for sending the Annual Action Plan to HUD is November 15<sup>th</sup> each year.

#### ***Citizen Participation***

In accordance with 24 CFR § 570.431, the City of Reading has developed and follows a detailed citizen participation plan that has been made available to the public. In accordance with 24 CFR § 570.431, the City's plan sets forth its policies and procedures for:

(1) Giving citizens timely notice of local meetings and reasonable and timely access to local meetings, information, and records relating to the grantee's proposed and actual use of CDBG funds including, but not limited to:

- (i) The amount of CDBG funds expected to be made available for the coming year, including the grant and anticipated program income;
- (ii) The range of activities that may be undertaken with those funds;
- (iii) The estimated amount of those funds proposed to be used for activities that will benefit low- and moderate-income persons;
- (iv) The proposed CDBG activities likely to result in displacement and the applicant's plans, consistent with the policies developed under § [570.606\(b\)](#), for minimizing displacement of persons as a result of its proposed activities; and
- (v) The types and levels of assistance the applicant plans to make available (or to require others to make available) to persons displaced by CDBG-funded activities, even if the applicant expects no displacement to occur;

(2) Providing technical assistance to groups representative of persons of low- and moderate-income that request assistance in developing proposals. The level and type of assistance to be provided is at the discretion of the applicant. The assistance need not include the provision of funds to the groups;

(3) Holding a minimum of two public hearings, for the purpose of obtaining citizens' views and formulating or responding to proposals and questions. Each public hearing must be conducted at a different stage of the CDBG program. Together, the hearings must address community development and housing needs, development of proposed activities and review of program performance. There must be reasonable notice of the hearings and the hearings must be held at times and accessible locations convenient to potential or actual beneficiaries, with reasonable accommodations including material in accessible formats for persons with disabilities. The applicant must specify in its plan how it will meet the requirement for hearings at times and locations convenient to potential or actual beneficiaries;

(4) Meeting the needs of non-English speaking residents in the case of public hearings where a significant number of non-English speaking residents can reasonably be expected to participate;

(5) Responding to citizen complaints and grievances, including the procedures that citizens must follow when submitting complaints and grievances. The applicant's policies and procedures must provide for timely written answers to written complaints and grievances within 15 working days of the receipt of the complaint, where practicable; and

(6) Encouraging citizen participation, particularly by low- and moderate-income persons who reside in slum or blighted areas, and in other areas in which CDBG funds are proposed to be used.

The City's Citizen Participation Plan is available upon request at the Community Development Office.

## **Annual Action Plan Process**

### ***Identifying Needs***

#### **Consultation with Public**

In accordance with the City's Citizen Participation Plan, Citizens will be consulted during the development of the Plan. There are three (3) general venues of public involvement. They include 1) public hearings, 2) community meetings and committees, and 3) individual citizen contact in the form of comments, complaints, or inquiries submitted directly to the Community Development Department.

Specifically, citizens are invited to attend a Public Needs Hearing before applications are made available to agencies. Open to the entire community, it is held during the initial stages of Consolidated Plan and Annual Action Plan development. The purpose of the hearing is to assess the community development needs of the community.

Orientation information is also provided at the first public hearing. City staff presents this information, which includes: the amount of funds available, the range of eligible activities, review of activities previously funded in the community, the planning process and the schedule of preparation of the Plan, the role of citizens in development of the Plan, and a summary of any other important program requirements such as environmental policies, fair housing provisions, and contracting procedures.

Public hearings are advertised at least ten (10) days prior to the hearing date (though the City generally attempts to provide at least 30 days notice to the public) and specify the purpose of the hearing.

#### **Council Consultation with City Administration**

In addition to holding public hearings and formal meetings, citizen input is gained when City Council members consult with constituents within their respective districts. This is particularly important where public facilities and public improvements are concerned. As such, City Council members must discuss and submit their Council district's public facility and improvements funding requests with the Public Works Director. The Public Works Director then meets with individual Council members to discuss public facility and improvement projects in their respective Council Districts. Finally, the Public Works Director meets with the MD to find out if the administration concurs with Council's requests.

This process of discussion and consultation between Council members, the Public Works Director, and the Managing Director should begin in April of each year and last until June. The Public Works Director must then submit a grant application for any public facilities/ public improvements to the Community Development Office by the end of June.

## ***Application Process***

### ***Internal applications***

In addition to Public Works, various other City Departments have projects that are eligible for HUD program funding, and they also submit applications. The City makes applications for HUD funding available to City Departments earlier than it makes applications available to external entities. Other Department Directors should also consult with the Managing Director before submitting an application.

