

## **2020 CDBG Best Practices Webinar Series**

### **Grant Oversight Strategies, 11/12/20**

James Höemann: Hello. I'm James Höemann, the director of the Entitlement Communities Division. Thank you for joining us for the CDBG webinar series on CDBG best practices. I want to take this opportunity to thank the panelists today who agree to share their creative strategies for grant oversight.

The goal of this series is to provide a platform for our grantees to learn from each other and show useful program models that can be adapted to fit different grantees needs. We hope that this series and accompanying CDBG best practices report will assist CDBG grantees in identifying and replicating successful strategies.

As part of the Senate Appropriations Committee request, the Office of Block Grant Assistance at HUD headquarters was asked to put this series together with a focus on four specific areas. Prioritizing greatest needs activities and projects, which we had the other day, and today's topic, grant oversight; reducing CDBG admin cost and leveraging CDBG funds.

In an effort to encourage peer to peer learning among CDBG grantees, HUD will have these webinars posted on the HUD Exchange so that they can be viewed and shared widely. In addition, the CDBG best practices report, we are preparing for Congress will also be posted so that it can be shared with grantees and their staff. Thank you.

Les Warner: Great. Thank you, James. This is Les Warner from ICF and I'm going to be the moderator for this session working along with Tom to try to keep things moving forward. So as James mentioned, we put together a panel of CDBG administrators that represent a diverse group of communities across the country, and they're going to be sharing some of their best practices and some of the strategies that they're using in overseeing their CDBG programs.

And the hope is that from this, you'll gain some ideas of some best practices, some things that are working for other CDBG administrators as a way to have better control, have a better quality program. We're hoping that some of these things will be things that you can pick up that idea and replicate that with your own program.

So our agenda for today, we're going to do really quick introductions of our panelists and then jump right into our panel presentations. We may have time at the end of each panelist presentation for a couple of questions, but we will have a Q&A at the completion of this section.

So our speakers for today -- we're going to have Cynthia Kemner who's the grants compliance manager for the community in Human Resources Division in Collier County, Florida. We also have Jennifer Schumann, who's the deputy director, and Tony Milner, who's the housing project and policy manager for Salt Lake City, Utah. We have Kelly Salmons, the program coordinator,

and Marco De La Toba who is the housing program analyst, for the County of San Diego in that Housing Community Development Services section.

We have Mary Dwyer who represents the community -- she's the community development coordinator for the City of Leavenworth, Kansas. And then finally we have Mary Oakley who's the community investments manager for the Ohio Development Services agency for the State of Ohio. So we've got a great group of presenters to be able to share some of their best ideas with you.

We want to start with a poll just to get an understanding of some of the participants that are on today's call. So on the right hand of your screen, you should be seeing a poll which is open now. And we're asking you to simply go ahead and click the side of the letter that indicates the size of your most recent CDBG allocation. If you could go ahead and vote now. Poll will be closing in 20 sec.

All right. So the polls are in and we've got a pretty good mix here. You'll see we've got a number of folks that are -- have an allocation over \$1 million but we also have a good spread of kind of a diverse group here which is perfect and our panel kind of represents the group that are participating today. So I'm going to switch the ball over to our next speaker, Cynthia. And I think we're ready to go.

Cynthia Kemner: Thank you, Les, but I don't think [inaudible] just yet. But I can start a little bit of introduction. My name is Cynthia Kemner and in addition to managing the combined [inaudible] in Collier County, I'm also a resident certified fraud examiner. Collier County is an open county located on the ocean in sunny southwest Florida. Our annual regular CDBG allocation for this year is a little more than \$2.7 million.

Our Community and Human Services Division administers our CDBG program and our compliance unit supports those efforts by conducting risk assessments and monitoring our subrecipients. We develop subrecipient agreements and maintain the library of policies and procedures and annually, we conduct training for staff and our subrecipients.

But it hasn't always been that way. About six or seven years ago before the establishment of our unit, most of those items were done inconsistently without any real organization. As you can imagine, we found ourselves with grantor monitorings that piled up with embarrassing numbers of findings and the same thing happened with our single audit findings. They were piling up as well.

So what I want to talk to you about today is a lack of coordination which can manifest itself in a number of ways -- stalled or abandoned projects or you missed program or reporting deadlines. If any of you have missed your annual timeliness target, especially more than once, you certainly know the consequences of increased oversight by your regional HUD office, or worse, a reduction of the CDBG funding coming to your country.

A lack of coordination might cause you to overlook significant regulations, and finally, incomplete and inaccurate leads to HUD saying if you can't show the documentation, it just

didn't happen. So a lack of coordination can definitely result in a finding which ultimately could result in the possible repayment of CDBG funds.

We were missing consistency, focused, and clear and regular communication. One of the really powerful changes that we made was to team up CDBG program staff with a grant accountant. We were fortunate to have in-house accounting staff but even a very small operation has someone who pays the bills or is responsible for internal audits who might be capable of assisting.

And you can begin to build on the expertise of your program and fiscal team working together and bring strength from each into your program oversight. We also have a three-tiered review of our subrecipient request, pay requests. Our grant coordinators and grant accountants do a review. Our program and fiscal managers split the workload and do another level of review. And finally, pay requests over a certain threshold also get reviewed by the director.

This has given us the consistency and the processing of our pay requests that allows us to catch both small and large mistakes before making a payment. Our staff regularly has one-on-one meetings with their managers and it gives the team an opportunity to review the progress of the project and any challenges that the subrecipient is experiencing long before these challenges become a bigger issue.

At the same time, we expanded our external contract with subrecipients, we included a project timeline as a deliverable in a subrecipient agreement. We also invested in software and we've established quarterly partnership meeting with our subrecipients and we conduct mandatory training for staff and subrecipients.

I would like to take a moment to talk to you about our quarterly partnership meetings. We call them partnership meetings because we really do in fact partner with our subrecipients. We are with them when it comes to meeting regulations and to make a project work, so we've designed our quarterly partnership meetings as an opportunity for our entire CDBG team to meet with the subs.

These partnership meetings are mandatory for subrecipient management. We want to make sure that the executive director or CEO is aware of any program changes as well as the obstacles that their team and our staff are facing. Attendance at the partnership meeting is included in their subrecipient agreement as well.

Our program and fiscal team, our managers, grant compliance and the director all participate in these meetings. It gives us an opportunity to show our subrecipients how we value this time together and if we have a specific challenge that we're facing, we have the most experienced CDBG staff contributing to the solution. We use the same agenda each quarter.

Sorry. It looks like I missed a slide for you. And as far as our training goes, we're using a mandatory term. It may sound a bit strong, but we do include it training requirement and subrecipient agreement to show our commitment to having the most knowledgeable staff and subrecipients possible. Demonstrating your commitment to training by having your staff attend

ties back to the whole concept of partnership and everyone being on the same page and understanding information in the same way.

