

STATE BOARD OF ACCOUNTS
302 West Washington Street
Room E418
INDIANAPOLIS, INDIANA 46204-2769

SUPPLEMENTAL COMPLIANCE REPORT

OF

CITY OF BLOOMINGTON

MONROE COUNTY, INDIANA

January 1, 2013 to December 31, 2013



FILED
09/30/2014

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SCHEDULE OF OFFICIALS

<u>Office</u>	<u>Official</u>	<u>Term</u>
Controller	Michael Trexler	01-01-13 to 01-01-13
	Susan West	01-02-13 to 06-13-14
	Donna Slater (Interim)	06-14-14 to 08-15-14
Mayor	Mark Kruzan	01-01-12 to 12-31-15
President of the Board of Public Works	Charlotte Zietlow	01-01-13 to 12-31-14
President of the Common Council	Darryl Neher	01-01-13 to 12-31-14
Utilities Director	Patrick Murphy	01-01-13 to 12-31-14



STATE OF INDIANA
AN EQUAL OPPORTUNITY EMPLOYER

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TO: THE OFFICIALS OF THE CITY OF BLOOMINGTON, MONROE COUNTY, INDIANA

This report is supplemental to our audit report of the City of Bloomington (City), for the period from January 1, 2013 to December 31, 2013. It has been provided as a separate report so that the reader may easily identify any Federal Findings and Audit Results and Comments that pertain to the City. It should be read in conjunction with our Financial Statement and Federal Single Audit Report of the City, which provides our opinions on the City's financial statement and federal program compliance. This report may be found at www.in.gov/sboa/.

The Federal Findings, identified in the above referenced audit report, are included in this report and should be viewed in conjunction with the Audit Results and Comments as described below.

As authorized under Indiana Code 5-11-1, we performed procedures to determine compliance with applicable Indiana laws and uniform compliance guidelines established by the Indiana State Board of Accounts. The Audit Results and Comments contained herein describe the identified reportable instances of noncompliance found as a result of these procedures. Our tests were not designed to identify all instances of noncompliance; therefore, noncompliance may exist that is unidentified.

Any Corrective Action Plan for the Federal Findings and Official Response to the Audit Results and Comments, incorporated within this report, were not verified for accuracy.

Paul D. Joyce
Paul D. Joyce, CPA
State Examiner

July 30, 2014

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CONTROLLER
CITY OF BLOOMINGTON

CONTROLLER
CITY OF BLOOMINGTON
FEDERAL FINDING

FINDING 2013-001 - INTERNAL CONTROLS OVER FINANCIAL TRANSACTIONS AND REPORTING

We noted several deficiencies in the internal control system of the City related to financial transactions and reporting. We believe the following deficiencies constitute material weaknesses:

1. Bank reconcilements presented for audit indicate that there is no proper management oversight of monthly bank reconcilements being performed. The City hired a Deputy Controller in June 2013 to primarily work on City bank reconcilements. The Deputy Controller was able to reconcile each month of 2013 by December 31, 2013. Once this was done, the Controller approved the entire year's bank reconcilements. Starting in January 2014, the monthly bank reconcilements are prepared by the Deputy Controller and then approved by the Controller.
2. The City's payroll processing was handled primarily by one staff person within the Controller's office. As a result of implementation of a new financial software system, there have been improvements to internal controls, since the various City departments are more involved in the payroll process. However, internal controls over payroll related areas are still lacking. The payroll staff person in the Controller's Office issues payments for employee benefits and related payroll expenses, and the Deputy Controller posts those payments to the various funds. It is difficult to determine, with the new system, who is approving these payroll posts. Also, each department has a payroll employee who enters into the New World System that department's payroll information for all employees in that department. The department heads are to approve this information in the system. The New World System will not allow the approvals to be viewed once the payroll has been processed.

Additionally, a detailed listing of employees being paid bi-weekly is not being reviewed and approved. The payroll is approved in total by fund.

3. Receipts were not issued for cash, checks, or EFT transactions at the utilities with the exception of customer payments on their accounts. Receipts are posted to New World System in one lump sum; therefore, individual receipts cannot be traced into the system.

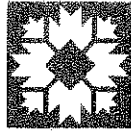
We recommended the City established and implement effective controls over the bank reconciliation, payroll processes, and utility receipts.

Indiana Code 5-13-6-1(e) states: "All local investment officers shall reconcile at least monthly the balance of public funds, as disclosed by the records of the local officers, with the balance statements provided by the respective depositories."

Receipts shall be issued and recorded at the time of the transaction; for example, when cash or a check is received, a receipt is to be immediately prepared and given to the person making payment. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 7)

Governmental units should have internal controls in effect which provide reasonable assurance regarding the reliability of financial information and records, effectiveness and efficiency of operations, proper execution of management's objectives, and compliance with laws and regulations. Among other things, segregation of duties, safeguarding controls over cash and all other assets, and all forms of information processing are necessary for proper internal control.

Controls over the receipting, disbursing, recording, and accounting for the financial activities are necessary to avoid substantial risk of invalid transactions, inaccurate records and financial statements and incorrect decision making. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 7)



**City of Bloomington
Office of the Controller**

CORRECTIVE ACTION PLAN

Section II – Financial Statement Findings

FINDING 2013-001 - INTERNAL CONTROLS OVER FINANCIAL TRANSACTIONS AND REPORTING

Contact Person(s):

Donna Slater	slaterd@bloomington.in.gov	812-349-3412
Michael Horstman	horstmam@bloomington.in.gov	812-349-3635

Expected Completion Date: 12/31/13

Corrective action:

1. As stated in the financial statement finding, cash reconciliations will now be performed monthly by the Deputy Controller and approved by the Controller.

2. We recognize that this comment has appeared in previous audits and we believe that appropriate steps were taken in 2013 to resolve the issues concerning documented approvals over payroll. The accounting software does record the approval made by the Deputy Controller when the payroll entry is posted. Beginning in August 2013, the Deputy Controller reconciled the Pay Day Earning Report, which is generated each payroll period, to the payroll journal entry. Any corrections needed are made prior to posting the entry. This is documented both electronically in the accounting software by drilling down to each general ledger account and on hard copy. We concur with the auditor's opinion concerning documentation of approval of employees hours maintained within the accounting software. The software provider was been made aware of this deficiency with their product in 2013. However, beginning in January 2013, hours worked are approved by department heads both prior to entry in the accounting software and again after manual entry to the software. An hours report for each department is printed from the accounting software, compared to the time cards or time sheets, and if any discrepancies are found they are corrected prior to payroll processing. The department heads then sign and date the corrected hours report to document their approval. These reports are available for review. In July 2014, the City of Bloomington began the process to implement an electronic payroll time keeping system that will record and store the department heads approval, as well as, uploads the hours to the accounting software. The implementation of this time keeping system is to be completed by year-end 2014. Beginning in January 2014, a detailed departmental payroll register has been provided to the respective boards for their approval.

3. The Utility staff has been trained on the recommended procedures to issue receipts for every deposit and these entries have been corrected for calendar year 2014. We worked with the Controller's office to understand the changes necessary to use the recommended procedures.

Section III – Federal Award Findings and Questioned Costs

FINDING 2013-002 - SUSPENSION AND DEBARMENT

Contact Person:

Lisa Abbott abbottl@bloomington.in.gov 812-349-3401

Expected Completion Date: 7/1/14

Federal Agency: HOME Investment Partnerships Program

Federal Program: HOME Investment Partnerships Program

CFDA Number: 14.239

Federal Award Number and Year (or Other Identifying Number): M-09-MC-18-0200, N-10-MC-18-0200, M-11-MC-18-0200, M-12-MC-18-0200, M-13-MC-18-0200

Pass-Through Entity: Direct

Federal Agency: Housing and Urban Development

Federal Program: Community Development Block Grants/Entitlement Grants

CFDA Number: 14.218

Federal Award Number and Year (or Other Identifying Number): B-11-MC180013 and B-12-MC-180013

Pass-Through Entity: Direct

Corrective Action:

1. HUD monitored the City of Bloomington in 2012 and required HAND to document that a contractor was eligible to work on a federally funded project and create a policy and procedure outlining contractor eligibility. Previous to this audit, HAND would check eligibility on the Excluded Parties List System, but not print out the sheets showing that our "search returned no results." This audit finding requires HAND to check its sub recipients (social service agencies), developers and partners against System for Award Management (SAM) to ensure parties are not on the Excluded Parties List (Suspension and Debarment). HAND has amended its procedural manual to reflect that change. Please see Attachment A.
2. HAND will note this requirement in its HOME and CDBG applications. Please see an example noted as Attachment B.
3. Successfully funded applicants are required to sign a variety of documents which may include a Funding Agreement or Partnership Agreement. The SAMs will be attached as an exhibit to the required Funding or Partnership Agreements. These documents are reviewed by the Legal Department, the HAND Department and the Office of the Mayor. These reviews are noted by the signature of the Mayor, Redevelopment Commission President and/or HAND Director.