### ***External applications***

Applications for HUD program funding are made available to all other entities by May 1<sup>st</sup> of each year. Applications are due by the last weekday in June of each year.

## ***Recommendation and Approval Process***

### ***CD Review for eligibility/fundability***

Once the Community Development Department receives funding applications, program staff specializing in the particular HUD program for which funding is sought, review the applications. Program Specialists assess the applications for eligibility and fundability. Staff then informs the CD Director of which applications are eligible and fundable under the requirements of the particular program. Program Specialists also reach out to applicants for any clarification needed regarding the applications, and may offer technical assistance in some instances.

The Community Development Department usually takes about 30 days to review all applications for eligibility and fundability and conduct necessary outreach to applicants.

The Community Development Director then reviews all of the applications and their eligibility and fundability with the Managing Director by the end of July each year.

### ***Administration Review and Recommendations***

The Managing Director makes recommendations for program funding to the Mayor, who makes the final recommendations for funding based on City needs and priorities by August 15<sup>th</sup>.

### ***Council Review, Discussion, and Approval***

Council receives a draft of the plan and the Administration's recommendations by August 15<sup>th</sup> of each year. Council members must review the plan, and opportunities to discuss the plan must be provided at the earliest possible Council meetings. After discussions with the Administration, final decisions about the plan should be made by Council no later than September 15<sup>th</sup> of each year. This gives the CD staff time to enter changes to the plan into the IDIS system and ensure the public has 30 days to comment on

the plan, as required by the City's Citizen Participation Plan. A resolution to adopt the Annual Action Plan must be adopted by Council before November 15<sup>th</sup> of each year.

***It is important to note that because citizens are to have 30 days to comment on the final plan, the final plan should be decided upon well in advance of November 15<sup>th</sup> of each year (Hence, it is recommended that the final plan be decided upon by September 15<sup>th</sup> of each year). No major changes to the plan should take place after the plan is published for final public comment in order for the City to be able to send its action plan to HUD by the November 15<sup>th</sup> deadline. Therefore, while Council needs to officially pass a resolution to approve the Action Plan by November 15<sup>th</sup>, final decisions about the plan should be made well in advance, by September 15<sup>th</sup>. Failure to do so may result in the City having to begin its program year late, delay funding for projects to internal and external entities, and risk being unable to meet its timeliness test.***

#### Incorporation of Citizen Comments

Another public hearing is held upon completion of the draft plan document. This hearing is usually held in September. The purpose of this hearing is to present what has been proposed and to give opportunity for comment and revision prior to approval by the Mayor and City Council. Other public hearings may be scheduled throughout the year at the discretion of the Mayor.

According to the City's adopted Citizen Participation Plan, Citizens will be given the opportunity to view the Action Plan for a minimum of thirty (30) days prior to the submission to HUD. A summary of the Plan will be printed in the Reading Eagle/Times. Citizen comments and views shall be incorporated into the final version of the Action Plan.

#### Send Action Plan to HUD

The Annual Action Plan is sent to HUD on or before November 15<sup>th</sup> of each year so that the City may begin its Program Year activities by January 1<sup>st</sup>.

## **Section 3: Funding Process**

### **HUD Approval of Action Plan**

Once HUD Receives the City's Annual Action Plan, they will approve or deny the plan. Once the plan is approved (and all Environmental Review Requirements are met), activities may begin. Though activities may begin (usually on January 1<sup>st</sup>), the City will not generally know the amount of funding they have received until months later. Therefore, while agency CDBG agreements with the City may be dated for January 1<sup>st</sup>, the City will not sign agreements, accept invoices, or pay invoices of outside entities until notice of the actual amount of funding is received. Activities being implemented by Public Works and other City Departments may begin on January 1<sup>st</sup> and funding may be drawn for those activities.

### **Receipt of Actual Allocation Amount and Revision of Action Plan**

Once the City receives notice of the actual amount of funding it will receive, the City must revise and resubmit its Annual Action Plan to reflect the actual amount. As long as the purpose, scope, location, or beneficiaries of an activity do not substantially change, the city may revise its action plan without undergoing an amendment and Citizen Participation process.

If significant changes to the Action Plan are needed, an Action Plan amendment will need to be made. Significant changes to the action plan include 1) adding a new activity or completely deleting an activity that has been recommended by the administration for funding and 2) changing the purpose, scope or beneficiaries of a project or activity.

