

**Ashland Housing and Human  
Services Commission  
Regular Meeting Agenda**

**CITY OF  
ASHLAND**

**March 24: 4:30 – 6:30pm**  
**Siskiyou Room of the Community Development Building**  
**51 Winburn Way**

1. (4:30) **Approval of Minutes** (5 min)  
February 25, 2016
2. (4:35) **Public Forum** (5 min)
3. (4:40) **Community Development Block Grant Applications Presentation** (40 min)
4. (5:20) **Community Development Block Grant Discussion and  
Recommendations** (40 min)
5. (6:00) **Housing Trust Fund Sub-Committee update** (20 min)
6. (6:20) **April 28<sup>rd</sup> 2016 Meeting Agenda Items**  
**Quorum Check** – Commissioners not available to attend upcoming regular meetings  
should declare their expected absence.
7. (6:25) **Upcoming Events and Meetings**  
**Next Housing Commission Regular Meeting**  
4:30-6:30 PM; April 28, 2016 in the Siskiyou Room of the Community Development  
Building
8. (6:30) **Adjournment**

In compliance with the Americans with Disabilities Act, if you need special assistance to participate in this meeting, please contact the Community Development office at 541-488-5305 (TTY phone is 1-800-735-2900). Notification 48 hours prior to the meeting will enable the City to make reasonable arrangements to ensure accessibility to the meeting (28 CFR 35.102-35.104 ADA Title 1).



**CITY OF  
ASHLAND**

**Ashland Housing and Human Services Commission  
Draft Minutes February 25, 2016**

**CALL TO ORDER**

Chair Josh Boettiger called the meeting to order at 4:30 pm in the Siskiyou Room at the Community Development and Engineering Offices located at 51 Winburn Way, Ashland OR 97520.

<b>Commissioners Present:</b>	<b>Council Liaison</b>
Joshua Boettiger	Pam Marsh, left at 6:00pm
Rich Rohde	
Heidi Parker	<b>SOU Liaison</b>
Sue Crader	Megan Mercier, absent
Tom Gunderson	
Gina DuQuenne	<b>Staff Present:</b>
Tom Buechele	Linda Reid, Housing Specialist
<b>Commissioners Absent:</b>	Carolyn Schwendener, Administrative Assistant
Coriann Matthews	

**APPROVAL OF MINUTES**

Parker/Rohde m/s to approve the minutes of the January 28, 2016 Housing and Human Services Commission meeting. Voice Vote: All ayes, minutes were approved as presented.

**PUBLIC FORUM**

Lindsay Gerkin introduced herself. Ms. Gerkin is a local insurance agent at Reinholdt & O'Harra Insurance in Ashland and is a 2003 SOU graduate. Ms. Gerkin was also a member of the City of Ashland Conservation Commission. Ms. Gerkin addressed the issue of increased rent rates in the City of Ashland. She is particularly concerned about the management company, Pacific Properties and the way in which they are treating their clients. Once her property was sold to Pacific Properties her rent as well as the others in her building increased by \$200.00. Everyday working people are becoming homeless, stated Ms. Gerkin.

**DRAFT FAIR HOUSING REVIEW AND RECOMMENDATIONS**

Reid reported that she attended a monthly meeting of the Southern Oregon Rental Association. Her purpose was to explain the Commission's desire to get feedback from both landlords and students about changes that the City could make to the Fair Housing Ordinance to further protect students as well as ideas on how to help students become more desirable renters. Reid acknowledged she did not get a great deal of positive feedback and there appeared to be some confusion regarding the language in the ordinance. Reid emphasized at the meeting that the City is not requesting that students be a protected class and nothing in this ordinance would preclude them from going through the regular application process such as checking rental history, credit, and criminal background checks.

The Commissioners discussed the ordinance changes and agreed it was ready to move forward to the Council. The changes in the ordinance language addressed income and age. The Commissioners agreed the University needs to take more of a responsibility at developing resources for their students insuring that they can be housed. One of our recommendations is that we continue future outreach with the college to see if they can mitigate some of these issues or create programs to help to eliminate some of the concerns of the property owners, stated Reid.

Reid said that this ordinance change goes to the City Council Study Session on March 14, 2016.

