



**COUNTY OF BUCKS  
DEPARTMENT OF HOUSING & COMMUNITY DEVELOPMENT (HCD)  
2023 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG)  
APPLICATION**

**Applicant Name:** \_\_\_\_\_

**Applicant EIN #:** \_\_\_\_\_

**Applicant UEI #:** \_\_\_\_\_

**Applicant Address:** \_\_\_\_\_

**Project Name:** \_\_\_\_\_

**Project Location:** \_\_\_\_\_

**Funding Amount Requested:** \_\_\_\_\_

**Project Contact Person:** \_\_\_\_\_

**Title:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**Email:** \_\_\_\_\_

**Applicant's Finance Official:** \_\_\_\_\_

**Finance Official Email:** \_\_\_\_\_

**Finance Official Phone:** \_\_\_\_\_

**Applicant's Authorized Official:** \_\_\_\_\_

**Authorized Official Title:** \_\_\_\_\_

**Authorized Official Phone:** \_\_\_\_\_

**Authorized Official Email:** \_\_\_\_\_

If agency submits multiple applications, this project proposal is:  Priority  Secondary



# Section 1 Applicant Information

**A. Indicate the type of enterprises that describe the organization listed above (you may select more than one type):**

- |   |  |
|---|--|
| <input type="checkbox"/> Non-Profit               | <input type="checkbox"/> Government                    |
| <input type="checkbox"/> Healthcare               | <input type="checkbox"/> Call Center                   |
| <input type="checkbox"/> Professional Services    | <input type="checkbox"/> Economic Development Provider |
| <input type="checkbox"/> Social Services Provider | <input type="checkbox"/> Emergency Responder           |
| <input type="checkbox"/> Child Care Center        | <input type="checkbox"/> Industrial                    |
| <input type="checkbox"/> Authority                | <input type="checkbox"/> Homeless Services             |
| <input type="checkbox"/> Commercial               | <input type="checkbox"/> Faith Based Organization      |
| <input type="checkbox"/> Educational Facility     | <input type="checkbox"/> Other _____                   |
| <input type="checkbox"/> Housing Provider         |  |

**B. Background**

In the space provided below:

1. Describe the purpose or mission of the agency and annual sources of funding.
2. Indicate the length of time the agency has been in operation, *attach* articles of incorporation to this application.
3. Describe your organization's program and development goals over the next two- three years.



**C. Qualifications**

In the space provided below:

1. Discuss your agency’s capability to develop, implement, and administer the proposed project.
2. Briefly identify the staff needed to complete the proposed project including their skills and/or experience. Project implementation includes but is not limited to: financial recordkeeping; procurement; contracting and labor standards; day to day administration and oversight of 3rd party agreements, contracts; and audits.
3. Indicate who in your organization will undertake the responsibility of project manager.
4. Include and attach your agency’s organizational chart and any other pertinent agency information.

5. Describe the services currently provided by the agency, and include the number and characteristics of clients served annually.
6. Describe how your agency will monitor progress in implementing the project.



**D. Financial:**

In the space provided below:

1. Briefly describe the agency's fiscal management system, including financial reporting, record keeping, accounting system, payment procedures, and audit requirements. Please attach most recent completed audit.
2. Describe below if the agency has received any audit or monitoring findings in the past three years? If yes, what were they and how were they resolved?
3. Include a summary of your agency's current operating budget. Include or attach your agency's purchasing policy.

**Does your organization expend \$750,000 or more a year in federal funds?**     Yes     No



**E. Previous Accomplishments:**

For agencies that have previously received County of Bucks CDBG funding, in the space below describe the accomplishments achieved and note the year(s) funded. Include the degree to which the objectives were met. If there were difficulties in achieving the objectives or delays, describe how that will be overcome in the future. If your agency currently has a CDBG-funded project in process, explain when this project will be completed. If the agency has not previously received County of Bucks CDBG funding, describe accomplishments achieved through other funding sources.



## Section 2 Fair Housing Training

The Community Development Block Grant (CDBG) Program, which is under the Office of Community Planning and Development (CPD), provides annual grants to develop viable urban communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title I of the Housing and Community Development Act of 1974, Public Law 93-383, as amended 42 U.S.C. 530.1 et seq. HUD's Office of Fair Housing and Equal Opportunity (FHEO) works to eliminate housing discrimination, promote economic opportunity, and achieve diverse, inclusive communities. FHEO monitors the CDBG program for consistency with applicable fair housing and civil rights requirements.