In order to amend the Action Plan and make such changes, the City must revise and re-advertise the annual Action Plan in the newspaper and provide the public 30 days to comment before Council can approve a resolution adopting the action plan.

### **Receipt of Funds from HUD**

Once HUD receives the final Action Plan from the City, they will sign an agreement with the City and release funds. Release of funds does not usually occur until May or June of each year, but has occurred as late as August.

### **Completion of ERR**

Before funding may be obligated (as defined by HUD ERR regulations), all federally-funded projects must receive an environmental review using the criteria and statutory authorities specified in the HUD regulations 24 CFR Part 58 ( [http://www.access.gpo.gov/nara/cfr/waisidx\\_04/24cfr58\\_04.html](http://www.access.gpo.gov/nara/cfr/waisidx_04/24cfr58_04.html) ) and, for more complex projects, using procedures from NEPA. The Community Development Office must maintain a written record of the environmental review undertaken under this part for each project. This document is designated the “Environmental Review Record” (ERR), and is made available for public review, as is required by HUD. The document is completed before the start of the program year.

The ERR contains all the governmental review documents, public notices and written determinations or environmental findings required by 24 CFR 58 as evidence of review, decision making and actions pertaining to a particular project of a recipient. As appropriate, the document:

- Describes the project and activities the recipient has determined to be part of the project;
- Evaluates the effects of the project or the activities of the human environment;
- Documents compliance with applicable status and authorities, in particular those cited in Section 58.5 and 58.6; and
- Records the written determinations and other review findings required by this part (e.g., exempt and categorically excluded projects determinations, findings of no significant impact)

The purpose of these environmental procedures are to ensure that all projects funded with federal funds including program income are in compliance with all applicable federal laws and authorities identified in Title 24 Part 58: Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities. Also, the procedures are intended to insure a suitable living environment, or more specifically, to determine if any significant environmental impact may occur as a result of a proposed project; to release funds to support eligible projects that neither harm nor are harmed by the environment; to safeguard, enhance, and restore the environment; and to foster public participation in the development decision-making process.

The City of Reading Community Development Department, as a responsible entity has assumed the responsibility for environmental review, decision-making, and other actions that would otherwise apply to the U.S. Department of Housing and Urban Development (HUD) under National Environmental Policy Act of 1969 (NEPA) and other provisions of the law that further the purposes of NEPA as specified in Title 24 Part 58.5, by execution of a grant agreement with HUD. It is the City's goal to carry out these responsibilities to ensure compliance with all federal regulations as outlined in Title 24 Part 58. Therefore, the City engages consultants with expertise in environmental review to complete the ERR.

## Section 4: Spending

### **CDBG Commitment and Spending Expectations – Meeting the Annual Timeliness Test**

A very important concept in administering CDBG program activities is planning for the timely expenditure of funds. Timeliness refers to how quickly the grantee is able to commit and expend CDBG funds. Since federal program budgets are tight all across the government and since there is a huge need for community development programs, it is vital that CDBG grantees make every effort to quickly use their funds.

The entitlement program rule for timeliness is that that grantee cannot have more than 1.5 times their annual allocation sitting in their line of credit at the U.S. Treasury. This analysis for entitlements is calculated at 60 days prior to the end of the grantee's program year. The City of Reading's timeliness test occurs on November 1<sup>st</sup> each year.

***If the City chronically has more than 1.5 times their allocation in their line of credit at the time of the timeliness test, HUD may recapture grant funds and/or withhold future grant funding until the grantee effectively spends their existing resources.***

As the CDBG program accounts for the largest portion of the City's allocation of HUD funding, timely expenditure of CDBG funds is paramount to remaining in compliance with HUD. Therefore, though activities are reviewed on a case-by-case basis, funding is generally expected to be committed to each activity at the start of the program year. Funds for each activity are expected to be expended by the end of the program year, or December 31<sup>st</sup> of each year.

### **HOME Commitment and Spending Expectations**

HOME funds must be committed to specific activities within 24 months of HUD signing the agreement.

The HOME Program Final Rule, published in July 2013, made a number of changes to the Definition of Commitment at 24 CFR 92.2. Realizing that many grantees did not recognize the point at which it is appropriate to execute a written agreement committing funds to a specific project, HUD amended the definition of commitment to make clear that a grantee may not enter into a written agreement for a HOME project until:

- All necessary financing has been secured;
- A budget and a schedule for the construction or rehabilitation have been established; and
- The underwriting and subsidy layering requirements have been met.