*Buechele/Rhode m/s as a Commission we propose the ordinance of the Ashland Municipal Code Chapter 10.110 Fair Housing as amended.*

Motion was discussed

*Motion was amended as follows; 1) that Council consider the alternate language of State and Local laws. 2) Further recommend working with the college to look at Housing options and look at programs addressing those barriers. Voice Vote: All ayes, motion passed unanimously.*

It was suggested that in the memo that goes to Council to mention that the value of amending the Fair Housing Ordinance is the educational component.

The Commissioners will try and attend the City Council meeting and Rhode volunteered to co present with Reid.

#### **STRATEGIC PLAN PRIORITY UPDATE**

Boettiger gave a brief update from his meeting with Daniel Murphy and Ben Morgan regarding Mr. Murphy's proposal "Ashland Connects." This program is about training volunteers who would engage with anyone on the streets who might need assistance (directions, mental health needs, etc.) connecting them with the appropriate resources. Boettiger went on to say that the Peace Commission is working on a similar project and the two streams are coming together to work on this. Councilor Marsh conveyed she is very supportive of this program and it fits right in with other programs currently being discussed. This Commission is happy to help with this program in any way they can.

Reid spoke with Reverend Norma Nakai Burton from the Ashland Unity Church. Ms. Burton explained she is working with a group of people who are interested in doing a co-housing project. They are discussing having some kind of affordable housing component with the project. Currently the group does not have enough people to make this goal happen. The Ashland property that seems to meet their needs is the Verde Village property located on Nevada by the dog park. Reid gave Ms. Burton some suggestions of agencies to contact who might be interested in a partnership.

- ACCESS
- Neighborworks Umpqua in Roseburg
- School District (work force housing)
- Senior Co-Housing - Melanie Mindlin

#### **HOUSING TRUST FUND UPDATE**

Rohde and Parker met to discuss the next steps in revenue options for the Housing Trust Fund (HTF). Some of the potential sources of revenue are; food and beverage tax, hotel/motel tax and property tax. After Rohde and Parker reviewed the budget they acknowledged there are some opportunities in the budget for money for the HTF. One suggestion was the potential to put a cap on the food and beverage tax revenue then use the tax growth monies above that cap each year which may be a large enough contribution for the HTF. Currently that tax money is dedicated to purchasing open space for parks and the waste water treatment plant utilizing the funds received above the capped amount would ensure that HTF contributions would not be taking funding away from identified uses but rather capturing funding above that which was expected. Other suggested sources were; the newly proposed marijuana tax, a construction excise tax, a surcharge on building permit fees. It was mentioned if a number of multiple sources were used for smaller amounts of money it would be less of an impact.

Michael Anderson, the National staff person for the HTF is willing to discuss his ideas and thoughts with the Commission. Perhaps the Commission could do a conference call or skype with Mr. Anderson rather than have him drive down from Portland. Our role is to present several options to the council for their decision.

#### **SOCIAL SERVICE GRANT PROCESS EVALATION LETTER REVIEW**

Reid composed a letter to Social Service Grantees informing them that like the United Way, the City of Ashland will also be requesting a mid-cycle report from all grantees. Reid included the mid cycle report from the United Way with one modification. Reid removed the tally on the backside of the form for all the different areas. The Commission liked the letter and Reid will mail it out to the Grantees in the next week.

#### **DISCUSSION ABOUT RENTAL HOUSING FORUM**

Reid and the Commissioners agreed it would be appropriate for this Commission to endorse a Rental Housing Forum. The Commissioners discussed the different venues that might be available and decided the Unitarian Church would be the most appropriate as it has plenty of parking.

*Rohde/DuQuenne m/s that the Housing Commission sponsor and reach out to other housing groups to sponsor a Rental Housing Forum in April and that we set up a committee to do the planning. Voice Vote: All ayes, motion passed.*

#### **LIAISON REPORTS**

**Council** - No report, Marsh left the meeting at 6:00

**Staff** – Reid reported that the Community Development Block Grant applications were due last Friday. The City received four applications

1. Maslow Project \$10,000
2. St. Vincent DePaul Home Visitation Program \$25,000
3. Options For Homeless Residence of Ashland \$12,700
4. Capital Improvement project - Ashland Supportive Housing \$70,000

Reid confirmed that the allocation was reduced this year to \$158,700. We do have some carry over funds in the amount of \$101,000, stated Reid. She emphasized the importance of awarding the capital improvement money this year.

