City of Columbia South Carolina

Community Development Block Grant – Disaster Recovery

Homeowner Program Policies and Procedures: Columbia Homeowner Assistance Program (CHAP) Minor Home Repair Program (MRP) and Reimbursement Program

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Revision History

Date	Revision
October 2, 2018	Original Residential Rehabilitation Policy
January 2019	Add description of pre-application process; identify specific staff responsible for eligibility review and DOB; add description of priority levels; clarify that properties in Chapter 7 bankruptcy proceedings are ineligible (Chapter 13 bankruptcy proceedings are acceptable as long as the applicant is meeting payment requirements); add section on vacancy requirements for SRRP; add sections on inactive process and voluntary withdrawal; add recapture language to DOB section; add definition of decent, safe and sanitary conditions; add sections on flood plain management, LBP, asbestos and mold to ERR; clarify preconstruction and construction processes; add section on construction payment; add section on optional homeowner relocation assistance; update reporting requirements and grievance process; include templates of homeowner grant agreement, construction contract and Request for Payment.
March 2021	Complete reorganization of policies and procedures to clarify and streamline process, eliminate duplications and inconsistencies. Program modifications included in Substantial Amendment #5 (approved by HUD 10/4/2019), have been incorporated.
April 2021	Sec. 5.2.5.3 Accessory structures and detached garages posing a health and safety risk will be demolished, but not repaired. Sec. 6.6 Add additional level of approval for recommendations of Special Case Panel. Sec. 7.1 All General Contractors must receive training from the Subrecipient to be eligible to become fully qualified in the City's CDBG-DR program. Sec. 7.2 Contractors must sign in at the pre-bid conference which will be coordinated by the Subrecipient. Section 7.2 Delete option for the applicant to select their own contractor. Sec. 8.1 Specific circumstances under which temporary relocation assistance will be provided to homeowners. All references to IPMC have been removed.

June 2021	Sec. 7.2 Residential designs for homes requiring reconstruction (including any historical building requirements) will be based on household composition at the time that the final eligibility determination was made
August 2021	Section 1.3 Removed inconsistency in homeowner retention period for Homeowner Repair and Reconstruction Program. Section 1.7 Clarification of environmental clearance requirements to begin Construction (receipt of executed Tier 2 checklist) Section 2.5 Modification of appeal process. Section 4.1 Modification of tiered environmental approval to include reconstruction of homes. Section 5.1.5: • Section 5.2.5.3 Modification related to treatment of accessory structures. • Section 5.2.5.11 Treatment of damaged duct work. • Section 5.2.5.13 Clarification of requirements for repair of damaged walls and ceilings • Section 5.2.5. Delete fireplaces from non-essential items listing. Section 6.2.1 Overview: • Item 13 Added language to clarify process for homes exceeding thresholds in Section 7.3. • Item 14 Removed. • Item 16 Clarification of process. Section 6.3 Updated Xactimate reference, and removal of sentence repeated in Section 6.5. Section 6.5 Changed to be consistent with existing process. Section 6.6 Clarify reference to change orders exceeding 10% contingency Section 8.5 Clarification of use of Tier 2 Checklist to document environmental clearance. Section 9.3 Addition of form for City Inspections Section 9.4 Modifications to change order approval process.
October 2021	Edits to Duplication of Benefits documentation process.
November 2021	Addition of Section 1.3.4 – Administrative Withdrawal from the program Section 7.2 – Minimum standards for replacement housing. Section 7.3.1 Reconstruction Standards – standard will be 3 bedrooms and 2 baths

1.0 Program Overview

1.1 Program Description

1.1.1 Columbia Homeowner Assistance Program (CHAP)

Overview and Delivery

The Columbia Homeowner Assistance Program (CHAP), administered by the City's Community Development Department, will provide up to $150,000 for rehabilitation, repair, or reconstruction of owner-occupied households with major damages directly related to the October 2015 disaster and with unmet needs exceeding $25,000. The program will also provide assistance to meet elevation requirements where required. Only LMI households will be assisted. In order to leverage limited CDBG-DR funding, homeowners eligible to participate in FEMA's Increased Cost of Compliance (ICC) program, must apply for this funding if elevation of the rehabilitated structure is necessary. Assistance for reconstruction of substantially damaged, owner-occupied dwellings will also be provided; the International Residential Code and Green Building certification requirements will be applied to all reconstruction activities. In all cases, sufficient federal and non-federal resources must be available to complete rehabilitation and reconstruction projects to HUD and CDBG Disaster Recovery Housing Standards. Funding for this program will be capped at $150,000, not including relocation assistance. In cases of demonstrated hardship, the program will also cover the costs of initial homeowner hazard insurance premiums and coverage of flood insurance premiums (for properties covered by the Flood Disaster Protection Act of 1973 as amended, pursuant to §570.605) for one year.

Connection to Disaster and Updated Needs Assessment

CHAP was developed to address low to moderate-income single-family households identified by FEMA as sustaining Major or Severe damages as a result of the flood. While elderly, disabled, and female headed households with children will be prioritized for participation in the program, all LMI households will be given the opportunity to receive assistance. In May 2017, Disaster Recovery staff mailed letters to 259 households on FEMA's major and severe damage lists inviting them to participate in one of two public information sessions and schedule an appointment with a Case Manager. The City's Public Relations Department (PRD) issued press releases to approximately 70 local media organizations and interviews were conducted by several television and radio stations. Photos taken at one of the initial public information sessions was posted on YouTube. A second press release was issued July 10 announcing the final ==eight public information sessions. PRD issued a press release and outreach flyer on August 2 announcing the final public information session. Program information was posted on the Disaster Recovery website, the City Talk July 14; WISTV posted a notice on its website July 18; ABC Columbia posted notices on its website July 10 and July 30; and the Director of Community Development and the Disaster Recovery Manager appeared on WIS TV August 1 to discuss the Disaster Recovery program.

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to the Columbia's long-term recovery strategy. While single family owner-occupied or rental dwellings suffered the greatest damage from the declared disaster, it is our belief, based on continuing community outreach and information exchange with Richland and Lexington Counties and the United Way of the Midlands, that many of the homeowners identified in the Action Plan have either completed repairs on

their own or do not meet the low to moderate income requirements. The program will serve those that have met eligibility requirements and will remain open to applicants until all funds have been expended or reallocated. After some initial damage assessments, we believe some of the applicants to our Minor Repair Program will have more than $25,000 in damages and will be moved to CHAP. Homeowners may be provided with temporary relocation assistance if they are required to relocate during construction. This assistance will be in addition to their grant, based on assessment of need.

Home repairs and improvements funded through this program will minimize the impact of future storms and floods. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community. These home repairs also help stabilize damaged neighborhoods, retain consumers for local businesses, preserve the local tax base, and encourage new investment.

Eligible Applicants

Eligibility requirements for participants in this program are:

- Damaged residential dwelling must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium.
- Application for and receipt of ICC funding for elevation, if required.
- Sufficient gap financing if required.

Ineligible Applicants

Ineligibility criteria for this program are:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than two units or rental properties.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Gap financing unavailable to complete rehabilitation, reconstruction, and/or elevation projects in accordance with city building code and floodplain requirements.
- Ineligible structure type

Prioritization of Applicants

One of the City's most important goals is to assist LMI owner-occupied households who experienced the most severe damage. Among those, priority will be given to applicants who are elderly, disabled, and female head of households with children.

Use of Funds

The City will confirm applicant eligibility and oversee all payments. Funds will be provided in the form of a grant agreement between the subrecipient selected by the City and the applicant. The city's designated subrecipient will oversee construction and contractor payments. The City will retain final approval over all grant agreements and payments.

The grant agreement will include obligations to:

1. authorize payments directly to the contractor responsible for executing rehabilitation, elevation and/or reconstruction work;
2. repay the city should additional federal assistance become available for physical repairs completed by the CDBG Disaster Recovery team after calculation of the grant amount;
3. own and occupy the damaged dwelling as a primary residence for a period of five (5) years after the completion of repairs; and
4. maintain flood insurance in perpetuity if located within a floodplain. Execution of a program covenant memorializing the flood insurance requirement and a subrogation agreement are also required.

Monitoring

Monitoring of program progress and compliance will be performed by the City's Community Development compliance staff and the internal auditor in accordance with the CHAP executed grant agreements and covenants, the Disaster Recovery QA/QC Plan, program policies and procedures, and the City of Columbia CDBG-DR Monitoring Plan.

Program Performance Period

- Application Open: April 2017
- Application Close: October 1, 2018
- Program Closeout: December 2022

1.1.2 Minor Home Repair Program

Overview and Delivery

The Minor Repair Program (MRP), administered by the City's Community Development Department, assists primarily low-to-moderate income (LMI) owner-occupied households that sustained minor damages as a result of the 2015 storm and who have remaining repair needs not covered by the FEMA Individual Assistance Program or Small Business Administration. Funding up to $25,000 will repair rain/flood damages and includes work related to Green Building improvements, and repairs necessary to provide decent, safe, and sanitary conditions as defined by the DR Housing Standards, and comply with City building codes when appropriate, thus ensuring these housing units are more resilient to future natural hazards. Relocation assistance and environmental remediation costs will be provided outside the $25,000 program cap.

While the program was initially intended to assist homeowners up to 120% AMI, in Substantial Amendment #5, the program threshold was changed to 80% AMI to ensure that the homeowners with the greatest need would be served first. Thus, any applicant deemed eligible after September 30, 2019, where the household income exceeded 80% AMI will not be eligible to be served in this program.

Connection to Disaster and Unmet Needs

The provision of safe, disaster resistant housing for residents impacted by the October 2015 flood is critical to Columbia's long-term recovery strategy. By addressing the most critical unmet housing needs and encouraging high-quality, disaster resistant construction, the city improves the long-term safety and stability of its community and minimizes the impact of future storms and floods. These home repairs also help stabilize damaged neighborhoods, retain consumers for local businesses, preserve the local tax base, and encourage new investment.

Based on damage assessments and remaining housing needs cited in this Action Plan Amendment, the city determined that single family owner-occupied dwellings suffered the greatest damage from the 2015 Flood. Home repairs and improvements funded through this program will assist those low-income households not eligible for the City's Buyout and Homeowner Assistance Programs, which focus on homes with major to severe damages and those inside the floodplain.

Eligible Applicants

Eligibility requirements for participants in this program are:

- Damaged residence must be located within Columbia City Limits.
- Applicants must have owned and occupied the damaged property as their primary residence as of and prior to the date of the storm event (October 2015).
- Applicants must have sustained minor storm damages.
- Damaged residence must be a single-unit structure, duplex, townhome, or condominium with $25,000 or less in damages.
- Applicants must be between 0-80% AMI at application intake.

Ineligible Applicants

Ineligibility criteria for this program is:

- Homes located outside of Columbia city limits.
- Secondary homes or rental properties.
- Residential structures with more than two units or rental properties.
- Applicants without flood insurance who have received prior federal assistance requiring the maintenance of flood insurance in perpetuity.
- Ineligible structure type.

Prioritization of Applicants

Applicants who are elderly, disabled, or female headed households with children will be given first priority for participation in MRP.

Use of Funds

The City will confirm applicant eligibility and oversee all payments. Funds will be provided in the form of a grant agreement between the Subrecipient selected by the City and the applicant. The city's designated subrecipient will oversee construction and contractor payments. The City will retain final approval over all grant agreements and payments.

The grant agreement will include obligations to:

1. authorize payments directly to the contractor executing repairs;
2. own and occupy the home for not less than three (3) years after the completion of repairs and receipt of Certificate of Occupancy;
3. repay the city should additional federal assistance become available for physical repairs completed by the CDBG Disaster Recovery team after calculation of the grant amount; and
4. maintain flood insurance in perpetuity on the damaged home, if located within a floodplain.

Execution of a program covenant memorializing the flood insurance mandate will also be required for homes in the floodplain.

Monitoring

Monitoring of program progress and compliance will be performed by the City's Community Development compliance staff and the Internal Auditor in accordance with the MRP executed grant agreements, covenant and subrogation requirements, program policies and procedures, the Disaster Recovery QA/QC Plan, and the City of Columbia CDBG-DR Monitoring Plan.

Program Performance Period

- Application Open: April 2017
- Application Close: October 1, 2018
- Program Closeout: December 2022

1.1.3 Reimbursement

The city also recognizes that many homeowners did not wait for federal assistance to complete necessary repairs, many securing loans or using savings to pay for repairs. To address this unmet need the City may reimburse applicants who used personal funds to repair damage to their homes resulting from the storm if the program determines the costs associated with these repairs are both reasonable and necessary and applicants can demonstrate a financial hardship. Reimbursements are limited to costs incurred by homeowners for storm-related repairs completed satisfactorily by a licensed contractor prior to program application and within one year of the 2015 Flood. The minimum amount of reimbursement is $5,000 with a $10,000 maximum allowable. Applicants for reimbursement may include households already deemed eligible. Detailed receipts will be necessary, and a duplication of benefits review will apply to reimbursement costs. Lead Safe Housing Rules apply to all reimbursements. All homeowner reimbursement applications are screened for applicability of Lead Safe Housing Rules, and necessary evaluation, hazard remediation, and clearance will be carried out.

To be eligible for reimbursement, the expense must have been incurred prior to the date on which the applicant applied for the program and must have been incurred within one year after the date of the disaster.

Program Performance Period

- Application Open: April 2017
- Application Close: October 1, 2018
- Program Closeout: December 2022

1.2 Eligibility Overview

1.2.1 Location

The damaged residence must be located within the city limits of Columbia, South Carolina.

1.2.2 Ownership and Occupancy

During the flooding that resulted in Presidentially declared disasters in 2015 (FEMA-4241 DR), the damaged residence must have been owned and occupied by the applicant as the applicant's primary residence. Second homes, vacation residences, and rental properties are not eligible for assistance under this program. Homeowners must be current on their property taxes or have documentation that they have entered into a payment plan with the City and County.

1.2.3 FEMA Registration

FEMA registration was initially required. This requirement was eliminated when it became apparent that many storm-damaged households had not registered for FEMA.

1.2.4 Flood Insurance Requirements for Applicants Receiving Prior Disaster Assistance

In accordance with the Stafford Act, applicants that previously received disaster recovery assistance after September 14, 1994, are required to obtain and maintain adequate and necessary flood insurance coverage. The Office of Community Development will verify prior to executing a grant award that any applicant that has received prior disaster recovery assistance has maintained flood insurance, if required.

1.2.5 Tie to the Storm

The residence must have sustained damage as a result of the 2015 storms (e.g., flooding, wind damage, windblown rain damage). This could be documented through FEMA registration, SBA documents, private insurance documentation, photographs, or other means acceptable to the program.

1.2.6 Income

The Columbia Homeowner Assistance Program, the Minor Home Repair Program, and the Reimbursement Programs are limited to serving residents at or below 80% of Area Median Income (AMI). The Elevation reimbursement program has no income restrictions.

1.3 Homeowner Obligations

1.3.1 Retention of Home as Principal Residence

Homeowners assisted by the program are required to retain the home as their principal residence for a period of five years following receipt of Certificate of Occupancy (reconstruction) or Final Cards (rehabilitation). The award will be secured with a forgivable five-year lien. Should the homeowner wish to sell the home at any point during this period, a pro rata share of the original grant amount must be paid back at the time of sale.

1.3.2. Compliance with National Flood Insurance Program Requirements

The City of Columbia adopted Ordinance 2015-046 in compliance with FEMA and National Flood Insurance Program requirements to mitigate future flood damage. Division 3, Flood Hazard Reduction, Section 21-172, Specific Standards, requires that "*new construction or substantial improvement to residential structures (in a Special Flood Hazards Area) shall have the lowest floor, including basements, elevated no lower than two feet above the base flood elevation. No basements are permitted. Should solid foundation walls be used to elevate a structure, flood openings sufficient to facilitate the unimpeded movement of floodwaters shall be provided in accordance with standards of subsections (3) of this section.*"

1.3.3 Homeowner's Responsibilities During Construction

Homeowners will have the following responsibilities during the period of construction.

- Ensure the contractor has clear access to the home and all repair areas;
- Contact their Case Manager concerning issues or concerns that arise during the course of work; homeowners may not ask the contractor to make changes to the scope;
- Refrain from directing sub-contractors or other workers on site. The homeowner should contact their Case Manager with any issues or concerns regarding construction activities;
- Indicate in writing any unresolved issues with the contractor and submit it to the Case Manager, who will inform the Subrecipient for review and written determination/response. Any issues that cannot be resolved by the Subrecipient will be referred to the Director of the Office of Community Development for resolution.
- Work with Case Manager to ensure utilities are connected and available or cut off as directed by the Subrecipient;
- Once the construction schedule has been determined, respond promptly to requests to vacate the property, move/remove contents, or other actions as requested.
- Respond promptly to request for signature on final work. If there is a disagreement, the city will be the final arbiter.

1.3.4 Administrative Withdrawal from the Program

Homeowners who fail to cooperate with program staff requests, or who are unresponsive to letters or other program communications, will be sent a Certified Letter giving them five (5) days to contact the program and/or respond to specific requests. If no response is received, at the end of the five-day

period, the homeowner will receive another Certified Letter administratively withdrawing them from the Program and notifying them they are no longer eligible to be assisted.

1.4 Requirements for Properties in Special Flood Hazard Areas (SFHAs)

The City of Columbia adopted Ordinance 2015-046 in compliance with FEMA and National Flood Insurance Program requirements to mitigate future flood damage. Division 3, Flood Hazard Reduction, Section 21-172, Specific Standards, requires that "*new construction or substantial improvement to residential structures (in a Special Flood Hazards Area) shall have the lowest floor, including basements, elevated no lower than two feet above the base flood elevation. No basements are permitted. Should solid foundation walls be used to elevate a structure, flood openings sufficient to facilitate the unimpeded movement of floodwaters shall be provided in accordance with standards of subsections (3) of this section.*"

1.5 Duplication of Benefits

Homeowners will be asked to provide documentation for any assistance received, including from FEMA, SBA, private insurance, other federal, state of local sources, and/or charity. Documentation can include a FEMA letter, SBA loan documents, insurance claim payments, and documentation of any charity received. The program will verify the information with third-party sources, as needed.

