

City of Salem, Oregon

HOME-ARP Allocation Plan

Participating Jurisdiction: City of Salem, Oregon

Date: 03/02/2022

Consultation

Before developing its plan, a PJ must consult with the CoC(s) serving the jurisdiction's geographic area, homeless and domestic violence service providers, veterans' groups, public housing agencies (PHAs), public agencies that address the needs of the qualifying populations, and public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities, at a minimum. State PHs are not required to consult with every PHA or CoC within the state's boundaries; however, local Pjs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

Summarize the consultation process:

The City of Salem (COS) Federal Program staff have many established relationships with for-profit and non-profit organizations. The City's Diversity, Equity, and Inclusion Coordinator (DEI) also interacts and has established internal and external relationships within the community that provide awareness regarding inclusion for all persons and groups. Consultations with these programs and entities occur on a regular basis.

Salem Housing Authority (SHA) and Marion County housing authority are current and on-going established relationships. The Salem Housing Authority as well as West Valley housing are intricately related to the COS Urban Development department that houses the Federal Programs. There are many organizations operating projects and programs that are utilizing federal funds and are collaborating partners. As the responsible entity, the City conducts environmental reviews, review each PHAs five-year plan and coordinate housing activities to meet community needs. The Urban Development Director is supervisor of SHA. The Housing Administrator at SHA meets regularly with the Urban Development team to discuss priorities and programs.

Federal Program staff attends Continuum of Care (CoC) meetings regularly. Many of the community programs and projects that have applied for the HOME-ARP funds are members of the CoC and participate in meetings, work groups and trainings regularly. As of March 16, 2022, COS Federal Program staff has shared the HOME-ARP plans with the CoC.

The City of Salem has one Domestic Violence program- Center for Hope Safety (CHS) and Federal Programs staff communicate with CHS staff regularly. Regular meetings are held to discuss projects, plans, construction of the new HOPE Plaza building.

CoC information and annual PIT count data are available through the Mid-Willamette Valley Community Action Agency (MWVCAA) and Continuum of Care (CoC) respective websites.

Long standing relationships exist with the shelter programs- consultations and connection with the Union Gospel Mission (UGM) men's shelter, Family Promise (family shelter), The Salvation Army which shelters single men and women. Additionally, St. Francis Shelter provides shelter for families facing homelessness. Many of these agencies have or have had City of Salem federal program funds for many years. West Care currently provides Veteran services. Northwest Human Services and 211 information hotline have established data systems that are connected to the city of Salem and all of Marion County. They hold and update information for the public's use for reaching out to services

when in need. These services include a crisis hotline, information on where to find emergency housing, warming shelters, food, other emergency services that will ease the caller’s moment of crisis.

The City of Salem holds a contracted agreement with the local Fair Housing Council of Oregon. They offer trainings on an annual basis. City federal program staff are typically invited and attend these trainings.

List the organizations consulted, and summarize the feedback received from these entities.

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
Salem Housing Authority (SHA)	Housing Authority	Public meetings, notices, and consultations	SHA is in current construction and rehab of several properties for housing purposes. The HOME-ARP will be used for the newest project.
Northwest Human Services	Youth Shelter	Public meetings, notices, and consultations	Northwest Humans Services Host Youth program is a youth shelter and young adult program in need of case management funding.
St. Francis Shelter	Family Shelter	Public meetings, notices, and consultations	St. Francis is currently using federal dollars for TBRA assistance and expects to continue its program.
Women at the Well Grace House	Women’s Shelter	Public meetings, notices, and consultations	Women at the Well have identified a growth in their program and the need for more staffing and case management.
Center for Hope and Safety	Domestic Violence Shelter and Counseling	Public meetings, notices, and consultations	Center for Hope and Safety is currently using funds for staff for their hotline and case management. They are also utilizing part of the HOME ARP funds to complete the package of building for their new shelter build.
Mid-Willamette Valley Community Action Agency (MWVCAA)	Community Action Agency	Public meetings, notices, and consultations	MWVCAA is the community action agency that operates the Coordinated Entry system, HMIS, annual PIT count, day shelters, warming shelters,

			youth services and a TBRA program. They are a collaborative partner to many of the agencies in the community that utilize the Coordinated Entry data.
Kosti Efstathion	City of Salem DEI Coordinator	Public meetings, notices, and consultations	The City of Salem’s Diversity Equity Inclusion (DEI) Coordinator for perspective on internal operations and outside community connections.
West Care	Veterans Shelter	Public meetings, notices, and consultations	West Care’s focus is for homeless veterans. They are not utilizing any of the HOME-ARP funds but have utilized past federal funds to update the shelter.