In addition to fair housing, which we do every year, this year we did [inaudible] pay requests, Section 3, and procurement. When planning next year's training, we always look for recipient feedback so that we tailor our training to those topics that are a concern to them. And finally, contact your state housing organization or national community organization for any presentations they might have or presenters who would speak to your group.

Insufficient or inadequate monitoring also results in grantor findings that lead to single audit findings which end up with someone from your organization standing before your governing board explaining why. So the question you're asking is, how do you avoid this situation? And the answer for us was that, whether you're a small or a large organization, you basically need a team. And the ideal team for us was a team leader for large projects and a program staff person and a fiscal person, preferably not the daily program staff.

I understand that in a small organization, that might be difficult to arrange an independent team, but you can set up your office so that you monitor each other's work and then that way you not only get an independent review with fresh eyes on the documentation but you also get the cross training that comes from learning someone else's program.

So the question is, where do you start? You've identified your team; now what? And the answer is at your most vulnerable point. You need to identify your highest risk projects and then you need to concentrate on the environmental reviews, procurement, and meeting the national objective. Any issues that would cause you to have to repay CDBG funds need to be reviewed and corrected if necessary.

Again, by documenting everything -- and I mean everything, from your award letter to your close out monitoring, post close out monitoring. You need to be able to demonstrate that you executed the project that met a national objective with allowable cost and in compliance with the CDBG regulations.

With every improvement you make to your monitoring process, you create a new most vulnerable point. This new vulnerable point becomes your area of concentration for your next monitoring process improvement. And as the saying goes, wash, rinse, repeat. Even the most seasoned CDBG program team has an area in which they can make an improvement; what's yours?

Your next likely question is going to be, how do I know what to monitor for? Of course, that's different for every project but there are resources to help you develop your monitoring tools. We have found that the HUD CPD monitoring handbook to be a very valuable tool. This handbook is used by HUD to monitor your programs so you can in turn use the relevant portions of that monitoring handbook when you're developing the tool to monitor your subrecipients.

Another good handbook is HUD's subrecipient oversight monitoring handbook. Additionally, the White House produces the OMB Circular A-133. This OMB circular was designed for auditors

to help guide them in their review of their documentation during single audit. Although OMB hasn't changed the name of the circular yet, remember that 2 CFR 200 is your source for uniform administrative requirements, cost principles and audit requirements.

And consider gathering tools online by -- shared by CDBG jurisdictions who were once where you are now. These samples are a great way to guide you in developing your own tools and monitoring policies.

A few years ago, our division developed a number of internal controls for our HUD program that strengthened our monitoring process. Here are just a few of them to use as an example. These are ways to strengthen your internal controls. But the question is, what about your subrecipients? And you might consider looking for conflict of interest, for example, during your pre-award risk assessment by reviewing the employee roster and organizational chart of the subrecipient, looking for possibly related parties.

There are also opportunities for fraud, waste, and abuse of CDBG funds. So we need to be vigilant of some signs that conditions are ripe for fraud. In the organization, you might watch for financial difficulties. This is one reason we do a financial analysis on every subrecipient during the risk assessment, experienced or beginner alike. A history of problems, management instability or the domination of the organization by one person are just a few more things to look at.

Testing their processes is one of the best ways to uncover a potential fraud issue. For example, you can request a list of vender names and addresses and compare the addresses against the list of employee names and addresses for a possible procurement irregularity. Well, we could spend another hour on this slide alone, but I would like to conclude my portion of the presentation with a Chinese proverb that says, when was the best time to plant a tree? Twenty years ago. And the second-best time is now.

Looking back, I think my coworkers would agree that overcoming these challenges was simple but it definitely wasn't easy. It certainly doesn't happen overnight but make it simple. Wash, rinse, repeat. You can do it too. Thank you.

Les Warner: Thanks, Cynthia. We have a few minutes here before we move on. So I think before we do the poll question, I think if you would like to answer a couple of these questions. We had folks that were interested in knowing what grants management software that you are using.

Cynthia Kemner: Oh. Well, I left that off because I wasn't sure that we -- that I wanted to advertise for a specific software company, but we do use the Neighborly software.

Les Warner: Okay. And then folks were also curious, based on your allocation, how many staff that you had.

Cynthia Kemner: Aside from our management team, we have two CDBG -- we call them grant coordinators, and one CDBG grant accountant. And then our managers and our -- on my team, I

have to monitor a lot of different programs, not just CDBG. So we have two monitors or operations analysts who serve as monitors, and one senior accountant. But we really do have a lot to monitor. I think we did about 45 active projects last year and another almost three-dozen closed projects. Plus all of the residences for our projects that have -- they're in their continued use period.

Les Warner: Great. Well, that was a very good segue to our poll question. Tom, if you want to go ahead and open up the poll question. So we're asking the group of participants how you perform monitoring. And your options are collaboratively with a specific monitoring team or you're sharing information and data from regional partners, if you might be monitoring with a focus on data-driven primary problems or concerns, or you may be focusing on high needs subrecipients. Or maybe it's something completely different as other. If you go ahead and vote on the poll now.

Tom: The poll will be closing in 20 seconds.

Les Warner: Thanks, Tom. All right. So we've got a variety here and I would think a lot of this is going to depend on sort of scale of your program and staffing. So quite a variety on this. So we're going to close the poll and we're going to move on to hearing from Jennifer and Tony in Salt Lake City.

Jennifer Schumann: Hello from Salt Lake City, Utah. My name is Jennifer Schumann and I'm the deputy director of Housing and Neighborhood Development Division. I've been working with CDBG since 2008 and over the years have revamped the delivery of our programming, looking for that sweet spot of providing an efficient delivery system and balancing the needs that we all grapple with -- federal regulations, federal interpretation, local political will and community need.

Today, I will be co-presenting with Tony Milner, our amazingly talented program and policy manager who directly oversees a variety of federal and local grant programs, including CDBG, emergency solutions grants, Home Investment Partnership program, and Housing Opportunities for Persons With AIDS.

Together, we're honored to be panelists today discussing CDBG grant oversight strategies and would invite any of you to reach out through the Q&A function or via e-mail after this presentation if there's something that piques your interest. Today, we have a few slides to present. We'd like to tell you a little bit about Salt Lake City so you can get a quick feel of our size and characteristics.

We are going to highlight how we've used technology to help build efficiencies and how we've coordinated locally. Of course, we know top of everyone's mind is the impacts of COVID-19 and we'll discuss how the city is poised to use CDBG funding to respond to the pandemic. And lastly, leave you with a few lessons learned that we have learned along the way. So with that, I'm going to turn it over to Tony to do the Salt Lake City overview.