#### **GENERAL ANNOUNCEMENTS**

Parker announced that the Jackson County Homeless Taskforce has proposed Hope Village. A tiny house is on display at the Rogue Valley Mall.

#### **QUORUM CHECK:**

Next Housing Commission Meeting – 4:30-6:30 PM; March 24, 2016 4:30-6:30 in the Siskiyou Room at the Community Development & Engineering Department located at 51 Winburn Way. -  
Both Buechele and DuQuenn will not be able to attend next month's meeting.

#### **Adjournment**

The meeting was adjourned at 6:25 p.m. *respectfully submitted by Carolyn Schwendener*



# Staff Evaluation

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**To:** Ashland Housing and Human Services Commission  
**Title:** Community Development Block Grant (CDBG) 2015 RFP  
**Date:** March 14, 2016  
**Submitted By:** Linda Reid, Housing Program Specialist

The City of Ashland has received four applications for \$228,691 in competitively available Community Development Block Grant (CDBG) funds. The total CDBG allocation to the City of Ashland for the 2016 Program Year is \$158,726. Of this amount 20% is reserved for program administration (\$31,745). The remaining \$126,981 plus \$101,710 in reprogrammed funds from Program year 2015 may be awarded to eligible projects benefiting Ashland's low-income population. The total amount of CDBG funds available to award to capital improvement projects in Program year 2016 is \$228,691. \$23,808, is available for award to Public Service activities (15% of the 2016 Program Year allocation).

The City of Ashland Housing and Human Services Commission will hold a public hearing on March 24, 2016 to review the grant requests and make a recommendation to forward to the City Council for consideration. The Council will make the final award selections at a public hearing scheduled for April 19, 2016. Staff's eligibility assessment of each of the proposals received, and recommendations regarding the allocation of the 2016 CDBG funds are provided on the following pages.

## Proposals Received

Organization	Proposed Project	CDBG Funds Requested	Goal	Consolidated Plan Goal # and Rank*
St. Vincent De Paul	Assist low income and at risk Households with emergency funding to prevent homelessness. <b>*Public Service</b>	\$25,500	With CDBG funds provide <b>32</b> low income individuals with emergency rent and security deposit assistance to avoid homelessness (320 HH with CDBG and matching funding)	Support Services for Homelessness outreach, prevention and transition.- <b>High</b>
Maslow Project	Encourage stability, self-sufficiency and school achievement for homeless youth. <b>*Public Service</b>	\$10,000	Provide access to basic needs, information and referral. Provide case management to improve stability to approximately <b>100</b> identified homeless youth ages 0-21.	Support Services for Homelessness outreach, prevention and transition.- <b>High</b>



Ashland Supportive Housing	Installation solar panels as part of a larger rehabilitation and upgrade of a housing unit serving adults with intellectual and developmental disabilities. <b>*Capital Project</b>	\$70,000	Improve energy efficiency of a housing unit serving <b>5</b> adults with disabilities	Support housing and services for peoples with Special Needs- <b>High</b>
Options for Homeless Residents of Ashland	Funding to support .50 FTE of a Lead Resource Navigator position to assist low income families maintain or obtain housing, and secure employment for unemployed individuals. <b>*Public Service</b>	12, 664	Provide housing and employment resources for approximately <b>74</b> homeless and at risk low income clients	Support Services for Homelessness outreach, prevention and transition.- <b>High</b> Support Economic Development activities that assist in reducing poverty among low-, moderate-, and special needs populations- <b>Medium</b>

### **Funding Requested/Available**

A total of approximately \$228,691 in CDBG funds is expected to be available to distribute to eligible recipients for projects meeting the CDBG national objectives, and which are consistent with the City of Ashland 2015-2019 Consolidated Plan. The maximum allocation allowable to be used to support public services is limited to approximately \$23,808.

These funds will be available upon approval of the 2016 Action Plan, and upon the completion of any regulatory requirements including but not limited to environmental review clearance. Upon completion of the Action Plan a public hearing for review and approval will be held before the Housing and Human Services Commission to insure consistency with the awards designated by the City Council. The US department of Housing and Urban Development (HUD) must review the annual Action Plan submitted by the City to ensure the activities funded are consistent with federal requirements, and with the local Consolidated Plan.

### **Assessment Criterion**

Staff has assessed the proposals to determine whether they meet the Federal CDBG regulations and address the priorities identified within the City of Ashland 2015-2019 Consolidated Plan.