Public Participation

PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

For the purposes of HOME-ARP, PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive,
- The range of activities the PJ may undertake.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

Public comment period: start date 04/01/2022, end date 04/18/2022

Public hearing: 04/25/2022

Describe any efforts to broaden public participation:

The public hearing will also be broadcast live on Facebook, Comcast Cable CCTV, CCTVSalem, and YouTube.

A PJ must consider any comments or views of residents received in writing, or orally at a public hearing, when preparing the HOME-ARP allocation plan.

Summarize the comments and recommendations received through the public participation process:

[enter narrative here]

Summarize any comments or recommendations not accepted and state the reasons why:

[enter narrative here]

Needs Assessment and Gaps Analysis

PJs must evaluate the size and demographic composition of qualifying populations within its boundaries and assess the unmet needs of those populations. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services. The PJ may use the optional tables provided below and/or attach additional data tables to this template.

Intentionally omitted since it is optional.

Describe the size and demographic composition of qualifying populations within the PJ’s boundaries:

In the latest data provided by Mid-Willamette Valley Homeless Alliance, the GAP analysis states that “In August 2021, Alliance staff prepared the second regional Gaps Analysis. Updated findings and data were aligned with the region’s priority areas identified in the Alliance Strategic Plan.” It goes on to say that “Local Coordinated Entry data (June 2021) illustrates the number of the region’s homeless population and chronic homeless prevalence, as compared to the state and nation.”

TABLE 1—LOCAL PREVALENCE OF HOMELESS AND CHRONIC HOMELESSNESS, JUNE 2021, MARION/POLK REGION

Total homeless 811

Single Individuals 592

Number of Families 76

Source: Mid-Willamette Valley Homeless Alliance, <https://mwvhomelessalliance.org/>.

The City of Salem continues to work with multiple partners and agencies to address any gaps in homeless service needs:

On their website, the City states that, “In an ongoing effort to bridge the gap of programs and activities, the city has developed partnerships and collaborations with local service providers and City departments that have been instrumental in meeting the needs and demands of the homeless, low-income individuals and families, and other special needs. The city will continue to expand on developing partnerships with public service organizations throughout FY 2022-2023.”

Source: City of Salem website, <https://www.cityofsalem.net/CityDocuments/draft-salem-hud-annual-action-plan-2022.pdf#search=aap>.

Describe the unmet housing and service needs of qualifying populations, including but not limited to:

- **Sheltered and unsheltered homeless populations;**
- **Those currently housed populations at risk of homelessness;**
- **Other families requiring services or housing assistance or to prevent homelessness; and,**
- **Those at greatest risk of housing instability or in unstable housing situations:**

June 2021 local data was collected by the CoC and Mid-Willamette Valley Homeless Alliance, used to prepare the GAP Analysis report. The City of Salem utilizes the information found in this report, along with the Housing Inventory Count (HIC) to identify the unmet housing needs of qualifying populations. The HIC was updated May 17, 2021, based on beds available the night of the PIT Count conducted 1/26/21.

The Mid-Willamette Valley Homeless Alliance reported that, “The 2021 HIC shows 1,186 year-around beds, and 85 seasonal beds for a total of 1,271 beds to address homelessness in Marion and Polk counties. The addition of 91 temporary beds, added with COVID funding, helped offset the beds lost due to social distancing requirements and brought the total up to 1,362.” They went on to say, “The number of market-based beds fluctuates with available resources for hotel/motel stays and rental assistance (rapid re-housing and most permanent housing). Year-around facility-based beds are comprised of permanent shelters, transitional housing, and some permanent housing. In 2021 there were 579 facility-based beds to meet the region’s year-around needs.”

Source: Mid-Willamette Valley Homeless Alliance, <https://mwvhomelessalliance.org/>.

Salem Housing Authority recently opened Redwood Crossings August 2020. Redwood Crossings is a permanent supportive housing facility with 36 beds. The Mid-Willamette Valley Community Action Agency also opened the Tanner Project November of 2020. The Tanner Project is a Veteran focused low-barrier transitional housing facility with 36 beds for men and women. Although these examples demonstrate the proactive actions being taken to create supportive housing for Salem’s vulnerable populations, more low-barrier and transitional service shelters are needed.