FINDING 2013-03 – Reporting

Contact Person:

Lisa Abbott abbottl@blcomington.in.gov 812-349-3401

Expected Completion Date: 9/8/14

Federal Agency: Housing and Urban Development

Federal program: Community Development Block Grants/Entitlement Grants

CFDA Number: 14.218

Federal Award Number and Year (or Other Identifying Number): B-11-MC-180013 and B-12-MC-180013

Pass-Through Entity: Direct

Corrective Action:

1. The following will be added to all CDBG Funding Agreements:

Federal Funding Accountability and Transparency Act of 2006 (FFATA)

FFATA reporting requirements will apply to any CDBG Agreement in the amount of \$25,000 or greater. The Grantee must provide any information needed pursuant to these requirements. This includes entity information, the unique identifier of the Grantee, the unique identifier of the Grantee's parent if applicable, and relevant executive compensation data, if applicable. See subsection 3 below regarding executive compensation data).

1. Data Universal Numbering System (DUNS) number

Pursuant to FFATA reporting requirements and in order to receive funding under this Agreement, the Grantee shall provide City with a valid Dun & Bradstreet (D&B) Data Universal Numbering System (DUNS) number that identifies the Grantee. A DUNS number may be requested online at <http://fedgov.dnb.com/webform>.

2. System for Award Management (SAM)

The Grantee shall register in the System for Award Management (SAM), which is the primary registrant database for the US Federal Government, and shall enter any information required by FFATA into the SAM, update the information at least annually after the initial registration, and maintain its status in the SAM through the Term of this Agreement. Information regarding the process to register or update information in the SAM can be obtained at www.sam.gov.

3. Executive Compensation

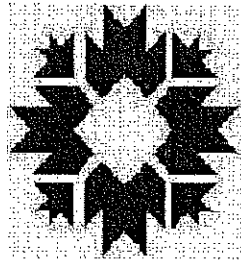
The Grantee shall report the names and total compensation of the five (5) most highly compensated officers of the Grantee in SAM if the Grantee in the preceding fiscal year

received eighty percent (80%) or more of its annual gross revenues from Federal contracts and Federal financial assistance (as defined at 2 CFR 170.320) and \$25,000,000 or more in annual gross revenues from Federal contracts and federal financial assistance (as defined at 2 CFR 170.320); and if the public does not have access to this information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. The Grantee may certify that it received less than eighty percent (80%) of annual gross revenues from the federal government, received less than \$25,000,000 of its annual gross revenues from the federal government, already provides executive compensation to the Securities Exchange Commission, or meets the Internal Revenue Code exemption, and will not be required to submit executive compensation data into the SAM under FFATA, provided, that the Grantee shall still register and submit the other data requested

2. HAND will add the FFATA reporting requirements to its Comprehensive Annual Performance Evaluation Report (CAPER) checklist in order to meet the November 30th deadline. HAND's Comprehensive Annual Performance Evaluation Report is due to HUD no later than August 30th of each year. Please see checklist as Attachment C. The reports for the CAPER are completed by the program managers and reviewed by the director or assistant director prior to submission to HUD. The FFATA report will be initialed by the director or assistant director upon review.


Donna Slater, Interim City Controller

**City of Bloomington, Indiana
Housing and Neighborhood Development
Department**



Policies and Procedures Manual

Community Development Block Grant

HOME Investment Partnership Program

Bloomington Housing Trust Fund

City of Bloomington, Indiana
Housing and Neighborhood Development Department
P. O. Box 100, 401 North Morton Street
Bloomington, IN 47402
(812) 349-3401
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Introduction

The City of Bloomington, Indiana, administers two main sources of funding from the Housing and Urban Development (HUD) Department's Housing and Community Development Program; Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). In addition, the HAND Department provides staffing assistance for the Bloomington Housing Trust Fund.

This manual sets forth policies and procedures for administration of programs and projects funded by the City of Bloomington. CDBG and HOME are governed by complex and involved federal regulations and policies, but this manual will summarize the major elements for proper program operations.

The Consolidated Plan is the City's five year strategic plan which identifies the City's overall needs for affordable housing, community development, economic development, homeless services and services to persons with special needs. The City of Bloomington's Consolidated Plan can be found at http://bloomington.in.gov/documents/viewDocument.php?document_id=4818. Each year, HUD requires the City to file an Annual Action Plan outlining the activities to be undertaken for that year. Those plans can be found at http://bloomington.in.gov/sections/viewSection.php?section_id=233. In addition, HUD requires that the City file a Comprehensive Annual Performance Evaluation Report outlining the activities accomplished for the past fiscal year. Those reports can be found with the Annual Action Plans.

Tips for making the process smoother:

1. Learn the process and requirements. Start by reading this manual. To avoid unnecessary missteps that might cause you delays, you need to understand the various processes and application pathways.
2. Read your agreements and contracts. The details and requirements of your specific project are outlined in your agreements and contracts. You must know your obligations to avoid complications.
3. Submit forms, reports and requested data in a timely manner. You report to HAND. We report to HUD. It is important that we are able to report to HUD in a timely manner. And, it is important to close out your project as soon as possible in order to start your compliance period. We cannot close out your project until we have all of the required information.
4. Attend training sessions. HAND hosts informational and training sessions for CDBG. It is important for the person who is actually writing the application and will handle the project to attend the meeting.
5. Familiarize yourself with the federal requirements. Ask us questions. We want to help. We know the federal requirements are complicated. It is easier on everyone to understand what is required up front.

This manual is not intended to be all inclusive nor so restrictive that it cannot be amended. For more information, contact the City of Bloomington, Housing and Neighborhood Development Department, 401 N. Morton, Suite 130, PO Box 100, Bloomington, Indiana 47402. Telephone: (812) 349-3401. Fax: (812) 349-3582. Website: www.bloomington.in.gov/hand. Email: HAND@bloomington.in.gov.

Community Development Block Grant

A. CDBG National Objectives and Eligible Activity Categories

HUD awards grants to entitlement community grantees to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. The City of Bloomington is an entitlement community and receives an annual allocation of Community Development Block Grant funds to implement to solve local problems that meet a national objective as defined by HUD.

CDBG funds are used to achieve one of the following national objectives:

1. To benefit low- and moderate income persons.
2. To prevent or eliminate slums or blight.
3. To meet urgent needs.

Eligible activities include:

- acquisition of real property;
- relocation and demolition;
- rehabilitation of residential and non-residential structures;
- construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- public services, within certain limits;
- activities relating to energy conservation and renewable energy resources; and
- provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

B. Application Process

In order to achieve the national objectives, the City of Bloomington allocates CDBG funds on an application basis each year. A Subrecipient is a public or private nonprofit agency, authority or organization that receives CDBG funds to undertake eligible activities. Subrecipients can apply for either physical improvement projects (example: acquisition, construction, rehabilitation, etc.) or public service funding. Unless otherwise noted, "Subrecipient" will be used throughout this manual to denote all entities receiving CDBG funds.

1. Applications

Applications are released every year in late August or early September and are available on the City's website. Notice of the release of applications is printed in the Bloomington Herald-Times. Individual notices are NOT sent to agencies. Subrecipients can apply for physical improvement funding, public service funding or both. Only one application will be accepted from a Subrecipient for each funding type. Information regarding required letters of intent, funding maximums or minimums, mandatory training, site visits and application deadlines are updated annually when the applications are released and can be found on the HAND's website.

2. Requirements to note:

1. Agencies must have an approved Affirmative Action Plan on file with the City of Bloomington's Human Rights Division at 812-349-3429 prior to application.
2. Agencies must adhere to the City of Bloomington's Living Wage ordinance. If you have questions regarding the Living Wage ordinance, contact either Bob Woolford or Marilyn Patterson at 812-349-3401.
3. Applications must include the agency's DUNS number.

3. Citizens Advisory Council

Allocation recommendations are made by the Citizens Advisory Council (CAC). The Citizens Advisory Council is made up of two (2) members of the Redevelopment Commission, (2) members of the Common Council and appointees by the Mayor. The CAC reviews all applications; host a public hearing for each funding type, and makes allocation recommendations. Those recommendations are approved by the Redevelopment Commission (public meeting), the Mayor, and finally the City Council (public meetings).

4. Funding Agreements

Funding agreements are approved by the Redevelopment Commission at a public meeting following the receipt of annual contracts from HUD. Funding Agreements will outline the funding amounts, scope of services, expected service numbers, reporting requirements, and other obligations. It is the responsibility of the Agency to read and understand all elements of the Funding Agreement.

C. Project Close out

The compliance period does not start until the project has been closed out with HUD. In order to close out the project, the Agency must provide HAND with all required information as outlined in the Funding Agreement. After receipt of all required information, HAND will issue the final payment and close the project out in its IDIS system. HAND will issue a close-out letter to the Agency stating the date the project was closed out and information regarding the compliance period.

D. Annual Action Plan

The Annual Action Plan is written after the CDBG approval process is complete. The Plan will include goals outlined in the applications and funding agreements. The Plan is posted for public comment. Notice is printed in the Bloomington Herald-Times. Copies of the plan are available on the HAND website (www.bloomington.in.gov/hand), in the HAND Office at 401 N. Morton, Suite 130, and in the Indiana Room at the Monroe County Public Library.

E. Comprehensive Annual Performance Evaluation Report (CAPER)

The Comprehensive Annual Performance Evaluation Report (CAPER) is written after the completion of the fiscal year on May 31st. The CAPER will include the achievements of all of the CDBG recipients as obtained from their required reports and monitoring. The CAPER is posted for public comment. Notice is printed in the Bloomington Herald-Times. Copies of the CAPER are available on the HAND website (www.bloomington.in.gov/hand), in the HAND Office at 401 N. Morton, Suite 130, and in the Indiana Room at the Monroe County Public Library.