Tony Milner: We'd like to give you a little quick snapshot of Salt Lake City. By the numbers our population is around 200,000 with 82,000 households, pretty much half renters, half homeowners. The poverty rate in Salt Lake City is about 14 percent with a median household income of \$64,000. We're a capital city and a regional hub for Utah and the surrounding states.

Salt Lake City is one of the fastest-growing cities in the U.S. with very low unemployment, which is good, but this growth has unfortunately stretched out our housing market and our transportation corridors. The challenge we are experiencing, like I'm sure most of you on this call, include a loss of naturally occurring affordable housing, displacement of low-income households, an increase in behavioral health needs, an increase in unsheltered individuals experiencing homelessness.

Salt Lake City's in the middle of the Wasatch Front which is a network of adjoining cities with Ogden to our north, Provo to our south. These cities comprise about 2.5 million individuals. We greatly benefit from very collaborative partnerships with our regional funding partners including in particular Salt Lake County and the State of Utah.

We have a total of about 16 different neighboring HUD grantees. So we at the Housing and Neighborhood Development Division for the city are in our 45th year as a HUD grantee. We've been there since the beginning basically. We average an annual CDBG allocation of \$3.5 million and we also administer, like Jennifer said, Home [inaudible] and proper grant programs. Overall, as a division, we strive to continue to learn and grow so we can address the current and then also the future unique needs of our city. And with that, let me throw it back to Jennifer.

Jennifer Schumann: Awesome. Thank you, Tony. For years, Salt Lake City administered the CDBG program in a very manual, paper-based way. We accepted paper applications, we made photocopies of the applications and put them in, if you can believe it, five-inch binders. We would then drive those binders to our citizen advisory board member houses where they had to comb through usually two if not three of these binders each year.

Board members had to lug these binders to and from [inaudible] until each application's been reviewed. Once contracts were drawn up, the agency would receive a paper copy to review with their legal team and then they would sign and hand deliver or snail mail the contract back. Each month, I would have over 70 invoices with backup documentation either mailed or dropped off to my office.

All the tracking of reimbursements, monitoring, reporting, those were all done in very separate systems and often only the person that was doing that task had access to that information. What we had was not efficient, and to be honest, it was not serving our team nor the community in a meaningful way.

Grants administration was happening independently in a variety of manual steps leading to inefficient processes, increased human error, difficulty in sharing data, and it was really a challenge to see the overall program performance across the grant. Now, we know that these sorts of situations often lead to issues with findings or controls.

So five years ago, that changed. We transitioned to a web-based grant management system. And I know Cynthia mentioned Neighborly and we definitely see a lot of benefit in Neighborly. After researching a lot of options, we chose one that best suit our needs and that was cost-effective for us, and we went with ZoomGrants.

Hands down, I can tell you this has been one of the best decisions in terms of how we manage our grant process. This end-to-end solution enables us to centralize all components of the grant delivery process in one space. All the necessary documents, including applications, contracts, program documents, environmental review documents, reimbursement information, reports, they're all just a click away.

In addition, it became incredibly easy to upload and store information for each program. So it becomes a communication tool with the subgrantees. This solution has been so powerful that 27 municipalities in Utah are now using the same system.

What has that meant for Salt Lake City and surrounding grantees? It's allowed the grantees to start talking the same language. We can easily share information across jurisdictions and we have the ability to compliment each other's processes and leverage efforts without disrupting the political will and still being able to respond to each of our community's unique needs.

Even if Salt Lake City was the only municipality using this web-based system, we have found the following benefits. One, we've been able to operationalize and automate many of the grant administration steps that had been a manual process, which provides for consistency and transparency throughout.

We're able to benefit from fast and efficient ad hoc reporting and data sharing, provide a singular location for program documents accessible by all staff with just a click of a mouse. And it's been incredibly easy to access documents during compliance visits from internal auditors, external auditors and during HUD monitoring visits. It can feel overwhelming with all the things that we have to do, and using technology has been able to free up our time to be able to work alongside our community partners and provide technical assistance and capacity building which decreases the likelihood for accidental misuse of funds or conflict of interest issues.

We've invested more time in understanding the unique and everchanging needs of our community and increase transparency on how grant funding is meeting those needs. We have the space to explore other ways to be more efficient. The grant space is always changing and evolving just like our community needs are and so moving to the web-based solution was just the starting point for us and enabled us to really focus our time and energy and effort in areas where our program was lacking.

And lastly, we've been able to realize increased collaboration with other jurisdictions, which needs me to my next slide and discussing some of our strategies around that local coordination. Tony mentioned that we have a large number of grantees in the state and we work with just about all of them in one way or another.



In Salt Lake County, there are seven grantees and each one has a historically -- has a very different way of administering the CDBG program, which would cause confusion for the subgrantees who are receiving funding from more than one grantee. Why were they confused? Because everyone did it different; right?

So in addition to rallying around this web-based grant administration solution, so that we can start speaking the same language, we also committed to meeting very regularly. And I love how Cynthia brought that up too; right? That meeting regularly was really important. So sometimes our meetings are quite passionate discussions but they all come from the place of working to improve the overall performance of CDBG, increase efficiency as we administer the grant program, and have greater impact on our communities.

AS we all embarked on our consolidated plans, which I know many of you recently did, we often discussed what community needs were coming forward and how our plans might be structured. What we all know is that social issues do not stop at the border of our cities or counties. So it makes sense to discuss these larger social issues and how the grant funds can be partnered across jurisdictions for a larger regional impact.

We routinely discuss the status of where we are in our annual grant process. That allows us to identify if there are projects in common and ways that we can partner to better move forward an end goal, a common end goal. This partnership might include things such as consistent contractual details, environmental review processes, monitoring labor requirements, performance measurements and so on.

Speaking of monitoring, we discussed monitoring results, including best practices, that'll help build the capacity of another subgrantee. Of course, concerns and findings are heavily discussed and this collaboration allows each grantee to focus their monitoring efforts in specific areas, thereby leading to better training opportunities, better capacity building, and better performing subgrantees.

While I did say that we have seven grantees in our county, these collaboration meetings are open. They are open to all jurisdictions and associations of government along the Wasatch Front, and it's an opportunity to get together with peers who can offer support, insights, learning and training.

We've hosted local and regional [inaudible] which has been particularly useful at learning what's on their radar, common mistakes or missteps that are coming forward, and use them as a resource when we have challenging situations. What I hope you all are starting to hear or see is a theme of partnership because it's so critical to the overall success of our program.

And speaking of partnerships, I'm going to throw it over to Tony to talk about how Salt Lake City has continued to expand our partnerships and strategies as we've looked to address the challenge of COVID-19 in our community.