The Housing Equality Center of Pennsylvania (HECP), formerly the Fair Housing Council of SEPA, has partnered with the County to help provide fair housing education to all CDBG applicants and subrecipients. Attendance of at least one staff member from each applicant agency is required for the 2023 CDBG program application.

Number of staff member(s) that attended HECP Fair Housing Training: \_\_\_\_\_

Date of Training: \_\_\_\_\_

Name(s) of staff member(s) that attended HECP Fair Housing Training:

\_\_\_\_\_



## Section 3 Project Description

**Project Type:** (Check one box below that best describes the within proposed project)

- Public Service**
 **Permanent Housing**
 **Transitional Housing**  
 **Economic Development**
 **Public Facilities Improvements**

Project is a service with no alterations to the physical environment.	Indicate whether the project is a new or existing service/facility.	Will the project physically change the size or capacity of the facility by more than 20 percent?	Does the project require a change in land use?
<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> New <input type="checkbox"/> Existing	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

**A.** Describe the problem or need that the proposed project is intended to address. Indicate the primary function, of the facility, infrastructure, or service to be provided or improved.

**B.** Scope of Work: In the space below please write a detailed scope of work for your proposed project. Please include all proposed work necessary from start to finish, activities to be undertaken, or services to be provided, and also describe specifically how the requested CDBG funds will be used. Indicate if this application is a continuation of a previous project and describe how your agency will measure the accomplishments of your project/program. **Please be sure that this narrative is an accurate description of the proposed project in its entirety.**

**C. COVID-19:**

Does the proposed project directly prevent, prepare for, and respond to coronavirus?

- Yes                       No

If yes, please describe below. The below COVID Impact statement should be a description of how the project/program prevents, prepares for, and is in response to COVID. A key for COVID tieback is to focus on documented coronavirus effects or risks to overall economic, service, housing and infrastructure serving LMI neighborhoods and communities, and to consider both backward-looking and potential forward-looking risks and vulnerabilities to coronavirus. How do the services within this project application relate to the effects of the pandemic, or enable resilience to the effects of coronavirus in the future?

**D.** Briefly explain how the proposed project meets a community development objective and if the project/program is new or enhances an existing structure or program.

**E.** Is the proposed project site specific, a service area, or County-wide?

- Site Specific                       Established Service Area                       County-Wide Activity/Service

Please describe your determination:





**F.** Project address: (where will service or activity be delivered to clients/beneficiaries), what is the specific project location, include the street address, municipality, and/or intersection and cross streets.

**G.** Is the address listed above owned or leased by the Project Sponsor?

- Owned                       Leased                       Other \_\_\_\_\_

*If building/property is lease, please attach a copy of the lease and documentation demonstrating authority to carry out the proposed project.*

1. Is the facility a component of a multi-use building?

- Yes                       No

If yes, please describe: \_\_\_\_\_

2. Is any portion of the building leased to other tenant(s)? (as applicable)

- Yes                       No

If yes, please describe: \_\_\_\_\_

**H.** Does the proposed activity relate to or contribute to the feasibility of the development of affordable housing, particularly outside of areas of racial, ethnic, and low/moderate income concentration?

- Yes                       No

If yes, discuss the relationship and contribution to affordable housing.

**I.** If you selected service area above, describe the targeted area of the proposed project, include boundaries of the area, and justification for the delineation of the service area, include Census tracts and Block group(s). Attach maps of the jurisdiction which clearly depicts the service area.

**J.** If you selected county-wide activity above, describe the targeted population of the proposed project, include how clients will be solicited.



**K.** If you selected site specific above please respond to all below questions:

1. Will the project site be located in or will have an impact on a historic district, site, building, structure, or object included in or eligible for the National Register of Historic Places or otherwise deemed of historical importance by local government?