Three areas are evaluated for each proposal regarding compliance with federal regulations.

- Projects must meet the National Objective of the Community Development Block Grant Program.
- All CDBG funded projects must be an “eligible” use under the Community Development Block Grant Program.





Visitation Program has successfully administered Community Development Block grant funds for the past five years.

## **Maslow Project-School Based Services for Ashland Homeless Youth**

Staff has reviewed the Maslow Project, School Based Services for Ashland Homeless Youth Proposal to determine whether it meets the Federal CDBG regulations, and if the proposal addresses the priorities within the City of Ashland 2015-2019 Consolidated Plan. Maslow Project requested \$10,000 in Public Service Grant funds to continue to support a case manager in the elementary, middle and high schools, providing outreach to high risk homeless youth and providing them with immediate needs, case management to keep youth engaged in school and promote stability and self-sufficiency for the homeless youth and their families.

- This project proposal qualifies under the Low-Moderate Income (LMI) benefit national objective; homeless populations are a presumed benefit population under the CDBG program.
- Services to homeless and at-risk populations are an eligible use of CDBG funds.
- Maslow's proposal expects to provide services to 100 identified homeless school children currently enrolled in the Ashland School District.
- Maslow Project has proven capacity to administer CDBG grant funds-this would be Maslow's fourth year of undertaking this activity in Ashland.
- Staff finds that Maslow Project's proposal is consistent with goals identified in the City of Ashland's 2015-2019 Consolidated Plan.

In evaluating the proposal it is evident that the proposed project has a priority ranking of High.

Staff sees that Maslow Project's proposal is an eligible use of CDBG funds and is consistent with the City of Ashland Strategies as outlined in the 5 year Consolidated Plan. This activity assists in the prevention of homelessness for low-income households. Maslow has successfully administered this program within the Ashland School District for the past four years. Furthermore, this project meets and exceeds the 10% leverage requirement of the City of Ashland's CDBG program and leveraging funding from other sources.

## **Options for Homeless Residents of Ashland (OHRA)-Building Acquisition**

Staff has reviewed the Options for Homeless Residents of Ashland (OHRA) proposal to determine whether it meets the Federal CDBG regulations, and if the proposal addresses the priorities within the City of Ashland's 2015-2019 Consolidated plan. OHRA has requested \$12,664 in grant funds to provide .50 FTE support of a staff person to assist homeless and at risk populations with obtaining needed resources such as housing and with finding and securing employment.

- This project proposal qualifies under the Low-Moderate Income (LMI) benefit national objective.
- Services to homeless and at-risk populations are an eligible use of CDBG funds.
- OHRA's proposal expects to provide services to 74 homeless and at risk, or unemployed individuals.
- OHRA has not previously administered CDBG funding, this would be their first CDBG funded project.
- Staff finds that OHRA's proposal is consistent with goals identified in the City of Ashland's 2015-2019 Consolidated Plan.



- If a project meets all federal requirements and is selected for award, then federal regulations must be met throughout the course of the project.

Some examples of federal regulations which pertain to Community Development Block Grant funded projects are; all projects funded in whole or in part, with CDBG dollars require an environmental review in accordance with the National Environmental Policy Act (NEPA). Certain construction projects must use federal Davis-Bacon wage rates. Housing involving structures built prior to 1978 must be tested for the presence of Lead Based Paint and if found steps to mitigate Lead Based Paint must be taken. Any project involving the displacement of residents or businesses as a result of the federally funded project are entitled to assistance under the Uniform Relocation Act. Most importantly the beneficiaries from the application of CDBG funds must qualify as eligible populations under the Federal requirements for the CDBG program. Areas of concern are described for each proposal received. The Housing and Human Services Commission and the City Council can only award CDBG funds to projects that can meet all federal requirements and meets an objective as outlined in the City's 2015-2019 Consolidated Plan.

Priorities within the City of Ashland's 2015-2019 Consolidated Plan are given a priority ranking of High, Medium, or Low. The rankings are intended to assist in directing CDBG funds to the greatest needs. In cases where there are competing projects for limited funds, the projects(s) that are ranked the highest will be funded.

### **Public Service Proposal Evaluation**

#### **St. Vincent De Paul-Home Visitation Program**

Staff has reviewed the St. Vincent de Paul (SVDP) program proposal to determine whether it meets the Federal CDBG regulations, and if the proposal addresses the priorities within the City of Ashland 2015-2019 Consolidated plan. St. Vincent's has requested \$25,500 to assist homeless and at-risk populations in obtaining and maintaining housing.