Tony Milner: Yes. COVID. So I'm sure like all of you on this call, I'm pretty sure we can all be considered battle tested over the past few months and the challenges all of our communities are

facing. I'll speak to our approach in Salt Lake City with our HUD CV funds and waivers which has been from basically day one to understanding the evolving regulatory compliance of these funds. I want to give a shoutout to HUD and our regional office in Denver for all the help that they've been providing.

WE immediately applied all of our applicable waivers that were eligible in the CARES Act to our current subgrantees to allow as much flexibilities and safe distancing from the staff and the clients, especially those who are working remotely, such accommodations.

Next, we increased our community-wide collaboration with other CARES Act recipients, as well as research institutions. This also included service providers and community partners who serve the most vulnerable in our community. We wanted to kind of have a very broad table of diverse voices coming together to help us understand how COVID was affecting our community.

So gathering and interpreting the data was also a really large component for us to understand, really -- and kind of really pinpoint exactly who's being affected the most in our community by COVID infections and related losses of income. So mapping out and keeping up to date with each entity, of what they're funding, what type of assistance, either to individuals, households, nonprofits, small business, was challenging, as well as kind of understanding the reach and the eligibility of that different assistance.

Very challenging, but of course very necessary to understanding the gaps and as well as leveraging the best use of these one-time funds that our city was put in charge of. So additionally, we've had to work really hard to understand the many eviction moratoriums as well as the benefit cliffs, basically how the moratoriums were or were not being enforced, the ramifications of those moratoriums, and who was or was not being assisted by, for example, the PPP Program, the enhanced unemployment, etc.

So I could say that the best thing that we've done through our process has been, again, bringing together that really good diverse community voices who have been able to help guide us towards addressing the gaps. And because of that, we've been able to prioritize our CDBG funding to address a range of services, including basic needs, supporting frontline nonprofit service providers, mortgage assistance, and small [inaudible] grants.

And we plan to continue to gather those folks and to hear from them to understand what the impact of these programs are having in a community as well as the evolving needs that [inaudible] in our community. Jennifer?

Jennifer Schumann: Great. Thanks, Tony. As we wrap up Salt Lake City's portion of this presentation, I'd like to highlight four specific areas which I titled Lessons Learned. You'll note that these by design are not step-by-step grant administration processes but rather a bit more thematic in nature and looking at the culture that Salt Lake City has purposely crafted year over year.

Number one. We are here to serve our unique and diverse communities. As you think about every city, county or state that administers CDBG funding, there certainly is not a one-size-fits-

all sort of solution, so it's very critical that you invest in learning local data. You are the conduit for that information to be daylighted and ensure that data has an equal voice in this process.

Number two. Approach everything you do looking to get to a yes rather than a no. At the end of the day, the answer still might be no, but having community partners that know and trust that you are going to help get to a yes, if it's possible, is a gamechanger. If an agency is off course, partner with them to bring them back into compliance. HUD gives us a lot of flexibility here and I'd encourage each of you to develop a culture of working alongside your subgrantees rather than having an us vs. them sort of mentality. So definitely be a problem solver and a partner.

Number three. I can't say it enough. Be an approachable and accessible resource. Our subgrantees want to learn from you. They also want to be in compliance and they want to help their community. These are all things that we want as well so commit to working together, brainstorm, problem solve, host trainings, ask questions and get their input and feedback. I love how much Cynthia from Collier County mentioned training and partnership and the tools that she identified in her portion of the presentation. Those are all great, great ideas to help continue moving forward.

And lastly, this might sound a little odd, but be humble. I feel like as soon as I've learned something, it changes and I have to adjust my frame of mind. I don't know how many of you feel that way as well. I hope some of you are nodding or smiling in acknowledgment along with me. Come into this grant space open to learning, open to partnerships, open to trying something new. And most importantly, in my mind, committed to doing the most good and creating pathways to change lives.

As I turn it over to Kelly from the County of San Diego, we want to thank ICD and HUD for providing this opportunity and I hope that today helps reaffirm what you were already doing and spark some ideas on how you can shift towards being more efficient and a change agent in your community. And along the way, if there's anything Salt Lake City can do to help, please let us know. So with that, I'm going to turn it over to Kelly.

Les Warner: Thanks, Jennifer and Tony.

Kelly Salmons: Good afternoon. Thank you, Jennifer. My name is Kelly Salmons. I'm here with Marco De La Toba. We're with the County of San Diego's Housing and Community Development Division. Next year will be our 47th year participating in the CDBG program, so we've been around a little while.

Our annual allocation is just slightly over \$4 million and we administer CDBG as an urban county. So we administer for unincorporated areas here in the County of San Diego as well as six participating smaller cities. Our program is administered through Housing and Community Development Services which is a division of the county's Health and Human Services Agency.

So the Health and Human Services Agency is one of the four groups in the County of San Diego responsible for a broad range of social services and health services. So being part of that larger HHSA group helps us to leverage a lot of resources in administering our CPD programs.

Compared to some of the other larger jurisdictions in the region, the county's CDBG jurisdiction residents are significantly -- live in significantly more rural areas with -- which many more diverse climates and diverse needs.

Okay. In order to keep our processes flowing and hold both ourselves and our recipients accountable, we follow a strict yearly schedule that aligns to our annual action plan schedule. County staff estimates CDBG resources that are available for the upcoming year and then collects community input in the late summer each year.

Applications are developed and published in September and remain open until late October to early November. This allows ample time for organizations, county departments and residents to compile the necessary documents and project details.

Throughout the winter, our staff evaluates the applications and applications are compared against public input, goals outlined in our consolidated plan, relative geographic distribution, and their benefit to the intended population. A draft of set projects is published in the spring and the county hosts its second public input session before making any necessary changes and submitting our annual action plan.

Funds are typically released to our recipients between June and August each year, at which point staff begin the project performance review for the CAPER and gear up to begin the next year's cycle. Both in our annual action plan development and goal setting through the con plan, citizen participation is a driving force.

During our con plan years, county hosts community forums throughout our geographically large and diverse urban county. For the 2020-2024 con plan, we hosted 10 community meetings prior to the development of the plan, and an additional public hearing after the development. During the annual action plan years, we host multiple forums as well. This year, we hosted three virtual community meetings at various times of the day to accommodate a variety of schedules.

In addition to the actual meetings to gather feedback, we administer an online an paper survey to residents during the development of the con plan, and staff also reach out to community organizations, local nonprofits, community planning groups, and the regions continuum of care to gather data and feedback about specific facets of the region's community development and housing needs.

Lastly, there's an important organizational synergy between the different County of San Diego departments. The County of San Diego's vision is of a live well San Diego and focuses on creating healthy and thriving communities, and each individual department and team is a component of promoting this vision.

And this is beneficial to our CDBG team for several reasons. One of the greatest benefits is that departments will prioritize projects based on the needs that they have observed in eligible communities and data they've collected. So this doesn't only limit us to the feedback we receive during our community input sessions, but also the meetings at our Department of Public Works

or general services or parks, that they're having throughout the community, throughout different communities throughout the year.