HOME Investment Partnership Program

A. HOME Objectives and Eligible Activities

The National Affordable Housing Act of 1990 created the HOME Investment Partnership Program. This federal program is designed to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing.

HOME funds are used to achieve the following objectives:

- To provide decent affordable housing to lower-income households.
- To expand the capacity of non-profit housing providers.
- To strengthen the ability of state and local governments to provide housing.

- To leverage private sector participation.

Eligible activities are defined in accordance with the following categories:

- Housing rehabilitation.
- Homebuyer activities.
- Rental housing activities.
- Tenant-based Rental Assistance (TBRA).

Individual households, non-profit and for-profit developers may apply for HOME funding.

B. Application Process

HAND accepts applications on a year-round basis for projects that address the stated objectives and are for eligible activities.

4. Individual households can apply for Owner-Occupied Rehabilitation Loans (Attachment A), Purchase-Rehabilitation Conditional Loans (Attachment B), and Down Payment & Closing Cost Conditional Loans (Attachment C). Guidelines for those individual programs follow this manual. Process for Individual Households:
 - a. Applications can be found on-line at http://bloomington.in.gov/documents/viewDocument.php?document_id=1253.
 - b. Households must meet current HUD income guidelines which can be found at http://bloomington.in.gov/documents/viewDocument.php?document_id=2930.
 - c. If HAND determines the household to be eligible, an inspector will come out to do an assessment of the house. This assessment will include code related items, energy efficiency, lead based paint, etc. A Section 106 Review (Environmental Review) will also be conducted by staff.
 - d. Rehabilitation of single family homes must not exceed the HOME affordable homeownership limits for the Bloomington FMR as set by HUD.
 - e. The write up from the assessment will be sent to approved bidders for pricing. Acceptable bids will be reviewed with the household.
 - f. Approved projects will be sent a Partnership Agreement to sign. See Required Agreements in Section F below.
5. Process for Non-profit and For-profit Developers:
 - a. Applications can be obtained from HAND Department Staff.
 - b. HOME requires that 15% of the City's annual allocation be set aside for Community Housing Development Organizations

(CHDO). A CHDO is a private non-profit organization that's mission includes providing decent housing that is affordable to low- and moderate income persons as evidenced in its charter, articles of incorporation, resolutions or by-laws. The CHDO "qualifications checklist" is outlined below. If a non-profit developer would like to be a CHDO, they must fill out a CHDO application and submit it with all required documents.

- c. If the City of Bloomington accepts your proposal, a Letter of Commitment will be sent to the applicant. This Letter of Commitment only states that the City of Bloomington is interested in pursuing the project should it meet all of the required elements. This is not a notice to proceed and the City will not be held responsible for any work completed prior to the execution of the required agreements as defined in Section G below.
- d. Upon commitment construction must commence within twelve (12) months and project must be completed within forty-eight months (48).

C. Selecting a contractor

Any contractor selected to perform work under *any* agreement with HAND must be eligible as defined by the SAM System for Award Management. Interested contractors can check their eligibility by going to <https://www.sam.gov/portal/public/SAM/##11>. The City of Bloomington will check eligibility prior to the signing of any contract or agreement. A copy of the SAM will be kept in the individual project files.

D. Environmental Review (Non-profit & For-Profit Developers)

The City of Bloomington cannot commit or expend funds until environmental clearance has been achieved. Individual households' environmental review will be completed in-house with the application. It is imperative that the environmental review process start as soon as possible. The length of time to complete an environmental review will depend on the type of project, the specific property and any potential testing times. In order to expedite the process, please note the following steps:

1. Identify the project type:
 - a. Define your HAND funding request – is it acquisition of land, construction money, infrastructure.
 - b. Is the project new construction, reconstruction, rehabilitation?
 - c. Provide number of units.
 - d. Will this project require Planning approval?
2. Define the scope of the project:
 - a. Provide a map of the area. This can be a GIS map.
 - b. Provide a legal description if possible or a copy of the Deed.
3. Other helpful information:

- a. Provide copies of any other environmental studies that have been completed.
- b. Provide copies of title work if available.

HAND will determine the level of review; submit documents to applicable agencies, review comments from those agencies, make the environmental determination and the appropriate public notice. Once the review is complete, HAND will complete the Environmental Review Record attached as Attachment L and can move forward with funding agreements and funding commitments.

E. Affirmative Marketing

Developers must adopt affirmative marketing procedures and requirements for all HOME assisted units. Those procedures must include:

- Methods for informing the public, owners and potential tenants about fair housing laws and the City non-discrimination requirements. Developers must use the Fair Housing logo or equal opportunity language.
- A description of what owners will do to affirmatively market housing assisted with HOME funds.
- A description of what owners will do to inform persons not likely to apply for housing without special outreach.
- Maintain records to document actions taken to affirmatively market HOME assisted units and to assess marketing effectiveness.
- A description of how efforts will be assessed and corrective action taken, if necessary, where requirements are not met.

F. CHDO Requirements

Organizations must meet the following criteria to qualify as CHDO:

1. Must be organized under state/local law;
2. Have a purpose/mission to provide decent housing that is affordable to low- and moderate-income persons/households. This must be evidenced in the organization's charter, articles of incorporation, by-laws or a resolution by the board of directors;
3. No part of the organization's earnings may benefit any members, founders, contributors or individuals;
4. Must have a clearly defined services area;
5. Must have received tax-exempt status from the IRS under Section 501 (c) of the Internal Revenue code of 1986.
6. Must have a board composition that is at least one-third representatives of the low-income community and no more than one-third may be public officials; and
7. Must have demonstrated that it has at least one year of experience serving the community where it intends to develop the HOME assisted housing.

8. For each specific project the PJ will document that the CHDO has the capacity to own, develop or sponsor housing.

For more information on CHDOs, contact Marilyn Patterson, Assistant Director, Housing and Neighborhood Development at 812-349-3401.

G. Required Agreements

Every HOME funded project will be required to have written agreements outlining the responsibilities of the individual parties. It is the responsibility of the person to thoroughly read and understand all elements of the agreements. Those agreements can include:

1. Partnership Agreement – The funds are reserved when the City of Bloomington enters into a written agreement with the CHDO.
2. This agreement will include, but not be limited to, the following:
 - a. Activities to be carried out;
 - b. How they are funded; and
 - c. Responsibilities and options of the parties.
 - d. Form of assistance-grant or loan.
 - e. Specify HOME eligible or other activity to benefit low-income families
 - f. State the actual sales price of housing or describe the method that will be used to determine the sales price of the housing.
3. Mortgage – The mortgage evidences the funding for the project using the property as collateral. This document will have an amount that may not be exceeded when completing the project. Depending on the program, the mortgage may or may not be released upon completion as defined in the Partnership Agreement and Promissory Note.
4. Promissory Note – The Promissory Note is a promise of the City of Bloomington to pay a certain amount of funding for a project and the mortgagee's promise to meet the conditions outlined in the Mortgage and Note.
5. Affordability Covenants – Affordability Covenants may be required for some projects as defined by HUD. The Affordability Covenants specifies that the property will remain affordable by setting certain terms and conditions related to its long-term use. The Affordability Covenants cannot be released until the terms outlined in them have been met. The length of time that the Covenants will be in place is defined by the program and the amount invested in the project.

Upon execution of the required agreements, funds will be committed and may be disbursed for projects.

Housing Trust Fund

A. Objectives and Eligible Activities

The Bloomington Housing Trust Fund was established in 1995 by Mayor Tomilea Allison. The fund was established through the Bloomington Community Foundation. The purpose of the Housing Trust Fund is to provide financing for the creation and preservation of affordable housing for the low-income population of the community through acquisition of land and structures, and the construction and rehabilitation of affordable housing.

B. Application Process

The Bloomington Housing Trust Fund Advisory Board meets on an as-needed basis to review loan and grant applications. Interested parties should contact Marilyn Patterson at 812-349-3401 for more information on how to apply.

General Requirements

A. Disbursement of Funds

The City of Bloomington must follow disbursement procedures that are required by the State Board of Accounts as well as HUD. Please note the following:

1. Process for Individual Households Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the household/contractor and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation regarding costs incurred may be requested by the inspector and added to the file.
 - b. Claims for payment can be submitted by the contractor every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.
2. Process for Developer Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the developer and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation

- regarding costs incurred may be requested by the inspector and added to the file.
- b. Claims for payment can be submitted by the developer every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.
3. Process for CDBG Social Service Providers:
 - a. Reports and forms as required by the Funding Agreement must be filed with HAND to request payment. Additional documentation regarding costs incurred may be requested by the HAND program manager and added to the file.
 - b. Claims for payment can be submitted by the Social Service Provider every other week in accordance with the claims scheduled posted by the City of Bloomington's Controller's Office.
 4. Process for CDBG Physical Improvement Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the project manager and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation regarding costs incurred may be requested by the inspector and added to the file.
 - b. Claims for payment can be submitted by the project manager every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.

