



Special Attention of:

Notice CPD-92-29

Regional Administrators
Category A Office Managers
CPD Regional Directors
CPD Field Directors
CDBG Entitlement Grantees

Issued: September 18, 1992
Expires: September 18, 1993

Cross References:

Subject: Grantees' Responsibilities for Describing Activities and
Funding Sources in the Final Statement

I. PURPOSE

The purpose of this Notice is to provide guidance to the CDBG entitlement grantees and the HUD field staff on the level of detail to be provided on the activities and the funding sources described in the final statement. The final statement must be submitted by each entitlement grantee in order to receive its annual CDBG entitlement grant.

This Notice sets forth guidance on the nature of the descriptions to be provided for the proposed activities in order to consider the grantee in compliance with the regulatory requirement that its planned activities are described "in sufficient detail, including location, to allow citizens to determine the degree to which they may be affected" [24 CFR 570.301(a)(2)(ii)]. The Department has not previously identified the level of detail necessary to ensure compliance with this regulatory provision and, as a result, activity descriptions vary dramatically across entitlement communities. The Department has determined that guidelines are warranted to ensure that all citizens receive at least a comparable, basic level of detail on the proposed activities.

This Notice also describes the effect that the pending final rule implementing statutory changes from the Housing and Community Development Act of 1987 will have on final statements. This regulation will require grantees to be more accountable up-front for their funding decisions by providing more specific information on planned activities in the final statement. Grantees should note that when this final rule becomes effective, failure to describe activities in sufficient detail can result in the final statement not being acceptable for processing, thus delaying grant award.

CGBE: Distribution: W-3-1, R-1, R-6, R-3-1 (CPD)(ADM), Special (CPD Regional and Field Office Directors)

Finally, this Notice provides guidance on describing the CDBG funding sources in the final statement, specifically addressing the manner in which program income, float-funded activities, returned grant funds, and revolving funds should be described in the statement. Further information on processing and conducting the completeness check of final statements and the certifications is provided in Chapter 4 of the forth-coming CDBG Entitlement Grant Management Handbook, No. 6513.01.

The guidance in this Notice applies only to CDBG entitlement grantees and is effective for final statements submitted for FY 1993. An example of a final statement has been attached to this Notice; it is provided for illustrative purposes only, grantees are not required to follow its format.

II. ACTIVITY DESCRIPTIONS IN FINAL STATEMENTS

The CDBG regulation at 570.301(a)(2)(ii) requires the grantee to describe each planned activity it proposes to fund in sufficient detail, including location, to enable citizens to determine the degree to which they may be affected.

The level and type of detail to be provided for each proposed activity will vary depending on the type and nature of the activity. Whatever the activity, however, citizens should be provided with as much information as may be available so that they can determine whether they can participate in or qualify for an activity, and how an activity may affect the areas in which they live and work. This level of detail must also be provided in each annual statement for those activities that are continuations of on-going activities described in prior statements but funded with new grant funds or anticipated program income, such as revolving funds.

The level of detail that should be provided for each CDBG-assisted activity is described below. In the event that a grantee's activity descriptions do not meet these standards, the grantee should be provided with an opportunity to explain how its descriptions fulfill the requirements of 570.301(a)(2)(ii).

Activity Name: To provide for continuity within the overall reporting system for the CDBG program, grantees are encouraged, but not required, to use the "standard" activity titles listed in the CDBG Entitlement regulations at 24 CFR 570 Subpart C when identifying either an individual activity or a broad group of activities (e.g., "acquisition", "public facilities and improvements", "special economic development"). Where a project is composed of more than one type of assisted activity, each such activity needs to be identified separately. Structuring final statements in this fashion will also facilitate the grantee's completion of the annual Grantee Performance Report (GPR).

Agency Name: The name of the agency or subrecipient carrying out the activity should be included for each activity so that it may be a resource for citizens to obtain further information on an activity.

Amount of CDBG Funds: The amount of CDBG funding expected to be used for each activity will be required when the pending final regulations become effective; nevertheless, it is recommended that grantees that do not already provide this information do so now. Grantees are also encouraged to indicate whether there will be any significant amounts of other funding sources that affect the scope of the activity.