Homeowners will be asked to provide detailed information on any repairs that were completed on their home, either before application to the program or while waiting a final determination of eligibility. In addition, if receipts for repairs are available, they will be copied and returned to the applicant.

A preliminary duplication of benefits analysis will be completed by program management staff.

The Subrecipient[1] will be provided with information on repairs completed by applicants. At inspection, the construction inspectors will be asked to verify the work in place and repairs reported by the homeowner. Repairs made by homeowners, but not eligible to be completed under the program, may be considered for offset, in an effort to serve as many applicants as possible who are still waiting to receive assistance under the program.

Following the inspection and verification of Work in Place (WIP), a Scope of Work will be prepared by the Subrecipient. This scope will be reviewed with the homeowner. The homeowner will be given an opportunity to ask questions and make suggestions related to the final scope. If the homeowner refuses to accept the final scope as prepared by the Subrecipient, the homeowner may appeal to the Office of Community Development. The Director of the Office of Community Development is the final arbiter of all disputes.

[1] The City of Columbia procured a nonprofit, St. Bernard Project (SBP,) to act as the Construction Management Firm and to provide Case Management services to applicants during the construction process. References to Subrecipient in this document are exclusively to St. Bernard Project (SBP).

Once the homeowner accepts the scope of work, a final duplication of benefits determination will be made by the Program Manager and confirmed by the Office of Community Development.

1.6 Award and Grant Signing

Once the Estimated Cost of Repair (ECR) has been finalized and all construction related costs calculated by the Subrecipients, the Subrecipient staff will conduct a final duplication of benefits analysis and make a recommendation to the Office of Community Development regarding the final award amount. Any voluntary relocation costs, and a year's cost of insurance coverage may also be included in the calculation.

The program manager prepares a grant agreement, subrogation agreement, and covenant (if needed) specifying the final award. This document is signed by the City Manager and forwarded to the subrecipient case managers. Subrecipient case managers will review the documents with each applicant to ensure there is a full understanding of their commitment. The documents will then be signed by the applicants and notarized. A copy of all documents will be provided to applicants and the original documents returned to Office of Community Development (ODC) for recording with Richland County Register of Deeds Office.

Funding will only be provided to directly to homeowners in the Reimbursement Program. No funding will be provided directly to homeowners in the CHAP or Minor Repair Programs. The grant proceeds will be used to reimburse the Subrecipient for contractor costs, voluntary relocation costs, storage costs, and to purchase a flood insurance policy on behalf of the homeowner, if needed.

1.7 Construction

The City will issue the Subrecipient an executed Tier 2 checklist when all environmental review requirements have been met. This will enable the Subrecipient to execute a grant agreement and related documents with the homeowner. The Subrecipient will then issue a Notice to Proceed (NTP) to the contractor.

All aspects of construction and contractor payments will be overseen by the Subrecipient. Communication during construction will be handed by the Case Managers under their Subrecipient supervision.

1.8 Closeout

Once construction is complete, a Certificate of Occupancy (reconstruction) or Final Cards (repair) issued, and a warranty walk through (key handover) completed with the homeowner, the Subrecipient will submit a final payment request. The Program Manager will be advised that the file is ready for closeout.

A final grant reconciliation by the Program Manager will occur, to verify that no additional benefits have been received. If an adjustment needs to be made to the grant documents, an addendum will be prepared and executed by the program and homeowner. The requirements of the grant documents will again be reviewed with the homeowner, including the requirement to maintain as primary residence for five years and to maintain flood insurance.

The filed documents will serve as an alert to the program should a homeowner attempt to sell the property before the termination of the five-year recapture period.

2.0 Federal Cross-Cutting Requirements

2.1 Anti- fraud, Waste and Abuse Compliance

The city of Columbia has established policies and procedures to prevent fraud, waste, and abuse of funds. These procedures are designed to identify discrepancies and risks in the information provided by third parties. Such discrepancies and risks may be indicative of fraud, waste, and abuse. By implementing these checks, city staff can verify the accuracy of information provided by program applicants, vendors, and sub-recipients. These checks are conducted systematically, utilizing standardized research methodologies, which flag identification processes for consistency and equitable treatment across relevant sources.

2.1.1 Program Applicants

The following checks are run for each applicant:

- Social Security Number Check (for relevant applicant types);
- Business status check (for relevant applicant types);
- Confirmation of association with property address;
- Check of relevant watch lists and debarment lists;
- Richland County Tax Assessor's records to determine the approximate year as to when applicant's house was built.

Adverse findings are communicated as necessary to the applicant. A clarification process will be utilized to clear up or cure any discrepancies that the applicant may have with the results. In addition, deficient Anti-Fraud Waste and Abuse (AFWA) checks are reviewed by city program staff.

2.1.2 Vendors and Contractors

The city of Columbia staff will verify the accuracy of information provided by its vendors.

Prior to contract execution, the city's procedures include, but are not limited to, reviewing debarment lists, and verifying licenses and contractor certifications., The city of Columbia staff has established regular channels of communication with other State and local government agencies who are contracting with various entities for services relating to storm recovery efforts in order to be on guard for issues relating to contractor fraud, waste, and abuse. The Subrecipient is responsible for all tasks involved in vendor review listed above. Any findings are reported to city procurement staff.

2.1.3 Subrecipients

As it does with its vendors, the city of Columbia reviews debarment lists and known databases, conducts internet research, and obtains information available from State and Federal agencies, prior to executing agreements with sub-recipients. Findings are reported to city procurement staff.

2.1.4 Segregation of Duties in City Procurement Policies

Segregation of duties is a vital and critical measure used for effective internal controls in citywide procurement and contracting operations and to further ensure the integrity of the business process. These measures are in place to further reduce the risk of both erroneous and inappropriate actions, deter fraud and fraudulent act. Segregation of duties is a deterrent to fraud and fraudulent acts. A person with multiple functional roles has a greater opportunity to abuse their powers within an organization. Separate functions at the city of Columbia include, but may not be limited to, the clear separation of purchasing and finance roles. This also includes a separation of receiving (custody) of assets and recording, payments, monitoring, and reviewer approval roles. Examples of segregation of duties are as follows:

- The person who requisitions the purchase of goods or services is not the person who creates the purchase order or approves the purchase;
- The person who approves the purchase of goods or services is not the person who processes the invoices for payment;
- The person receiving on an invoice is not the same individual creating the Purchase Order;
- The person who approves the purchase of goods or services is not able to obtain custody of checks to the recipient;
- The person who opens the mail does not handle fixed assets, invoicing, checks, etc.

2.1.5 Inter-Departmental Coordination

Effective coordination between city departments and personnel enables all programs, vendors administering city programs, departments, and subrecipients to comply with applicable State and federal regulations, prevent and minimize fraud, waste, and abuse, and effectively fulfill the goals set forth by the city. The Community Development Department, in conjunction with Procurement, Finance, Internal Auditor, and the City Attorney Office, perform the following tasks:

- Gauge the overall progress and effectiveness of project implementation;
- Identify issues that may compromise program integrity, fund, and service delivery;
- Work with program and operational staff to implement corrective action and resolutions;
- Oversee the implementation of the city's recapture process;
- Provide information and input on how city programs and practices can be improved and enhanced to improve performance, efficiency, and curtail waste, fraud, and abuse; and
- Serve as a layer of oversight to mitigate any potential risks, proactively detect, and investigate potential fraud, and identify areas in which to strengthen program capacity and the quality-of-service delivery.

2.1.6 Internal Auditor

The Internal Auditor position was created as part of the City's CDBG DR efforts and reports directly to the City Manager. The role of the internal auditor is to conduct internal monitoring/audits of city administered programs as directed. The auditor will also be responsible for the review and evaluation of internal controls related to the city's CDBG-DR programs and coordination of external audits or monitoring by city, state, and federal agencies. In addition, the internal auditor will be responsible for managing CDBG-DR Quality Assurance/Quality Control processes and coordinating the city's efforts to detect fraud, waste,

and abuse in CDBG-DR programs. The internal auditor plays an important role in looking for errors and instances of malfeasance for all city procurements and program delivery, and specifically as part of the city's administration of its CDBG-DR funds. The internal auditor verifies that the city has in place procedures to perform price and cost analyses of proposed expenditures of grant funds and those analyses are performed, when required. The internal auditor evaluates documentation maintained by the city, regarding price and cost analyses, and verifies that it includes evidence that all costs are allowable, allocable, and reasonable. Finally, when items are procured with sole-source contracts, the internal auditor verifies that the city has maintained sufficient documentation supporting its position. The internal auditor is responsible for preparing a report that describes all internal control activities, its testing of those controls, and any concerns or issues noted during its review. This report is prepared annually and submitted to the City Manager's Office for review. Different functions within program areas are selected each year for internal control review. As necessary, the Community Development Department, along with its partners, develops an appropriate corrective action plan to strengthen the controls that mitigate, and address concerns or findings noted in the internal auditor's report. Documentation is required to ensure that corrective action has taken place prior to closing out concerns or findings.

2.1.7 Anti-Fraud Waste and Abuse Prevention

The Office of Community Development will verify the accuracy of information provided by program applicants, vendors, and sub-recipients. These checks are conducted systematically, utilizing standardized research methodologies, which flag identification processes for consistency and equitable treatment across relevant sources. If fraud is suspected, the file will be submitted to Columbia's Internal Auditor and forward to the Office of the State's Attorney General immediately. City residents may also call or email to report observations of fraud, waste, or abuse.

2.2 Conflict of Interest

Any person who is an employee, agent, consultant, officer, or elected official or appointed official of the City as Recipient, or of any designated public agencies, or of Contractor or Subrecipient who exercises or have exercised any functions or responsibilities with respect to CDBG-DR activities assisted pursuant to Part 570.611, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-DR-assisted activity, or have a financial interest in any contract, subcontract is perceived to have a potential conflict of interest. Potential conflicts must be reported to the Director of the Office of Community Development immediately such potential conflict is identified. Following a report, the Office of Community Development will evaluate the perceived conflict and make a determination regarding whether a conflict exists and/or whether the party in question is to be assisted by the program. Any perceived conflict must be reported, and a written determination made by the Director regarding program eligibility. Failure to report a perceived or actual conflict will result in immediate disqualification from the program.

2.3 Files, Records and Reports

In compliance with 24 CFR 570.506 the City has established the following record keeping procedures for its CDBG Disaster Recovery (CDBG DR) Program to ensure that HUD record keeping requirements are met. These procedures are communicated to staff on an as-needed basis and have been addressed verbally and in writing during interdepartmental CDBG Disaster Recovery training sessions and meetings.

Records maintained by the City of Columbia to demonstrate compliance with these policies and procedures are confidential and shall not be made public unless required by law. Only authorized City staff or HUD will have access to them; however, upon written request the City may give applicants, or an applicant's designated representative, the opportunity to inspect a record, during normal business hours, all records pertinent to his/her case, except materials classified as confidential. The City may impose reasonable conditions on the applicant's right to inspect these records, consistent with applicable laws.

All pertinent records will be retained for a minimum of five years after the latest of:

- The date by which all payments have been received by persons displaced by the project;
- The date the project has been completed;
- The date by which all issues resulting from litigation, negotiation, audit, or other action (e.g., civil rights compliance) have been resolved and final action taken; or
- For real property acquired with HUD funds, the date of final disposition (see 24 CFR 84.53 and 85.42).

Methods for collecting, transferring, and storing information will be in accordance with the May 2013 Executive Order on Making Open and Machine Readable the New Default for Government Information (2 CFR 200.335). The City of Columbia will, whenever practicable, collect, transmit, and store HUD CDBG Disaster Recovery-related information in open and machine-readable formats rather than in closed formats or on paper, although HUD will accept paper versions upon request. If paper copies are submitted, no more than an original and two copies will be provided. When original records are electronic and cannot be altered, there is no need to create and retain paper copies. When original records are paper, electronic versions may be substituted provided they are subject to periodic quality control reviews, provide reasonable safeguards against alteration, and remain readable.

2.3.1 Access to records

HUD, the Inspectors General, the Comptroller General of the United States, or any of their authorized representatives must have the right of access to any City of Columbia CDBG Disaster Recovery documents, papers, or other records to make audits, examinations, excerpts, and transcripts. This right also includes timely and reasonable access to the City personnel for the purpose of interviews and discussion related to such documents. These rights of access last as long as the records are retained.
Records that document activities meet a national objective and can be classified as an eligible activity:

- Records must provide a full description of each activity assisted with CDBG DR funds, including its location; the amount of CDBG DR funds budgeted, obligated, and expended for the activity; and the eligible activity pertinent to §570.482.
- Records must demonstrate that each activity undertaken meets one of the national objectives set forth in §570.208.
- For each activity determined to benefit low- and moderate-income persons, records will indicate the income limits applied and the point in time when the benefit was determined.
- For each activity determined to benefit low- and moderate-income persons based on the area served by the activity per HUD Notice CPD 05-06:
  - The boundaries of the service area;
  - The income characteristics of families and unrelated individuals in the service area; and
  - If the percent of low- and moderate-income persons in the service area is less than 51 percent, data showing that the area qualifies under the exception criteria set forth at *§570.208(a)(1)(ii).*
- For each activity determined to benefit low- and moderate-income persons because the activity involves a facility or service designed for use by a limited clientele consisting exclusively or predominantly of low- and moderate-income persons, records will include:
  - Documentation establishing that the facility or service is designed for the particular needs of or used exclusively by senior citizens, adults meeting the Bureau of the Census' Current Population Reports definition of *severely disabled*, persons living with AIDS, battered spouses, abused children, the homeless, illiterate adults, or migrant farm workers, for which the regulations provide a presumption concerning the extent to which low- and moderate-income persons benefit; or
  - Documentation describing how the nature and, if applicable, the location of the facility or service establishes that it is used predominantly by low- and moderate-income persons; or
  - Data showing the size and annual income of the family of each person receiving the benefit.
- Records must demonstrate that the City of Columbia has made the determinations required as a condition of eligibility of certain activities.
- Records must demonstrate compliance with §570.505 regarding any change of use of real property acquired or improved with CDBG Disaster Recovery assistance.
- Records must demonstrate compliance with the requirements in §570.606 regarding acquisition, displacement, relocation, and replacement housing.

2.3.2 Financial records in accordance with the requirements listed in 2 CFR 200 Subpart E – Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards.

Grantees must maintain evidence to support how the CDBG Disaster Recovery funds are expended including, to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, construction progress schedules signed by appropriate parties (e.g., general contractor and/or a project architect), and/or other documentation appropriate to the nature of the activity.

2.3.3 Fair housing and equal opportunity records

Fair housing and equal opportunity records will contain the following:

- Documentation of the analysis of impediments and the actions the City of Columbia has implemented with its housing and community development and other resources to remedy or ameliorate any impediments to fair housing choice.
- Data on the extent to which each racial and ethnic group and female-headed households (by gender of household head) have applied for, participated in, or benefited from, any program or activity funded in whole or in part with CDBG DR funds. Such information will be used only as a basis for further investigation of compliance with nondiscrimination requirements. No recipient is required to attain or maintain any particular statistical measure by race, ethnicity, or gender in covered programs.
- Data on employment in each of the City's operating units funded in whole or in part with CDBG funds, with such data maintained in the categories prescribed on the Equal Employment Opportunity Commission's EEO–4 form; and documentation of any actions undertaken to assure equal employment opportunities to all persons regardless of race, color, national origin, sex, or handicap in operating units funded in whole or in part under this part.
- Data indicating the race and ethnicity of households (and gender of single heads of households) Section the housing units to which each displaced household relocated. Such information will be used only as a basis for further investigation as to compliance with nondiscrimination requirements. No recipient is required to attain or maintain any particular statistical measure by race, ethnicity, or gender in covered programs.
- Records will document actions undertaken to meet the requirements of §570.607(b) implementing Section 3 of the Housing Development Act of 1968, relative to the hiring and training of low- and moderate-income persons and the use of local businesses.
- Data indicating the racial and ethnic character of each business entity receiving a contract or subcontract of $25,000 or more paid with CDBG DR funds,
- Data indicating which of those entities are women's business enterprises as defined in Executive Order 12138, the amount of the contract or subcontract, and documentation of recipient's affirmative steps to assure that minority business and women's business enterprises have an equal opportunity to obtain or compete for contracts and subcontracts as sources of supplies, equipment, construction, and services. Such affirmative steps may include, but are not limited to, technical assistance open to all businesses but designed to enhance opportunities for these enterprises and special outreach efforts to inform them of contract opportunities. Such steps shall not include preferring any business in the award of any contract or subcontract solely or in part on the basis of race or gender.
- Documentation of the affirmative action measures Columbia has taken to overcome prior discrimination, where the courts or HUD have found that the Columbia has previously discriminated against persons on the ground of race, color, national origin, or sex in administering a program or activity funded in whole or in part with CDBG DR funds.

2.3.4 Required Annual Reports

Program and Financial Reporting records are subject to *§ 570.507* as follows:

- The Director of Community Development and the Finance Director, or his/her designee, and the Community Development Administrator shall ensure that SF 425 and SF 425-A, the Quarterly Federal Financial Report, are filed accurately and in a timely manner.
- The Human Resources Director, or his/her designee, and the Community Development Administrator shall submit to HUD each year a report (HUD/EEO–4) on recipient employment containing data as of June 30. The Finance Officer and the Community Development Administrator shall ensure that HUD forms 60002 (Section 3 Summary Report), 2516 (MBE Contract Activity) and 4710 (Labor Standards) are filed correctly and in a timely manner.
- The Finance Officer shall also ensure that reporting requirements of the FFATA Act of 2009 are completed including reporting to FederalReporting.Gov.
- The Finance Officer and the Community Development Administrator will submit other reports and information determined necessary to perform its responsibilities.
- The Community Development staff will work with all sub-recipients to ensure they understand reporting requirements, with the understanding that the city and sub- recipients share joint responsibility for implementing activities in conformance with federal requirements. Sub-recipients shall demonstrate the achievement of program goals and the completion of activities on a monthly basis. All requests for reimbursement will have adequate documentation of how CDBG DR funds were used and that funds were used only for eligible activities.
- The Community Development Administrator, the Community Development Coordinator, and the Senior Finance Accountant will ensure that CDBG DR expenditures are drawn down on a regular basis and not less than monthly.