B. Financial Audit

All subrecipients receiving CDBG or non-profit developers receiving HOME funds will be required to have an audit of all Federal funds received from all sources, unless exempted in writing. The audits are to be performed in compliance with OMB Circular A-133. The audits must comply in all respects with the generally accepted auditing standards of the American Institute of Certified Public Accounts. Copies of audits must be provided to HAND prior to the execution of the CDBG Funding Agreement or the HOME Partnership Agreement.

For-profit developers may be required to provide tax returns, financial statements or other documentation showing financial stability in addition to any documentation required by the application upon request.

C. Procurement Procedures

If you intend to use CDBG or HOME dollars to acquire items or services not expressly outlined in your application, please contact Bob Woolford for instructions at 812-349-3401.

Please note that HOME funds may not be used to directly or indirectly employ, award contracts to, or otherwise engage the services of any contractor or subrecipient during any period of debarment, suspension or placement of ineligibility status. Please contact Bob Woolford at 812.349.3401 if you have questions regarding any contractor's or subrecipient's status.

D. Non-Discrimination and Equal Access

The City of Bloomington requires all program participants to adhere to Bloomington Municipal Code 2.21.020 that states "It is the policy of the city that it does not discriminate in the provision or implementation of its programs and services on the basis of race, religion, color, sex, national origin, ancestry, sexual orientation, gender identity, or disability. It is the public policy of the city to provide all citizens equal opportunity for education, employment, access to public accommodations and acquisition through purchase or rental of real property, including, but not limited to housing, and to eliminate segregation or separation based on race, religion, color, sex, national origin, ancestry, sexual orientation, gender identity, or disability, since such segregation is an impediment to equal opportunity. Equal education and employment opportunities and equal access to and use of public accommodations and equal opportunity for acquisition of real property are hereby declared to be civil rights."

In addition, all program participants must comply with all of the Federal laws, executive orders and regulations pertaining to fair housing and equal opportunity. They are: 1) Title VI of the Civil Rights Act of 1964, As Amended; 2) The Fair Housing Act; 3) Equal Opportunity in Housing (Executive Order 11063, as amended by Executive Order 12259); and Age Discrimination Act of 1975, As Amended.

E. Handicapped Accessibility

Program participants who received CDBG or HOME funds must adhere to regulations governing the accessibility of federally assisted buildings, facilities and programs. Those include:

1. Americans with Disabilities Act – Provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, state and local government services and telecommunications. The Act (ADA) states that discrimination includes failure to design and construct facilities that are accessible to and usable by persons with disabilities. ADA also requires the removal of architectural and communication barriers that are structural in nature in existing facilities. For more information, contact the City of Bloomington Human Rights Division at 812-349-3429.

2. Fair Housing Act – Multi-family dwellings must also meet the design and construction requirements at 24 CFR 100.205 which implement the Fair Housing Act.
3. Section 504 – This Act prohibits discrimination in federally assisted programs on the basis of handicap. Specific requirements for the removal of physical barriers include:
 - a. For new construction of multi-family projects, at least 5% of the units in the project, but not less than one unit, must be accessible to individuals with mobility impairments, and an additional 2% of the units, but not less than one unit, must be accessible to individuals with sensory impairments.
 - b. For substantial rehabilitation of mutli-family projects includes construction in a project with 15 or more units for which the rehabilitation costs will be 75% or more of the replacement cost. In such developments, at least 5% of the units in the project, but not less than one unit, must be accessible to individuals with mobility impairments, and an additional 2% of the units, but not less than one unit, must be accessible to individuals with sensory impairments.
 - c. For less extensive rehabilitation projects, alterations must, to the maximum extent feasible, make the unit accessible to and usable by individuals with handicaps until at least 5% of the units are accessible to people with mobility impairments. Alterations to common spaces must, to the maximum extent feasible, make the project accessible.
 - d. Accessible units must be, to the extent feasible, distributed throughout the project and sites and must be available in a sufficient range of sizes and amenities so as to not limit choice. Owners and managers of projects with accessible units must adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals and households with individuals with handicaps. They must also take reasonable non-discriminatory steps to maximize use of such units by eligible individuals.
 - e. When an accessible unit becomes vacant, before offering the unit to a non-handicapped individual, the owner/manager should offer the unit: 1) to a current occupant of the project requiring the accessibility features; and 2) to an eligible qualified applicant on the waiting list (if applicable) requiring the accessibility features.

Specific requirements for providing program accessibility include:

- a. Individuals with handicaps must be able to find out about, apply for and participate in federally assisted programs or activities.
- b. Special communication systems may be needed for outreach and ongoing communication (i.e. telecommunication devices for the deaf such as TDD, materials on tape or in Braille, accessible locations for activities & meetings, etc.).

- c. Policies and procedures must be non-discriminatory (i.e. housing providers may not ask people with handicaps questions not asked of all applicants, screen individuals with handicaps differently or assess an individual's ability to live independently).

F. Employment and Contracting

The City of Bloomington requires that all program participants comply with the laws governing Equal Employment Opportunity including the Equal Employment Opportunity, Executive Order 11246 and Section 3 of the Housing and Urban Development Act of 1968. Please note that Section 3 requires, to the greatest extent feasible, opportunities for training and employment arising from HOME will be provided to low-income persons residing in the program service area. For questions regarding Section 3, please contact Bob Woolford at 812-349-3401.

Program participants must also comply with certain regulations on wage and labor standards. Please contact Bob Woolford at 812-349-3401 for questions regarding these standards.

G. Relocation

Due to the complexity of the Uniform Relocation Action, if you are considering a project that may require relocation of individuals or households, please contact Bob Woolford at 812-349-3401 to schedule an appointment.

H. Opportunities for Women Owned and Minority Owned Businesses

Program participants must make every feasible effort to contact minority owned and women owned business enterprises to respond to initiations to bid. In addition, all program participants must submit a Minority Business Report, marked as Attachment K, to the City of Bloomington to report the number of minority and women owned businesses that worked on projects federally funded projects.

Program Guidelines

Individual program guidelines are attached hereto:

- Acquisition/Rehabilitation Program, Attachment D
- Emergency Home Repair/Utility Service Program, Attachment E
- Furnace & Insulation Program, Attachment F

- Home Buyers Education Down Payment and Closing Cost Assistance Program, Attachment C
- Home Modification for Accessible Living, Attachment G
- HOME New Construction Rental Program, Attachment H
- HOME Rental Rehabilitation Program, Attachment I
- Minority Business Report, Attachment K
- Owner-Occupied Rehabilitation Loan Program, Attachment A
- Purchase-Rehabilitation Program, Attachment B
- Rehab Assessment Form-Site Visit Report, Attachment J
- Environmental Review Record, Attachment L

Common/rdv/program guidelines/ procedural manual.doc

Updated 4-17-2014

CONTROLLER
CITY OF BLOOMINGTON
AUDIT RESULT AND COMMENT

POLICE PENSION EMPLOYEE CONTRIBUTION

The City Controller's Office incorrectly calculated the 2013 employee share contribution for police officers that are members of 1977 Police Officers' and Firefighters' Pension and Disability Fund. The employee share calculation is to be based upon the salary of a first class officer (\$49,131) for 2013 plus a longevity increase allowed of \$2,000 and then multiplied by 6 percent. The calculation for the salaries paid through July 26, 2013, was correct; however, from August through the end of the year, the employee share contribution to the police pension was only calculated upon the base pay of \$49,131. An adjustment was made at the beginning of August so that the entire year would be calculated only on the base pay.

Indiana Code 36-8-1-11 states:

"Salary of a first class patrolman or first class firefighter"; longevity increases

Sec. 11. (a) 'Salary of a first class patrolman or first class firefighter' means the base salary of a patrolman or firefighter plus all longevity increases, if provided by the employer, for service of twenty (20) years or less but does not include remuneration or allowances for fringe benefits, incentive pay, holiday pay, insurance, clothing, automobiles, firearms, education, overtime, or compensatory time off."



City of Bloomington
Office of the Controller


August 7, 2014

State Board of Accounts
302 W Washington St., Room E418
Indianapolis, IN 46204-2765

RE: Response to the 2013 City of Bloomington Audit Result and Comments

To Whom It May Concern:

The City of Bloomington discovered the police pension error in February 2014 and is correcting. Utility staff has been trained on the proper procedures to issue receipts for every deposit and these entries have been correct for calendar year 2014.



Mark Kruzan, Mayor



Donna Slater, Interim Controller

CONTROLLER
CITY OF BLOOMINGTON
EXIT CONFERENCE

The contents of this report were discussed on July 30, 2014, with Darryl Neher, President of the Common Council; Margie Rice, Corporate Counsel to the City; Mark Kruzan, Mayor; John Whikehart, Deputy Mayor; Adam Wason, Communications Director; Sara Jane Rhodes, Deputy Administrator/Researcher; and Donna Slater, Interim Controller.

The contents of this report were discussed on August 7, 2014, with Susan West, former Controller.

WATER AND WASTEWATER UTILITIES
CITY OF BLOOMINGTON

WATER AND WASTEWATER UTILITIES
CITY OF BLOOMINGTON
AUDIT RESULT AND COMMENT

RECEIPT ISSUANCE - UTILITIES

Receipts were not issued for cash, checks, or EFT transactions at the utilities with the exception of customer payments on their account.