In the City’s 2022-23 Annual Action Plan, the City says, “In the most recent Housing and Community Development Needs survey, it found that the greatest barriers to the development or preservation of affordable housing in Salem were a “Not in My Backyard (NIMBY) mentality (75 responses), the cost of land (57 responses), a lack of affordable housing development policies (57 responses), and the cost of materials (45 responses). With increased funds via the HOME -ARP the number of beds and housing are anticipated to increase, as the applicants continue to expand affordable living conditions that meet the needs for the unhoused.”

Source: City of Salem, <https://www.cityofsalem.net/CityDocuments/draft-salem-hud-annual-action-plan-2022.pdf#search=aap>.

The following programs have been recommended to Salem City Council for HOME-ARP funding:

- Salem Housing Authority- Sequoia Crossings (New construction- 60 units)
- Center for Hope and Safety- HOPE Plaza (New construction for domestic violence victims- 20 units)
- Center for Hope and Safety- Services for Victims of Domestic and Sexual Violence- case management-Crisis hotline.
- Women at the Well Grace House- Case Management
- Northwest Human Services- Youth Case Management
- St. Francis Shelter- Homeless families case management

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing:

The City of Salem utilizes federal resources to work collaboratively with its community partners to address the needs of

the unhoused.

The City comments that, “The Salem City Council recognizes homelessness as a critical problem in our community. We're actively working with partners to reduce hardships that lead to homelessness and increase access to affordable housing for our residents and families with children who are unsheltered or at-risk of becoming homeless. We're taking a collaborative approach and adapting multiple best practices to fit our community.”

Source: City of Salem website, <https://www.cityofsalem.net/Pages/city-efforts-to-address-homelessness.aspx>

The City of Salem currently has many diverse shelters and transitional services. The UGM recently (summer 2021) opened a new 284 bed men’s shelter which significantly increased the number of beds available and closing a gap in bed shortage. In addition, Mid- Willamette Valley Community Action Agency opened the Arches Inn hotel December 2021. The Arches Inn provides 80 rooms of emergency transitional shelter and plans are in place to expand to 125 rooms by spring 2022. Another project is the Tanner Project which provides veterans transitional housing for men and women. The Tanner Project is a 36-bed facility and is fully occupied. Redwood Crossing is a Salem Housing Authority project that provides permanent supportive housing. Redwood Crossing opened August 2020 and offers 37 private rooms with 6 of those for medical respite. The United Way of the Mid-Willamette Valley also offers a Safe Sleep United program. The program consists of a 19-bed, women’s overnight shelter. They also recently increased their daytime hours to provide more case management. Church at the Park is another new program that opened several managed safe parking sites and pallet shelter sites throughout Salem. Currently there are two open, and a third site is in the works. The Salem Warming Network opened again this winter season and had 16,500 bed nights that served 636 person/582 households. During the 2021 heat wave, the cooling centers served 138 persons with colling services.

Many of the City’s community partners continue to run and serve Tenant Based Rental Assistance (TBRA) programs which provide vouchers for security deposit and rental assistance. Some of the organizations providing TBRA services include:

- Salem Housing Authority- security deposit
- Family Promise- security deposit and rental assistance
- Mid-Willamette Valley Community Action Agency- rental assistance
- St Francis Shelter- rental assistance

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

The City of Salem has made many improvements towards service delivery and the number of available shelter beds. However, even with these improvements, there are still roughly a 30% gap according to the 2021 PIT count.

The 2021 Housing Inventory Count, the MWVCAA supports this by reporting that, “Each year, a regional Housing Inventory Count (HIC) is submitted to HUD. This snapshot represents beds in existence on the night of the annual Point-In-Time Count (January 26, 2021). The 2021 HIC shows 1,186 year-around beds, and 85 seasonal beds for a total of 1,271 beds to address homelessness in Marion and Polk counties. The addition of 91 temporary beds, added with COVID funding, helped offset the beds lost due to social distancing requirements and brought the total up to 1,362.” Source: Mid-Willamette Valley Homeless Alliance, <https://mwvhomelessalliance.org/>.