Regulatory Citations: The regulatory citations for both eligibility [24 CFR 570.201-206] and national objectives [24 CFR 570.208(a)-(d)] for each activity will be required when the pending final rule becomes effective. Grantees are encouraged to provide this information now if they do not already do so, and to be as specific as possible by using the complete regulatory citation (e.g., 570.208(a)(2)((i)(C))). Grantees should be aware that any change to a national objective for a particular activity requires an amendment to the final statement as this constitutes a substantial change to the beneficiaries.

Location of Activity: In describing the location of an activity, grantees should be as specific as possible by using the smallest area description known, preferably the street address or neighborhood(s) location. Of course, some activities, such as loan programs for economic development and rehabilitation, may truly be available "citywide" or "countywide" and may be so identified. If more than one location is being considered, all need to be mentioned. If the location has not yet been determined or if the activity will be available community-wide, the process to be followed in selecting the location should be described.

Nature of the Activity: The description of each activity should be in sufficient detail to permit a clear understanding of the nature and eligibility of the activity. Activities that may be expected to produce program income should be so noted if the nature of the activity does not itself so indicate this; grantees are encouraged to also specify the amount of program income expected to be generated by those activities. Examples are provided below of the level of detail to be provided.

- Public service activities should be described in terms of the nature of the service(s) to be offered and the targeted audience(s); it is generally not sufficient to limit the description to the intent of the activity.

Examples:

Acceptable: "Senior Services: Daily transportation services to nearby stores for approximately 100 seniors residing at Shady Manor."

Unacceptable: "Community Services: A variety of public services will be offered to meet the needs of the low- and moderate-income population."

- Since grantees frequently carry out a number of individual activities that fall under one broad category of public improvements, as with road improvements, one description may suffice to cover the individual activities as long as each such activity is listed by location. Descriptions that merely set forth the program objectives in general terms without describing the specific activities to be carried out with the CDBG funds clearly do not meet the regulatory requirement.

Examples:

Acceptable: "Street improvements consisting of sidewalks, paving, curb and gutters to be carried out in the following locations..."

Unacceptable: "Neighborhood Revitalization: Funds used to support a comprehensive array of capital improvements programs designed to strengthen the fabric of Anytown's neighborhoods. The key programmatic objectives are to preserve and create homeownership opportunities; rejuvenate properties and create open space."

- Loan programs (e.g., economic development and rehabilitation) should be described in a way that will enable citizens to determine who will be able to participate. The description of each loan program should include: the purpose of the program; to whom the loans will be offered (e.g., first-time homebuyers, micro-business entrepreneurs); the expected size and terms of the loans (or the expected range of the size and terms); the application process and selection criteria; and the expected timing of the awards.

Examples:

Acceptable: "Capital Heights Business Loan Program: Low interest loans offered by the Office of Business Development. Loans of up to \$35,000 for small-business owners (10 or fewer employees) located in the Capital Heights Enterprise Zone. Loans for working capital,

Unacceptable: "Overall program administration, planning studies, environmental assessments, and capacity building assessments."

In addition, program administration activities that are specifically covered by 570.206(a), "General management, oversight, and coordination", should be listed individually and distinctly from the other types of eligible administrative costs that are listed elsewhere in section 570.206.

- A "contingency" amount may be included in the final statement to cover potential cost overruns in activities described in that statement. Grantees may not use contingency funds to implement activities not described in the statement (sometimes referred to as "local options" or "set asides for unspecified activities") unless the statement is amended to include those activities. Similarly, if contingency funds are used to augment existing programs or activities the grantee should be aware that the citizen participation requirements may be triggered if those activities are substantially changed by that additional funding. The amount set aside for the contingency fund should be reasonable relative to the amount of CDBG funds described in the statement; if it exceeds ten percent of that amount, HUD should request a justification for the amount from the grantee.

III. FUNDS TO BE COVERED IN THE FINAL STATEMENT

General: The principal purpose of the final statement is for the grantee to describe to HUD and its citizens how it plans to use CDBG funds. It is therefore important that all CDBG funds be covered by a final statement, that the source of all such funds be clearly identified in the statement, and that the planned use of all such funds for activities (and allowable contingencies) be shown in the statement. Neither the law nor the regulations require the grantee to identify in the statement when the grant funds are to be used, but the statement must include all CDBG funds the grantee expects to receive during a grant year. (It is expected, of course, that grantees will maintain activity schedules for local purposes.)