Receipts shall be issued and recorded at the time of the transaction; for example, when cash or a check is received, a receipt is to be immediately prepared and given to the person making payment. (Accounting and Uniform Compliance Guidelines Manual for Cities and Towns, Chapter 7)

WATER AND WASTEWATER UTILITIES
CITY OF BLOOMINGTON
EXIT CONFERENCE

The contents of this report were discussed on July 30, 2014, with Darryl Neher, President of the Common Council; Margie Rice, Corporate Counsel to the City; Mark Kruzan, Mayor; John Whikehart, Deputy Mayor; Adam Wason, Communications Director; Sara Jane Rhodes, Deputy Administrator/Researcher; Donna Slater, Interim Controller; Patrick Murphy, Utilities Director; Julie Roberts, Utility Service Board Vice-President; and Michael Horstman, Assistant Director of Finance.

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HOUSING AND NEIGHBORHOOD DEVELOPMENT
CITY OF BLOOMINGTON

HOUSING AND NEIGHBORHOOD DEVELOPMENT
CITY OF BLOOMINGTON
FEDERAL FINDINGS

FINDING 2013-002 - SUSPENSION AND DEBARMENT

Federal Agency: Department of Housing and Urban Development

Federal Program: HOME Investment Partnerships Program

CFDA Number: 14.239

Federal Award Number and Year (or Other Identifying Number): M-09-MC-18-0200, M-10-MC-18-0200,
M-11-MC-18-0200, M-12-MC-18-0200,
M-13-MC-18-0200

Federal Agency: Department of Housing and Urban Development

Federal Program: Community Development Block Grants/Entitlement Grants

CFDA Number: 14.218

Federal Award Number and Year (or Other Identifying Number): B-11-MC-180013, B-12-MC-180013

Management of the City has not established an effective internal control system, which would include segregation of duties, related to the grant agreement and the Suspension and Debarment compliance requirement. The failure to establish an effective internal control system places the City at risk of non-compliance with the grant agreement and the compliance requirement. A lack of segregation of duties within an internal control system could also allow noncompliance with compliance requirements and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the programs.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement, or a type of compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the program. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

The City did not have procedures established to ensure that its project developer (applicable to the HOME Investment Partnerships Program) and physical improvement and social service applicants (applicable to Community Development Block Grants/Entitlement Grants), as well as its contractors, were not excluded, disqualified, or otherwise ineligible from Federal procurement and nonprocurement programs at the time of contract execution or during the period of project work. There were no policies indicating how a developer's and/or contractor's eligibility is verified and what documentation will be maintained to prove this. No documentation was provided for audit to show that the City had determined the developer's eligibility. There was documentation to show that the contractors were eligible; however, there was no indication that this was checked by someone other than the person who performed the initial task.

24 CFR 85.35 states: "Grantees and subgrantees must not make any award or permit any award (subgrant or contract) at any tier to any party that is debarred or suspended or is otherwise excluded from or ineligible for participation in federal assistance programs subject to 2 CFR part 2424."

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

HOUSING AND NEIGHBORHOOD DEVELOPMENT
CITY OF BLOOMINGTON
FEDERAL FINDINGS
(Continued)

The failure to establish internal controls could enable material noncompliance to go undetected. Noncompliance of the grant agreement or the compliance requirements that have a direct and material effect to the program could result in the loss of federal funds to the City.

We recommended that the City's management establish controls, including segregation of duties, and procedures to ensure compliance with the grant agreement and all compliance requirements that have a direct and material effect to the programs.

FINDING 2013-003 - REPORTING

Federal Agency: Department of Housing and Urban Development
Federal Program: Community Development Block Grants/Entitlement Grants
CFDA Number: 14.218
Federal Award Number and Year (or Other Identifying Number): B-11-MC-180013, B-12-MC-180013

Management of the City has not established an effective internal control system, which would include segregation of duties, related to the grant agreement and the Reporting compliance requirements. The failure to establish an effective internal control system places the City at risk of noncompliance with the grant agreement and the compliance requirements. A lack of segregation of duties within an internal control system could also allow noncompliance with compliance requirements and allow the misuse and mismanagement of federal funds and assets by not having proper oversight, reviews, and approvals over the activities of the program.

An internal control system, including segregation of duties, should be designed and operate effectively to provide reasonable assurance that material noncompliance with the grant agreement, or a type of compliance requirement of a federal program will be prevented, or detected and corrected, on a timely basis. In order to have an effective internal control system, it is important to have proper segregation of duties. This is accomplished by making sure proper oversight, reviews, and approvals take place and to have a separation of functions over certain activities related to the program. The fundamental premise of segregation of duties is that an individual or small group of individuals should not be in a position to initiate, approve, undertake, and review the same activity.

The City is required to perform subaward reporting under the Transparency Act. During 2013, these reports were not prepared by the City for the subrecipients of the Community Development Block Grants/Entitlement Grants. There are no controls in place to ensure these reports are prepared.

2 CFR, Appendix A to Part 170(I)(a), states in part:

"Reporting of first-tier subawards.

1. *Applicability.* Unless you are exempt as provided in paragraph d. of this award term, you must report each action that obligates \$25,000 or more in Federal funds that does not include Recovery funds (as defined in section 1512(a)(2) of the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5) for a subaward to an entity (see definitions in paragraph e. of this award term).

HOUSING AND NEIGHBORHOOD DEVELOPMENT
CITY OF BLOOMINGTON
FEDERAL FINDINGS
(Continued)

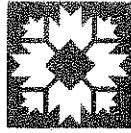
2. *Where and when to report.*
 - i. You must report each obligating action described in paragraph a.1. of this award term to <http://www.fsrs.gov>.
 - ii. For subaward information, report no later than the end of the month following the month in which the obligation was made. (For example, if the obligation was made on November 7, 2010, the obligation must be reported by no later than December 31, 2010.)
3. *What to report.* You must report the information about each obligating action that the submission instructions posted at <http://www.fsrs.gov> specify."

OMB Circular A-133, Subpart C, section .300 states in part:

"The auditee shall: . . . (b) Maintain internal control over Federal programs that provides reasonable assurance that the auditee is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs."

The failure to establish internal controls could enable material noncompliance to go undetected. Noncompliance of the grant agreement or the compliance requirements that have a direct and material effect to the program could result in the loss of federal funds to the City.

We recommended that the City's management establish controls, including segregation of duties, and procedures to ensure compliance with the grant agreement and all compliance requirements that have a direct and material effect to the program.



**City of Bloomington
Office of the Controller**

CORRECTIVE ACTION PLAN

Section II – Financial Statement Findings

FINDING 2013-001 - INTERNAL CONTROLS OVER FINANCIAL TRANSACTIONS AND REPORTING

Contact Person(s):

Donna Slater	slaterd@bloomington.in.gov	812-349-3412
Michael Horstman	horstmam@bloomington.in.gov	812-349-3635

Expected Completion Date: 12/31/13

Corrective action:

1. As stated in the financial statement finding, cash reconciliations will now be performed monthly by the Deputy Controller and approved by the Controller.

2. We recognize that this comment has appeared in previous audits and we believe that appropriate steps were taken in 2013 to resolve the issues concerning documented approvals over payroll. The accounting software does record the approval made by the Deputy Controller when the payroll entry is posted. Beginning in August 2013, the Deputy Controller reconciled the Pay Day Earning Report, which is generated each payroll period, to the payroll journal entry. Any corrections needed are made prior to posting the entry. This is documented both electronically in the accounting software by drilling down to each general ledger account and on hard copy. We concur with the auditor's opinion concerning documentation of approval of employees hours maintained within the accounting software. The software provider was been made aware of this deficiency with their product in 2013. However, beginning in January 2013, hours worked are approved by department heads both prior to entry in the accounting software and again after manual entry to the software. An hours report for each department is printed from the accounting software, compared to the time cards or time sheets, and if any discrepancies are found they are corrected prior to payroll processing. The department heads then sign and date the corrected hours report to document their approval. These reports are available for review. In July 2014, the City of Bloomington began the process to implement an electronic payroll time keeping system that will record and store the department heads approval, as well as, uploads the hours to the accounting software. The implementation of this time keeping system is to be completed by year-end 2014. Beginning in January 2014, a detailed departmental payroll register has been provided to the respective boards for their approval.

3. The Utility staff has been trained on the recommended procedures to issue receipts for every deposit and these entries have been corrected for calendar year 2014. We worked with the Controller's office to understand the changes necessary to use the recommended procedures.

Section III – Federal Award Findings and Questioned Costs

FINDING 2013-002 - SUSPENSION AND DEBARMENT

Contact Person:

Lisa Abbott abbottl@bloomington.in.gov 812-349-3401

Expected Completion Date: 7/1/14

Federal Agency: HOME Investment Partnerships Program

Federal Program: HOME Investment Partnerships Program

CFDA Number: 14.239

Federal Award Number and Year (or Other Identifying Number): M-09-MC-18-0200, N-10-MC-18-0200, M-11-MC-18-0200, M-12-MC-18-0200, M-13-MC-18-0200

Pass-Through Entity: Direct

Federal Agency: Housing and Urban Development

Federal Program: Community Development Block Grants/Entitlement Grants

CFDA Number: 14.218

Federal Award Number and Year (or Other Identifying Number): B-11-MC180013 and B-12-MC-180013

Pass-Through Entity: Direct

Corrective Action:

1. HUD monitored the City of Bloomington in 2012 and required HAND to document that a contractor was eligible to work on a federally funded project and create a policy and procedure outlining contractor eligibility. Previous to this audit, HAND would check eligibility on the Excluded Parties List System, but not print out the sheets showing that our "search returned no results." This audit finding requires HAND to check its sub recipients (social service agencies), developers and partners against System for Award Management (SAM) to ensure parties are not on the Excluded Parties List (Suspension and Debarment). HAND has amended its procedural manual to reflect that change. Please see Attachment A.
2. HAND will note this requirement in its HOME and CDBG applications. Please see an example noted as Attachment B.
3. Successfully funded applicants are required to sign a variety of documents which may include a Funding Agreement or Partnership Agreement. The SAMs will be attached as an exhibit to the required Funding or Partnership Agreements. These documents are reviewed by the Legal Department, the HAND Department and the Office of the Mayor. These reviews are noted by the signature of the Mayor, Redevelopment Commission President and/or HAND Director.