The MWVCAA Housing Inventory Count report is further supported by the State of Oregon’s Homeless Management Information System (HMIS) July 2021 report which states, “Over the past year, the Alliance expanded the number of housing providers using HMIS from 25% to 80% as of July 2021. The coverage rate for year-around beds reported in HMIS was 43% in 2020, which rose to 68% in 2021. The following chart shows how many of the region’s inventoried beds are represented in HMIS. 100% of permanent supportive housing providers and seasonal shelters utilize HMIS, 75% of rapid rehousing, 46% of transitional housing, and 68% of emergency shelter beds. Since organizations providing shelter for survivors of domestic violence do not use HMIS, data is calculated without those 72 beds for a total of 1,290 beds.” Source: Oregon.GOV: <https://www.oregon.gov/ohcs/for-providers/Pages/hmis.aspx>.

Last, but not least, the Mid-Willamette Valley Homeless Alliance also concurs with this data when they report the data in the chart below from their recent Gap Analysis.

Bed type	Inventory w/o DV beds	Beds in HMIS	HMIS Bed Coverage
Emergency shelter	247	167	68%
Transitional	382	176	46%
Rapid rehousing	369	245	75%
PSH	243	234	100%
Other per house	6	0	0%
SUBTOTAL	1205	822	68%
Seasonal/warming	85	85	100%
TOTAL	1290	907	70%

Source: Mid-Valley Homeless Alliance, Gap Analysis report, <https://mwvhomelessalliance.org/>.

Identify the characteristics of housing and associated with instability and an increased risk of homelessness if the PJ will include such conditions in its definition of “other populations” as established in the HOME-ARP Notice:

Properties housing families with increased risk of homelessness don’t typically have general characteristics. Lack of income and a limited affordable housing inventory are two of the leading indicators which contribute to becoming homeless. If the housing unit is the leading cause of putting someone at risk of becoming homeless it would typically be in such disrepair that items such as the plumbing would not function correctly, the roof might be leaking, the windows might be broken, the heating might not function, and/or other major elements of the home may be needed due to disrepair.

Identify priority needs for qualifying populations:

In the recent GAP Analysis report, the CoC and The Mid-Valley Homeless Alliance, found that there is still a gap in affordable rental housing. They report that the housing authority currently has a nine-month wait list. They point out that additional affordable housing is needed for seniors age 58+, farmworkers, and Transitional age youth (ages 18-24).

Source: Mid-Willamette Valley Homeless Alliance, GAP Analysis August 2021, <https://mwvhomelessalliance.org/>.

Explain how the level of need and gaps in its shelter and housing inventory and service delivery systems based on the data presented in the plan were determined:

The gaps in shelters, housing inventory and service delivery were mapped out in the CoC, and The Mid-Valley Homeless Alliance reports. In the City’s Con Plan 2020-2024 along with the 2021 GAP analysis, the city addresses the need for expansion of services. Many partners are coming together to identify how and where they can help close the gap. The Mid-Willamette Valley Homeless Alliance also provided the following information addressing the number of available beds:

INVENTORY EXPANSION

The number of facility-based beds is anticipated to increase further as the region is able to continue current services, utilize federal CARES ACT funding, leverage additional resources, and bring the following new programs online.

- Managed Camps (ES)
- Project Turnkey Hotels (ES)
- Union Gospel Mission expansion (ES)
- Salem Housing Authority, Yaquina Hall (PSH)
- Salem Housing Authority, Sequoia Crossings (PSH)
- Center for Hope and Safety, HOPE Plaza (permanent low-income housing)

Source: Mid-Willamette Valley Homeless Alliance, <https://mwvhomelessalliance.org/>

HOME-ARP Activities

Describe the method for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors and whether the PJ will administer eligible activities directly:

On October 22,2021 City of Salem Federal Programs staff posted on the City website <https://www.cityofsalem.net/Pages/salem-federal-funding-applications-open-october-22.aspx> the notice of available HOME ARP funds. The notice provided information and instructions about the available funds, eligible activities, when and where to apply, and deadlines. A link to the application portal was provided for applicants to enter, register, and complete their applications.

Upon expiration of the application deadline the application portal closed. Federal Programs staff began to review the submitted applications to determine eligibility. After all applications were reviewed, funding recommendations were made to upper management for approval and in April the recommendations will be presented to City Council for final approval.

If any portion of the PJ’s HOME-ARP administrative funds were provided to a subrecipient or contractor prior to HUD’s acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ’s entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ’s HOME-ARP program:

N/A

PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organizations operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits. The following table may be used to meet this requirement.