The regulations at 24 CFR 570.301(a)(2) require, for entitlement grantees, that the proposed and final statements show the proposed use of funds including:

- ~~the annual grant to be received for that year;~~

physical development and business expansion. Terms of loans range from 3-8%, 2-5 years, based on need and risk. Priority given to businesses less than 3 years old."

Unacceptable: "Innovative, flexible financing to support joint ventures between City and selected businesses to enhance economic viability of downtown business districts."

- For housing activities such as residential rehabilitation programs, downpayment assistance, limited new construction, the activity description should include information on the targeted population or areas (e.g., elderly, very low-income); the type(s) of units that qualify or will be affected (e.g., single-family or multi-family); and whether the assistance is for owner-occupied, rental, or publicly-owned units.

Examples:

Acceptable: "Housing Rehabilitation Program: City Housing Department will provide deferred loans of up to \$10,000 per unit to low-income homeowners who are elderly, disabled or single-heads of household for rehabilitation of substandard, single-family residential structures. Applications will be accepted from 1/1/93 through 12/31/93."

Unacceptable: "Variety of housing programs to improve quality of residences for City's minority populations."

- Planning activities should be listed and described separately from those pertaining to program administration. The instructions for completing the GPR Activity Summary form (4949.2) list the categories that should be used in describing these kinds of activities; this level of detail is appropriate for both planning and program administration activities listed in the final statement.

Examples:

Acceptable:

"Planning/Capacity Building Activities: ----

- Neighborhood Development Plan: Evaluation of Goldspring and Tacoma Junctions residential neighborhoods for improvements.
- Evaluation of social service needs of homeless families.
- Feasibility study for preserving and rehabilitating Mainstreet."

- program income expected to be received during that program year;
- program income received during the preceding program year that has not yet been programmed for use; and,
- surplus from urban renewal settlement for community development and housing activities.

While the regulations do not specify that returned grant funds are to be included in the final statement, clearly the use of such funds must also be shown in the statement.

Balancing Sources and Uses: Since it is clear from the statute that the final statement is the principal tool in the CDBG program for the grantee to use in notifying its citizens and HUD of how it plans to use the CDBG funds that will be available to it, the statement must show an exact balance between the sources and the uses of the CDBG funds. If the grantee identifies a larger amount of CDBG funds available than the amount it budgets for specific activities (including any amount of funds identified in the statement to cover cost overruns), it leaves open the question of how those additional funds will be used. Similarly, if the statement shows more activities than can be carried out with the available CDBG funds, both HUD and the citizens are left to guess which activities may not be carried out.

In reviewing final statements, HUD should therefore check that there is a balance between the sources of funds listed in the statement and the amounts budgeted for the individual activities. A check should also be made to ensure that the amounts listed as sources match the amount of estimated funding listed in blocks 15(a) and (f) of the corresponding SF 424. If there is a discrepancy between any of these figures, the grantee should be contacted immediately for clarification and correction.

Program Income: Program income has become a significant source of funds for many grantees, but because program income is not always predictable in terms of either the amount that will be received or the timing of its receipt, grantees frequently do not accurately describe in the final statement and amendments the actual amount of program income they (and their subrecipients) receive during a program year. Since knowledge of the amount of CDBG funds available is important for citizens to have in assessing the grantee's planned use of the funds, it is necessary for the grantee to notify its citizens of any changes in the amount of the funding available for use.

~~The regulations currently do not specify what steps are to be taken when the amount of program income actually received is~~

higher or lower than the amount estimated to be received. Of course, where the affect of this discrepancy is such that the grantee adds or deletes an activity or substantially changes the nature of any activity, it must comply with the requirements for amending its final statement at 570.305. Unless the grantee has specifically described its strategy in its Citizen Participation plan, the following guidance is offered for use by grantees in those instances when the amount of program income received varies from the amount described in the final statement:

- If the amount of program income received is less than that included in the final statement, an amendment to the statement would only be required if the shortfall is of such an amount that deletion or substantial change of an activity is to be made. Whether the adjustment should trigger an amendment would be based on the grantee's definition of substantial change. Since the grantee usually will not know this until late in the year, the grantee may want to wait until the end of the program year to amend the statement in order to more fully ascertain the amount of adjustment needed;
- If the amount received is greater than that amount included in the final statement for that year, the grantee should follow the steps listed below, depending on the amount of the excess funds and the timing during the program year in which the excess funds are received:
 - (a) If, during the first half of the program year, the amount of program income received exceeds the amount projected in the statement by either \$100,000 or ten percent of the annual grant (whichever is lower), the final statement for that year should be amended at that time;
 - (b) Where the amount of excess does not rise to the level cited above or where the excess occurs in any amount during the last half of a program year, the grantee should either amend the final statement for that year or identify the excess and describe its proposed use in the statement for the succeeding program year.