Yes       No

- i. If yes, include name of historic property or district:

\_\_\_\_\_

2. If the project includes construction on a structure, was the structure built before 1978?

Yes       No

3. If the project includes construction on a structure, will any painted surface be disturbed?

Yes       No

- i. If you answered yes to (2) and (3), please attach a lead inspection and risk assessment completed by an EPA/State licensed lead inspector per 40 CFR part 745.

4. Is there a potential that the building could be occupied by children age 6 years old and under before, during, or after the proposed project?

Yes       No

- i. Please explain: \_\_\_\_\_

5. Floodway, Coastal High Hazard Area, 500-year Floodplain, 100-year Floodplain, or Wetlands?

Yes       No

6. Any property acquired or improved in whole or in part with CDBG funds shall be used to meet one of the national objectives until five years after the expiration of the subrecipient agreement. Describe how your agency will ensure compliance with this HUD requirement:

7. What is the current permitted land use and zoning designation: \_\_\_\_\_

- i. Does the proposed project require a change or variance in land use and zoning?

Yes       No

8. Does the proposed scope of work include ADA improvements?

Yes       No

9. Does this activity require:

- i. Federal, State, or Local permits?       Yes       No

Identify: \_\_\_\_\_

- ii. Federal, State, or Local Reviews/Approvals?       Yes       No

Identify: \_\_\_\_\_

- iii. Approval from the property owner?       Yes       No

- iv. Acquisition of a structure, land, right of way, or easement (permanent or temporary)?       Yes       No

**L.** Attach maps and ACS data for your proposed project site and surrounding area. Please include census geography with boundaries relative to clearly identify landmarks.

**M.** Attach current photos of building/project site including front, back, interior and exterior.



## Section 4 Project Benefit

- A. Describe how the proposed project will directly benefit low- and moderate-income households and individuals:

- B. Provide an estimate of the number of beneficiaries that will be served directly and indirectly by your proposed project:

\_\_\_\_\_

- C. Check the box(es) below that represent population(s) served by your proposed project:

- Chronically Homeless (emergency shelter only)
- Severely Mentally Ill
- Chronic Substance Abuse
- Other Disability
- Veterans
- Persons with HIV / AIDS
- Victims of Domestic Violence
- Elderly (62+)
- Low - Moderate Income Persons (clientele)
- Low - Moderate Income Households
- Other: \_\_\_\_\_

- D. Does the proposed project require documentation of income and family size for client eligibility?

- Yes                       No

1. If yes, what is the programs income limitations and requirements?

2. Is source documents of income for all household members collected?

- Yes                       No

3. Is the project exclusively available to low and moderate income households and individual, using the HUD definition (below 80% AMI of the Phila, Camden area).

- Yes                       No

- E. If you answer no to (C) above, please describe the determination basis that the proposed project will serve low- and moderate-income households and individuals:

**F.** Is the project proposal a new service or an increase in services, please explain:

**G.** What is the typical life cycle or frequency for the services provided to clients?

**H.** For 5 years following proposed project completion, would you estimate a(n):

- decrease in beneficiaries     
  increase in beneficiaries     
  beneficiaries to remain the same.

Please explain: \_\_\_\_\_

**I.** Describe the process you have in place in order to attract and/or engage participants:

## Section 5 Project Funding

A budget and timeline excel template has been provided, please fill in as many details about the proposed project as possible. If the project proposal is construction based please also *attach* a cost estimate. Project budgets and cost estimates should be current within the last 60- 90 days of application submission. A price analysis is required to determine the reasonableness of the proposed contract price in accordance with 24 CFR 85.36 (f). Describe the use of CDBG as well as non-CDBG funds in the budget. As part of HUD’s new Performance Measurement System, sub-recipients are required to report the amount of funds leveraged by other sources. If CDBG funds are not available to address a project in its entirety; to be considered for partial funding, the budget must contain separate cost estimates for each work element proposed.