2.3.5 Non-Discrimination (Fair Housing and Equal Opportunity) by Sub-recipients

The CDBG Disaster Recovery staff will incorporate the following additional record keeping requirements per § 570.600 through § 570.614 as applicable.

- As a recipient of CDBG DR funds the City will ensure that sub-recipients comply with Title VI of the Civil Rights Act of 1964 (prohibiting race, color, and national origin discrimination including language access for limited English proficient persons), Section 504 of the Rehabilitation Act of 1973 (prohibiting disability discrimination), Title IX of the Education Amendments of 1972 (prohibiting sex discrimination in education and training programs), the Age Discrimination Act of 1975 (prohibiting age discrimination in the provision of services), and a variety of program-specific statutes with nondiscrimination requirements.
- Programs may target particular groups for services without violating guidelines regarding equal access to services, as long as any member of a particular group – e.g., any senior for a senior services program, any school-age child for a neighborhood-based afterschool program – is able to participate in the program. The City shall ensure that provisions of Executive Order No. 11246 of September 24, 1965, regarding Equal Employment Opportunity are carried out on all CDBG funded projects or activities, and that sub-recipients agree to and abide by federal (FHEO) and state (SC) fair housing and equal opportunity requirements for non-discrimination with regard to

access to services or housing provided by a sub-recipient. The City will further ensure that provisions of Executive Order 13166, *Improving Access to Services by Persons with Limited English Proficiency*, are carried out by sub-recipients to improve access to CPD programs and activities by eligible persons with limited English proficiency (LEP). The City and all sub-recipients shall adhere to Section 109 of the Act (§ 570.602), which requires that no person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance made available pursuant to the Act. Section 109 also directs that the prohibitions against discrimination on the basis of age under the Age Discrimination Act and the prohibitions against discrimination on the basis of disability under Section 504 shall apply to programs or activities receiving Federal financial assistance under Title I programs.

- The City shall abide by HUD regulations in Section 504, HUD's implementation of the American with Disabilities Act, to ensure that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving CDBG funds. The City shall include monitoring for Section 504 compliance as part of the annual monitoring of CDBG sub-recipients. Monitoring shall include inspection of facilities in which CDBG-funded program are offered to ensure that the facilities are accessible to persons with disabilities.

2.3.6 Environmental Review Records

Pursuant to environmental regulations (24 CFR Part 58*)* will document the following:

- Environmental review procedures set forth at 24 CFR part 58 have been completed for each activity (or project as defined in 24 CFR part 58), as applicable.
- Contracts were not executed, and expenditures were not approved until the environmental review was complete. In some cases, State environmental regulations and/or Local Coastal Plan (LCP) requirements was also considered.
- Environmental review forms and documents must be signed by the appropriate staff, which may include an environmental planner in the City Planning Division.
- Documentation will demonstrate that all Finding of No Significant Impact (FONSI) and Request for Release of Funds (RROF) requirements are completed prior to initiation of project activities for capital improvement and housing rehabilitation projects.

2.3.7 Citizen Participation Records

Citizen Participation Records will document:

- The city has followed its Citizen Participation Plan and guidelines for Substantial Amendments as set forth in the CDBG Disaster Recovery Action Plan. Any changes to the CDBG DR Action Plan must be approved by the Columbia City Council.

2.3.8 Labor Standards Records

Labor records (*§570.603)* will indicate that when CDBG funds in excess of $2,000 are allocated for construction projects, the sub-recipient and any contractor(s) shall abide by Davis Bacon and Related Acts

(DBRA) for prevailing wages and Section 3 economic opportunities for low and very low-income persons. Documentation that guidance is provided to sub-recipients and contractors regarding DBRA and Section 3 requirements, including wage determinations, as applicable should be included in program files.

2.3.9 Financial Management Records

Financial Management records will support the following processes:

- DBG DR expenditures are reviewed on a monthly basis by the Finance Officer and the Community Development Administrator. The CD Coordinator initiates the paperwork for a drawdown of funds based on actual expenses, prepares, and submits the draw request, and the CD Administrator and Director's signatures are required for the draw request approval. The Finance Deputy Director prepares the drawdown in DRGR, and the Finance Department approves the drawdown. Approval of the drawdown for entry into the City's accounting system (IFAS) is completed after acknowledgement in DRGR of receipt of funds from the U.S. Treasury.
- The City will not request CDBG funds in advance or as *float* funds from the U.S. Treasury.
- Monthly reports called draw down calculations monitor the status of all grant expenditures, are reviewed by the Community Development Administrator and Director, and forwarded to the Finance Department with IFAS Expenditure Report and back-up documentation.
- Payments are disbursed only on a reimbursement basis.
- Any interest received on grant funds will be considered Program Income and will be used for other eligible activities based on the program rules of the grant funds that generated that income. Interest income is reported to HUD quarterly on Form SF-272.
- Checks received are given to the Community Development Coordinator, who completes a Miscellaneous Revenue Payment form and hand delivers with back-up documentation to the finance officer who verifies the GL and JL account numbers are correct and then forwards to collections where a bank deposit is prepared.

2.4 Section 3 Compliance and Reporting

Section 3 requirements are triggered whenever the need for new employment, contracting or subcontracting is established for federally funded projects involving the construction or rehabilitation of housing, or other public construction projects, valued at $200,000 or more and contracts of $100,000 or more. Section 3 regulations apply to construction and professional services contracts alike and cover the entire project regardless of whether it is fully or partially funded by HUD.

The City of Columbia requires its contractors to provide equal employment opportunity to all employees and applicants for employment without regard to race, color, religion, sex, national origin, disability, veteran's or marital status, or economic status and to take affirmative action to ensure that both job applicants and existing employees are given fair and equal treatment. The City implements this policy by awarding contracts to contractors, vendors, and suppliers who create employment and business opportunities for qualified low and very low-income residents.

2.4.1 Procurement and Contracting

The City of Columbia has incorporated Section 3 procedures into its CDBG Disaster Recovery Procurement Policy and requires a Section 3 clause be included in all procurements generated for use with HUD funding. This policy establishes employment and training goals that contractors and subcontractors should meet to comply with Section 3 requirements.

The numerical goals:

Ten percent (10%) of the aggregate number of new hires in any fiscal year.

A Section 3 job qualifies if the wages or salary is at or below the annual income of a one-person household at 80% of Area Median Income (AMI).

It is the responsibility of contractors, vendors, and suppliers to implement progressive efforts to attain Section 3 compliance. Any contractor that does not meet the Section 3 numerical goals must demonstrate why meeting the goals were not feasible. The CDBG Disaster Recovery Compliance Specialist will actively ensure contractor and subcontractor compliance with Section 3 goals and responsibilities as follows:

- The Section 3 clause will appear in all applicable advertisements for bids and Requests for Qualifications and Proposals;
- The Section 3 clause and certifications will be included in all applicable construction specifications and final contracts;
- Contractor eligibility and lack of debarment will be verified before a Notice of Award is issued.
- A discussion of Section 3 requirements will be part of the agenda for all pre-construction conferences.
- Contractors will certify that any vacant employment or training positions filled after the contract award, but before contract execution, were not filled to circumvent obligations under 24 CFR Part 135.
- Contractors will include the Section 3 clause in every subcontract of $100,000 or more and will refrain from contracting with any firm known to be in violation of Section 3 regulations.
- Contractors and subcontractors will demonstrate and document good faith efforts to meet the numerical goals established by this Section 3 Plan.

Contractor compliance with Section 3 will be monitored and documented. The CDBG Disaster Recovery Compliance Specialist will assist contractors with little or no experience in achieving Section 3 hiring and contracting goals by:

- Asking the contractor to present a list of the number of subcontracting and/or employment opportunities expected to be generated from the initial contract.

- Providing the contractor with a list of Section 3 business concerns interested and qualified for construction projects. (See Subcontractor Outreach Program, Juliet Nelly, Program Compliance Administrator, 803-545-4185 or Juliet.Nelly@columbiasc.net, Office of Business Opportunities)

- Reviewing the new hire clause with contractors and subcontractors to ensure the requirement is understood. It is not intended for contractors and subcontractors to terminate existing employees, but to make every feasible effort to employ Section 3 program participants before others when hiring employees needed to complete proposed work to be performed with HUD (federal) funds. Before submitting bids or proposals all contractors/businesses seeking Section 3 preference must complete certifications acknowledging the Section 3 contracting and employment provisions required by this section. Such certifications shall be supported with appropriate documentation.

- Informing the contractor of known issues that might affect Section 3 residents from performing job related duties.

- Any business seeking Section 3 preference in the award of contracts or purchase agreements with the City of Columbia must complete the Certification for Business Concerns Seeking Section 3 Preference in Contracting and Demonstration of Capability form, which can be obtained from the Office of Business Opportunity and Procurement and Contracts. The business must be able to provide adequate documentation as evidence of eligibility for Section 3 preference.

- Certifications for Section 3 preference for business concerns must be submitted to the Section 3 Coordinator prior to the submission of bids for approval. If the Section 3 Coordinator previously approved the business concern to be Section 3 certified, then the certification can be submitted along with the bid.

- The Subrecipient will use the following methods to notify and contract with Section 3 business concerns when opportunities exist:

    - Advertise contracting opportunities via newspaper, mailings, and posting notices that provide general information about the work to be contracted and where to obtain additional information.

    - Provide written notice of contracting opportunities to all known Section 3 business concerns. The written notice will be provided in sufficient time to enable business concerns the opportunity to respond to the bid invitation.

    - Coordinate pre-bid meetings at which the Section 3 business concerns will be informed of upcoming contracting opportunities.

    - Provide contractor solicitation information to the Office of Business Opportunity to publicize opportunities.

- Contact business assistance agencies, Minority and Women's Business Enterprise (M/WBE) associations and community organizations informing them of contracting opportunities and requesting their assistance in identifying Section 3 businesses.

In an effort to resolve complaints of non-compliance through an internal process, the City of Columbia encourages submittal of such complaints to the Office of Business Opportunity as follows:

- Complaints of non-compliance should be filed in writing and must contain the name of the complainant and a brief description of the alleged violation of 24 CFR 135.

- Complaints must be filed within thirty (30) calendar days after the complainant becomes aware of the alleged violation.

- If the complaint is valid will conduct an informal, thorough investigation affording all interested parties an opportunity to submit pertinent testimony or evidence.

- The Office of Business Opportunity will provide written documentation detailing the findings of the investigation to the Office of Community Development. The Office of Community Development will review the findings before it is released to complainants, no later than thirty (30) days after filing of the complaint.

- If complainants wish to have their concerns considered outside of the City of Columbia, a complaint may be filed with:

  Assistant Secretary for Fair Housing and Equal Opportunity
  United States Department of Housing and Urban Development
  451 Seventh Street, SW
  Washington, DC 20410

- The complaint must be received no later than 180 days from the date of the action or omission upon which the complaint is based, unless the time for filing is extended by the Assistant Secretary for good cause.

2.5 Applicant and Citizen Complaint and Appeal Procedure

It is the policy of the City of Columbia to review all complaints and appeals received. Citizens have an opportunity to register appeals or complaints by email or letter only. Written complaints will be referred to the appropriate administrator for response. A written response will be made within 60 days from the deadline for submission of the appeal or complaint. A copy of the written complaint or appeal and the City's response will be maintained by the Community Development Department.

Complaints concerning the general administration of the CDBG Disaster Recovery Program may be submitted to:

Columbia CDBG Disaster Recovery Program
Community Development Department
1401 Main Street, 4th Floor
Columbia, SC 29201
CityRecoveryDR@columbiasc.net
803-545-4668

Initial complaints may be received by the Subrecipient, the Disaster Recovery Program Manager or the Office of Community Development. All complaints received are to be forwarded to the Disaster Recovery Program Manager, regardless of disposition by the Subrecipient or the Office of Community Development.

All complaints and appeals must be made in writing. An Appeal Committee made up of Office of Community Development staff will review each complaint or appeal and render a decision within 60 days of receipt of the complaint or appeal. That decision will be forwarded by certified mail to the applicant filing the complain or appeal.

Decisions of the Office of Community Development Appeal Committee may be appealed to the Director of the Office of Community Development for redetermination. The decision of the Director of the Office of Community Development will be final, and that decision communicated to the complainant by certified mail.

If the grievance has been forwarded to the City by HUD, the City's response to the grievance shall be copied to HUD and emailed to HUD's designated Disaster Recovery email address.

During application intake for CDBG Disaster Recovery funds, applicants for Disaster Recovery funds will be provided with the City's Grievance Procedures, which contain a point of contact, street address, and telephone number along with timeframes for filing a grievance. As a part of this process, applicants will be required to sign a receipt that they acknowledge and understand the grievance/complaint process.

The city will provide a written response to each complaint within 60 calendar days of receiving the complaint. All citizen or applicant grievances shall be appropriately logged and filed in a central repository for HUD review and monitoring. Additionally, a copy of the grievance and response will be maintained in the applicant's file. If the grievance has been forwarded to the city by HUD, the city's response to the grievance shall be copied to HUD and emailed to HUD's designed Disaster Recovery email address.

Persons objecting to approval of an application for the CDBG Disaster Recovery Program, the Citizen Participation Plan, environmental assessments, or program performance may present their written objection to the HUD area office:

U.S. Department of Housing and Urban Development
Community Planning and Development Division
1835 Assembly Street
Columbia, South Carolina 29201

2.6 Labor Standards

Applicability

The Project or Program to which the construction work covered by this contract pertains is being assisted by the United States of America and the following Federal Labor Standards Provisions are included in this Contract pursuant to the provisions applicable to such Federal assistance.

A. 1. (i) Minimum Wages. All laborers and mechanics employed or working upon the site of the work, will be paid unconditionally and not less often than once a week, and without subsequent deduction or rebate on any account (except such payroll deductions as are permitted by regulations issued by the Secretary of Labor under the Copeland Act (29 CFR Part 3), the full amount of wages and bona fide fringe benefits (or cash equivalents thereof) due at time of payment computed at rates not less than those contained in the wage determination of the Secretary of Labor which is attached hereto and made a part hereof, regardless of any contractual relationship which may be alleged to exist between the contractor and such laborers and mechanics. Contributions made or costs reasonably anticipated for bona fide fringe benefits under Section l(b)(2) of the Davis-Bacon Act on behalf of laborers or mechanics are considered wages paid to such laborers or mechanics, subject to the provisions of 29 CFR 5.5(a)(1)(iv); also, regular contributions made or costs incurred for more than a weekly period (but not less often than quarterly) under plans, funds, or programs, which cover the particular weekly period, are deemed to be constructively made or incurred during such weekly period. Such laborers and mechanics shall be paid the appropriate wage rate and fringe benefits on the wage determination for the classification of work actually performed, without regard to skill, except as provided in 29 CFR 5.5(a)(4). Laborers or mechanics performing work in more than one classification may be compensated at the rate specified for each classification for the time actually worked therein: Provided, That the employer's payroll records accurately set forth the time spent in each classification in which work is performed. The wage determination (including any additional classification and wage rates conformed under 29 CFR 5.5(a)(1)(ii) and the Davis-Bacon poster (WH1321) shall be posted at all times by the contractor and its subcontractors at the site of the work in a prominent and accessible, place where it can be easily seen by the workers.

(ii) (a) Any class of laborers or mechanics which is not listed in the wage determination, and which is to be employed under the contract shall be classified in conformance with the wage determination. HUD shall approve an additional classification and wage rate and fringe benefits therefor only when the following criteria have been met:

1. The work to be performed by the classification requested is not performed by a classification in the wage determination; and

2. The classification is utilized in the area by the construction industry; and
3. The proposed wage rate, including any bona fide fringe benefits, bears a reasonable relationship to the wage rates contained in the wage determination.

(b) If the contractor and the laborers and mechanics to be employed in the classification (if known), or their representatives, and HUD or its designee agree on the classification and wage rate (including the amount designated for fringe benefits where appropriate), a report of the action taken shall be sent by HUD or its designee to the Administrator of the Wage and Hour Division, Employment Standards Administration, U.S. Department of Labor, Washington, D.C. 20210. The Administrator, or an authorized representative, will approve, modify, or disapprove every additional classification action within 30 days of receipt and so advise HUD or its designee or will notify HUD or its designee within the 30-day period that additional time is necessary. (Approved by the Office of Management and Budget under OMB control number 1215- 0140.)

(c) In the event the contractor, the laborers, or mechanics to be employed in the classification or their representatives, and HUD or its designee do not agree on the proposed classification and wage rate (including the amount designated for fringe benefits, where appropriate), HUD or its designee shall refer the questions, including the views of all interested parties and the recommendation of HUD or its designee, to the Administrator for determination. The Administrator, or an authorized representative, will issue a determination within 30 days of receipt and so advise HUD or its designee or will notify HUD or its designee within the 30-day period that additional time is necessary. (Approved by the Office of Management and Budget under OMB Control Number 1215-0140.)

(d) The wage rate (including fringe benefits where appropriate) determined pursuant to subparagraphs (1)(ii)(b) or (c) of this paragraph, shall be paid to all workers performing work in the classification under this contract from the first day on which work is performed in the classification.

(iii) Whenever the minimum wage rate prescribed in the contract for a class of laborers or mechanics includes a fringe benefit which is not expressed as an hourly rate, the contractor shall either pay the benefit as stated in the wage determination or shall pay another bona fide fringe benefit or an hourly cash equivalent thereof.

(iv) If the contractor does not make payments to a trustee or other third person, the contractor may consider as part of the wages of any laborer or mechanic the amount of any costs reasonably anticipated in providing bona fide fringe benefits under a plan or program, Provided, That the Secretary of Labor has found, upon the written request of the contractor, that the applicable standards of the Davis Bacon Act have been met. The Secretary of Labor may require the contractor to set aside in a separate account asset for the meeting of obligations under the plan or program. (Approved by the Office of Management and Budget under OMB Control Number 1215-0140.)