- This project proposal qualifies under the Low-Moderate Income (LMI) benefit national objective.
- Generally Income payments (payments to an individual or family, which are used to provide basic services such as food, shelter (including payment for rent, mortgage, and/or utilities) or clothing) are ineligible public service activities when such payments are provided as a grant. However, such expenditures are eligible if; the income payments do not exceed three consecutive months; and the payments are made directly to the provider of services on behalf of an individual or family. This project meets those criteria.
- St. Vincent has a proven capacity to administer CDBG grant funding, this would be SVDP's fifth year of undertaking this activity in Ashland.
- In the past year (2015) St. Vincent assisted approximately 1,400 individuals with the granted funds and organizational matching funds.
- Staff finds that SVDP's proposal would merit a priority of high on the priority ranking identified within the City of Ashland's 2015-2019 Consolidated Plan.

Staff sees that St. Vincent's proposal is an eligible use of CDBG funds and is consistent with the City of Ashland Strategies as outlined in the 5 year Consolidated Plan. This activity assists in the prevention of homelessness for low-income and special needs households. Further this project meets and exceeds the 10% leverage requirement of the City of Ashland's CDBG program providing more than double the requested grant funds and leveraging further funds from other sources. The St. Vincent De Paul Home



Staff sees that OHRA's proposal is an eligible use of the CDBG funds and is consistent with the City of Ashland Strategies as outlined in the 5 year Consolidated Plan. This activity will assist homeless and at-risk populations with increased resources to obtain housing and employment, by expanding and improving the services available to homeless and at-risk population as well as to aid individuals seeking employment. This activity is expected to leverage several sources of funding that will meet and exceed the 10% leverage requirement of the City of Ashland's CDBG program.

## **Capital Improvement Proposals**

### **Ashland Supportive Housing-Special Needs Residential Home Solar Project**

Staff has reviewed the Ashland Supportive Housing (ASH) proposal to determine whether it meets the Federal CDBG regulations, and if the proposal addresses the priorities within the City of Ashland's 2015-2019 Consolidated plan. ASH has requested \$70,000 in grant funds to provide energy efficiency upgrades as part of a larger rehabilitation on a residential group housing unit occupied by five individuals with intellectual and developmental disabilities. This population qualifies under both the presumed benefit population and qualified low-income population. In 2015 ASH was awarded \$76,886 in CDBG funding to complete a rehabilitation of this group home, ASH requested \$130K which included the energy efficiency updates proposed in this current application, but had that portion of the project was not recommended for funding due to a recommendation to fund the Options for Homeless Residents of Ashland's capital campaign.

- This project proposal qualifies under the Low-Moderate Income (LMI) and Presumed benefit national objective.
- Rehabilitation and energy efficiency upgrades are eligible uses of CDBG Capital Improvement funds.
- This proposal anticipates serving approximately 5 individuals.
- Staff finds that the ASH proposal is consistent with priority goals identified in the City of Ashland's 2015-2019 Consolidated Plan.

Staff sees that ASH proposal is an eligible use of the CDBG funds and is consistent with the City of Ashland Strategies as outlined in the 5 year Consolidated Plan. This activity will assist ASH to better provide services to their service population. This activity meets the 10% leverage requirement of the City of Ashland's CDBG program. ASH has a proven track record of successful CDBG grant administration as well as the administration of other state and federal grant funds.

## **STAFF RECOMMENDATIONS**

Staff recommends award of the 2016-2017 CDBG funds as follows:

- \$70,000 to Ashland Supportive Housing for residential home rehabilitation
- 16,665 to St. Vincent De Paul Home Visitation Program
- 7,143 to Maslow Project School Based Services

Staff's recommendations are based on evaluation of CDBG eligibility, the City's five year Consolidated Plan Goals, agency experience and capacity, and readiness to proceed.



**Public Service Projects:** In examining the three applications for public service funding (SVDP, Maslow, & OHRA) staff found all three to be needed activities within the Ashland community that would benefit CDBG eligible populations. Both the SVDP program and the Maslow Project have successful track records of administering federal grant funds, providing counseling services, resource referrals and, in the case of the SVDP Home Visitation program, direct financial assistance to the homeless and those at risk of homelessness. The Maslow project's proposed activity would continue to benefit homeless populations as well but with an emphasis on homeless children enrolled in Ashland schools. The OHRA proposed activity would provide employment supports, resource referrals, and assistance with finding and obtaining suitable housing options. Unfortunately the public service cap of 15% of Ashland's annual award precludes awarding all three activities the requested amount of funding.