FINDING 2013-03 – Reporting

Contact Person:

Lisa Abbott abbottl@blcomington.in.gov 812-349-3401

Expected Completion Date: 9/8/14

Federal Agency: Housing and Urban Development

Federal program: Community Development Block Grants/Entitlement Grants

CFDA Number: 14.218

Federal Award Number and Year (or Other Identifying Number): B-11-MC-180013 and B-12-MC-180013

Pass-Through Entity: Direct

Corrective Action:

1. The following will be added to all CDBG Funding Agreements:

Federal Funding Accountability and Transparency Act of 2006 (FFATA)

FFATA reporting requirements will apply to any CDBG Agreement in the amount of \$25,000 or greater. The Grantee must provide any information needed pursuant to these requirements. This includes entity information, the unique identifier of the Grantee, the unique identifier of the Grantee's parent if applicable, and relevant executive compensation data, if applicable. See subsection 3 below regarding executive compensation data).

1. Data Universal Numbering System (DUNS) number

Pursuant to FFATA reporting requirements and in order to receive funding under this Agreement, the Grantee shall provide City with a valid Dun & Bradstreet (D&B) Data Universal Numbering System (DUNS) number that identifies the Grantee. A DUNS number may be requested online at <http://fedgov.dnb.com/webform>.

2. System for Award Management (SAM)

The Grantee shall register in the System for Award Management (SAM), which is the primary registrant database for the US Federal Government, and shall enter any information required by FFATA into the SAM, update the information at least annually after the initial registration, and maintain its status in the SAM through the Term of this Agreement. Information regarding the process to register or update information in the SAM can be obtained at www.sam.gov.

3. Executive Compensation

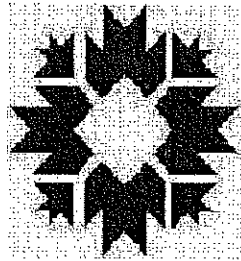
The Grantee shall report the names and total compensation of the five (5) most highly compensated officers of the Grantee in SAM if the Grantee in the preceding fiscal year

received eighty percent (80%) or more of its annual gross revenues from Federal contracts and Federal financial assistance (as defined at 2 CFR 170.320) and \$25,000,000 or more in annual gross revenues from Federal contracts and federal financial assistance (as defined at 2 CFR 170.320); and if the public does not have access to this information about the compensation of the senior executives of the entity through periodic reports filed under section 13(a) or 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. §§ 78m(a), 78o(d)) or section 6104 of the Internal Revenue Code of 1986. The Grantee may certify that it received less than eighty percent (80%) of annual gross revenues from the federal government, received less than \$25,000,000 of its annual gross revenues from the federal government, already provides executive compensation to the Securities Exchange Commission, or meets the Internal Revenue Code exemption, and will not be required to submit executive compensation data into the SAM under FFATA, provided, that the Grantee shall still register and submit the other data requested

2. HAND will add the FFATA reporting requirements to its Comprehensive Annual Performance Evaluation Report (CAPER) checklist in order to meet the November 30th deadline. HAND's Comprehensive Annual Performance Evaluation Report is due to HUD no later than August 30th of each year. Please see checklist as Attachment C. The reports for the CAPER are completed by the program managers and reviewed by the director or assistant director prior to submission to HUD. The FFATA report will be initialed by the director or assistant director upon review.


Donna Slater, Interim City Controller

**City of Bloomington, Indiana
Housing and Neighborhood Development
Department**



Policies and Procedures Manual

Community Development Block Grant

HOME Investment Partnership Program

Bloomington Housing Trust Fund

City of Bloomington, Indiana
Housing and Neighborhood Development Department
P. O. Box 100, 401 North Morton Street
Bloomington, IN 47402
(812) 349-3401
www.bloomington.in.gov/hand

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Introduction

The City of Bloomington, Indiana, administers two main sources of funding from the Housing and Urban Development (HUD) Department's Housing and Community Development Program; Community Development Block Grant (CDBG) and HOME Investment Partnership Program (HOME). In addition, the HAND Department provides staffing assistance for the Bloomington Housing Trust Fund.

This manual sets forth policies and procedures for administration of programs and projects funded by the City of Bloomington. CDBG and HOME are governed by complex and involved federal regulations and policies, but this manual will summarize the major elements for proper program operations.

The Consolidated Plan is the City's five year strategic plan which identifies the City's overall needs for affordable housing, community development, economic development, homeless services and services to persons with special needs. The City of Bloomington's Consolidated Plan can be found at http://bloomington.in.gov/documents/viewDocument.php?document_id=4818. Each year, HUD requires the City to file an Annual Action Plan outlining the activities to be undertaken for that year. Those plans can be found at http://bloomington.in.gov/sections/viewSection.php?section_id=233. In addition, HUD requires that the City file a Comprehensive Annual Performance Evaluation Report outlining the activities accomplished for the past fiscal year. Those reports can be found with the Annual Action Plans.

Tips for making the process smoother:

1. Learn the process and requirements. Start by reading this manual. To avoid unnecessary missteps that might cause you delays, you need to understand the various processes and application pathways.
2. Read your agreements and contracts. The details and requirements of your specific project are outlined in your agreements and contracts. You must know your obligations to avoid complications.
3. Submit forms, reports and requested data in a timely manner. You report to HAND. We report to HUD. It is important that we are able to report to HUD in a timely manner. And, it is important to close out your project as soon as possible in order to start your compliance period. We cannot close out your project until we have all of the required information.
4. Attend training sessions. HAND hosts informational and training sessions for CDBG. It is important for the person who is actually writing the application and will handle the project to attend the meeting.
5. Familiarize yourself with the federal requirements. Ask us questions. We want to help. We know the federal requirements are complicated. It is easier on everyone to understand what is required up front.

This manual is not intended to be all inclusive nor so restrictive that it cannot be amended. For more information, contact the City of Bloomington, Housing and Neighborhood Development Department, 401 N. Morton, Suite 130, PO Box 100, Bloomington, Indiana 47402. Telephone: (812) 349-3401. Fax: (812) 349-3582. Website: www.bloomington.in.gov/hand. Email: HAND@bloomington.in.gov.

Community Development Block Grant

A. CDBG National Objectives and Eligible Activity Categories

HUD awards grants to entitlement community grantees to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. The City of Bloomington is an entitlement community and receives an annual allocation of Community Development Block Grant funds to implement to solve local problems that meet a national objective as defined by HUD.

CDBG funds are used to achieve one of the following national objectives:

1. To benefit low- and moderate income persons.
2. To prevent or eliminate slums or blight.
3. To meet urgent needs.

Eligible activities include:

- acquisition of real property;
- relocation and demolition;
- rehabilitation of residential and non-residential structures;
- construction of public facilities and improvements, such as water and sewer facilities, streets, neighborhood centers, and the conversion of school buildings for eligible purposes;
- public services, within certain limits;
- activities relating to energy conservation and renewable energy resources; and
- provision of assistance to profit-motivated businesses to carry out economic development and job creation/retention activities.

B. Application Process

In order to achieve the national objectives, the City of Bloomington allocates CDBG funds on an application basis each year. A Subrecipient is a public or private nonprofit agency, authority or organization that receives CDBG funds to undertake eligible activities. Subrecipients can apply for either physical improvement projects (example: acquisition, construction, rehabilitation, etc.) or public service funding. Unless otherwise noted, "Subrecipient" will be used throughout this manual to denote all entities receiving CDBG funds.

1. Applications

Applications are released every year in late August or early September and are available on the City's website. Notice of the release of applications is printed in the Bloomington Herald-Times. Individual notices are NOT sent to agencies. Subrecipients can apply for physical improvement funding, public service funding or both. Only one application will be accepted from a Subrecipient for each funding type. Information regarding required letters of intent, funding maximums or minimums, mandatory training, site visits and application deadlines are updated annually when the applications are released and can be found on the HAND's website.

2. Requirements to note:

1. Agencies must have an approved Affirmative Action Plan on file with the City of Bloomington's Human Rights Division at 812-349-3429 prior to application.
2. Agencies must adhere to the City of Bloomington's Living Wage ordinance. If you have questions regarding the Living Wage ordinance, contact either Bob Woolford or Marilyn Patterson at 812-349-3401.
3. Applications must include the agency's DUNS number.