2. Withholding. HUD or its designee shall upon its own action or upon written request of an authorized representative of the Department of Labor withhold or cause to be withheld from the contractor under

this contract or any other Federal contract with the same prime contractor, or any other Federally-assisted contract subject to Davis-Bacon prevailing wage requirements, which is held by the same prime contractor so much of the accrued payments or advances as may be considered necessary to pay laborers and mechanics, including apprentices, trainees and helpers, employed by the contractor or any subcontractor the full amount of wages required by the contract In the event of failure to pay any laborer or mechanic, including any apprentice, trainee or helper, employed or working on the site of the work, all or part of the wages required by the contract, HUD or its designee may, after written notice to the contractor, sponsor, applicant, or owner, take such action as may be necessary to cause the suspension of any further payment, advance, or guarantee of funds until such violations have ceased. HUD or its designee may, after written notice to the contractor, disburse such amounts withheld for and on account of the contractor or subcontractor to the respective employees to whom they are due. The Comptroller General shall make such disbursements in the case of direct Davis-Bacon Act contracts.

3. (i) Payrolls and basic records. Payrolls and basic records relating thereto shall be maintained by the contractor during the course of the work preserved for a period of three years thereafter for all laborers and mechanics working at the site of the work. Such records shall contain the name, address, and social security number of each such worker, his or her correct classification, hourly rates of wages paid (including rates of contributions or costs anticipated for bona fide fringe benefits or cash equivalents thereof of the types described in Section l(b)(2)(B) of the Davis-bacon Act), daily and weekly number of hours worked, deductions made, and actual wages paid. Whenever the Secretary of Labor has found under 29 CFR 5.5 (a)(1)(iv) that the wages of any laborer or mechanic include the amount of any costs reasonably anticipated in providing benefits under a plan or program described in Section l(b)(2)(B) of the Davis Bacon Act, the contractor shall maintain records which show that the commitment to provide such benefits is enforceable, that the plan or program is financially responsible, and that the plan or program has been communicated in writing to the laborers or mechanics affected, and records which show the costs anticipated or the actual cost incurred in providing such benefits. Contractors employing apprentices or trainees under approved programs shall maintain written evidence of the registration of apprenticeship programs and certification of trainee programs, the registration of the apprentices and trainees, and the ratios and wage rates prescribed in the applicable programs. (Approved by the Office of Management and Budget under OMB Control Numbers 1215-0140 and 1215-0017.)

(ii) (a) The contractor shall submit weekly for each week in which any contract work is performed a copy of all payrolls to HUD or its designee if the agency is a party to the contract, but if the agency is not such a party, the contractor will submit the payrolls to the applicant sponsor, or owner, as the case may be, for transmission to HUD or its designee. The payrolls submitted shall set out accurately and completely all of the information required to be maintained under 29 CFR 5.5(a)(3)(i) except that full social security numbers and home addresses shall not be included on weekly transmittals. Instead, the payrolls shall only need to include an individually identifying number for each employee (e.g., the last four digits of the employee's social security number). The required weekly payroll information may be submitted in any form desired. Optional Form WH-347 is available for this purpose from the Wage and Hour Division Web site at http://www.dol.gov/esa/whd/forms/wh347instr.htm or its successor site. The prime contractor is responsible for the submission of copies of payrolls by all subcontractors. Contractors and subcontractors

shall maintain the full social security number and current address of each covered worker, and shall provide them upon request to HUD or its designee if the agency is a party to the contract, but if the agency is not such a party, the contractor will submit the payrolls to the applicant sponsor, or owner, as the case may be, for transmission to HUD or its designee, the contractor, or the Wage and Hour Division of the Department of Labor for purposes of an investigation or audit of compliance with prevailing wage requirements. It is not a violation of this subparagraph for a prime contractor to require a subcontractor to provide addresses and social security numbers to the prime contractor for its own records, without weekly submission to HUD or its designee. (Approved by the Office of Management and Budget under OMB Control Number 1215-0149.)

(b) Each payroll submitted shall be accompanied by a "Statement of Compliance," signed by the contractor or subcontractor or his or her agent who pays or supervises the payment of the persons employed under the contract and shall certify the following: (1) That the payroll for the payroll period contains the information required to be provided under 29 CFR 5.5 (a)(3)(ii), the appropriate information is being maintained under 29 CFR 5.5(a)(3)(i), and that such information is correct and complete;

(2) That each laborer or mechanic (including each helper, apprentice, and trainee) employed on the contract during the payroll period has been paid the full weekly wages earned, without rebate, either directly or indirectly, and that no deductions have been made either directly or indirectly from the full wages earned, other than permissible deductions as set forth in 29 CFR Part 3;

(3) That each laborer or mechanic has been paid not less than the applicable wage rates and fringe benefits or cash equivalents for the classification of work performed, as specified in the applicable wage determination incorporated into the contract.

(c) The weekly submission of a properly executed certification set forth on the reverse side of Optional Form WH-347 shall satisfy the requirement for submission of the "Statement of Compliance" required by subparagraph A.3.(ii)(b).

(d) The falsification of any of the above certifications may subject the contractor or subcontractor to civil or criminal prosecution under Section 1001 of Title 18 and Section 231 of Title 31 of the United States Code.

(iii) The contractor or subcontractor shall make the records required under subparagraph A.3.(i) available for inspection, copying, or transcription by authorized representatives of HUD or its designee or the Department of Labor, and shall permit such representatives to interview employees during working hours on the job. If the contractor or subcontractor fails to submit the required records or to make them available, HUD or its designee may, after written notice to the contractor, sponsor, applicant, or owner, take such action as may be necessary to cause the suspension of any further payment, advance, or guarantee of funds. Furthermore, failure to submit the required records upon request or to make such records available may be grounds for debarment action pursuant to 29 CFR 5.12.

4. Apprentices and Trainees.

(i) Apprentices. Apprentices will be permitted to work at less than the predetermined rate for the work they performed when they are employed pursuant to and individually registered in a bona fide apprenticeship program registered with the U.S. Department of Labor, Employment and Training Administration, Office of Apprenticeship Training, Employer and Labor Services, or with a State Apprenticeship Agency recognized by the Office, or if a person is employed in his or her first 90 days of probationary employment as an apprentice in such an apprenticeship program, who is not individually registered in the program, but who has been certified by the Office of Apprenticeship Training, Employer and Labor Services or a State Apprenticeship Agency (where appropriate) to be eligible for probationary employment as an apprentice. The allowable ratio of apprentices to journeymen on the job site in any craft classification shall not be greater than the ratio permitted to the contractor as to the entire work force under the registered program. Any worker listed on a payroll at an apprentice wage rate, who is not registered or otherwise employed as stated above, shall be paid not less than the applicable wage rate on the wage determination for the classification of work actually performed. In addition, any apprentice performing work on the job site in excess of the ratio permitted under the registered program shall be paid not less than the applicable wage rate on the wage determination for the work actually performed. Where a contractor is performing construction on a project in a locality other than that in which its program is registered, the ratios and wage rates (expressed in percentages of the journeyman's hourly rate) specified in the contractor's or subcontractor's registered program shall be observed. Every apprentice must be paid at not less than the rate specified in the registered program for the apprentice's level of progress, expressed as a percentage of the journeymen hourly rate specified in the applicable wage determination. Apprentices shall be paid fringe benefits in accordance with the provisions of the apprenticeship program. If the apprenticeship program does not specify fringe benefits, apprentices must be paid the full amount of fringe benefits listed on the wage determination for the applicable classification. If the Administrator determines that a different practice prevails for the applicable apprentice classification, fringes shall be paid in accordance with that determination. In the event the Office of Apprenticeship Training, Employer and Labor Services, or a State Apprenticeship Agency recognized by the Office, withdraws approval of an apprenticeship program, the contractor will no longer be permitted to utilize apprentices at less than the applicable predetermined rate for the work performed until an acceptable program is approved.

(ii) Trainees. Except as provided in 29 CFR 5.16, trainees will not be permitted to work at less than the predetermined rate for the work performed unless they are employed pursuant to and individually registered in a program which has received prior approval, evidenced by formal certification by the U.S. Department of Labor, Employment and Training Administration. The ratio of trainees to journeymen on the job site shall not be greater than permitted under the plan approved by the Employment and Training Administration. Every trainee must be paid at not less than the rate specified in the approved program for the trainee's level of progress, expressed as a percentage of the journeyman hourly rate specified in the applicable wage determination. Trainees shall be paid fringe benefits in accordance with the provisions of the trainee program. If the trainee program does not mention fringe benefits, trainees shall be paid the full amount of fringe benefits listed on the wage determination unless the Administrator of the Wage and Hour Division determines that there is an apprenticeship program associated with the corresponding

journeyman wage rate on the wage determination which provides for less than full fringe benefits for apprentices. Any employee listed on the payroll at a trainee rate who is not registered and participating in a training plan approved by the Employment and Training Administration shall be paid not less than the applicable wage rate on the wage determination for the work actually performed. In addition, any trainee performing work on the job site in excess of the ratio permitted under the registered program shall be paid not less than the applicable wage rate on the wage determination for the work actually performed. In the event the Employment and Training Administration withdraws approval of a training program, the contractor will no longer be permitted to utilize trainees at less than the applicable predetermined rate for the work performed until an acceptable program is approved.

(iii) Equal employment opportunity. The utilization of apprentices, trainees, and journeymen under 29 CFR Part 5 shall be in conformity with the equal employment opportunity requirements of Executive Order 11246, as amended, and 29 CFR Part 30.

5. Compliance with Copeland Act requirements. The contractor shall comply with the requirements of 29 CFR Part 3 which are incorporated by reference in this contract.

6. Subcontracts. The contractor or subcontractor will insert in any subcontracts the clauses contained in subparagraphs 1 through 11 in this paragraph A and such other clauses as HUD or its designee may by appropriate instructions require, and a copy of the applicable prevailing wage decision, and also a clause requiring the subcontractors to include these clauses in any lower tier subcontracts. The prime contractor shall be responsible for the compliance by any subcontractor or lower tier subcontractor with all the contract clauses in this paragraph.

7. Contract termination; debarment. A breach of the contract clauses in 29 CFR 5.5 may be grounds for termination of the contract and for debarment as a contractor and a subcontractor as provided in 29 CFR 5.12.

8. Compliance with Davis-Bacon and Related Act Requirements. All rulings and interpretations of the Davis-Bacon and Related Acts contained in 29 CFR Parts 1, 3, and 5 are herein incorporated by reference in this contract.

9. Disputes concerning labor standards. Disputes arising out of the labor standards provisions of this contract shall not be subject to the general dispute's clause of this contract. Such disputes shall be resolved in accordance with the procedures of the Department of Labor set forth in 29 CFR Parts 5, 6, and 7. Disputes within the meaning of this clause include disputes between the contractor (or any of its subcontractors) and HUD or its designee, the U.S. Department of Labor, or the employees or their representatives.

10. (i) Certification of Eligibility. By entering into this contract, the contractor certifies that neither it (nor he or she) nor any person or firm who has an interest in the contractor's firm is a person or firm ineligible to be awarded Government contracts by virtue of Section 3(a) of the Davis-Bacon Act or 29 CFR 5.12(a)(1)

or to be awarded HUD contracts or participate in HUD programs pursuant to 24 CFR Part 24.

(ii) No part of this contract shall be subcontracted to any person or firm ineligible for award of a Government contract by virtue of Section 3(a) of the Davis-Bacon Act or 29 CFR 5.12(a)(1) or to be awarded HUD contracts or participate in HUD programs pursuant to 24 CFR Part 24.

(iii) The penalty for making false statements is prescribed in the U.S. Criminal Code, 18 U.S.C. 1001. Additionally, U.S. Criminal Code, Section 1 01 0, Title 18, U.S.C., "Federal Housing Administration transactions", provides in part: "Whoever, for the purpose of . . . influencing in any way the action of such Administration.... makes, utters, or publishes any statement knowing the same to be false.... shall be fined not more than $5,000 or imprisoned not more than two years, or both."

11. Complaints, Proceedings, or Testimony by Employees. No laborer or mechanic to whom the wage, salary, or other labor standards provisions of this Contract are applicable shall be discharged or in any other manner discriminated against by the Contractor or any subcontractor because such employee has filed any complaint or instituted or caused to be instituted any proceeding or has testified or is about to testify in any proceeding under or relating to the labor standards applicable under this Contract to his employer. B. Contract Work Hours and Safety Standards Act. The provisions of this paragraph B are applicable where the amount of the prime contract exceeds $100,000. As used in this paragraph, the terms "laborers" and "mechanics" include watchmen and guards.

(1) Overtime requirements. No contractor or subcontractor contracting for any part of the contract work which may require or involve the employment of laborers or mechanics shall require or permit any such laborer or mechanic in any workweek in which the individual is employed on such work to work in excess of 40 hours in such workweek unless such laborer or mechanic receives compensation at a rate not less than one and one-half times the basic rate of pay for all hours worked in excess of 40 hours in such workweek.

(2) Violation; liability for unpaid wages; liquidated damages. In the event of any violation of the clause set forth in subparagraph (1) of this paragraph, the contractor, and any subcontractor responsible therefor shall be liable for the unpaid wages. In addition, such contractor and subcontractor shall be liable to the United States (in the case of work done under contract for the District of Columbia or a territory, to such District or to such territory), for liquidated damages. Such liquidated damages shall be computed with respect to each individual laborer or mechanic, including watchmen and guards, employed in violation of the clause set forth in subparagraph (1) of this paragraph, in the sum of $10 for each calendar day on which such individual was required or permitted to work in excess of the standard workweek of 40 hours without payment of the overtime wages required by the clause set forth in sub paragraph (1) of this paragraph.

(3) Withholding for unpaid wages and liquidated damages. HUD or its designee shall upon its own action or upon written request of an authorized representative of the Department of Labor withhold or cause to be withheld, from any moneys payable on account of work performed by the contractor or subcontractor

under any such contract or any other Federal contract with the same prime contract, or any other Federally-assisted contract subject to the Contract Work Hours and Safety Standards Act which is held by the same prime contractor such sums as may be determined to be necessary to satisfy any liabilities of such contractor or subcontractor for unpaid wages and liquidated damages as provided in the clause set forth in subparagraph (2) of this paragraph.

(4) Subcontracts. The contractor or subcontractor shall insert in any subcontracts the clauses set forth in subparagraph (1) through (4) of this paragraph and also a clause requiring the subcontractors to include these clauses in any lower tier subcontracts. The prime contractor shall be responsible for compliance by any subcontractor or lower tier subcontractor with the clauses set forth in subparagraphs (1) through (4) of this paragraph.

C. Health and Safety. The provisions of this paragraph C are applicable where the amount of the prime contract exceeds $100,000.

(1) No laborer or mechanic shall be required to work in surroundings or under working conditions which are unsanitary, hazardous, or dangerous to his health and safety as determined under construction safety and health standards promulgated by the Secretary of Labor by regulation.

(2) The Contractor shall comply with all regulations issued by the Secretary of Labor pursuant to Title 29 Part 1926 and failure to comply may result in imposition of sanctions pursuant to the Contract Work Hours and Safety Standards Act, (Public Law 91-54, 83 Stat 96). 40 USC 3701 et seq.

(3) The contractor shall include the provisions of this paragraph in every subcontract so that such provisions will be binding on each subcontractor. The contractor shall take such action with respect to any subcontractor as the Secretary of Housing and Urban Development or the Secretary of Labor shall direct as a means of enforcing such provisions.

2.6.1 Contract Work Hours and Safety Standards Act (40 USC 3701-3708)

When applicable, all contracts awarded by the City in excess of $100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 USC 3702 and 3704, as supplemented by the Department of Labor Regulations (29 CFR Part 5). Under 40 USC 3702 of the Act, each contractor must compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40.

2.7 Fair Housing, Language Access Plan, Management of Accessibility Requirements

2.7.1 Fair Housing

The Columbia CDBG Disaster Recovery Program fully complies with all Housing and Urban Development (HUD) regulations governing Fair Housing and Equal Opportunity. No person shall, on the grounds of race, color, sex, religion, national or ethnic origin, familial status, or disability, be excluded from participation in, be denied benefits of, or otherwise be subjected to discrimination during the implementation of any Columbia CDBG Disaster Recovery Program. Displaced households who believe they have suffered illegal discrimination should contact the Community Development Department immediately for review and assistance in filing a complaint with the HUD Office of Fair Housing and Equal Opportunity.

2.7.2 Language Access Plan

The city and the CDBG-DR program will adhere to the requirements set forth in the City's CDBG Language Access Plan, as it relates to providing programs and services to households where English is not the primary language of the household. Request for language access assistance will be logged by case managers and referred to OCD's LAP Coordinator if they have questions or are unable to provide the required services.

2.7.3 Accommodations for Persons with Disabilities

The City shall abide by HUD regulations in Section 504, HUD's implementation of the American with Disabilities Act, to ensure that no qualified individual with a disability should, only by reason of his or her disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving CDBG funds. The City shall include monitoring for Section 504 compliance as part of the annual monitoring of CDBG sub-recipients. Monitoring shall include inspection of facilities in which CDBG-funded program are offered to ensure that the facilities are accessible to persons with disabilities.

Construction scopes of work will take into consideration and provide modification for any homeowners requiring disability modifications for themselves or household members. Case managers will note where modifications are requested and ensure that the Construction Manager is aware of the request at the time of scope development.

2.8 Lead Based Paint

Policy and Procedures for compliance with HUD Lead-Safe Housing Rule,24 CFR part 35 & EPA Lead-Based Paint RRP Rule,40 CFR part 745 as adopted by the City of Columbia for the Disaster Recovery Program

2.8.1. Overview

The workflow procedures contained in this document are to be used in implementing the City of Columbia's Lead-Based Paint policies. These procedures were developed to ensure that the City's disaster recovery programs are carried out in compliance with 24 CFR Part 35, which is commonly referred to as HUD's Lead-Safe Housing Rule (LSHR) and 40 CFR Part 745, which is commonly referred to as EPA's Lead-Based Paint Renovation, Repair, and Painting (RRP) Rule.