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Service	\$242,700		
Acquisition and Development of Non-Congregate Shelters	\$0		
Tenant Based Rental Assistance (TBRA)	\$0		
Development of Affordable Housing	\$1,650,000		
Non-Profit Operating	\$0	#%	5%
Non-Profit Capacity Building	\$0	#%	5%
Administration and Planning	\$352,405.65	15%	15%
Total HOME-ARP Allocation	\$2,349,371		

Additional narrative, if applicable:

Below is a table of the program funding recommendations.

Total HOME ARP Funds Available			\$2,349,371	
		Category	Amount Funded	Percent
Center for HOPE and Safety	HOPE Plaza Low Income Housing	Development of Affordable Housing	\$250,000	.11
Center for HOPE and Safety	Services for Victims of Domestic Violence	Supportive Services	\$100,000	.04
Women at the Well Grace House	Case Management	Supportive Services	\$47,000	.02
NW Human Services	HOST Youth Program	Supportive Services	\$35,700	.02
St. Francis Shelter	Case Management	Supportive Services	\$60,000	.03
Salem Housing Authority	Sequoia Crossings	Development of Affordable Housing	\$1,500,000	.64
Salem Housing Authority	Sequoia Crossings	Project Delivery Costs	\$4,000	.00
Admin (15%)	Admin	Admin	\$352,405.65	.15
Total			\$2,349,105.65	
Funds Available			\$265.35	

Below is a table of expected outcomes.

Program	Program Description	# new housing units	# of people served
Center for HOPE and Safety	HOPE Plaza low-income Housing. Will produce many needed units for families fleeing domestic violence.	20	
Center for HOPE and Safety	24-hr Crisis hotline, and Case management for victims of domestic violence.		2,200
Women at the Well Grace House	Case management and emergency shelter and services for women experiencing homelessness.		20
NW Human Services	The HOST program assists youths (18-24 yrs old) experiencing homelessness through case management and other emergency services.		15
St. Francis Shelter	Navigating to Home program provides case management to families experiencing homelessness.		55

Salem Housing Authority	Sequoia Crossings is a new construction low-income apartment complex	60	
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Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The gap analysis demonstrated that there was a gap in the affordable housing inventory and the number of beds available for homeless individuals. The programs selected for HOME-ARP will all serve to dramatically increase the number of affordable housing units. Additionally, Federal Programs staff communicate with service providers regularly to check in and review program progress and needs. The need continues for public services such a crisis hotline, case management, housing for victims escaping domestic violence and human trafficking, homeless youth, and families experiencing homelessness. Through effective communication with partners, the City has elected to fund these types of activities with HOME-ARP funds both, because there continues to be a strong need for these programs, they are eligible through HOME-ARP, but also because they align with the City’s Consolidated Plan goals.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

The City of Salem currently has two large scale affordable housing construction projects that have been recommended to receive HOME-ARP funding. First is Sequoia Crossings which is a 60-unit complex aimed at providing housing to vulnerable individuals experiencing chronic homelessness. Second, is HOPE Plaza which is a 20-unit complex which will provide housing to survivors of domestic violence, sexual assault, stalking, and human trafficking.

Total, there will be 80 units of new affordable housing created using HOME-ARP funds.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how it will address the PJ’s priority needs:

The affordable housing stock in Salem continues to be in short supply and funding is also limited. The goal for PY 2022-23 is to provide enough funding to fill budget gaps that resulted from pandemic related materials cost increase which caused budget shortfalls. Funding both HOPE Plaza and Sequoia crossing will result in the successful completion of these projects and production of 80 new units (combined) of affordable housing. Currently the City of Salem’s top Con Plan priority is Ending Homelessness. Funding and completing these two affordable housing projects target that priority and will remove many individuals from homelessness.

Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- PJs are not required to describe specific projects to which the preferences will apply.

There are no current or intentional preferences identified by the City of Salem for the HOME-ARP allocations. The City of Salem is utilizing these funds for the over-all homeless population identified in the information from the City's Con Plan 2020-2024 and the GAP Analysis report from the Mid-Valley Homeless Alliance- August 2021.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or category of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Intentionally left blank

If a preference was identified, describe how the PJ will use HOME-ARP funds to address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the preference:

Intentionally left blank

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for the HOME-ARP rental project, including:

- **Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity.**

N/A

- **Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.**

N/A

- **State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.**

N/A

- **Specify the required compliance period, whether it is the minimum 15 years or longer.**

N/A

- **State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.**

N/A

- **Other requirements in the PJ's guidelines, if applicable:**

N/A