**Capital Projects:** The City received one capital project proposals; Ashland Supportive Housing-Special Needs Residential Home Solar Project. This project qualifies as an eligible use of CDBG funds, is ready to proceed and would be able to expend the funds in a timely manner thereby allowing the City to meet its timeliness cap.

### HUD Timeliness Rule

The CDBG program has a stipulation that grant administrators plan for the timely expenditure of funds. This is called timeliness, timeliness refers to how quickly the grantee is able to commit and expend CDBG funding. The program rule for timeliness is that the grantee cannot have more than 1.5 times their annual allocation and any other funds sitting in their line of credit at the U.S. treasury. The analysis for timeliness is calculated 60 days prior to the end of the grantees program year (which is July 1<sup>st</sup> for the City of Ashland.) If a grantee has more than 1.5 times their allocation in their line of credit they will be required to submit a "work out plan" to HUD to explain how the money will be utilized to avoid chronic timeliness issues. A grantee that shows chronic timeliness issues is at risk of having HUD withhold future grants until the grantee can expend existing resources. Due to the City's small allocation, the City reaches the 1.5 timeliness threshold more quickly than most grantees

Unexpended allocated 2015 grant funds (approximate amount)	\$87,826
Unallocated 2015 grant funds	\$50,000
Reprogrammed Funds	\$1,710
2016 Allocation	<u>\$158,726</u>
	\$298,262

The City can have up to \$238,089 in funding in the line of credit until May 1<sup>st</sup> 2016 at which time the timeliness rule will be triggered. Currently the City has approximately \$37,826 in unexpended grant funds from the prior year that are expected to be drawn down before the end of the program year, \$101,710 in unallocated funds from the prior year, and an new unallocated grant of \$158,726, to be allocated in April, but not awarded or able to be spent until July 1, 2016. Given these amount total \$298,262 the City will be over the timeliness threshold on May 1<sup>st</sup> when the timeliness test is run. At that time the City will need to compete a workout plan detailing how the City will proceed with a timely expenditure of the remaining funds.

Staff's evaluation and recommendation is based on prioritizing the use of CDBG funds to projects which are ready to proceed and which can expend the funds in a timely manner.



<b>Ratings: High=3, Medium=2, Low=1</b>		ST. Vincent	Maslow	Ashland Supportive Housing	OHR
A	The Project provides benefit to a demographic group that has a need documented in the City of Ashland CDBG Consolidated Plan				
B	The project assists low and moderate-income households in substantially improving their living conditions. The proposed project must have or be part of a comprehensive approach that takes clients from the beginning to the end of the process that improves their living conditions. "Safety net" services or services that meet basic needs shall only be funded if it can be demonstrated that clients receiving those benefits are part of a program that will eventually help them obtain self sufficiency. Exceptions to this requirement are projects targeted at helping people with special needs.				
C	The project is a proven effective strategy to improve conditions or solve an identified problem.				
D	If the project is related to affordable housing, the project retains the units as affordable. The longer the period of time the units remain affordable, the higher ranking the project shall be given				
E	If the project is related to economic development for jobs for low and moderate-income people, at least 51% of the jobs shall be held by low and moderate income people. The longer period of time the jobs are held by low and moderate-income persons, the higher the ranking the project shall be given. The larger percentage of jobs held by low and moderate-income persons the higher the ranking the project shall be given.				
F	The project maximizes partnerships in the community				
G	The project has at least 10% of the total project in matching funds. The larger the amount of matching funds the higher the ranking the project shall be given (10%=1, 20-50%=2, 50%+=3)				
H	The project utilizes already existing resources in effective and innovative ways. The project shall not duplicate service provided by another organization				

I	The agency submitting the proposal has the capacity to carry out the project					
J	The budget and time line are well thought out and realistic					
K	The proposal demonstrates CDBG funds are the most appropriate funding source for the project					
L	The project is ready for implementation within a year of a CDBG award notification					
M	The organization proposing the project has the experience and capacity to undertake the proposed activity.					
	Total					