2.8.2 Description of Program Evaluation and Compliance Tools

The following forms will be used to track overall compliance and to document the steps that were taken to apply LSHR regulations to CDBG/DR housing projects. Some of these forms will be utilized by designated staff to help determine the level of testing and remediation that is necessary for each project in order to meet requirements of the LSHR. **Responsibility for each form is noted in bold.**

A. LSHR Compliance Checklist [Exhibit-3] – This form will be used to document the completion of certain tasks in order to comply with the Lead Safe Housing Rule. Assigned staff shall use this form starting with applicant intake up until final closeout in order to record receipt of required documentation. **Subrecipient**

B. LSHR Applicability Form [Exhibit-4] – This form will be used by assigned staff as an initial assessment tool in order to determine if the LSHR applies to each project. Staff shall perform this assessment immediately following approval for applicant to participate in the CDBG/DR program. This form may require periodic updates based upon results of any required lead paint testing. **Subrecipient**

C. Lead Safe Housing Requirements Screening Worksheet Parts 1 thru 4 [Exhibit-5] –These forms will be completed by assigned staff immediately after required lead paint testing has been performed on pre-1978 housing and after initial inspection/assessment of damage has been completed at property. Parts 1 thru 2 shall be completed prior to completing scope of work. Parts 3 thru 4 shall be completed after scope of work and cost estimate have been finalized. Staff will use the "Calculating Level of Rehabilitation Assistance: Worksheet 1 Single Family Unit" form [Exhibit-8] or the "Calculating Level of Rehabilitation Assistance: Worksheet 2 thru 3 Multi Family" forms [Exhibit-9] to determine hard cost and the required level of hazard reduction [See chart- Exhibit-2]. **Subrecipient**

D. Lead-Based Paint Evaluation Notice [Exhibit-6] – This form will be used by assigned staff to notify applicant of any LBP Evaluation that is performed at Applicant's home. A copy of the evaluation /report along with this notice will be delivered to and receipt noted by applicant within fifteen days of Staff receiving report from LBP testing company [*If subject property is rental unit, then all Tenants must sign for receipt of LBP Evaluation Notice and receive copy of evaluation/report **Subrecipient (results must be attached).**

E. Lead Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities [Exhibit-7] – This form will be used by assigned staff to determine if Applicant's relocation will be necessary as a result of addressing any lead-based paint hazards in the home. **Subrecipient based on assessor's report.**

F. Calculating Level of Rehabilitation Assistance: Worksheet #1 Single-Family Unit [Exhibit-8] - This form will be used by assigned staff to calculate the "hard cost" of repairs to single-family housing in order to determine level of lead hazard reduction activities required to comply with the LSHR. **Subrecipient**

G. Calculating Level of Rehabilitation Assistance: Worksheet #2 Multi-Family – All units Federally Assisted [Exhibit-9] - These forms will be used by assigned staff to calculate the "hard cost" of repairs to multi-Family unit housing in order to determine level of lead hazard reduction activities required to comply with the LSHR. **Subrecipient**

H. Re-Occupancy Authorization [Exhibit-10]- This form will be used by Assigned staff to notify any Applicant that was temporarily relocated due to LBP hazard remediation activities, that it is safe to return home. A copy of the LBP Clearance Test along with an LBP Evaluation Notice will be included with this notice. **Subrecipient after full clearance with copy of result.**

I. Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities [Exhibit-11] - This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is used to document Contractor's methods used to protect occupant belongings and methods used to secure the site during LBP hazard remediation activities. **Subrecipient and abatement contractor.**

J. Lead Based Paint Renovation Recordkeeping Checklist [Exhibit-12] – This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This checklist form is used to document steps taken by Contractor to ensure that site was secure, proper containment was in place, and site was thoroughly cleaned as part of the LBP hazard remediation activities. **Subrecipient and abatement contractor.**

K. Lead Based Paint Post Construction Safe Work Practices Certification [Exhibit-13]-This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is used to document that workers used Safe Work Practices during LBP hazard remediation activities. **Subrecipient and abatement contractor.**

L. Lead-Based Paint Contractor/Employee Certification of Worker Training [Exhibit-14]-This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is completed by the Contractor after all work is complete and is used to document that all persons who worked on the rehabilitation project were properly qualified to do LBP hazard remediation work. **Subrecipient and abatement contractor.**

M. Lead-Based Paint – Ongoing Monitoring Schedule for Rental Property [Exhibit-15]-This form will be filled out by assigned staff and given to Applicant / Owner of any rental property where lead-based paint has not been abated. Staff shall encourage Applicant /Owner to perform the recommended LBP re-assessments on the dates as listed on this document. **Subrecipient**

N. "Contractor Selection Criteria for Lead-Safe Housing Rule Compliance"(Exhibit 16) - Subrecipient will use the information on this form to locate EPA Lead-Based Paint Certified Firms and Abatement Contractors. **Subrecipient**

2.8.3 Process

A. Initial Intake – Prior to meeting with applicant, assigned staff will obtain information from Richland County Tax Assessor's records to determine the approximate year as to when applicant's house was built. During the first meeting with applicant/owner of housing built prior to 1978, Staff will provide applicant with the "Protect Your Family from Lead in Your Home" and "The Lead-Safe Certified Guide to Renovate Right" brochures [Exhibit- 1] and obtain signature(s) for receipt of brochures from applicant. Staff shall verify that the applicant has listed the names and ages of all occupants of the home on applicants' initial application for assistance in the CDBG/DR program.

B. Determining whether prior risk assessment can be used. The Subrecipient will evaluate the prior risk assessment and determine whether it is adequate to proceed or whether additional assessment will be required due to a change in project scope. At this point if additional assessment is needed the city and/or Subrecipient will make the determination regarding who will conduct the additional risk assessment

If it is determined that a new assessment is not needed, then the Subrecipient will sign the certification (Exhibit 5).

C. Documenting the Compliance Checklist

ICF staff shall use the Compliance Checklist to track the steps that are required to comply with the LSHR and verify that all documentation is in electronic and hard files.

D. Evaluation of Properties

ICF staff shall use the LSHR Applicability form and Screening Worksheets to determine if the property or project are exempt from the Rule.

If upon initial view, the project is determined to be exempt from the Rule, staff will fill out and sign the LSHR Applicability Form listing approximate date home was constructed as determined by tax documents. Attach tax document/information to form and place in file.

If the project is initially not exempt from the rule, Subrecipient staff shall proceed with obtaining lead-based paint test results in order to make a determination on required activity. Initial work write-up is forwarded to testing company to assist with determining area(s) to be tested for lead-based paint. An EPA certified Risk Assessor performs testing following EPA guidelines and forwards results to assigned staff. Upon receipt of test results, staff use the Screening Worksheet(s) to determine if project is exempt from the LSHR.

If project is exempt after testing, Subrecipient staff will fill out and sign LSHR Applicability form, sign all applicable Screening Worksheets, and attach lead-based paint test result documentation to the Screening Worksheets. Staff will fill out “Lead-based Paint Evaluation Notice” and forward notice and a copy of the LBP Risk Assessment to applicant. The applicant signs for receipt of all documents within fifteen days after staff receives results from LBP testing Company.

If project is not exempt after testing, Subrecipient staff will fill out the “Lead-Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities” sheet and “LBP Evaluation Notice” and forward to applicant along with copy of Risk Assessment and obtain signatures prior to placing documents in file(s).

If project is not exempt after testing, Subrecipient staff will place the signed LSHR Applicability form, signed applicable Screening Worksheets, test results, signed Lead-Based Paint Evaluation Notice”, and “Lead-Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities” sheet in project file(s) and move forward with addressing any lead-based paint hazards noted on Risk Assessment [lead-paint test] as required by the LSHR.

E. Updating Work Write-up- Subrecipient staff will update the initial work write-up to include activities required to address all lead-paint **hazards** as listed in Risk Assessment.

F. Calculating Federal Rehabilitation Assistance

After the scope of work has been updated to include lead-paint hazard reduction requirements and the cost estimate for repairs, Subrecipient staff will use the "Calculating Level of Federal Rehabilitation Assistance" worksheet(s) [Exhibit-8: Single-family, Exhibit-9: multi-family] to determine the total rehabilitation hard cost. The hard cost is then used to determine the level of hazard reduction that is required under the LSHR [see Exhibit-2].

G. Bid Solicitation

Subrecipient staff will prepare bid package which includes the work write-ups, instructions to bidders, a list of required licenses and certifications, and copies of all environmental testing results. Contractors must utilize a certified abatement contractor for all abatement work and provide the appropriate disposal documentation with their invoices.[2] All Companies bidding must be EPA Lead-Based Paint Certified Firms whenever bidding on repairs to housing containing lead-based paint. ALL Contractors and/or Sub-contractors that conduct work that disturbs lead-based paint must have RRP certification. EPA Lead-Based Paint Certified Renovators are required for all LBP projects where hard cost is less than $25,000 but more than $5,000. HUD approved Lead-Safe Practices training is required for all workers on projects where hard cost is less than $5,000. See Exhibit 16, "Contractor Selection Criteria for Lead-Safe Housing Rule Compliance"

H. Verification of Lead Remediation Contractor Certifications

Companies/Contractors are required to submit copies of their licenses and certifications during their initial application to participate in the City's CDBG/DR program. Subrecipient staff shall maintain bid list to ensure that all licenses and certifications are received during initial application. Bid list shall clearly designate companies that are EPA Lead-Based Paint Certified Abatement or Renovation Firms. Prior to award of any construction contract, Staff shall verify that all licenses and certifications are currently up to date.

[2] On June 18, 2003, EPA issued a final rule to help accelerate the pace of lead-based paint removal from residences, and thereby reduce exposure to children and adults from the health risks associated with lead, This final rule expressly allows residential lead-based paint waste to be disposed of in construction and demolition (C&D) landfills. Thus, residential lead-based paint waste may be disposed of in a C&D landfill or a municipal solid waste landfill.

https://www.epa.gov/lead/regulatory-status-waste-generated-contractors-and-residents-lead-based-paint-activities#:~:text=RCRA%20Amendment&text=Thus%2C%20residential%20lead%2Dbased%20paint,a%20municipal%20solid%20waste%20landfill

I. Monitoring Lead Remediation Work

All remediation work will be completed prior to the start of repairs. Upon completion, Subrecipient staff will contact the City's contracted risk assessment firm to provide an initial clearance. Follow that clearance, the renovation work may start. Subrecipient staff shall perform weekly monitoring of site to ensure that containment/protection measures are in place and that home remains vacant during environmental remediation work.

J. Lead Clearance Examinations

At the completion of all repairs, Subrecipient staff will contact the City's contracted risk assessment contractor to conduct a lead-based paint clearance examination. An EPA Certified Lead-Based Paint Risk Assessor will conduct the clearance examination following EPA guidelines to ensure that the site is safe for the occupants to return to the home. Once clearance is obtained, Subrecipient staff shall fill out "Re-Occupancy Authorization" form [Exhibit-10] and "Lead-based Paint Evaluation Notice" form [Exhibit-6] and attach copy of clearance examination test results to the form. A copy of previously mentioned documents shall be delivered to applicant, with receipt of notice, within fifteen days from Staff's receipt of test results. Copies of all previously mentioned documents shall be placed in file.

K. Contractor Paperwork

After LBP Clearance is achieved, Subrecipient staff shall confirm receipt of the following documents to be provided by Contractor prior to final payment / closeout of project:

- Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities [Exhibit-11]
- Lead Based Paint Renovation Recordkeeping Checklist [Exhibit-12]
- Lead Based Paint Post Construction Safe Work Practices Certification [Exhibit-13]
- Lead-Based Paint Contractor/Employee Certification of Worker Training [Exhibit-14]

All of these documents will be provided to OCD staff along with the final invoice for each specific property.

2.8.4. Qualifications for Hazard Evaluators

Lead-based Paint Inspectors and Risk Assessors must be EPA certified to conduct evaluations. Staff assigned to field inspections shall possess HUD's "Lead-Based Paint Visual Assessment Certification". The following specific certification requirements apply to EPA certified evaluators (from 40 CFR 745.226):

Certified Paint Inspectors must:

- Successfully complete an EPA accredited training program;
- Pass the exam required by the certifying authority;
- Apply for and be certified by the EPA.

Risk assessors must:

- Successfully complete an EPA accredited training program;

- Pass the exam required by the certifying authority;
- Apply for and be certified by the EPA;

Clearance must be performed by the following:

- EPA Certified Risk Assessor;
- EPA Certified Lead-based Paint Inspector;

Exhibit 1: "Protect Your Family from Lead in Your Home" and "The Lead-Safe Certified Guide to Renovate Right" brochures

Exhibit 2: Level of Lead Hazard Reduction Activities

2. 9 Uniform Relocation Act

In the event of any temporary or permanent relocation of tenants as a result of CDBG Disaster Recovery-funded activities, the City will follow the policies and procedures identified in its Uniform Relocation Plan. Records of residential relocation or displacement (*§570.606)* will:

- Include a list identifying the name, address, and characteristics for all tenants residing at the property at the time of application for assistance;
- A list identifying the name, address and characteristics for all persons displaced as a result of acquisition, rehabilitation, or demolition activities.
- A list of persons occupying the property upon completion of the project.
- Documentation on persons not displaced shall include:
    - Evidence that the person received timely written notice that they would not be displaced by the project or that they might be temporarily relocated (copy of the Notice of Non-displacement and receipt).
- Evidence that the tenant occupant received an offer to lease and occupy a suitable, safe, sanitary, and affordable dwelling in the building and reimbursement of any out-of-pocket expenses incurred in connection with temporary relocation.
- A copy of any appeal or complaint filed and the City's response.
- Separate case files for persons displaced should include documentation demonstrating that the City verified the persons relocation needs, current situation, and eligibility for URA assistance.
- Records will include:
    - the name, sex, age, race/ethnicity, disability,
    - relationship to head of household,
    - annual income,
    - certification of citizenship;
    - the number of bedrooms, amenities, square footage,
    - amount of rent and utilities,
    - date of initial occupancy of the current unit;

- Documentation of income (for tenants only), rent and utility costs for the displacement and comparable replacement units;
- Copies of the following notices displaying the person's name, mailing address, and date mailed:
    - General Information Notice,
    - Notice of Eligibility,
    - 90 Day Notice and/or 30-Day notice and
    - evidence of delivery;
- Identification of relocation needs and preferences;
- Dates of personal contacts and advisory services provided;
- Records of referrals to comparable replacement dwellings, date of referral, date of availability, reason(s) person declined referral, inspection(s) of the chosen replacement dwelling for decent, safe, and sanitary conditions;
- Moving cost estimates, bids, or amount determined based on current Fixed Residential Moving Cost Schedule;
- Copies of all relocation claim forms and related documentation, evidence that person received payment;
- Documentation to support why a claim was not made or was not paid (e.g., displaced person moved on his/her own, moved prior to Notice, failed to provide requested documentation to support a claim, or a signed statement indicating the persons decision not to claim part, or all of the assistance offered); and
- A copy of any appeal or complaint filed and the City's response.

2.9.1 Voluntary Relocation

Some homeowners may require voluntary relocation assistance. A determination will be made by the case managers whether or not the household has the ability to secure temporary housing while construction is underway. If it is determined by the Case Manager that the household has insufficient resources to secure temporary housing or to provide for the storage of household items and other resources to assist cannot be identified, the applicant's case will be referred to the Special Case Panel for a determination. The determination of the Special Case Panel must be approved by the Executive Leadership Team (Director of the Office of Community Development, Assistant City Manager for Economic and Community Development, and Director of Budget and Programs) prior to implementation. If hardship is determined, then the program will provide financial support to enable the household to relocate as long as the construction activities to be undertaken require that they vacate the home. Costs related to voluntary relocation will NOT be included in the calculation of the applicant's forgivable grant amount.

The CDBG-DR Action Plan for the City of Columbia defines a demonstrable hardship as a substantial change in an applicant's situation that prohibits or severely affects their ability to provide a minimal standard of living or the basic necessities of life including food, housing, clothing, and transportation without causing economic distress well beyond mere inconvenience as shown by objective evidence.

In addition to the city's demonstrable hardship policy as outlined in the approved Action Plan (defined above), the city has defined financial hardship as outlined in the city's Voluntary Relocation Policy. This policy applies to the optional relocation of owner-occupants participating in voluntary CDBG-DR housing programs, and not tenants, when they cannot afford to continue to pay for household expenses in addition to the temporary relocation costs associated with the rehabilitation, environmental remediation, or reconstruction of their damaged home.

3.0 Application and Program Eligibility Determination

3.1 Application Process

The application process for the Columbia Homeowner Assistance Program and the Minor Home Repair Program opened in April 2017 and closed for applications on October 1, 2018.

When a homeowner expressed an interest in the rehabilitation program, they were asked to complete a brief Pre-Application (Phase 1), which was reviewed for basic program acceptability. Homeowners were contacted by Disaster Recovery case managers and asked to schedule an appointment to complete an electronic application. Applicants met with a case manager to complete electronic application, submit required program documents, sign release forms to have information verified by outside sources, sign certification that all information in the application is true, and verify receipt of the following: *Asbestos in your Home, Protect your Family from Lead in your Home, The Lead-Safe Certified Guide to Renovate Right, and Disaster Recovery Grievance and Complaint Procedures.*

CDBG Disaster Recovery case managers staff will establish clear criteria and a program requirements checklist to ensure an equitable, transparent process. Acceptable homeowner applications must demonstrate meet the following eligibility criteria:

- Property must be located within the city limits of Columbia Presidentially declared disasters of 2015;
- Property must have been the homeowner's primary residence at the time of the qualifying disaster (does not apply to owners of rental properties);
- Homeowner must have been the owner of record on or before the date of the Presidentially declared disaster and continue to be the owner throughout the grant compliance period set by the city.