And then thanks to the focus on our data-driven live well San Diego, much of the data collection from other departments is extensive and can be focused on specific communities. And our goal setting specifically, the goal of the County of San Diego sets during the con plan process are intended to respond directly both to the qualitative community input we just talked about and to the quantitative regional data indicators.

For example, one statistic that jumped out during our 2020-2024 planning process was that 61 percent of our low-income households in the region are considered house and cost burdens. Excuse me. Each of the goals we created is based on the SMART goal model where SMART is an acronym for specific, measurable, achievable, relevant and timebound. So for example about cost burden, our SMART goal becomes increase affordable housing opportunities across the region for low to moderate income and special needs residents, and serve approximately 5,000 residents with affordable housing and housing related services over the five-year con plan.

Also integral to our outreach are the outreach strategies themselves. We think of our CDBG outreach in a three-pronged approach -- public and resident outreach, internal department outreach, and community organization outreach.

For the public, we reach out through social media, our website, our county news sites, and through e-mail blast. For our internal outreach, we maintain a separate application process, so internal being our other county departments. Our staff has also worked with many of the same individuals in our departments over the years so we have a great interdepartmental working relationship.

Lastly, we allow other departments to prioritize their own projects within program requirements, of course, to respect the additional data collection and community input process that they've already completed.

For our community organizations, we utilize similar methods but we also reach out to community planning groups and interest lists and relevant nonprofits or organizations. We maintain a list of organizations and individuals and update it with new contacts each year as necessary.

Lastly, I want to touch on a few of our internal processes that help keep things running smoothly. Our CDBG procedures and prioritization process is integrated into our staff onboarding procedures so it sets as an expectation for all. We have a separate team that reviews our CDBG files to ensure program compliance as well as a fiscal oversight team who ensures contract and expenditure compliance.

Finally, as part of our application evaluation process, we build enough [inaudible] checks to ensure these projects are useful and beneficial to our community. One of these is our site visit requirements. We ask staff -- a staff member go out to project locations to evaluate each site. This allows us to screen out some oddities that we've come across through the years, such as

ADA ramps in locations with only a few feet of sidewalks or sidewalks that dead end to nowhere.

Sometimes project details are more easily evaluated in person and we found ourselves missing the -- missing pitfalls quite a few times by going out to look at sites prior to approving what seemed to be really good proposals. So this concludes our portion of the presentation and I will turn it over to Mary Dwyer.

Mary Dwyer: Hi there. I'm Mary Dwyer. I'm the Community Development Coordinator for the City of Leavenworth, Kansas. We're a small grantee. We have about 50,000 population, which includes Fort Leavenworth, and this year our award was \$342,000. So not millions; thousands. My discussion is from the perspective of a small CDBG grantee, a one-person shop. And if you're a larger grantee, some of my comments might be tools that you can share with your subgrantees.

First thing about grant oversight I was going to talk about has been discussed earlier, but I'm going to reiterate it. It's working with subgrantees. To shoot for your best results and gauge your grantees, I think it's great to treat the monitoring as a collaborative learning effort to get in and find out what your CDBG subgrantee needs.

It's part of the capacity building that CDBG would like us to do, so I get involved with the agencies. I find out what they need to succeed from either the city or the community, from CDBG, just so that we can maybe help some cross-pollination [sic] or we might be able to point them in the direction of some resources.

And then I also spend time stating what our requirements are from the federal government and from the city for our projects. Then I like to work with them to get some feedback about what's working, not working with perhaps paperwork and reporting that we have for them. When I first came to the city, we required getting their statistics monthly and I found that it was taking them time to do those monthly reports and couldn't we please do them quarterly.

And so we do accept those quarterly. It saves them a little time and effort and we are still able to update our information into IDIS on time. So that works well. And finally, I think this has been brought up earlier as well, but it's an important piece. And that's providing technical assistance, especially to those small grantees or high-risk grantees, subgrantees and subrecipients.

One example is that when I first got here, one of the subrecipients was doing their financial from their checkbook balances, didn't have a spreadsheet. I don't know how that exactly happened but we got them quickly over to QuickBooks and we got them some training so that they are a stronger program now. Small nonprofits have their hearts in the right place and they may have a strong program, but they might not have all the tools they need. So we can help them along with that.

As a small city, we don't have any housing organizations in town, nor are there any interested regional housing agencies interested in running housing programs in our city. So we run them in-

house. I do an in-house minor home repair program that serves about 25 families a year and I treat this like a business.

So there are two components that I try to make sure that I address. One is to make sure that I have people who can serve the applicants that I recruit, and so I advertise for contractors on Facebook, with posters at the inspection department. I put posters up at Home Depot and other supply businesses here in town, just to spread the word that both the program is available and that we're looking for contractors who would qualify and be able to work our program.

This is one of the web postings that we did on the city website. What I tried to do within this was explain what we did succinctly and what kind of contractors we were looking for, and then the carrot, which is that we pay promptly at the completion of a project. Excuse me. So that's an important part to emphasize so that contractors will consider working with the city. In small communities, sometimes contractors think working for the city is complicated and they might not want to do that.

The second part is advertising for clients to keep the flow of clients going regularly so that we continually spend our funds. I like to advertise for clients, send the application to area churches, to social service agencies. We do that by e-mail directly. Sometimes we also send paper copies because not everybody reads their e-mails.

We do press releases and place spot advertisements in city publications and websites which get mailed -- the publications get mailed to every household. The website is accessed by those who are interested in city business.

The next thing that I do with minor home repairs is we look for what's not working and the one stumbling block was that we were requiring applicants to get the bids and bring them to us. I brought the bidding process in-house to run the program more efficiently and it seems to fit with the regulations stronger, especially with small town folks who might not have computer access or that are elderly. It helps them get their issues served more quickly.

The next thing that I like to do to oversee our program -- we're running a lot of things at the same time, so I work with a punch sheet to maintain the process and documentation. And this is an example of the home repair punch sheet that I use. This way, I can click off everything that I've done. This is one of the few pieces that I keep as a paper piece, but I put it in a file to make sure that I'm doing all the pieces that we need to do to keep a good tight record and then it's easier to close it out as we get to the end of the project.

Homeownership is another key for us since we're over 50 percent rental. While homeownership serves the low moderate income clients, it's actually the lenders and the realtors that promote the program. So I engage with the businesses to drive my program. I meet with lenders, title companies, and realtors to promote the program.

I've also held some roundtable discussions with lenders and realtors to pinpoint program bottlenecks, reasons they might not want to refer their client to our program, just to make sure

that everything is running smoothly. They've had some good suggestions in the past and so I like to keep that activity running.