<p><b>Total Project Cost:</b></p> <p>CDBG: \$ _____</p> <p>Federal: \$ _____</p> <p>State: \$ _____</p> <p>Local: \$ _____</p> <p>Private: \$ _____</p> <p>Other: \$ _____</p> <p><b>Total: \$ _____</b></p>	<p><b>Pending</b></p> <p><input type="checkbox"/> Secured    <input type="checkbox"/> Pending</p> <p><input type="checkbox"/> Secured    <input type="checkbox"/> Pending</p> <p><input type="checkbox"/> Secured    <input type="checkbox"/> Pending</p> <p><input type="checkbox"/> Secured    <input type="checkbox"/> Pending</p> <p><input type="checkbox"/> Secured    <input type="checkbox"/> Pending</p>
<p><small>*Engineering, architectural, and project management costs will be considered a match and are not eligible for CDBG, if these costs are necessary for this proposal, please list these costs appropriately above.</small></p>	



A. Is this project currently in progress?

Yes  No

B. If the project goes over budget, does the applicant have funds available to contribute?\*

Yes  No

If yes, please describe: \_\_\_\_\_

*\*Please note that if the application is approved, the project budget becomes a binding part of the agreement between the applicant and the County, therefore the projected figures must be accurate.*

1. Describe how your organization is prepared to deal with unanticipated project costs (i.e. cost overruns, change orders, etc.)

C. Have other funding applications or funding sources been requested or planned to be submitted for this project?

Yes  No

1. If yes, please provide detail and status of other funding opportunities:

D. For construction and acquisition based project proposals, describe your operation plan for capital improvement. Describe how the improvement will be maintained and how this will be paid for.

E. Do you intend to levy special assessments to recover the cost of the improvements?

Yes  No

F. Have federal prevailing wage rates pursuant to the Davis Bacon Act been factored into the cost estimate for this activity?

Yes  No

1. If yes, please indicate the General Decision Number\* that was referenced:

\_\_\_\_\_  
*\*Please note, if project is awarded, the above listed wage determination will be required to be updated.*

G. If your project is not funded by the County, please indicate how/if this activity would be carried out in the absence of these funds.

H. Please describe project readiness. Is the project ready to be implemented immediately? If the project is not ready to be immediately implemented describe why and what is needed to become ready.



- I. Describe any other issues that have the potential to delay your project and describe steps that have been or will be taken to address them (land use issues, site control, acquisition requirements, easements, funding commitments, etc.)

- J. Is there any project phasing and/or reduction options? If so, provide a detailed summary of each phase, in priority order including the cost of each. If a project cannot be phased, please provide a thorough explanation of why.

- K. Please attach your agency's procurement policy.
- L. Attach any letters of commitment and/or agreements as they relate to this project.



## Section 6 Certifications

### **Application Content Certification** (required from all applicants)

Governing Body Certifies that all the information provided in this application is correct to the best of their knowledge.

### **Official Resolution**

Governing Body has duly adopted or passed as an official act, a resolution, motion or similar action authorizing the filing of the application, including all understandings and assurances contained therein, and directing and authorizing the person identified as the official representative of the application to act in connection with the application and to provide such additional information as may be required.

### **Access to Information**

Governing Body assures that it will give the Bucks County Department of Housing & Community Development, and the U. S. Department of Housing and Urban Development (HUD), through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the activity; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.

### **Nondiscrimination**

Governing Body certifies that it will comply with all Federal Statutes relating to nondiscrimination. These include but are not limited to:

1. Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin;
2. Title IX of the Education Amendments of 1972, as amended (20 USC §§1681-1686), which prohibits discrimination on the basis of sex;
3. Section 504 of the Rehabilitation Act of 1973, as amended (29 USC §794), which prohibits discrimination on the basis of handicaps;
4. the Age discrimination Act of 1975, as amended (42 USC §§ 6101-6107), which prohibits discrimination on the basis of age;
5. The Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse;
6. The Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism;
7. §§523 and 527 of the Public Health Service Act of 1912 (42 USC 290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records;
8. Title VIII of the Civil Rights Act of 1968 (42 USC §3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing;
9. Any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made;
10. The requirements of any other nondiscrimination statute(s) which may apply to the application.

### **Equal Opportunity**

Section 109 of the Housing and Community Development Act of 1974, P.L. 93-383 (42 USC 5309) and the regulations issued pursuant thereto (24 CFR part 570.602), which provide that no person in the United States shall, on the grounds of race, color, national origin, or sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with funds provided under this Part.