The following information is collected for all applicants:

- Household composition (names & ages of everyone living in the unit including unrelated members);
- Applicant's household income;
- Household income as a percentage of AMI family income as defined by HUD;
- The race and ethnicity of the head of household;
- The household's familial status;
- The presence of a household member with a disability and whether the housing unit is or needs to be Americans Disability Act (ADA) accessible;
- Housing assistance not directly linked to a specific beneficiary.

3.1.1 Application Priorities

One of the City's most important goals is to assist LMI owner-occupied households who experienced the most severe damage. **Priority will be given to applicants who are elderly, disabled, female heads of households with children, and situations where deteriorating damage conditions pose an immediate threat to the health and/or safety of the homeowner.**

Special Circumstances Related to Occupancy:

- Active-duty military personnel who own a storm-damaged home within the Columbia city limits but are currently assigned to duty away from their home or were assigned to duty away from their home at the time of the storm, are eligible to apply.
- Applicants who are incapacitated or in a nursing home at the time of the storm, must present proof at the time of application that they will not be incapacitated for more than 180 days and will reoccupy the home within 180 days after rehabilitation.
- Applicants who were incarcerated at the time of the storm must present proof at the time of application that they will reoccupy the home within 180 days after rehabilitation.

The income limits utilized for the CDBG Disaster Recovery Program are the income limits established yearly by HUD. All beneficiaries of the Columbia Homeowner Assistance Program and the Minor Home Repair Program must meet the Low to Moderate Income (LMI) National Objective, defined as providing a benefit to households with incomes of 80% or less of the area median income (AMI) based on HUD Income Limits. This determination of income was made at the time the application was initially reviewed and deemed to be eligible, based on the HUD income limits published for that year. If, upon review, it is not possible to determine or confirm household income at the time of initial review, the household's current income and HUD current income limits will be used.

Note: Under Action Plan Amendment #1, the Minor Repair Program was revised to allow households with income between 81% and 120% of AMI to qualify for program assistance. This requirement was again revised with Substantial Amendment #5 which limits eligibility for the Minor Repair Program to households at or below 80% of Area Median Income. The effective date of that Substantial Amendment is September 2019. Any activity carried out with CDBG DR funds involving residential rehabilitation is considered to benefit LMI persons only to the extent such housing will, upon completion, be occupied by such persons.

3.2 Eligible Structures

Single family homes, owner-occupied units in duplex structures are eligible. Owner-occupied units in mixed-use structures, recreational Vehicles (RV), house boats, mobile homes and campers are not eligible, even if the applicant occupied one of these as a primary residence. In circumstances where the property contains multiple detached residential structures, funds may only be obligated for eligible work associated with the primary residence, as defined by the program.

3.3 Eligibility Determination and Documentation Requirements

3.3.1 Identification

Every applicant and co-applicant must present a current picture identification. Expired picture identification is acceptable. Acceptable forms of identification include:

- Driver's License
- State Issued ID
- Passport/Passport Card
- State, Federal or other Photo ID acceptable to the program

If no valid picture ID is included in the applicant file at the time of QA/QC review, the applicant will be asked to produce a valid picture ID.

3.3.2 Ownership

To be eligible for the program, the applicant must have owned the property at the time of the storm and retain ownership throughout the application and construction process. The grant will impose an additional five-year ownership and primary residency requirement. Acceptable documentation of ownership includes:

- Deed or Title in Applicant's name
- Life Estate
- Act of Donation, Gift, Will
- Appraisal District/Property Tax record showing Homestead Exemption.
- Death Certificate, if needed
- Affidavit of Heirship
- Other documentation acceptable to program
- Affidavit of ownership if more than one name appears on the ownership documents.

An individual with Power of Attorney (POA) for the owner occupant may complete the application on the applicant's behalf. Allowable ownership arrangements include traditional fee simple ownership only.,. Applicants with mortgages, including reverse mortgages, are eligible.

If the owner applicant has been declared eligible for the program, but dies before construction has started, if an heir was living in the house at the time of the storm, then the application may proceed. If there was no heir living in the home at the time of the storm, the property is no longer eligible for assistance.

3.3.3 Primary Residence

The property must have been the applicant's primary residence at the time of the storm and remain the primary residence throughout the application and construction period. The grant will impose an additional requirement that the applicant maintain the property as his/her primary residence throughout the duration of the five-year affordability period.

Acceptable documentation of primary residency includes:

- 2015 Appraisal District/Property Tax record showing Homestead Exemption.
- 2015 Voter Registration
- Driver's license which was valid on October 5, 2015
- Affidavit of Principal Residency with documentation (Utility bill for address that includes date of flood in applicant's name, voter registration, other documentation acceptable to program).

3.3.4 Tie to the Storm/ Evidence of Flood Damage

Applicants must be able to document evidence of flood damage as a tie to the storm. This can be done in a number of ways:

- FEMA letter
- insurance settlement
- SBA Award letter
- Statement from qualified inspector verifying flood damage.
- Photos of damage provided by applicant, claims adjuster, city, etc.

3.3.5 Documentation of Income

The Homeowner shall provide documentation of household income for all household occupants at the time of eligibility determination. The preferred documentation is the tax return or a Social Security award letter or other documentation of retirement income or annuity for the year that eligibility was determined. If it is necessary to use paystubs and bank account records, three months of consecutive pay stubs and two months of bank statement for all checking and savings accounts must be produced.

The determination of income was made at the time the application was initially reviewed and deemed to be eligible, based on the HUD income limits published for that year. If, upon review, it is not possible to determine or confirm household income at the time of initial review, the household's current income and HUD current income limits will be used.

Homeowner certifies that he/she has provided complete, accurate information regarding household income to demonstrate Homeowner's eligibility to receive CDBG Disaster Recovery funds. The income limits utilized for the CDBG Disaster Recovery Program are income limits established annually by HUD at the time of eligibility determination.

All beneficiaries of the Columbia Homeowner Assistance Program and the Minor Home Repair Program must meet the Low to Moderate Income (LMI) National Objective, defined as providing a benefit to households with incomes of 80% or less of the area median income (AMI) as computed on the most current HUD Section 8 Income Limits.

All acceptable income documentation is AS OF the date that the applicant was declared to be eligible for the program. Acceptable forms of income documentation:

- Most current 1040 as of date of eligibility determination
- Latest SSA/SSI or other benefits award letter
- Latest Disability, Pension or Annuity statements

- Last 3 months pay stubs with 2 months bank statements.
- Letter from employer stating wage and frequency of payments with 2 months bank statements.
- Verification of Zero Income - Required for any household member over 18 that states they have no income.

Note: All household members must be identified prior to determination of income eligibility.

3.3.6 Documentation of Assistance Received

Applicants are required to provide third party verification of any assistance received from the following sources:

- FEMA Award letter
- SBA Award letter
- Insurance claim report
- Any other sources of funds or assistance to repair home (faith-based, non-profits, etc.)

The information provided by the applicant will be verified using information obtained by the city directly from FEMA and SBA.

3.3.7 Repair Report

Each applicant will be asked to complete a questionnaire that provides a detailed description of the assistance received and repairs made with assistance received prior to the grant. Receipts can be used to document the cost of repairs but are not required. The repair report form will require a Self-Certification of Repairs.

- Receipts for all funds spent for any funds received from all sources.
- If receipts are not available, provide a Self-certification Statement of Repairs, including a description of the items repaired, the amount spent on the repair and location of repair.

3.3.8 Damage Determinations

A property inspection will be conducted by the Subrecipient which will result in the production of three documents:

- A Work in Place report that will verify the repairs made by the applicant and assign costs to them. Some repairs not covered by the program may still be permitted as an offset to assistance received. Examples of these include:
  - Repair of garage or carport
  - Debris removal (trees, fences, etc.)
  - Other items at the discretion of the program
- A scope of work that represents unmet needs for repairs, and the pricing associated with these repairs to bring the property to the program's housing standards, including green building and energy efficiency upgrades.
- A scope of work for any mitigation of environmental concerns identified in the lead, asbestos, or mold assessments.

3.3.9 Notices and Forms Required

The following forms will be used as needed for applicants:

- Assistance received and repairs completed.
- Program participation agreement
- Affidavit of ownership, with sign off from all parties in title, if needed
- Affidavit of no income, if needed
- Affidavit of principal residency, if needed
- "Protect Your Family from Lead in Your Home" and "The Lead-Safe Certified Guide to Renovate Right" brochures, if applicable
- LSHR Applicability form and Screening Worksheets, if applicable

3.3.10 Property Tax Status

Applicant must furnish evidence that property taxes are current or that one of the following alternatives have been met:

- The property owner qualified for and received a tax deferral as allowed under local tax code;
- The property owner qualified for and received a tax exemption pursuant to the local tax Code; or
- The applicant entered into a payment plan with the taxing authority and payments are current.

Support documentation verifying the tax deferral or tax exemption must be provided by the applicant. Property tax record data bases may be used to verify property tax status. Any applicant that enters into a payment plan must supply a signed copy of the payment plan from the taxing entity, along with documentation that they are current on their payment plan.

3.3.11 Proof of Insurance

If the unit is located in the 100-year flood plain, flood insurance is mandatory. Flood hazard insurance may be purchased by the CDBG Disaster Recovery Program on behalf of the homeowner for one year from the date of assistance. Assisted homeowners will be required to maintain flood insurance; failure to maintain flood insurance may impact future disaster assistance.

3.3.12 Proof of Disability

Applicants who are to be prioritized based on disability status, or for whom physical modifications to their home are requested can verify disability status through either physician's statement or other documentation of disability (e.g., DMV hang tag, veteran's disability letter, etc.)

3.4 Duplication of Benefits

The first step of the DOB determination (calculation)the Subrecipient will determine the amount of assistance needed and the amount of funds previously received, or to be received, for a disaster recovery activity. This is accomplished by first determining the applicant's, grantee or sub-recipient's post-storm disaster need prior to the receipt or potential receipt of other funds.

Next, all other sources of recovery assistance received, or available to be received, must be disclosed during the application process, and must be validated and verified. Other sources of funds include, but are not limited to private insurance, Federal Emergency Management Agency, Small Business Administration (SBA), the National Flood Insurance Program (NFIP), local and state funds, other federal programs, and private and nonprofit organizations.

The next step is to identify assistance that is not available for the activity. This consists of: funds received that are not for the same purpose as the CDBG-DR activity(s); funds not available to the applicant, i.e., forced mortgage payoff, funds from private grants not guaranteed by the SBA; and any other asset or line of credit available to the applicant, such as checking and savings accounts, stocks, etc. These funds are not considered to be duplicative and may be excluded from being deducted as a duplication of benefit.

The next step is to verify any repairs made to the property with the assistance provided. This verification is done by the Subrecipient and uses repair information and receipts provided by the applicant. If receipts are unavailable and repairs cannot be otherwise documented, a "Self-Certification of Repairs" form must be filled out by the applicant, signed, and notarized. The resulting Work in Place report serves to verify any offset (or reduction) in potentially duplicative assistance. An Estimated Cost to Repair (ECR) is then developed providing a detailed scope of work for remaining repairs needed.

Finally, after subtracting from the proposed activity cost any remaining duplicative funds received or available to receive, the maximum award is calculated. The final award cannot exceed the program cap of $150,000. If assistance received cannot be offset by receipts, visual inspection, or Self-Certification by the applicant, then, when the ECR is presented to the applicant for approval, the process will include advising them of the additional funds that will need to be provided. Applicant's will be given fifteen (15) days to produce documentation of sufficient funds on hand. If, after 15 days, the applicant is unable to secure documentation of funds on hand, the file will be sent to the City with a recommendation to withdraw the applicant from the program. The program manager will draft a letter to be signed by the City for applicants with insufficient funds, advising them that they will be withdrawn from the program. Applicants will have 15 days to appeal this decision.

If the applicant can provide the funding, it will be collected by the Subrecipient's case manager in the form of a cashier's check made payable to the Subrecipient. The Subrecipient will show the duplication of benefit amount and reduce the final invoice to the city by that amount.

Once the maximum CDBG-DR award has been determined, applicants, grantees or sub-recipients will be required to sign a subrogation agreement requiring them to return to the City of Columbia any additional assistance received for the same purpose as the CDBG Disaster Recovery funds. This agreement will be monitored by Disaster Recovery program staff, grantees, and sub-recipients (if applicable) at least once annually for a period of five years. Unless an additional need is established, disaster recovery funds must be recaptured to the extent they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose.

Disaster recovery assistance needs are calculated at a point in time. As a result, subsequent circumstances may occur that affect the need. A duplication of benefits calculation will occur initially at the time of application, validated, and verified by inspections and receipts, and verified at grant signing, and again at final grant reconciliation.

If, after the assistance has been calculated and/or a CDBG Disaster Recovery award has been made, an applicant can demonstrate a change in circumstances the award calculation may be subsequently reevaluated to take the increased need into consideration. Such changes in circumstance include vandalism, contractor fraud, an increase in the cost of materials and/labor, a change in local zoning law or building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be completed before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired).

3.4.1 Verification of Assistance Received

The program will verify assistance received as follows:

3.4.1.1 FEMA Funds

Funds for repairs received from FEMA are considered in the duplication of benefits analysis.

- FEMA funds that are provided to a homeowner for an eligible purpose other than those provided by the program may be excluded from the final award calculation. If the applicant can document that the FEMA funds were provided for eligible interim housing costs (such as rent, in accordance with FEMA program eligibility) or other activities not related to construction, the award will not be reduced by the amount of FEMA assistance used for interim housing.
- FEMA funding is typically used for "temporary repairs" to make a home safe, sanitary, and habitable until more permanent repairs can be made. FEMA funding used for repair to the property will be considered as "temporary" and excluded from the final award calculation unless a construction inspector confirms otherwise.
- FEMA provides a data feed to OCD that reports the amounts applicants have received. The amount reported by FEMA will be used in the award calculation unless the applicant provides documentation that the FEMA funds were used for another eligible purpose, or the applicant asserts that the FEMA report is incorrect. In the latter case, OCD will request FEMA to reconfirm the amount awarded.
- If the applicant claims interim housing costs were paid from the FEMA repair funds, the applicant must demonstrate that the cost of interim housing exceeds any amounts the applicant received from FEMA for "rental."

3.4.1.2 Small Business Administration (SBA) Funds

The amount of any SBA loan accepted by the applicant, and designated specifically for "real estate", or other eligible construction purposes, is considered in the duplication of benefits analysis. If the applicant was approved for an SBA loan but did not accept it, or accepted a lessor amount, only the amount

accepted will be considered for duplication of benefits analysis. If the applicant accepted an SBA loan, drew down only a portion of the total loan amount, the program may consider just the draw down amount only if the applicant makes a formal request to the SBA to cancel the remaining loan, and the cancellation is documented by SBA and included in the applicant file.

> *''Provided further, That with respect to any such duplication of benefits, the Secretary and any grantee under this section shall not take into consideration or reduce the amount provided to any applicant for assistance from the grantee where such applicant applied for and was approved, but declined assistance related to such major declared disasters that occurred in 2014, 2015, 2016, and 2017 from the Small Business Administration under section 7(b) of the Small Business Act (15 U.S.C. 636(b)) – FR 6169-N-02 "2019 DOB Notice"*

SBA provides a data feed to OCD that reports the amounts applicants have received. The amount reported by SBA will be used in the award calculation unless the applicant provides documentation the amount reported was not received or asserts that the amount SBA reported is incorrect. In such cases, housing advisors will review documentation from homeowner and adjust DOB for only that amount that was received by the homeowner. OCD will coordinate with SBA to confirm the amount received to ensure compliance or subrogation will be required.

3.4.1.3 Treatment of National Flood Insurance Program (NFIP) Proceeds

Funds received from NFIP insurance proceeds for rehabilitation or reconstruction of the damaged dwelling are considered in the duplication of benefits analysis. A data feed from the NFIP is provided to OCD and the amount reported will be used in the award calculation unless the applicant provides documentation that the amount reported is not correct. In such cases, OCD will request the NFIP reconfirm the amount received.

3.4.1.4 Treatment of ICC Funds

The National Flood Insurance Program includes Increased Cost of Compliance (ICC) Coverage for all new and renewed Standard Flood Insurance policies. This coverage provides up to $30,000 to help homeowners bring their home into compliance with conditions imposed concerning their community's floodplain ordinance. Under ICC terms and conditions, homeowners eligible for ICC Coverage will receive final payment once the work is completed, a final inspection has occurred, and a Certificate of Occupancy has been issued. This reimbursement payment must be taken into consideration when calculating the DOB and award amount, even though the funding will not be received until construction is complete. The subrogation agreement addresses this contingency.

3.4.2 Reimbursement

The City recognizes that many homeowners did not wait for federal assistance to complete necessary repairs, many securing loans or using savings to pay for repairs. To address this unmet need, if funding remains, the City may reimburse applicants who used personal funds to repair damage to their homes resulting from the storm if the program determines the costs associated with these repairs are both reasonable and necessary and applicants can demonstrate a financial hardship.

Reimbursements are limited to costs incurred by homeowners for storm-related repairs completed satisfactorily by a licensed contractor prior to program application and within one year of the 2015 Flood. The minimum amount of reimbursement is $5,000 with a $10,000 maximum allowable. Applicants for reimbursement may include households already deemed eligible. Detailed receipts will be necessary, and a duplication of benefits review will apply to reimbursement costs.

3.4.3 Responsibility to Obtain and Maintain Flood Insurance

In accordance with the Stafford Act, applicants that previously received disaster recovery assistance after September 14, 1994, are required to obtain and maintain adequate and necessary flood insurance coverage. OCD will verify prior to executing a grant award that any applicant that has received prior disaster recovery assistance has maintained flood insurance, if required.

Applicants will be asked as part of their eligibility verification:

- If applicant has received any flood event related assistance for damage to this property from any Federal source for any previous Presidentially declared disaster (occurring after September 14, 1994) that required the mandatory purchase of flood insurance pursuant to National Flood Insurance Program (NFIP) regulations.
- Which flood disaster event applicant received federal funds for.
- The amount of federal assistance related to flood that was received.
- If applicant carried flood insurance at the time of event.
- If the insurance coverage is currently in effect.