In general HOME funds must be expended within four years of the date the agreement is signed by HUD. However, to provide an incentive for PJs to proactively manage CHDO set-aside funds by moving them from nonperforming CHDOs to performing CHDOs before they expire, HUD has added a new requirement at §92.500(d)(1)(C) to establish a separate 5-year expenditure deadline for CHDO set-aside funds.

Any funds not committed and spent within the aforementioned commitment and expenditure deadlines will be recaptured by HUD.

### **ESG Commitment and Spending Expectations**

The City must obligate all funds, except for the amount for administrative costs, within 180 days after HUD signs the grant agreement. All grant funds must be expended within 24 months after HUD signs the grant agreement with the recipient.

## **Section 5: Reporting**

### **The Consolidated Annual Performance and Evaluation Report (CAPER)**

The CAPER must be submitted in accordance with 24 CFR 91.520 and are due 90 days after the close of the recipient's consolidated program year. Recipients also have other reporting requirements, as specified in 24 CFR 576.500(aa).

### **Other Reporting Requirements**

In addition to the annual reporting requirements set forth by HUD, the City has developed monthly reports for the CDBG program. These reports must be submitted with monthly invoices in order for invoices to be approved for payment.

The City requires that recipients of ESG funding report on each client served using the Homeless Management Information System (HMIS). Additionally, the City asks for demographic information of clients served at the time invoices are submitted. Some recipients submit invoices and reports on a monthly basis while others submit invoices and reports on a quarterly basis.

## Section 6: Action Plan Timeline Activities, Deadlines, Responsible Entity Table

As previously mentioned, the City is required to adhere to its citizen participation plan and other strict guidelines before adopting an annual Action Plan, commit, expend funds, and report on activities in a timely manner. In order to ensure that all requirements are met, the process for developing the annual action plan must start in April of each year. The table below lists the activities, their deadlines, and responsible entities for completing and implementing the City of Reading’s Annual Action Plan.

Abbreviations: CC – City Council; CD – Community Development; MD – Managing Director; PW – Public Works; IT – Information Technology Department; HUD – US Department of Housing and Urban Development

Activity	Time Period/ Deadline	Responsible Entity
Applications are created by CD staff	April	CD
The applications and the cover memo are sent to City Department Directors	April	CD
The Managing Director is reminded by CD to inform City Council members that they must discuss and submit their Council district’s public facility and improvements funding requests with the Public Works Director.	April	CD, MD, CC
The Public Works Director meets with individual Council members to discuss public facility and improvement projects in their respective Council Districts	April-June	PW, CC
The Public Works Director meets with the MD to find out if the administration concurs with Council’s requests	April-June	PW, MD
A joint Needs Hearing is conducted with the County	May	CD
The City (or County) publishes the Needs Hearing Notice in the Reading Eagle and on the CD webpage indicating that applications are available.	May	CD
CD and IT place CDBG, ESG, and HOME applications on the CD webpage.	May	CD, IT
Existing funding recipients are emailed by CD reminding them that new applications are available	May	CD
Public Works Department Director meets with CD staff for technical assistance with completing applications	April – May	CD, PW
Non-profit agencies meet with CD staff if they need assistance with completing their applications	May-June	CD
City Departments and Non-Profit Organizations applications are due to CD	June 30 <sup>th</sup>	PW
Staff reviews funding applications for completeness and eligibility/fundability	July	CD
Action Plan draft is submitted by MD to CC	August 15 <sup>th</sup>	CD, MD
MD and CC agree/finalize Action Plan revisions	September 15 <sup>th</sup>	CC, MD
Revisions need to be entered into IDIS by CD staff	September 15 <sup>th</sup> – 30 <sup>th</sup>	CD
CD staff downloads the Action Plan in IDIS and makes the document available for 30-days of public review and comment.	October 1 <sup>st</sup>	CD
CD staff prepares the City Council Action Plan resolution	October 1 <sup>st</sup>	CD
The joint Public Meeting is held with the County	October 1 <sup>st</sup>	CD
City Council approves the Action Plan resolution	November 15 <sup>th</sup>	CC
The Action Plan is certified by the Mayor and CD sends the document to HUD	November 15 <sup>th</sup>	CD
Begin ERR and complete before January 1 <sup>st</sup>	November 16 <sup>th</sup> – December 31 <sup>st</sup>	CD (Consultants)
HUD has 45 days to review the Action Plan and request additional information, if necessary.	December 31 <sup>st</sup>	HUD