Then I like to keep the program in mind by advertising the program via e-mail in the spring and early summer to those lenders and realtors. I keep a list of e-mails that I can send our reminders to them and invariably, they will ask for the application again. When I start the program year over again, if I've made any changes to the application, I resend that out as well.

And then, again, I use a punch sheet to process smoothly and maintain the documents that I need. Whoops. And now I've gotten myself off track here. Here we go. So this is the punch sheet that I use. Again, just trying to make sure that I check off everything that needs to be done, get all the forms in one place and know that everything is solid for any future monitoring.

And this point I think everyone has been emphasizing, and I love that, but I like to keep the program fresh. So I'm always looking for how I can build a better mouse trap. One of the ways that I do that is to create a cohort group with some of my regional CDBG operators or administrators.

I want to know what other people are doing. I usually bounce them several times a year, see what they're up to. This is especially important right now during this COVID crisis, so I like to bounce them and make sure that we're doing everything that we can to make a tight ship and a well-running ship.

And then the other thing I like to do is look through everything with a fine-toothed comb once a year or twice a year and go out of the box. I want to challenge my current operations. Why am I asking for this particular document? Why am I looking for this? Is there something that I didn't get in onto the punch sheets? Where might be our shortfalls?

So I go through all of our programs -- homeownership, home repair, demolitions, subrecipients -- and look at ways that I might be able to do a better process. If you're unsure why you're doing a particular step, you can certainly ask your HUD rep. We are very lucky here in our Region 7 that our folks help us figure that out all the time and they're a good resource to use. So I encourage you to do that. And I guess at this point, I'll just go ahead and change the speaker to Mary Oakley.

Mary Oakley: This is Mary Oakley. I manage the CDBG funding for the State of Ohio. Our offices are in Columbus, which is the state capital, and conveniently, centrally located. We receive approximately \$46 million a year and use the funding for community development, economic development, and housing. We serve the state's 78 non-entitlement counties.

Administrative capacity is the single most significant challenge to successful program implementation. Ohio has an ongoing relationship through a biannual allocation with 101 rural counties and small city governments. Additional small cities and villages are eligible for other funding.



Our programs are administered locally by government staff, regional planning organizations, community action agencies and consulting firms. Budget cuts, retirements, downsizing of departments, turnover and a dwindling interest in the public sector employment have impacted both the quantity and quality of local partners. What used to be a three-person community development department headed by professionals is now a part-time staff person in the commissioner's office.

Those with experience are retiring and every time we train someone new, he or she moves onto another position. States are seeing similar challenges with budgets and staffing. Ohio's allocation has decreased approximately 20 percent. I think at our peak year we were at a \$58 million program. And regulatory requirements and oversight expectations continue to increase.

Ohio has taken a multifaceted approach to address this challenge. We have reduced the number of communities eligible to receive direct funding. [Inaudible] in small cities must apply through the county's jurisdiction. We've also made changes to our program structure. Larger grants, fewer projects per grant, and longer timelines for completion have led to better projects and more effective and efficient program administration.

We have added compliance checks to our application review process. For example, we determined the level of environmental review required, ensured the project is not in a floodway, and flagged projects that are in the 100-year floodplain or where uniform acquisition and relocation requirements kick in.

We continue to move from noncompetitive programs where every eligible community receives funding to competitive programs that require a good project and demonstrated administrative capacity. With special condition grant agreements with compliance requirements and follow up with those grantees to provide technical assistance during implementation.

We also have milestones for environmental review and getting in contract execution and our grant agreements and our annual action plans, and we work closely with our fiscal staff putting all grants on hold so no funds are drawn until we issue an environmental review release of funds.

Ohio continues to shift its compliance model to more technical assistance and better oversight prior to the grant award and during implementation with the goal that monitoring becomes a checklist formality. We monitor 100 percent of the grantee awards. Prior to COVID-19, the majority of those monitoring visits were on site and required both a file review and a visit to the project site.

We are currently doing some desktop monitoring and developing a process for virtual site visits. We have created a file guide which mirrors our monitoring checklist and details every record a community is required to maintain. This file guide is provided to our grantees so there should be no surprises.

The monitoring checklist has questions for a generalist review and a specialist review of each compliance area. The specialist review allows us to take a deeper dive into one or more

compliance areas as dictated by our risk analysis. We have program staff and also an environmental review, fair housing, and labor standards compliance specialists.

Monitoring assignments both by staff and what needs to be reviewed by determined prior to the onset of the monitoring season. And if we monitor all grants, the risk analysis is used to prioritize the list and determine what we will review. Risk factors include the age of the grant, the amount of the grant, whether there has been staff turnover, issues identified during implementation, financial management red flags, and late reports.

Our agency also has an audit office and we work with them to ensure every grantee is audited at least every three years. Ohio has developed technical assistance tools. We have a website where all resource materials are located. It includes quick reference guides to help grantees navigate [inaudible] online grants management system, the application submissions, drawing funds and filing a report.

The site also includes low and moderate income data, interactive maps, application checklists and documents, compliance resources and policy notices in areas such as financial management, eligibility and national objective, administration and construction procurement, conflict of interest, subrecipient agreement, and duplication of benefits. Prior to the CARES Act, Ohio did not fund many public service activities so the subrecipient agreement and duplication of benefits notices are new.

We also publish an electronic weekly digest with notices for upcoming trainings, both ones we're hosting and others that are relevant to our communities, and we post announcements and link them back to our technical assistance site for additional information.

Ohio has made a lot of changes to its program over the last five to 10 years and stakeholder engagement is critical. We hold two public hearings a year, more if we amend our annual action plan, and that's been happening a lot lately. The first is a public hearing on needs to kick off the year and then also an annual action plan public hearing is held prior to our plan submission to HUD.

We hold annual advisory committee meetings with grantee representatives for every program we administer to [inaudible] past performance, proposed changes and solicit feedback. We hold additional small group meetings when we roll out new programs for proposed substantive changes. We also conduct application trainings, record webinars on programmatic and compliance requirements, and participate in statewide conferences with partner organizations.

Buy in is extremely important. Our programs are only as good as the local staff administering them, and if our programs don't work for our communities, projects will not be successful and our residents will not benefit.

Most of the changes we make, we make incrementally. This gives locals time to prepare and adjust. Transparency is essential. Lots of communication and no surprises. We use data to support our policy decisions and program changes as numbers rarely lie. We also [inaudible]

benefits to our local government partners and to our state agencies. Very few of the decisions we make are solely or primarily for our administrative ease.

By reducing the number and type of eligible grantees, more awards are made to counties and larger cities with the potential for higher administrative capacity. Fewer grantees enable state staff to spend more time with each one, more frequent contact results and more trust and better relationships.