The statute is clear that each annual grant is to be subjected to citizen participation and covered in a separate final statement. That is, the grantee's description in the statement is to show how it expects to use the funds for which it is making application. Therefore, the grantee is not to describe in the statement it submits for this year's grant how it plans to use

grant funds it may receive in a subsequent year. Decisions concerning the planned use of such future funds are to be developed in conjunction with citizen participation to be conducted expressly for planning the use of the future grant(s). A description of the planned activities to be funded thereby is to be included in the statement submitted in applying for those funds. The law does not specify how the use of program income is to be developed or described. However, the law requires that, if a grantee wants to keep and use any income generated by the CDBG grant funds, it must use them in accordance with the rules applicable to the grant funds themselves. HUD has taken this to mean that the use of such program income must also be subjected to the same citizen participation as that used for the grant funds, and that the final statement submitted in applying for the grant funds must include a description of how both the grant funds and the program income it expects to receive will be used. It follows then that, if future grant funds are not to be covered in this year's final statement, the final statement for a given program year is not to include the planned use of program income that is expected to be received in a future program year. An exception to this principle is discussed in the following section on float-funded activities.

Float-Funded Activities: Under the CDBG entitlement program, the regulations do not require that funded activities be completed within a particular time period. Planned activities are often scheduled by the grantees to be carried out over a period of time, some of them over several years. There is some constraint on the grantee's ability to schedule activities over long periods since the regulations provide a maximum level of unexpended funds a grantee is generally authorized to have when it is about to receive its next annual grant. However, the allowable level of funds at that point can be as much as one- and one-half times the community's annual grant amount. Accordingly, many grantees have a substantial level of unexpended funds in their line of credit at any one point in time. This level of undisbursed funds is called the "float".

A large number of grantees have noted that while the funds that make up the float are slated to be used for specific purposes, they could be used for other activities during the interim, as long as those activities can be expected to generate program income by the time the funds are needed for their original planned use. Grantees that have used the float to finance other activities usually make loans that are to be repaid within a short time period. A typical use would be to make a loan from the float for a special economic development activity such as construction financing provided to a for-profit business.

Several years ago, in response to inquiries about this possible use of CDBG funds, HUD provided guidance on float-funded activities in a memorandum dated August 19, 1987. That guidance made it clear that any activity funded through the use of the float had to meet all of the same requirements that apply to CDBG-assisted activities generally. It stated that, as with the use of any CDBG funds to carry out an activity not already described in a final statement, a float-funded activity would need to be included through the process of amending the final statement, in order to give citizens an opportunity to comment on the activity prior to making the decision to include the activity in the statement.

Some grantees have attempted to deal with their citizen participation responsibilities by simply noting on each of their final statements that they intend to carry out one or more unspecified float-funded activities. While such notification may be helpful, it does not relieve them of the responsibility to identify the specific uses of the float as they materialize, to notify citizens of each such planned use, and to consider any comments citizens may offer on such planned uses before deciding to proceed.

However, there is another limitation to the grantee's ability to carry out float-funded activities in the CDBG program. As mentioned on page 7 of this Notice, the program income to be included in a final statement is to be restricted to that expected to be received within the program year covered by the statement. This effectively means that a grantee is not authorized to add a float-funded activity to a final statement without also showing that the loan payback is expected to be received within the program year. If the grantee is not able to do so, in order to proceed with the loan, it would be required to identify the activities it would delete or reduce to balance the sources and uses in the statement as a result of adding the new activity. (It could, of course, restore any such deletion or reduction in the future in the final statement covering the year during which the loan is expected to be repaid since that statement would include the program income from the repayment.)