3. Citizens Advisory Council

Allocation recommendations are made by the Citizens Advisory Council (CAC). The Citizens Advisory Council is made up of two (2) members of the Redevelopment Commission, (2) members of the Common Council and appointees by the Mayor. The CAC reviews all applications; host a public hearing for each funding type, and makes allocation recommendations. Those recommendations are approved by the Redevelopment Commission (public meeting), the Mayor, and finally the City Council (public meetings).

4. Funding Agreements

Funding agreements are approved by the Redevelopment Commission at a public meeting following the receipt of annual contracts from HUD. Funding Agreements will outline the funding amounts, scope of services, expected service numbers, reporting requirements, and other obligations. It is the responsibility of the Agency to read and understand all elements of the Funding Agreement.

C. Project Close out

The compliance period does not start until the project has been closed out with HUD. In order to close out the project, the Agency must provide HAND with all required information as outlined in the Funding Agreement. After receipt of all required information, HAND will issue the final payment and close the project out in its IDIS system. HAND will issue a close-out letter to the Agency stating the date the project was closed out and information regarding the compliance period.

D. Annual Action Plan

The Annual Action Plan is written after the CDBG approval process is complete. The Plan will include goals outlined in the applications and funding agreements. The Plan is posted for public comment. Notice is printed in the Bloomington Herald-Times. Copies of the plan are available on the HAND website (www.bloomington.in.gov/hand), in the HAND Office at 401 N. Morton, Suite 130, and in the Indiana Room at the Monroe County Public Library.

E. Comprehensive Annual Performance Evaluation Report (CAPER)

The Comprehensive Annual Performance Evaluation Report (CAPER) is written after the completion of the fiscal year on May 31st. The CAPER will include the achievements of all of the CDBG recipients as obtained from their required reports and monitoring. The CAPER is posted for public comment. Notice is printed in the Bloomington Herald-Times. Copies of the CAPER are available on the HAND website (www.bloomington.in.gov/hand), in the HAND Office at 401 N. Morton, Suite 130, and in the Indiana Room at the Monroe County Public Library.

HOME Investment Partnership Program

A. HOME Objectives and Eligible Activities

The National Affordable Housing Act of 1990 created the HOME Investment Partnership Program. This federal program is designed to strengthen public-private partnerships and to expand the supply of decent, safe, sanitary, and affordable housing.

HOME funds are used to achieve the following objectives:

- To provide decent affordable housing to lower-income households.
- To expand the capacity of non-profit housing providers.
- To strengthen the ability of state and local governments to provide housing.

- To leverage private sector participation.

Eligible activities are defined in accordance with the following categories:

- Housing rehabilitation.
- Homebuyer activities.
- Rental housing activities.
- Tenant-based Rental Assistance (TBRA).

Individual households, non-profit and for-profit developers may apply for HOME funding.

B. Application Process

HAND accepts applications on a year-round basis for projects that address the stated objectives and are for eligible activities.

4. Individual households can apply for Owner-Occupied Rehabilitation Loans (Attachment A), Purchase-Rehabilitation Conditional Loans (Attachment B), and Down Payment & Closing Cost Conditional Loans (Attachment C). Guidelines for those individual programs follow this manual. Process for Individual Households:
 - a. Applications can be found on-line at http://bloomington.in.gov/documents/viewDocument.php?document_id=1253.
 - b. Households must meet current HUD income guidelines which can be found at http://bloomington.in.gov/documents/viewDocument.php?document_id=2930.
 - c. If HAND determines the household to be eligible, an inspector will come out to do an assessment of the house. This assessment will include code related items, energy efficiency, lead based paint, etc. A Section 106 Review (Environmental Review) will also be conducted by staff.
 - d. Rehabilitation of single family homes must not exceed the HOME affordable homeownership limits for the Bloomington FMR as set by HUD.
 - e. The write up from the assessment will be sent to approved bidders for pricing. Acceptable bids will be reviewed with the household.
 - f. Approved projects will be sent a Partnership Agreement to sign. See Required Agreements in Section F below.
5. Process for Non-profit and For-profit Developers:
 - a. Applications can be obtained from HAND Department Staff.
 - b. HOME requires that 15% of the City's annual allocation be set aside for Community Housing Development Organizations

(CHDO). A CHDO is a private non-profit organization that's mission includes providing decent housing that is affordable to low- and moderate income persons as evidenced in its charter, articles of incorporation, resolutions or by-laws. The CHDO "qualifications checklist" is outlined below. If a non-profit developer would like to be a CHDO, they must fill out a CHDO application and submit it with all required documents.

- c. If the City of Bloomington accepts your proposal, a Letter of Commitment will be sent to the applicant. This Letter of Commitment only states that the City of Bloomington is interested in pursuing the project should it meet all of the required elements. This is not a notice to proceed and the City will not be held responsible for any work completed prior to the execution of the required agreements as defined in Section G below.
- d. Upon commitment construction must commence within twelve (12) months and project must be completed within forty-eight months (48).

C. Selecting a contractor

Any contractor selected to perform work under *any* agreement with HAND must be eligible as defined by the SAM System for Award Management. Interested contractors can check their eligibility by going to <https://www.sam.gov/portal/public/SAM/##11>. The City of Bloomington will check eligibility prior to the signing of any contract or agreement. A copy of the SAM will be kept in the individual project files.

D. Environmental Review (Non-profit & For-Profit Developers)

The City of Bloomington cannot commit or expend funds until environmental clearance has been achieved. Individual households' environmental review will be completed in-house with the application. It is imperative that the environmental review process start as soon as possible. The length of time to complete an environmental review will depend on the type of project, the specific property and any potential testing times. In order to expedite the process, please note the following steps:

1. Identify the project type:
 - a. Define your HAND funding request – is it acquisition of land, construction money, infrastructure.
 - b. Is the project new construction, reconstruction, rehabilitation?
 - c. Provide number of units.
 - d. Will this project require Planning approval?
2. Define the scope of the project:
 - a. Provide a map of the area. This can be a GIS map.
 - b. Provide a legal description if possible or a copy of the Deed.
3. Other helpful information:

- a. Provide copies of any other environmental studies that have been completed.
- b. Provide copies of title work if available.

HAND will determine the level of review; submit documents to applicable agencies, review comments from those agencies, make the environmental determination and the appropriate public notice. Once the review is complete, HAND will complete the Environmental Review Record attached as Attachment L and can move forward with funding agreements and funding commitments.

E. Affirmative Marketing

Developers must adopt affirmative marketing procedures and requirements for all HOME assisted units. Those procedures must include:

- Methods for informing the public, owners and potential tenants about fair housing laws and the City non-discrimination requirements. Developers must use the Fair Housing logo or equal opportunity language.
- A description of what owners will do to affirmatively market housing assisted with HOME funds.
- A description of what owners will do to inform persons not likely to apply for housing without special outreach.
- Maintain records to document actions taken to affirmatively market HOME assisted units and to assess marketing effectiveness.
- A description of how efforts will be assessed and corrective action taken, if necessary, where requirements are not met.

F. CHDO Requirements

Organizations must meet the following criteria to qualify as CHDO:

1. Must be organized under state/local law;
2. Have a purpose/mission to provide decent housing that is affordable to low- and moderate-income persons/households. This must be evidenced in the organization's charter, articles of incorporation, by-laws or a resolution by the board of directors;
3. No part of the organization's earnings may benefit any members, founders, contributors or individuals;
4. Must have a clearly defined services area;
5. Must have received tax-exempt status from the IRS under Section 501 (c) of the Internal Revenue code of 1986.
6. Must have a board composition that is at least one-third representatives of the low-income community and no more than one-third may be public officials; and
7. Must have demonstrated that it has at least one year of experience serving the community where it intends to develop the HOME assisted housing.

8. For each specific project the PJ will document that the CHDO has the capacity to own, develop or sponsor housing.

For more information on CHDOs, contact Marilyn Patterson, Assistant Director, Housing and Neighborhood Development at 812-349-3401.

G. Required Agreements

Every HOME funded project will be required to have written agreements outlining the responsibilities of the individual parties. It is the responsibility of the person to thoroughly read and understand all elements of the agreements. Those agreements can include:

1. Partnership Agreement – The funds are reserved when the City of Bloomington enters into a written agreement with the CHDO.
2. This agreement will include, but not be limited to, the following:
 - a. Activities to be carried out;
 - b. How they are funded; and
 - c. Responsibilities and options of the parties.
 - d. Form of assistance-grant or loan.
 - e. Specify HOME eligible or other activity to benefit low-income families
 - f. State the actual sales price of housing or describe the method that will be used to determine the sales price of the housing.
3. Mortgage – The mortgage evidences the funding for the project using the property as collateral. This document will have an amount that may not be exceeded when completing the project. Depending on the program, the mortgage may or may not be released upon completion as defined in the Partnership Agreement and Promissory Note.
4. Promissory Note – The Promissory Note is a promise of the City of Bloomington to pay a certain amount of funding for a project and the mortgagee's promise to meet the conditions outlined in the Mortgage and Note.
5. Affordability Covenants – Affordability Covenants may be required for some projects as defined by HUD. The Affordability Covenants specifies that the property will remain affordable by setting certain terms and conditions related to its long-term use. The Affordability Covenants cannot be released until the terms outlined in them have been met. The length of time that the Covenants will be in place is defined by the program and the amount invested in the project.

Upon execution of the required agreements, funds will be committed and may be disbursed for projects.