If applicant is determined to have received prior federal disaster recovery assistance and has failed to maintain the adequate and necessary flood insurance, applicant will be deemed ineligible for any of the homeowner programs.

3.4.4 Award Determination

The first step in calculating DOB is to determine the amount of assistance needed and the amount of funds previously received or expected for a disaster recovery activity. All sources of recovery assistance must be disclosed and verified during the application process using third party information and verification procedures.

The amount of assistance will be determined as follows:

- Review applicant total need prior to assistance;
- Identify potentially duplicative assistance as defined above;
- Validate through inspection any repairs made by the applicant;
- Determine the cost of the remaining repairs;
- Deduct duplicative assistance;
- Determine the maximum eligible award and apply the program cap to calculate final award.

Applicants must agree to subrogate (commit to the City) any future payments they may receive after the award amount is determined from sources that represent a potential duplication of benefits. The

subrogation agreement, included as an exhibit in the grant agreement, requires the homeowner to notify OCD if additional funds are received and to assist OCD in collecting any amounts owed to the homeowner from these sources.

3.4.5 Responsibility of Applicant to Provide Funds

Outstanding DOB must be paid at the grant agreement review and approval meeting. The grant agreement will include a requirement that any additional assistance received for the same purpose as CDBG Disaster Recovery funds must be returned to the City (subrogation agreement). If the ECR amount exceeds the program cap plus any outstanding DOB, then for the project to move forward, the applicant must provide the additional funding required to complete construction. The funds will be paid by the applicant in the form of a cashier's check made payable to the Subrecipient and held by the City until the work has been completed and approved for reimbursement.

4.0 Environmental Review

4.1 Tier One Approval and Authorization to Use Grant Funds

The City will follow the guidelines established in the *24 CFR Part 58 Compliance Guidebook* published by HUD Region VI in April 2014 to complete Environmental Review Records for each program activity. An Exemption for professional services was executed on February 20, 2017.

As the Responsible Entity, the City of Columbia evaluated the scope of its housing programs and determined three tiered Categorically Excluded Subject (CEST) to 58.5 reviews are necessary to comply with NEPA-Related Federal Laws and Authorities as follows:

- CEST Major rehabilitation activities – Columbia Homeowner Assistance
- CEST Minor rehabilitation activities – Minor Repair Program

The Program has complied with the statutory laws and authorities cited in §58.5 and with the requirements of §58.6, completing the Compliance Checklist related to Flood Disaster Protection; restrictions for a project located in Coastal Barrier Resource Areas; and buyer notifications if a project is located in a Runway Clear Zone or Clear Zone. Until specific addresses of applicants are known, the City conducted Tier 1 reviews of scattered sites within the city limits addressing the following authorities:

- Coastal Zone Management,
- Sole Source Aquifers,
- Endangered Species,
- Wild and Scenic Rivers,
- Air Quality,
- Farmland Protection,
- Noise Control and Abatement,
- Explosive and Flammable Operations, and
- Airport Hazards.

An 8 Step Decision Process has been completed for the 140 major and severely damaged properties located in the floodplain. The City published an Early Floodplain notice on June 5, 2017; a Final Floodplain

notice on June 30, 2017; and a combined Finding of No Significant Impact and Intent to Request Release of Funds Notice on July 16, 2017. The Request for Release of Funds for the Tier I CEST reviews was submitted to HUD on August 7, 2017, and an Authorization to Use Grant Funds was received on August 24, 2017, for rehabilitation activities. An amended Tier 1 was submitted to HUD to include reconstruction activities for the homeowner program in July 2021. Authorization to use grant funds was received on _____.

4.2 Tier Two Checklist and Mitigation Requirements

The site-specific strategy described in the Tier 1 Environmental Review Record will address the compliance factors that could not be addressed in the broad environmental review. These compliance factors are included on the site-specific checklists, which will be completed as properties are identified and determined eligible for the program. A site-specific review and Tier Two checklist will be completed on each property and included in the homeowner's file.

These site-specific environmental reviews will be completed for each property before executing a grant agreement or taking any *choice limiting actions*. *Choice limiting actions* include acquisition of real property; leasing property; rehabilitation, demolition, construction of buildings or structures; relocating buildings or structures, conversion of land or buildings/structures. The following environmental factors will be addressed for each individual property:

- Historic properties
- Floodplain management
- Wetland protection
- Contamination and toxic substances including Lead Based Paint, Asbestos and Mold
- Environmental Justice

4.3 Section 106 Historic Preservation Compliance Review

The City of Columbia has executed an Addendum to the Federal Emergency Management Agency (FEMA) Programmatic Agreement with South Carolina to expedite Section 106 reviews of historic properties that may be affected by one of the housing programs described above. Under the Unified Federal Review process each Responsible Entity must perform sufficient public outreach. A Public Notice concerning the proposed Addendum was published in *The State* on February 24, 2017, and letters were sent to the Richland County Conservation Commission, the Lexington County Historical Society, Historic Columbia, and the SC Department of Archives and History.

The environmental services firm procured for the Program will include staff that meets the Secretary of the Interior's Professional Qualification Standards to conduct Section 106 reviews and has been confirmed by HUD. The executed Addendum, a cover letter, and a copy of the staff resume will be submitted to HUD and posted on the Section 106 Agreements section of the HUD Historic Preservation website.

As part of its broad programmatic review, the Program has defined the Area of Potential Effects (APE) as any of the 15 historic preservation districts within the city limits. Section 106 reviews will be completed for all dwellings age 45 years or older when deemed eligible for the program.

The City of Columbia and State Historic Preservation Office (SHPO) have a Programmatic Agreement (PA)

that expedites consultation when rehabilitation activities conform to the original footprint and/or are performed in previously disturbed soils. Upon environmental clearance the grant award will be calculated based on the cost estimate and the duplication of benefits review.

4.4 Flood Plain Management

The City of Columbia adopted Ordinance 2015-046 in compliance with FEMA and National Flood Insurance Program requirements to mitigate future flood damage. Division 3, Flood Hazard Reduction, Section 21-172, Specific Standards, requires that "*new construction or substantial improvement to residential structures (in a Special Flood Hazards Area) shall have the lowest floor, including basements, elevated no lower than two feet above the base flood elevation. No basements are permitted. Should solid foundation walls be used to elevate a structure, flood openings sufficient to facilitate the unimpeded movement of floodwaters shall be provided in accordance with standards of subsections (3) of this section.*"

With regard to activities in floodplains, flood hazard area, or the equivalent in FEMA's data source, the program will do the following:

- Require compliance with the Section 582(a) of the National Flood Insurance Reform Act of 1994, by verifying whether or not the applicant at any time received Federal flood disaster assistance that required the applicant to obtain and maintain flood insurance protection for the assisted property in accordance with the requirements of the Federal flood disaster assistance but failed to do so. In this instance, the applicant would be ineligible for CDBG-DR assistance.

- Require the purchase of flood insurance when CDBG-DR assistance is intended in whole or in part for the acquisition, construction, reconstruction, repair, or improvement of privately owner housing, including a mobile home, and for any personal property, contained therein as a condition of assistance.

- Require that flood insurance be maintained during the life of an assisted property, regardless of transfer of ownership of such property.

- Require housing that is reconstructed, repaired from substantial damage, or substantially improved to be elevated or floodproofed.

4.5 Lead-based Paint

See Section 2.8 for the Lead Safe Housing Rule Policy and Procedures adopted by the program and approved by HUD. Appropriate checklists will be completed and kept in client files. Applicability Form (indicating that the property is covered by or exempt from Lead Safe Housing Rule) and LSHR checklist for general compliance documentation.

Before execution of a grant agreement for HUD assisted residential rehabilitation projects, homeowners and tenants will receive if their home was built before 1978 (or the date of construction cannot be determined):

- EPA-approved information pamphlets on identifying and controlling lead-based paint hazards

"Protect Your Family from Lead in Your Home" and "The Lead-Safe Certified Guide to Renovate Right."

- Disclosure of information concerning LBP or lead-based paint hazards such as the location and condition of the painted surfaces.
- Reports on lead-based paint and/or lead-based paint hazards within 15 days of submission of the environmental contractor final laboratory report to the Program.
- A signed and dated statement that the homeowner or tenant received required Lead Warning notifications.

4.6 Asbestos Risk Assessment

The environmental services firm will complete asbestos testing and inspections subject to National Emissions Standards for Hazardous Air Pollutants (NESHAP) established by EPA at 40 CFR 61 Part M and the SC Department of Health and Environmental Control (SCDHEC) Bureau of Air Quality regulation 61-86.1, Standards of Performance for Asbestos Projects. This includes inspection and sampling of only suspect asbestos containing building materials in the critical path of rehabilitation and renovation activities as identified in the Disaster Recovery damage assessments.

Abatement of Asbestos Containing Materials (ACM) must be performed by a SCDHEC licensed and EPA trained abatement contractor. Per SCDHEC Asbestos Regulation 61-86.1, this abatement effort must also be designed in accordance with 40 CFR 763.90 (g) (Federal Register, Volume 52, Number 210, Friday October 30, 1987), as amended and any subsequent amendments and editions. Contractors performing abatement work shall post at the job site a clear copy of a current training certificate issued by an approved training provider and a Department-issued personnel license.

4.7 Mold Assessment and Remediation

The Subrecipient will examine the home for the presence of mold and will specify treatments per the Mold Remediation Protocol provided in Exhibit 18. If previously unknown instances of mold are discovered in the course of construction, the construction contractor will immediately notify the Subrecipient to determine corrective measures.

5.0 Housing Construction Standards

The City of Columbia has adopted construction standards emphasizing high quality, durability, energy efficiency, sustainability, and mold resistance and continues to address hazard risks from possible sea level rise, high winds, storm surge and flooding. Future property damage will be minimized by requiring that any rebuilding be constructed according to the best available science with respect to base flood elevations.

All reconstruction and rehabilitation in Flood Hazard Areas (with the exception of the floodway where rehabilitation activities are prohibited) shall include flood resistant construction techniques, including but not limited to the following:

- Be designed (or modified) and anchored to prevent flotation, collapse, or lateral movement of the structure;

- Be constructed with materials and utility equipment resistant to flood damage;
- Be constructed by methods and practices that minimize flood damage; and
- Be constructed with electrical, heating, ventilation, plumbing and air conditioning equipment designed and located to prevent water from entering or accumulating within the components during floods.

All construction activities must comply with all applicable codes, ordinances, regulations, laws, and other requirements per federal, state, and local governments to include CDBG-DR specific requirements associated with the Disaster Relief Appropriations Act of 2016. [Public Law 114-3, June 17, 2016]. All installations shall be per manufacturer's specifications.

All program-approved construction contractors must be appropriately licensed by the SC Residential Builders Commission.

All Companies must be EPA Lead-Based Paint Certified Firms whenever working on housing containing lead-based paint. EPA certified Lead-Based Paint Abatement Contractors are required for all LBP projects where hard cost exceeds $25,000 per unit. EPA Lead-Based Paint Certified Renovators are required for all LBP projects where hard cost is less than $25,000 but more than $5,000. HUD approved Lead-Safe Practices training is required for all workers on projects where hard cost is less than $5,000. See Exhibit 16 "Contractor Selection Criteria for Lead-Safe Housing Rule Compliance".

All trades will appropriately be licensed and certified by the State of South Carolina, the County of Richland, and the City of Columbia. A licensed plumber must perform all plumbing work. Asbestos abatement work will be performed by appropriately licensed and certified contractors. Building permits are required for all construction work.

5.1 Definitions

Acceptable	In a condition that is favorable to all parties involved including the City.
Defective / defects	In a condition unlike that which was original at time of construction; not working properly, not functional, or missing parts that are needed for a complete unit.
Deteriorated	In a state of disrepair; not structurally sound; displaying rot.;
Excessively damaged	Damaged to a point where pavement is separated ½" or more in any direction.
Free-and-clear/free of	Not containing; absent of
Functioning properly	Working in a manner consistent with that which it was originally designed to operate

Good working order	Working in a manner consistent with that which it was originally designed to operate
Good condition	In like new condition
IRC	The most recent version of the International Residential Code adopted by the state of SC.
IECC	The most recent version of the International Energy Conservation Code adopted by the state of SC.
Like new condition	In a condition favorable to all parties involved including the City; functioning properly; free of defects; good working order
Notable	Obvious; visible; apparent
Not suitable for rehabilitation	Dwelling units where substandard conditions threaten the health and safety of its occupants and it is not financially or structurally feasible for rehabilitation.
Originally designed/manufactured	In like new condition and working in a manner as was originally constructed to operate
Over spanned	Exceeding an acceptable length as determined using standard engineering design practices
Patchwork	Any work where joints, seams, or any other types of intersections of materials are noticeable to the naked eye from a distance of 5 feet from the area in question (not to include obvious joints at inside and outside corners).
Structure	Any building supported by a permanent foundation
Structurally sound	Capable of supporting all imposed loads; free of excessive deterioration

5.2 Housing Standards

Both Reconstruction and Rehabilitation projects must conform to the following:

- The current International Residential Code (IRC) as adopted by the City of Columbia SC (currently the 2018 IRC).
- The current International Energy Efficiency Code (IECC) as adopted by the City of Columbia SC (currently the 2018 IECC).
- Applicable floodplain and zoning ordinances.
- All installations of building components and fixtures shall conform to the manufacturer's specifications.

5.2.1 Green Building Standards:

Requirements within these Housing Construction Standards, for both the Reconstruction and Rehabilitation of homes, that relate to energy efficiency, water conservation, sustainable building

materials such as finishes and the avoidance of contaminants such as VOCs, lead based paint (LBP), formaldehyde and asbestos, constitute the program's Green Building Requirements. A HUD CPD Green Building Retrofit Checklist will be completed, for each Rehabilitation project, to document the adherence to the Green Building Standards.

5.2.2. Flood Resilient Standards

All reconstruction and rehabilitation in Flood Hazard Areas (with the exception of the floodway where rehabilitation activities are prohibited) shall include flood resistant construction techniques when possible:

- Be designed (or modified) and anchored to prevent flotation, collapse, or lateral movement of the structure;
- Be constructed with materials and utility equipment resistant to flood damage;
- Be constructed by methods and practices that minimize flood damage; and
- Be constructed with electrical, heating, ventilation, plumbing and air conditioning equipment designed and located to prevent water from entering or accumulating within the components during floods.

5.2.3 Accessibility

Accessibility features are an approved treatment in both Reconstruction and Rehabilitation projects if there are occupants with a demonstrated accessibility issue. Installations of fixtures such as grab bars and handrails shall follow the ADA guidelines for height and design. The following components are approved as applicable; other components may be approved by the City of Columbia if needed. See also Universal Design features under 5.2.4 Reconstruction; and under Rehabilitation (See: Paving repairs 5.2.5.3 Yard; Ramps 5.2.5.5 Porches and Steps.)

- One Access Ramp either front or rear
- Door levers latches (instead of knobs)
- Drawer and Cabinet pulls that do not catch clothing or mobility devices ("U" shaped)
- Grab bars near toilet, fixed or folding
- Grab bars in the tub or shower
- Low threshold tub and/or folding seat or transfer bench
- Shower with no curb and built-in or folding seat
- Chair height toilet (greater than 16" in height)
- Elevated toilet seats
- Hearing-impaired fire and co2 alarms
- Height adjustable shelving in pantry
- Floating vanity with insulated plumbing – providing wheelchair access
- Barrier free door thresholds - to allow wheelchair access
- Common flooring throughout the home allowing for no threshold or transition strips.
- Open upper shelves in the kitchen instead of cabinets

5.2.4 Reconstruction:

Reconstruction of properties unsuitable for rehabilitation per the City of Columbia SC CDBG-DR policies and procedures must meet the following construction standards. These standards meet HUD's recommended use of a national Green standard by requiring ENERGY STAR® certification. In addition, these standards substantially conform to the Enterprise Green Communities Criteria.

- The current ENERGY STAR® certification criteria for new construction (with the current revisions) which represents the CDBG-DR program's "Green" requirements for energy efficiency.
- The following Green Building requirements for building materials:
  - Caulks paints, adhesives and sealants must meet the South Coast Air Quality Management District (SCAQMD) requirements for VOC levels.
  - Flooring must be smooth and easily cleanable; resilient flooring must meet the FloorScore® Certification Standard; the installation of carpet is not advised.
  - Plumbing fixtures must be WaterSense labeled. www.epa.gov/watersense.
  - Toilets must score at least 1,000 points on the current MaP test report. www.map-testing.com
  - Universal Design features are highly recommended for all Reconstruction projects. ADA recommended accessibility features for access to and throughout the building are approved treatments if an occupant has a demonstrated accessibility problem that can be addressed by such measures.
  - Radiant barrier sheathing for roofing.
  - Fortified Roof certification. https://fortifiedhome.org/roof/
  - Openings, including window, doors and garage doors must meet the Fortified Standard 2.8.2Acceptaable Design Pressure (DP) Ratings for Openings. https://fortifiedhome.org/wp-content/uploads/2020-FORTIFIED-Home-Standard.pdf

5.2.5 Rehabilitation:

The Rehabilitation of properties in the City of Columbia CDBG-DR program must meet the following construction standards. A HUD Green Building Retrofit Checklist customized to meet the Green standards for this program will be completed for each property. The Green Retrofit Checklist is attached in Exhibit 17.

5.2.5.1 Demolition

All debris shall be removed from premises weekly unless contained in a commercial grade trash container, dump truck, trailer, or other vehicle used specifically for debris removal. The debris may remain on premises until the container is filled to a reasonable capacity, when it shall be removed from premises. All debris shall be taken to an approved landfill as determined by the South Carolina Department of Health and Environmental Control (DHEC} based upon the composition of material, including any lead-based paint, asbestos, or other hazardous waste.