### **Fair Housing**

Title VIII of the Civil Rights Act of 1968, as amended by Fair Housing Amendments act of 1988 (42 USC 3601-20) and implementing regulations at 24 CFR part 100, which states that no person shall be subjected to discrimination because of race, color, religion, sex, handicap, familial status, or national origin in the sale,



rental, or advertising of dwellings, in the provision of brokerage services, or in the availability or residential real estate-related transactions; and requires that grantees administer all programs and activities related to housing and community development in a manner to affirmatively further fair housing. Actions that the application or sub-recipient undertake to affirmatively further fair housing will be consistent with action identified in any locally adopted fair housing analysis.

### **Uniform Relocation Assistance**

Governing Body assures that it will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally assisted program. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in the purchase.

### **Hatch Act**

Governing Body assures that it will comply with the provisions of the Hatch Act (5 USC §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

### **Labor Standards**

Governing Body assures that it will comply, as applicable, with the provision of the Davis-Bacon Act (40 USC §§276a to 276a-7), the Copeland Act (40 USC §276c and 18 USC §874), and the Contract Work Hours and Safety Standard Act (40 USC §§327-333), regarding labor standards for federally assisted construction sub-agreements.

### **Environmental Clearance**

Governing Body will comply with environmental laws and authorities at 24 CFR parts 50 and 58 and will 1) supply the Department of Housing & Community Development with information necessary for it to perform necessary environmental reviews of each activity; 2) carry out mitigating measures required by Housing & Community Development 3) not acquire or otherwise carry out any program activities with respect to any eligible project until Housing & Community Development approval is received.

### **Release of Funds**

Governing Body acknowledges that receipt of any Grant is subject to the release of funds by the U.S. Department of Housing and Urban Development, and that release of payments will be subject to documenting compliance with all requirements listed in the Grant Agreement to be executed with Bucks County.

### **Environmental Standards**

Governing Body assures that it will comply with environmental standards which may be prescribed pursuant to the following:

1. Institution of environmental quality control measures under the Nation Environmental Policy act of 1969 (P.L. 91-190) and Executive Order (EO) 11514;
2. Notification of violating facilities pursuant to EO 11738;
3. Protection of wetlands pursuant to EO 11990;
4. Evaluation of flood hazards in floodplain in accordance with EO 11988;
5. Assurance of project consistency with the approved State management program developed in the Coastal Zone Management Act of 1972 (16 USC §1451 et seq.);
6. Conformity of Federal actions to State (Clear Air) Implementation Plan under Section 176(c) of the Clear Air Act of 1955, as amended (42 USC §7401 et seq.);
7. Protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended, (P. L. 93-523); and
8. Protection of endangered species under the Endangered Species Act of 1973, as amended, (P. L. 93-205).

### **Historic Preservation**

Governing Body assures that it will assist in assuring compliance with section 106 of the National Historic Preservation Act of 1966, as amended (16 USC 470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 USC 469a-1 et seq.).





### **Lead-Based Paint**

Governing Body assures that it comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R. and the Lead-Based Paint Poisoning Prevention Act (42 USC §4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation or residence structures.

### **Financial Requirements**

Governing Body assures that it will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act of 1984. Governing Body acknowledges that the Federal Programs will not be responsible for any project costs incurred prior to the full execution of a Sub-recipient Agreement.

### **Procurement**

Governing Body acknowledges that the Department of Housing & Community Development must approve and verify that all procurement requirements have been meet in accordance with the Program Regulations. The Department of Housing & Community Development must approve any purchases or the awards of any contracts to be funded in full or in part with any Federal funds granted through the CDBG Program/ HOME Program or ESG Program.

### **Other Program Requirements**

Governing Body agrees that implementation of any project funded in full or in part will not proceed without full execution of the program requirements as described in the Sub-recipient Agreement. The Governing Body certifies that it will comply with all applicable requirements of all other Federal laws, executive orders, regulations and policies governing this program.

### **Lobbying**

Governing Body certifies that to the best of its knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

### **Section 3**

Governing Body certifies that it will comply with Section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 75

### **Excessive Force**

Governing Body has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and,
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non- violent civil rights demonstrations within its jurisdiction.

### **Drug-Free Workplace**

Governing Body certifies that it will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
  - a. The dangers of drug abuse in the workplace;



- b. The grantee's policy of maintaining a drug-free workplace;
  - c. Any available drug counseling, rehabilitation, and employee assistance programs; and,
  - d. The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
  - a. Abide by the terms of the statement; and
  - b. Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days, after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;
6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
  - a. Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - b. Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5, and 6.