Over the last four years, our community development programs have reduced the number of grant agreements from approximately 165 a year to 105 or a 33 percent decrease. More funding [inaudible] more impactful projects. Communities are not having to phase projects over multiple years and competitive funding has enabled the allocation of limited resources to better projects.

Extension requests are down because we have given communities additional time to complete large projects and we're funding more single project versus multi-project contracts. We also have seen a decrease in serious compliance finding. Environmental review and [inaudible] still seem to be the most difficult, but most of the compliance issues we see are Ohio revised code violations.

What's most important to remember is that grant oversight is a never-ending process and Ohio is committed to continuous evaluation of our programs and policies for good stewardship of valued federal dollars. And I think with that, I am turning it over to ICF for another poll.

Les Warner: Great. Thank you, Mary. So as our final poll for the day, we want to ask a little bit about how you're promoting your CDBG program. So Tom's going to open up the poll for us. We want to know, are you doing outreach through local community groups, faith-based organization, neighborhood meetings. Are you using social media and local news outlets? What about partnering with nonprofits? Also asking about in-house publications and media, or other. If you would vote now, that would be much appreciated.

Tom: The poll will be closing in 20 seconds.

Les Warner: All right. So looks like the number one choice is working through local community groups. Lots of folks using social media partnering with other nonprofit organizations and then in-house publications and media, lots of votes for that also. I think kind of following that idea, what we'd like to do -- first off, we're going to go over resources with this and then we'll open up to some questions. And I have some questions for our panelists that kind of relate to this outreach.

So I wanted to mention that we've had a -- quite a number of folks asking about, how do I access the slides from this? Is this session being recorded? So yes. As was mentioned at the beginning, this and the other sessions or webinars within the series are all being recorded and so the recording, the slides will be posted on the HUD Exchange. Usually takes a week or so before those are actually posted. And so here's our link for the HUD Exchange, specifically for CDBG. And then here's our link specifically for the best practices and videos that will be posted.

I mean, and there's really a lot of resources that are available -- guides, tools, webinars and other things -- that are posted on the HUD Exchange. I'd really encourage you, particularly for folks that are a little newer, but I also think they're really helpful for folks that have been around a long time, to just refresh your memory, double check yourself and those resources are all found at the HUD Exchange.

So at this point, we're just about on schedule amazingly. I want to open up for some questions. We've collected a lot of really good questions as we've gone through our great presentations from our panel. First, I want to thank the panel who did such a great job, put a lot of energy into their presentations.

I wanted to start with a question that we heard from a couple of different folks about ways that you use to try to engage community members. And also as part of that, kind of trying to gain some diversity as part of the voices that you're getting input in. So I would just pose that to the overall panel, if any of you want to comment or add some suggestions on how you are currently trying to gain and engage a diverse community participation.

Mary Dwyer: This is Mary Dwyer from the City of Leavenworth. As a small community, it's -- we don't have a lot of avenues to reach out. So we've tried using SurveyMonkey and advertising that on Facebook.

Les Warner: Great.

Jennifer Schumann: This is Jennifer Schumann from Salt Lake City. And I would agree. Certainly, surveying now in the world of post-pandemic, it seems to make a lot of sense. We also make sure that we use our social media platforms when we're doing any surveying, but then also encourage our community partners who are working with the folks on the ground to send the survey out to their client list as well.

Salt Lake City has really focused on creating a customer relationship management software package. We're currently using Salesforce but it has looked differently in years past, even down to just a spreadsheet that maintains all of the customer -- sorry. The constituent interactions that we've had. Any time we've had an opportunity to collect an e-mail address, we then use that to do our targeted surveying.

Another one is any neighborhood-based surveying that you can do or platforms that you can do so you can target specific neighborhoods, if you have an area that is more concentrated with low-income population than others.

Les Warner: Great. Anyone else? All right. In the meantime, we'll move on. But if panelists have other things they want to add, I would encourage you to jump in. We had a number of questions that related to monitoring and so I kind of would like to cobble two of these together. And folks would like to hear from folks about the most common findings that you're having, which usually is an indication of where are those sort of challenges for your partners and kind of understanding those requirements.

And then kind of paired with that, because we happen to be in a time of COVID, how you're adapting from what you would have typically done as an on-site visit at the moment. So any comments from the panel would be greatly appreciated.

Cynthia Kemner: Hi. This is Cynthia from Collier County. Our number one biggest trip up seems to be Davis-Bacon and so we've been doing more training. We do a training session this year, one of our mandatory training sessions because a lot of folks really don't understand how it works and how precise they need to be in their documentation. So we've been doing a lot of training on that. That's probably our biggest.

And then secondarily, not being able to work their way through the procurement steps to make sure that they advertise properly for certain activities. They're probably our two biggest monitoring difficulties.

Les Warner: Great. And any adaptations you're doing at the moment with COVID and not being able to go on-site?

Cynthia Kemner: Yes. We are leaning more towards the way the states are doing it where they're seeing a lot more documentation in advance to try and be prepared with the information and prescreening everything and approving things earlier in the process so there's not quite as much to do during the monitoring. And that's something that we learned from our local state DEO office. Their approach is working so we were trying to do the same thing.

Les Warner: Great. I'm just going to go down the list. So Jennifer and Tony, any common findings and then ways that you're trying to adapt with COVID on monitoring?

Tony Milner: Salt Lake City. One thing we had to do was basically because our city went to remote as soon as possible in March, and so all of our monitoring this year was done remote. We use WebEx, the Cisco WebEx platform. It actually worked out pretty well. It wasn't as [inaudible] to kind of have see the organization in person. But at the same time, all the other organizations, their staff, most of them are working remotely as well.

Safe and secure Dropbox account with password protections to share files -- excuse me. So just new for everyone this year. Went pretty well. I can't think of common findings or kind of thinking about it just now and they're kind of depending on our four different programs, kind of a range of things.

I -- maybe I will say too, just the biggest advice that I always try to give subgrantees is to have their own policies and procedures and to make sure that they are sticking to their policies and procedures and that they are constantly annually updating policies and procedures. And that usually seems to be a really good helpful thing for them, keeping them on task. Plus, any new staff that they have coming in could then train [inaudible] staff with the unique and special [inaudible] of the federal funding.

Les Warner: Great. Thank you. Kelly and Marco? You want to add?

Kelly Salmons: I would say our most common finding, and probably similar for a lot of people, is Davis-Bacon. And we have a pretty stern process of reviewing certified payrolls and also putting documentation 100 percent review before we pay claims. We learned that the hard way many, many years ago. And so we really ensure up front that we're catching those errors prior to reimbursing our subrecipients. Because Davis-Bacon can be a real hard one to fix on the back end.

So I'd say just having a really stern review process of reimbursement requests and requiring that all supporting documentation, especially for Davis-Bacon, is submitted with those requests. And taking the time to review them up front has been a good lesson for us.

Les Warner: Great. How about from Mary Dwyer?