One clear effect of this interpretation of the statute and regulations is that a grantee may not make a loan using the float concept unless the loan is expected to be paid back within, at maximum, a one year period, unless it is willing to identify what activities it will reduce or delete if the repayment does not materialize. Even where a grantee decides to limit its float loans to a period of less than one year, the timing of making the loan may pose a problem. If the opportunity to make such a loan develops in the latter part of a program year, the grantee might

have to wait until the beginning of the next program year to make the loan in order to avoid having to delete or reduce other activities to make room for the new activity in the final statement for the current year. HUD believes this is an unnecessarily restrictive outcome. Therefore, until the program regulations are amended to specify how float-funded activities are to be handled in a final statement, the following policy shall apply:

Grantees that make a float-funded loan with repayment terms that do not exceed a one year period may amend the final statement for the current year to add the new activity and may identify the program income to be received from the repayment of the loan in order to balance the sources and uses, even though some or all of the repayment is actually not expected to be received until the next succeeding program year. (When preparing the final statement for the succeeding program year, the grantee should identify the amount of program income it expects to receive during that year from the repayment of the float-funded activity and deduct that amount from the total fund sources to be covered by the planned usage portion of the statement.)

In all other cases, the grantee could only add a new loan-financed activity to the final statement as it would any other new activity: by showing what the impact would be on the other activities already contained in the statement (presumably by deletion or reduction), as may be necessary to balance the sources and uses.

HUD believes that the policy of allowing the inclusion in an amended final statement of some program income that will probably not be received until the next succeeding year in the case of float-funded loans having a repayment period not to exceed one year does not substantially deviate from the intention of the statute concerning which funds are to be covered in a final statement. In this case, HUD has determined that a limited deviation is justifiable since it serves to make more practicable the use of the float-funded loan by grantees at a time when the Federal resources are so limited.

Returned Grant Funds: Under certain circumstances, the grantee will return grant funds to its CDBG program account or its line of credit after they have already been used. The regulations do not specifically refer to this practice or how to treat such funds in the final statement.

Examples of instances of grant returns occur when:

- The grantee has used CDBG funds to pay for an activity that HUD determines to be ineligible (or for which the funds are otherwise disallowed), and the grantee reimburses its CDBG line of credit with non-Federal funds which become available for other uses.
- Fees are charged to defray the costs associated with carrying out a CDBG-assisted activity as with fees that are charged by the grantee to cover the costs of issuing economic development loans. The fees that are used to cover some or all of the CDBG costs are considered to be "applicable credits" (per OMB Circular A-87, Attachment A, paragraph C.3) and are to be returned to the grantee's CDBG program account for some other eligible use.

The grantee must reprogram the use of these funds to carry out other CDBG eligible activities, and the planned use of grant returns must be covered in a final statement. The guidance provided on page 8 of this Notice on determining which final statement to use for describing the use of unanticipated program income should be similarly applied to the receipt of grant returns. Where the sources of funds are described in the statement, the availability and amount of grant returns are to be specifically described. It should be remembered that returned grant funds are not included in calculating either the planning/administration cap or public service cap. (The adjustments that are to be made to the GPR to reflect the return of grant funds that have already been reported as expended will be covered in forthcoming instructions on the preparation of GPRs.)

Revolving Funds: Under the current CDBG regulations at 570.500(b), grantees may establish revolving funds (e.g., revolving loan funds). These are funds into which the grantee or subrecipient places the program income that is generated from the activity (as with loan repayments to a housing rehabilitation program) so that it can continue to carry out that same activity. To use program income this way the grantee must have declared in advance its intention of using the program income generated from the activity in this manner.

Since the income that is received from these types of activities is CDBG program income, it must be treated as such in the final statement. As with any other CDBG program income, the amount that the grantee expects to receive over the course of the program year for deposit into its revolving fund must be included

in both the proposed and final statements each year that the fund is open. The statement must include a description of the activity to which this program income is to be applied and list this income among the sources of funds. This coverage in the final statement will ensure that citizens are aware of these activities and are provided with the opportunity to reconsider the continued use of the program income for the same purposes.

If the actual amount of loan repayments differs from that amount listed in the statement, the guidance provided on page 8 of this Notice on determining which final statement to use to describe this discrepancy should be followed.

IV. CONTACTS

For further information or clarification on the guidance that has been provided in this Notice, the HUD field staff can contact the Entitlement Communities Division on (202) 708-1577; entitlement grantees should contact their HUD field office.