### **Conflict of Interest**

Governing Body certifies that no persons described as an employee, agent, consultant, officer, or elected official or appointed official of the governing body, or of any designated public agencies, or Sub-recipients which are receiving funds under a Sub-recipient Agreement, who exercise or have exercised any functions or responsibilities with respect to Community Development Block Grant Activities, HOME Activities or Emergency Shelter Activities assisted under a Sub-recipient Agreement; or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract or agreement with respect thereto, or the proceeds thereunder, either for themselves or those with whom they have family or business ties, during their tenure or for one year thereafter.

Please read the following Conflict of Interest Statements excerpted from the Code of Federal Regulations at 24 CFR 570.611 and indicate your acceptance on the proceeding signature page.

1. Applicability.
  - a. In the procurement of supplies, equipment, construction, and services by recipients and by sub-recipients, the conflict of interest provisions in 24 CFR 85.36 and 24 CFR 84.42, respectively, shall apply.
  - b. In all cases not governed by 24 CFR 85.36 and 24 CFR 84.42, the provisions of this section shall apply. Such cases include the acquisition and disposition of real property and the provision of assistance by the recipient or by its sub-recipients to individuals, businesses, and other private entities under eligible activities that authorize such assistance (e.g., rehabilitation, preservation, and other improvements of private properties or facilities pursuant to § 570.202; or grants, loans, and other assistance to businesses, individuals, and other private entities pursuant to §§ 570.203, 570.204, 570.455, or 570.703(i)).
2. Conflicts prohibited. The general rule is that no persons described in paragraph (c) of this section who exercise or have exercised any functions or responsibilities with respect to CDBG activities



assisted under this part, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter. For the UDAG program, the above restrictions shall apply to all activities that are a part of the UDAG project, and shall cover any such financial interest or benefit during, or at any time after, such person's tenure.

3. Persons covered. The conflict of interest provisions of paragraph (b) of this section apply to any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of sub-recipients that are receiving funds under this part.
4. Exceptions. Upon the written request of the recipient, HUD may grant an exception to the provisions of paragraph (b) of this section on a case-by-case basis when it has satisfactorily met the threshold requirement of paragraph (d)(1) of this section, taking into account the cumulative effects of paragraph (d)(2) of this section.
  - a. Threshold requirements. HUD will consider an exception only after the recipient has provided the following documentation:
    - i. A disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
    - ii. An opinion of the recipient's attorney that the interest for which the exception is sought would not violate State or local law.
  - b. Factors to be considered for exceptions. In determining whether to grant a requested exception after the recipient has satisfactorily met the requirements of paragraph (d)(1) of this section, HUD shall conclude that such an exception will serve to further the purposes of the Act and the effective and efficient administration of the recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:
    - i. Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
    - ii. Whether an opportunity was provided for open competitive bidding or negotiation;
    - iii. Whether the person affected is a member of a group or class of low- or moderate-income persons intended to be the beneficiaries of the assisted activity, and the exception will permit such person to receive generally the same interests or benefits as are being made available or provided to the group or class;
    - iv. Whether the affected person has withdrawn from his or her functions or responsibilities, or the decision making process with respect to the specific assisted activity in question;
    - vi. Whether the interest or benefit was present before the affected person was in a position as described in paragraph (b) of this section;
    - vii. Whether undue hardship will result either to the recipient or the person affected when weighed against the public interest served by avoiding the prohibited conflict; and
    - viii. Any other relevant considerations.



I have read the within Certifications, regulations, requirements and Conflict of Interest Statements excerpted from the Code of Federal Regulations at 24 CFR 570.611, and I agree to abide by the principles embodied therein. I do hereby certify that the information contained in this application for Community Development Block Grant Funds for the FY 2023 is complete and accurate to the best of my knowledge. I do also certify that if the information contained herein should change at any time, I will notify the Bucks County Department of Housing & Community Development of such change.

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Authorized Official Signature

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Date

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Print Name/Title

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Applicant Organizational Name

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Authorized Official Signature

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Date

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Print Name/Title

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Applicant Organizational Name