Mary Dwyer: I would agree. Davis-Bacon is probably our biggest challenge and a lot of our small public service agencies don't want to work in that arena. So unfortunately, it limits some of our programming. But those that do come true, Davis-Bacon is our biggest challenge. As far as monitoring, we also are doing is by Zoom because even though we're in the office every day, a lot of our subgrantees are working remotely.

Les Warner: Great. And Mary Oakley?

Mary Oakley: Well, again, Davis-Bacon on the environmental review front. It's mainly just not great environmental review records, so a lot of lacking documentation or failure to coordinate with the State Historic Preservation Office. On procurement, things go pretty well if it's competitive field bids. But if we're looking to do something else, that's where our community seems to struggle.

And for us, we were [inaudible] different monitoring season when we were sent home in March to work remotely. We're still at home and will be probably at least for another six to nine months. So we're working out procedures on how to do remote monitoring. We wrapped up the end of our last season with a lot of paperwork being e-mailed to us and [inaudible] instead of site visits, and obviously that's not going to work long term. So we're still at the fairly infant stages of putting a remote monitoring process together.

Les Warner: Great. And then I would ask, and we mentioned this in our source gathering of the panel, asking for some input from the panel about strategies that you use for your program on how to prevent malfeasance and conflicts of interest when you're distributing your CDBG funds. And kind of thinking in terms of, how do you ensure that that CDBG aware process is fair, unbiased and free from political influence? Anybody want to offer some insight on your process?

Mary Oakley: I guess I'll start. For the state of Ohio, we've developed a conflict of interest policy and it requires communities to go through the Ohio Ethics Commission for an opinion. And so the first step is that the local legal council has to review the situation to determine whether there is or is not a conflict of interest.

They then send their opinion to the Ohio Ethics Commission for a response and then the state gets that and we review that with our legal counsel and also our Columbus HUD field office. So there are quite a few steps, hoops that one has to jump through if there is a conflict of interest or an apparent conflict of interest.

And so we always tell communities that if you want to do a project and the project is going to benefit the mayor or the county commissioner or their family member or there's an apparent conflict, to one build on a lot of time to go through the process, and two to think twice about it. Is there another project you can do where you're not going not have to jump through all of these hoops and get all of these approvals?

And I think nine times out of 10, the problem takes care of itself and in the 10th case where the community is insistent that's the project they want to do, there are multiple people, multiple places where oversight occurs and we get to a position where if there is a conflict, it's mitigated sufficiently.

Les Warner: Great. Anybody going to add to that?

Jennifer Schumann: This is Jenn Schumann at Salt Lake City. That was a really long question. I'm hoping that I'm hitting [inaudible] --

Les Warner: [Inaudible] part of that.

Jennifer Schumann: I would agree with everything Mary said. Certainly having -- collecting information I think when you accept applications, including board members, does the agency that's submitting applications have conflict of interest policies? Are they attesting to the fact that they [inaudible] policy and that they follow it? Are you auditing, monitoring for that?

We're a small community here in Salt Lake City and so there -- relatively small considering the size and who's working in these spaces. And so we really -- that partnership that I spoke of earlier, and that others spoke of, really becomes helpful at learning who's working with whom in the community. And I think a lot of what you learn actually doesn't come through your grant space necessarily. It's information that you learn just getting to know your partners.

In terms of the political -- keeping politics out of CDBG, I don't think you'll ever do that 100 percent. But one of the things that we -- several things that we did is really shift to a more data-centered process and making sure that we have a scoring criteria that is clear and transparent from the application point forward that really identified this is what you'll be scored on and there's an administrative score and then our citizen advisory board scores. Those scores are then brought together and moved forward through our process.

Our citizen advisory board is a recommending body, not a decision making body. But because they spend so much time reviewing and evaluating the applications and doing the scoring and analysis of the applications, the mayor and the council feel very, very comfortable in many cases with how that shakes down.

So I would definitely say as clear and transparent scoring, what's the scoring criteria, and I think that has helped to bring data in. And then again, getting to know your local data. Are there trends that are happening? Are there challenges that are occurring? Are there other losses of funding in the community that impact potentially how your CDBG funding could be targeted?

Les Warner: Great. Thank you. Anyone else want to share?

Cynthia Kemner: This is Cynthia. I just wanted to echo some of Jennifer's remarks. And the only thing I would add is to help encourage this separation of politics from the process. We do use the software, grant management software application process, and so it has a timed window. And only those applications that are submitted within that time period are under consideration.

The review committee has an opportunity to see that information right at their desktop and they do go through pretty much the same process that Jennifer described. But we have that one extra little step for controlling which applications move forward and they are the only ones that are under consideration.

Les Warner: Great. And I thought -- think I heard another voice? Maybe not. We did have a question for Kelly on remind us what SMART stands for. Kelly, you might be on mute.

Kelly Salmons: Hello? Can you hear me now?

Les Warner: Yes.

Kelly Salmons: Sorry. Having some technical difficulties. So smart is specific, measurable, achievable, relevant and timebound.

Les Warner: Great. Thank you. And then I think we have time for maybe one last question. A number of you have, as part of your strategies, have implemented some change, whether it was embracing technology or trying to reduce the number of grants that you're actually working with.

And we wondered a little bit about some of the challenges of communicating that strategy, how your subrecipients and other partners responded on that and how you worked to get buy in when you have change in your program. Because we all know that any time you try to change anything with programs, a lot of times you're going to have some challenges.

Jennifer Schumann: Jenn with Salt Lake City jumping in. I think you're always going to have people that are resistant to change; right? I think that is one thing that we know is a constant. One thing that we did in Salt Lake City was to survey each of the kind of groups that we're working with.

So public service agencies got surveyed, housing providers got surveyed, our decision makers got surveyed. And so being able to have the -- them be the reason and them being able to learn from those surveys to really determine what kind of changes to make and how to implement it. Some changes may not happen overnight so definitely think incrementally, especially if you have a community that is resistant to change.



One of the ones that we made several years ago was to implement a funding floor, so we will not fund less than \$30,000 which, by the way, is still below what HUD's recommended floor is. But previous to that, we would have our city council who would award \$1,500 to an agency. That doesn't go very far; right?

And so some changes -- definitely think about incremental change and then get feedback from those that are on the ground doing all of the things that they do in the community and decision makers.

Les Warner: Great, Jennifer. I think then that was going to be our sort of closing thought here, and that was a great way to wrap things up. Just a reminder to all of our participants that the materials, the recording of this session will be posted on the HUD Exchange, and I just want to thank all of our panelists who put a lot of time and energy and had a lot of really good ideas and insights to be able to share with folks.

We hope this session has been helpful for folks and thank you for joining us today. We would encourage you to also participate in the next sections -- sessions of this series. Thanks everybody.

(END)