Housing Trust Fund

A. Objectives and Eligible Activities

The Bloomington Housing Trust Fund was established in 1995 by Mayor Tomilea Allison. The fund was established through the Bloomington Community Foundation. The purpose of the Housing Trust Fund is to provide financing for the creation and preservation of affordable housing for the low-income population of the community through acquisition of land and structures, and the construction and rehabilitation of affordable housing.

B. Application Process

The Bloomington Housing Trust Fund Advisory Board meets on an as-needed basis to review loan and grant applications. Interested parties should contact Marilyn Patterson at 812-349-3401 for more information on how to apply.

General Requirements

A. Disbursement of Funds

The City of Bloomington must follow disbursement procedures that are required by the State Board of Accounts as well as HUD. Please note the following:

1. Process for Individual Households Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the household/contractor and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation regarding costs incurred may be requested by the inspector and added to the file.
 - b. Claims for payment can be submitted by the contractor every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.
2. Process for Developer Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the developer and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation

- regarding costs incurred may be requested by the inspector and added to the file.
- b. Claims for payment can be submitted by the developer every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.
3. Process for CDBG Social Service Providers:
 - a. Reports and forms as required by the Funding Agreement must be filed with HAND to request payment. Additional documentation regarding costs incurred may be requested by the HAND program manager and added to the file.
 - b. Claims for payment can be submitted by the Social Service Provider every other week in accordance with the claims scheduled posted by the City of Bloomington's Controller's Office.
 4. Process for CDBG Physical Improvement Projects:
 - a. Inspectors will be on-site during the project to monitor the work completed. Written assessments of those inspections will be reviewed with the project manager and placed in the file. A copy of the assessment form is attached to Manual and marked as Exhibit J. Additional documentation regarding costs incurred may be requested by the inspector and added to the file.
 - b. Claims for payment can be submitted by the project manager every other week in accordance with the claims schedule posted by the City of Bloomington's Controller Office.

B. Financial Audit

All subrecipients receiving CDBG or non-profit developers receiving HOME funds will be required to have an audit of all Federal funds received from all sources, unless exempted in writing. The audits are to be performed in compliance with OMB Circular A-133. The audits must comply in all respects with the generally accepted auditing standards of the American Institute of Certified Public Accounts. Copies of audits must be provided to HAND prior to the execution of the CDBG Funding Agreement or the HOME Partnership Agreement.

For-profit developers may be required to provide tax returns, financial statements or other documentation showing financial stability in addition to any documentation required by the application upon request.

C. Procurement Procedures

If you intend to use CDBG or HOME dollars to acquire items or services not expressly outlined in your application, please contact Bob Woolford for instructions at 812-349-3401.

Please note that HOME funds may not be used to directly or indirectly employ, award contracts to, or otherwise engage the services of any contractor or subrecipient during any period of debarment, suspension or placement of ineligibility status. Please contact Bob Woolford at 812.349.3401 if you have questions regarding any contractor's or subrecipient's status.

D. Non-Discrimination and Equal Access

The City of Bloomington requires all program participants to adhere to Bloomington Municipal Code 2.21.020 that states "It is the policy of the city that it does not discriminate in the provision or implementation of its programs and services on the basis of race, religion, color, sex, national origin, ancestry, sexual orientation, gender identity, or disability. It is the public policy of the city to provide all citizens equal opportunity for education, employment, access to public accommodations and acquisition through purchase or rental of real property, including, but not limited to housing, and to eliminate segregation or separation based on race, religion, color, sex, national origin, ancestry, sexual orientation, gender identity, or disability, since such segregation is an impediment to equal opportunity. Equal education and employment opportunities and equal access to and use of public accommodations and equal opportunity for acquisition of real property are hereby declared to be civil rights."

In addition, all program participants must comply with all of the Federal laws, executive orders and regulations pertaining to fair housing and equal opportunity. They are: 1) Title VI of the Civil Rights Act of 1964, As Amended; 2) The Fair Housing Act; 3) Equal Opportunity in Housing (Executive Order 11063, as amended by Executive Order 12259); and Age Discrimination Act of 1975, As Amended.

E. Handicapped Accessibility

Program participants who received CDBG or HOME funds must adhere to regulations governing the accessibility of federally assisted buildings, facilities and programs. Those include:

1. Americans with Disabilities Act – Provides comprehensive civil rights to individuals with disabilities in the areas of employment, public accommodations, state and local government services and telecommunications. The Act (ADA) states that discrimination includes failure to design and construct facilities that are accessible to and usable by persons with disabilities. ADA also requires the removal of architectural and communication barriers that are structural in nature in existing facilities. For more information, contact the City of Bloomington Human Rights Division at 812-349-3429.

2. Fair Housing Act – Multi-family dwellings must also meet the design and construction requirements at 24 CFR 100.205 which implement the Fair Housing Act.
3. Section 504 – This Act prohibits discrimination in federally assisted programs on the basis of handicap. Specific requirements for the removal of physical barriers include:
 - a. For new construction of multi-family projects, at least 5% of the units in the project, but not less than one unit, must be accessible to individuals with mobility impairments, and an additional 2% of the units, but not less than one unit, must be accessible to individuals with sensory impairments.
 - b. For substantial rehabilitation of multi-family projects includes construction in a project with 15 or more units for which the rehabilitation costs will be 75% or more of the replacement cost. In such developments, at least 5% of the units in the project, but not less than one unit, must be accessible to individuals with mobility impairments, and an additional 2% of the units, but not less than one unit, must be accessible to individuals with sensory impairments.
 - c. For less extensive rehabilitation projects, alterations must, to the maximum extent feasible, make the unit accessible to and usable by individuals with handicaps until at least 5% of the units are accessible to people with mobility impairments. Alterations to common spaces must, to the maximum extent feasible, make the project accessible.
 - d. Accessible units must be, to the extent feasible, distributed throughout the project and sites and must be available in a sufficient range of sizes and amenities so as to not limit choice. Owners and managers of projects with accessible units must adopt suitable means to assure that information regarding the availability of accessible units reaches eligible individuals and households with individuals with handicaps. They must also take reasonable non-discriminatory steps to maximize use of such units by eligible individuals.
 - e. When an accessible unit becomes vacant, before offering the unit to a non-handicapped individual, the owner/manager should offer the unit: 1) to a current occupant of the project requiring the accessibility features; and 2) to an eligible qualified applicant on the waiting list (if applicable) requiring the accessibility features.

Specific requirements for providing program accessibility include:

- a. Individuals with handicaps must be able to find out about, apply for and participate in federally assisted programs or activities.
- b. Special communication systems may be needed for outreach and ongoing communication (i.e. telecommunication devices for the deaf such as TDD, materials on tape or in Braille, accessible locations for activities & meetings, etc.).

- c. Policies and procedures must be non-discriminatory (i.e. housing providers may not ask people with handicaps questions not asked of all applicants, screen individuals with handicaps differently or assess an individual's ability to live independently).

F. Employment and Contracting

The City of Bloomington requires that all program participants comply with the laws governing Equal Employment Opportunity including the Equal Employment Opportunity, Executive Order 11246 and Section 3 of the Housing and Urban Development Act of 1968. Please note that Section 3 requires, to the greatest extent feasible, opportunities for training and employment arising from HOME will be provided to low-income persons residing in the program service area. For questions regarding Section 3, please contact Bob Woolford at 812-349-3401.

Program participants must also comply with certain regulations on wage and labor standards. Please contact Bob Woolford at 812-349-3401 for questions regarding these standards.

G. Relocation

Due to the complexity of the Uniform Relocation Action, if you are considering a project that may require relocation of individuals or households, please contact Bob Woolford at 812-349-3401 to schedule an appointment.

H. Opportunities for Women Owned and Minority Owned Businesses

Program participants must make every feasible effort to contact minority owned and women owned business enterprises to respond to initiations to bid. In addition, all program participants must submit a Minority Business Report, marked as Attachment K, to the City of Bloomington to report the number of minority and women owned businesses that worked on projects federally funded projects.

Program Guidelines

Individual program guidelines are attached hereto:

- Acquisition/Rehabilitation Program, Attachment D
- Emergency Home Repair/Utility Service Program, Attachment E
- Furnace & Insulation Program, Attachment F

- Home Buyers Education Down Payment and Closing Cost Assistance Program, Attachment C
- Home Modification for Accessible Living, Attachment G
- HOME New Construction Rental Program, Attachment H
- HOME Rental Rehabilitation Program, Attachment I
- Minority Business Report, Attachment K
- Owner-Occupied Rehabilitation Loan Program, Attachment A
- Purchase-Rehabilitation Program, Attachment B
- Rehab Assessment Form-Site Visit Report, Attachment J
- Environmental Review Record, Attachment L

Common/rdv/program guidelines/ procedural manual.doc

Updated 4-17-2014

HOUSING AND NEIGHBORHOOD DEVELOPMENT
CITY OF BLOOMINGTON
EXIT CONFERENCE

The contents of this report were discussed on July 30, 2014, with Darryl Neher, President of the Common Council; Margie Rice, Corporate Counsel to the City; Mark Kruzan, Mayor; John Whikehart, Deputy Mayor; Adam Wason, Communications Director; Sara Jane Rhodes, Deputy Administrator/Researcher; and Donna Slater, Interim Controller.