Attachment

ATTACHMENT

Funding Sources
CDBG Final Statement

Program Year 18
7/1/92 - 6/30/93
B-93-MC-00-1234
City of Silverberg, USA

CDBG FUNDING SOURCES AVAILABLE FOR USE:

18th Year CDBG Fund Allocation:	\$ 341,500
Projected Program Income from:	
- Repayments on Single-Family Rehab Loan Program	\$ 90,000
- Disposition of two parcels of land (Green Acres and Quince Orchard)	\$ 55,000
Returned Grant Funds:	\$ 24,000
TOTAL:	\$ 510,500

COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM
FINAL STATEMENT

Program Year 18: July 1, 1992 - June 30, 1993
Grant No.: B-93-MC-00-1234
City of Silverberg, USA

Activity Name & Description	Implementing Agency	Location(s)	Funding (\$)	Regulatory Cites Elig./Nat. Obj. [24 CFR 570]
Public Services				
1. Senior Services. Daily transportation for approximately 100 residents of Shady Manor to nearby stores.	South County Seniors in Action	12 East Ave.	25,000	201(e)/ 208(a)(2)(i)(A)
2. Youth Counseling. Counseling provided to abused children having emotional problems.	Heads First	98 Main St.	55,500	201(e)/ 208(a)(2)(i)(A)
Public Improvements				
1. Park Improvements. Installation of wooden playground equipment at 2 parks in low-income neighborhoods.	Parks Dept.	Green Park: 12 & R Sts. Woodley Park: Wood & 11 Sts.	12,000	201(c)/208(a)(1)
2. Traffic Improvements. Construction of improvements to widen road, install signal, and paint street markings.	Transp. Dept.	Berwick Rd. 12th to 13th Streets	24,000	201(c)/208(a)(1)

Subtotal: \$ 116,500

CDBG Project Summary
 7/1/92 - 6/30/93
 B-92-MC-00-1234
 City of Silverberg, USA

Activity Name & Description	Implementing Agency	Location(s)	Funding (\$)	Regulatory Cites Elig./Nat. Obj. [24 CFR 570]
Economic Development				
1. Business Loans. Low-interest loans of up to \$25,000 for new businesses (less than 5 years old) in Silverberg Square for working capital, business expansion. Terms of loans based on need and risk of each assisted business.	Office of Bus. & Econ. Dev.	Silverberg Square, 18th & Fern Sts.	120,000	203(b)/208(a)(1) or 208(a)(4)

Subtotal: \$ 120,000

CDBG Project Summary
 7/1/92 - 6/30/93
 B-93-MC-00-1234
 City of Silverberg, USA

Activity Name & Description	Implementing Agency	Location(s)	Funding (\$)	Regulatory Cites Elig./Nat. Obj. [24 CFR 570]
Rehabilitation				
1. Revolving Loan Fund. Deferred-payment loans of up to \$12,000 for lower-income homeowners to rehab single-family homes. Applications accepted on first-come/first-served basis starting on 9/1/92.	Office of Housing	Citywide	145,000	202(b)/ 208(a)(3)
Program Administration				
1. Oversight, management, monitoring and coordination of the CDBG program.	Office of Admin.	NA	48,000	206(a)
2. Fair Housing. Provision of fair housing services and counseling available to all city residents.	CDA*	Citywide	8,000	206(c)
3. Public Information on CDBG program available to all city residents.	CDA*	Citywide	7,000	206(b)
Subtotal:			\$ 208,000	

*CDA: Community Development Agency

CDBG Project Summary
 7/1/92 - 6/30/93
 B-93-MC-00-1234
 City of Silverberg, USA

Activity Name & Description	Implementing Agency	Location(s)	Funding (\$)	Regulatory Cites Elig./Nat. Obj. [24 CFR 570]
Planning & Capacity Building				
1. Revitalization plan for Crown Point.	CDA*	Crown Pt. Enterprise Zone	25,000	205(a)(4)(i)
2. Study of expanding housing program for migrant workers.	CDA*	West End	14,000	205(a)(4)(i)
3. Analysis of barriers to fair housing in Golden Heights.	CDA*	Golden Heights	12,000	205(a)(4)(vii)
Contingency				
Funds set-aside to cover cost overruns of activities described in this statement.	CDA*	NA	15,000	To be determined
Subtotal:			\$ 66,000	
TOTAL CDBG Funds Programmed For Use:			\$ 510,500	

*CDA: Community Development Agency