5.2.5.2 Foundation

- Foundations shall be structurally sound; all deteriorated and/or over spanned building components shall be replaced and/or properly supported. The City reserves the right to require an inspection by a licensed structural engineer registered to practice in South Carolina to determine the structural soundness of the component.
- All foundation vents in Special Flood Hazard Areas (SFHAs) that are designated as Zone A (A, AE, A1-30, AH, and AO) on Flood Insurance Rate Maps (FIRMs) shall conform with NIFP Technical Bulletin 1 dated March 2020.
- Crawl spaces shall either be ventilated to meet section 408 of the IRC or be "Unvented" per the same section of the IRC.
- Structures will be inspected for termites. If evidence of termite infestation is found, structures shall be treated for termites by a state licensed exterminator who shall issue an *Official South Carolina Wood Infestation Report* showing that the structure is free of infestation or damage caused by any wood destroying insects or fungi. Structures treated within the last five years by a state licensed exterminator may be exempt from re-treatment upon receipt of documentation confirming treatment.
- Wood products shall have a minimum 6" of clearance with grade under a structure. Piers shall be permanent masonry units with poured concrete footings.
- Existing structurally sound masonry piers may remain in place. Stacked masonry units, wooden piers, and metal jacks are prohibited for use as piers and must be replaced with permanent masonry units with poured concrete footings.
- Accessory doors and windows located below main level of structure and all sub-flooring shall be considered part of the foundation.
- The floors of enclosed crawl space shall be covered with a minimum 6- mil vapor barrier overlapping a minimum of 6" at seams and sealed with tape designed for use with crawl space vapor barriers, or with fiber reinforced duct sealant. The vapor barrier will cover a minimum of 6" of foundation walls and piers and be sealed to those masonry components in the same manner as with seams.

5.2.5.3 Yard

- When storm water is known or expected to create moisture problems in a structure, either regrading to create 6" of fall in the first 10' from the foundation or the use of swales to move storm water are approved treatments. Storm water shall not be diverted onto adjacent properties or directly into a City right-of-way. See references to stormwater management under "Roof" - "Gutters and Downspouts."
- All tree limbs within six feet of structure shall be removed. Any tree whose root system is undermining the structure, shall be permanently removed from the site. Removal shall include the stump.
- Paving repairs and replacement are a permitted expense when the existing paving creates tripping hazards greater than ¾", where the condition of the paving creates access issues for occupants that have mobility issues. When the absence of paving from

the street, or from a driveway to a building entrance creates a safety hazard, the installation of new walkway paving is permitted.
- LBP hazards on accessory structures and detached garages shall be addressed.

5.2.5.4 Siding/Cladding

- Siding must be intact, shed water to grade, be free from holes or defects, and if painted, have a continuous paint finish. All defects that could allow pest entry shall be repaired.
- Moisture and termite damaged exterior wood products and any defective [split, large knot holes, etc.] exterior wood products shall be replaced with material matching the remaining wood products.
- Other types of damaged siding [brick, block, vinyl, aluminum] will be replaced with in-kind materials.

5.2.5.5 Porches & Steps

- Porch and step components shall be structurally sound and missing materials will be replaced.
- All wood products used in steps and porch structures, located 18 inches from the ground must be preservative treated.
- The installation of ramps, installed per ADA guidelines, is an approved treatment if the occupants have a demonstrated accessibility issue. Wood framed and prefabricated aluminum ramps are acceptable.
- Repairs to existing ramps with structural or health and safety issues are an approved expense.

5.2.5.6 Windows

- Windows must operate as originally designed and must be free of defects [cracked glass, brittle spackling, defective hardware, etc...].
- Bedroom windows must meet code egress requirements.
- Storm damaged windows and windows that are not repairable will be replaced.
- New windows must be ENERGY STAR® certified for Columbia, SC. Vinyl windows are acceptable replacements, except where zoning requires historic preservation of such components.
- Screens must be in like new condition. If shutters are present, they must be free of defects and must be properly secured to structure.

5.2.5.7 Exterior Doors

- Exterior doors must operate as originally designed and must be free of defects [cracked or missing glass, defective hardware, splits in wood, etc...], and weather-stripped.
- Replacement exterior doors shall be insulated steel or fiberglass with a minimum R value of 5, Structures listed as historic may have solid wood doors with a configuration matching the existing or an historically accurate configuration. New doors shall have single cylinder deadbolts and latches. Lever style door latches are highly recommended.

- Double cylinder deadbolts will be replaced with single cylinder deadbolts, keyed to match existing locks.
- Existing storm doors that are repairable must include a pneumatic closure and a latch.

5.2.5.8 Roof

- Roof system must be free of leaks, structurally sound, clear of any foreign matter.
- All substantially damaged roofs will include roof venting, balanced between vents placed high and low on the roof to create natural convection. New roof venting systems shall have a combined net free ventilating area of not less than 1/150 of the attic area being ventilated. Ridge vents must be the shingle over style. The combination of ridge vents with soffit vents is highly encouraged. The addition of venting to existing roof systems is an allowable expense when attic moisture problems are present.
- If attic vents are present, they must be screened with opening that are a minimum of 1/16" and a maximum of 1/4".
- Existing gutters and downspouts shall be intact, leak free, sloped to and outlet and functioning properly and have corrosion resistant leaf guards installed. The installation of gutters with corrosion resistant leaf guards and downspouts is an approved expense to address stormwater management problems. Splash blocks at downspout outlets may be installed if they will predictably improve storm water management. The installation of below grade storm leaders utilizing PVC drainage piping to daylight or to a pop-up emitter are approved treatments when positive grading or the use of swales are impractical.
- Radiant barrier sheathing is an approved expense when resheathing at least 50% of a roof.
- All new roofing must include Fortified Roof certification for the entire roof assembly. https://fortifiedhome.org/roof/

5.2.5.9 Electrical

- Electrical systems must be functioning properly. All electrical components must be inspected including service, meter, wiring and fixtures even if no electrical work is specified. Unsafe components must be replaced. All wiring, in living areas must be enclosed per code.
- Functional Combo Smoke and CO alarms must be installed in locations pursuant to City code. Combo Smoke and CO alarms must either be hard-wired and interconnected with battery backup, or battery-operated with a sensor expiration date at least 2 years in the future and working alkaline batteries. New battery-operated Combo Smoke and CO alarms must have 10-year lithium-ion batteries and 10-year rated sensors. If a hearing-impaired person occupies the home, the detectors must have an alarm system designed for hearing-impaired persons.
- Three prong outlets without ground wiring must be labeled as such.
- Non-functioning GFCIs will be replaced. Kitchen counter, bath, laundry, and basement receptacles within 6 feet of a plumbing faucet must be a GFCI-protected receptacle or protected by a GFCI device.

- All lights and switches in hallways, stairs and other passages will be operable and safe. All halls, stairs, and rooms necessary to cross to other rooms and stairways must be well lit.
- Every habitable space in a dwelling shall contain not less than two separate and remote receptacle outlets.
- Electrical panels with less than 100 AMP capacity, or undersized for the electrical loads of the house, are eligible for replacement with a 200 AMP panel with at least 30 circuit breaker positions.

5.2.5.10 Plumbing

- Every dwelling unit will have a minimum of one single bowl sink with hot and cold running water in the kitchen and at least one bathroom containing sink or a vanity with a sink, and a shower/tub unit, both with hot and cold running water, and a toilet. Fixtures must function properly, be secured to structure, and be free of any defects [chipped enamel, rust, cracks, leaks, etc...]. Existing tub and shower surrounds and pans must be in good condition and watertight. Supply drain and plumbing vent lines must be installed per code, in good condition and functioning properly for the distribution of water and the removal of all waste from premises. Drain lines must be connected to a wastewater system approved by DHEC.
- New plumbing fixtures must be WaterSense labeled. www.epa.gov/watersense.
- New toilets must score at least 1,000 points on the current MaP test report. www.map-testing.com, and new toilets must be comfort height.
- Water heaters must function properly, display no signs of back drafting, be installed per new construction building code, and be free of rust. Water heaters 10 years old or more shall be replaced. All water heater units outside of heated space must be insulated to an R-8 value and elevated at least four inches above adjacent grade. Drain pans are not required on existing functioning water heaters.
- Piping for water heaters installed outside conditioned space shall be insulated to a minimum R-6. Tape all seams in pipe insulation with HVAC metal duct tape.
- Dryer venting inside walls, attics, or crawl spaces must be rigid metal; ductwork must be vented directly outdoors with all joints and seams sealed with HVAC metal duct tape or duct mastic (not cloth duct tape).
- Existing garbage disposals that are defective shall be replaced with a minimum ½ HP model.

5.2.5.11 Heating & Air Conditioning

- All structures must contain a central heating system in good working condition that is capable of maintaining a temperature of 68 degrees Fahrenheit [at three feet above floor level] in all habitable rooms.
- Fuel burning equipment must draft properly and not display signs of back drafting.

- New ductwork must meet or exceed EnergyStar® for Homes duct leakage standard with a leakage rate of 5% or less when measured with a *duct blaster* or similar diagnostic device.
- Damaged duct insulation will be removed and replaced with R-8. Any ductwork seams exposed during the process will be sealed with UL181 rated material. In addition, all accessible insulations seams will be property sealed with UL 181 rated sealant or tape.
- New central heating and cooling systems shall be ENERGY STAR® Certified, have a minimum AFUE rating of 95% if it is a furnace and a minimum SEER rating of 15 if it is a heat pump, and include ductwork insulated to a minimum R-8 value. [Installer shall certify that the system meets the minimum requirements.] City Community Development staff reserves the right to make exceptions to the above requirements as long as installed system meets ENERGY STAR® requirements for the Columbia, SC region, which is a minimum 90% AFUE for furnaces.
- All new heating and air conditioning equipment shall be sized in accordance with the most recent editions of the Air Conditioning Contractors of America (ACCA) Manuals J and S.

5.2.5.12 Ventilation

- Bathrooms without windows, or with mold or moisture problems (regardless of the presence of a window), must have mechanical ventilation ducted to the exterior (not the attic, basement, or crawl space) rated at a minimum of 50 CFM for half baths and a minimum of 80 CFM for full baths.
- Kitchen range hoods, vented to the exterior (not the attic, basement, or crawl space), are required for all gas fired ranges, and highly encouraged for all kitchens. Ductwork must be smooth galvanized steel. The installation of enclosed soffits above kitchen wall cabinets to enclose ductwork is an approved treatment.
- In those cases where no cabinetry is present, the installation of a shelf or cabinet to secure the range hood would be prudent.

5.2.5.13 Interior Walls & Ceilings

- All interior walls and ceilings must be structurally sound and finished uniformly. They will be devoid of visible cracks, nail pops, buckling, materials not bonding, torn wallpaper, holes, exposed framing, delaminated material, or texturing gaps. The repair will include painting all repaired walls in their entirety to present a uniform appearance. In the case of non-standard colors on other walls in the room, all walls in the room will be painted to the same neutral color. For paneled areas, patches are not authorized. Replace sections of paneling if a matching panel is available. If not, them complete replacement or removing and returning to drywall ware acceptable alternatives.

5.2.5.14 Insulation and Air Sealing:

- Accessible portions of the building envelope, such as attics and crawl spaces, or framing exposed during construction, shall be insulated to meet the following R values: Ceilings, R-38; Walls, R-13; Floors of crawl spaces, R-19. Alternately walls of crawl spaces may be insulated instead of the floor system to R-10 of continuous insulation on the interior or

exterior. Insulating crawl spaces is not required when access is not available, or where clearance to grade less than 18". If already up to R-30 that is acceptable, and no additional insulation needs to be added. If less than R-30, then can insulate up to R-38 while maintaining airspace for soffit ventilation.

- All holes, seams and gaps shall be sealed with caulk or spray polyurethane foam in exposed framing prior to insulating.

5.2.5.15 Fireplace

- All chimneys shall be structurally sound and in safe working condition.
- All fireplaces shall have tight fitting dampers.
- Chimneys not meeting these requirements shall be permanently sealed at all openings.

5.2.5.16 Interior Trim

- All damaged trim shall be repaired or replaced with a material matching the remaining trim in each room.
- All door and window hardware shall function properly, and any missing hardware installed to bring door and window back to workingcondition.

5.2.5.17 Interior Doors

- Bedroom and bathroom doors shall be free from defects, fit the framed opening, latch securely, and include privacy latches.
- New door latches may be lever style as a Universal Design feature.

5.2.5.18 Floors

- All sub-flooring shall be structurally sound. Particleboard sub-flooring shall never be used as a sub-floor replacement within four feet of any water source. [This includes supply lines inside wall cavities but does not include supply lines underneath the floor.]
- Damaged flooring material will be replaced with carpet, vinyl, or tile. Laminate flooring made of pressed board, fiber board or any other fibrous structure that is not waterproof, is not permitted.
- Carpet is discouraged, but newly installed carpet shall meet the minimum requirements in the chart below. Carpet and pad shall be Carpet and Rug Institute (CRI) certified Green Label +Plus.

Carpet: Carpet must meet or exceed the minimum weight and density requirements specified in the chart below for the texture used.	**BCF Nylon**		**BCF Polypropylene**		**Staple Polyester**	
Texture:	**Weight**	**Density**	**Weight**	**Density**	**Weight**	**Density**
Level/Texture Loop	20	3300	20	3600	N/A	N/A
Cut-pile Heat Set Plied	24	1250	32	4000	32	1550

- Newly installed vinyl flooring must meet the FloorScore® Certification Standard for resilient flooring.
    - Vinyl sheet goods must meet the standards of ASTM F1303, be fully adhered and have a minimum overall thickness of 2mm.
    - Vinyl plank flooring must be a minimum of 4 mm thick with interlocking edges, and a simulated wood design. Vinyl plank flooring must be fully adhered and properly sealed.
- Painted floors are not acceptable unless pre-approved by City staff.

5.2.5.19 Kitchen

- All cabinets shall be in good working order.
- Cabinets and countertops shall be free of water damage. Countertops must be intact, free from cracks or defects and cleanable for food preparation.
- New cabinetry shall be a minimum of 24 cf of wall cabinet storage and 40 cf of base cabinet storage in each kitchen.

5.2.5.20 Bathroom:

- All bathrooms shall include a mirror, towel bar, tissue holder, shower rod (where applicable}, and a medicine cabinet.
- Existing fixtures shall be in good working condition.
- Vanity tops shall be secured to cabinet and sealed at all edges to prevent waterinfiltration.
- Tub and shower surrounds shall be watertight and in like newcondition.

5.2.5.21 Painting:

- Interior and exterior painted surfaces damaged or badly deteriorated will be repainted.
- All window glazing must be in like new condition.
- Stained woodwork must include a finish sealer type coating.
- All open seams or joints must be caulked or filled consistent with methods widely used in the construction industry.
- All interior paints and primers must be less than or equal to the following VOC levels: Flats--50 g/L; Non-flats--50 g/L; Floor--100 g/L. [g/L = grams per liter]

- All adhesives must comply with Rule 1168 of the South Coast Air Quality Management District. All caulks and sealants must comply with regulation 8, rule 51 of the Bay Area Air Quality Management District.

5.2.5.22 Appliances

- All habitable structures shall include a kitchen equipped with a minimum 18 cubic foot refrigerator. and a standard size cooktop and oven.
- Appliances must be clean and in working condition.
- All new refrigerators must be ENERGY STAR® Certified products.
- See Range Hoods under Ventilation.

5.2.5.23 Miscellaneous

- Non-essential items are not eligible in this program. Non-essential items include fencing, patios, hot tubs, security systems, decks, stained glass windows, skylights, marble and granite countertops, swimming pools and room additions.

6.0 Inspections

6.1 Determination of Work in Place

Assistance received and applicant- paid repair information will be collected on a form provided by the program manager. The form to be used will provide sufficient detail to give guidance to the Subrecipient's construction inspector to confirm determination of Work in Place. Applicants will be encouraged to retain all repair receipts.

If receipts are not available, alternative forms of documentation will be considered by the program:

- Contractor information provided) with amount paid.
- City permits and inspection records.
- Affidavits signed by city official inspection of the property to ensure repairs were completed and that assigns a value to the repairs.
- Canceled or cleared checks.
- Credit card statements that support contractor work or estimates.

The inspection report of Work in Place will be used to determine the extent to which assistance provided to applicants was used by them to make repairs to their homes. These amounts will become an offset for benefits received. Once the inspection report has been received, a final duplication of benefits analysis will be completed. It should be noted that most repairs done by nonprofits and repairs paid with FEMA IA funds are considered "temporary" repairs for the purpose of making the home safe, sanitary for the occupant to shelter in place. These "temporary" repairs will be considered an offset against assistance received.

Inspectors may use Xactimate to estimate the cost of repairs made if the owner is unable to provide a receipt. This report, if relevant, must be made available to the program manager either before or immediately after the scope of work has been determined, as this assessment will be needed for a duplication of benefits confirmation in advance of computing the grant award.

The protocol for damage assessments outlined in Section 6.2.2 will also be followed for Work in Place assessments.

6.2 Damage Assessment Protocol

This section is designed to guide the Subrecipient's assessment/inspection staff with inspection protocol and preparation of a damage assessment, and Scope write up and verification of work in place (WIP) to offset any DOB (if applicable). The purpose of these procedures is to establish routineness and standardization when conducting assessments. This process's desired result is to produce a complete Scope of Work as efficiently as possible with the highest degree of completeness and quality assurance for City of Columbia Disaster Recovery Housing Program. Subrecipient staff assigned to field inspections must possess HUD's "Lead-Based Paint Visual Assessment Certification."

6.2.1 Overview:

1. Right of Entry will be provided by applicants during the application/intake process.
2. Applicants will be contacted to schedule their site visit with a 72-hour notice given prior to the site visit. Scheduling will be made and tracked in the system of record (SOR).
3. A Joint Site Visit will be conducted at the physical address of the dwelling applicants have provided. The Program Damage Assessor (DA), and the applicant will be present during each site visit.
4. The purpose of the site visit is to do an initial estimate, verify storm damage, observe, measure, and quantify the repairs needed to repair, integrate any environmental mitigation activities in the scope of services, and make a recommendation regarding replacement or rebuilding the applicant's structure in accordance with the Program policies.
5. The inspector must ensure any repairs suggested are in-line with local code and the full list of Disaster Recovery Housing Construction Standards.
6. The inspector will use Xactimate estimating software to produce the Scope of Work write up and DOB verification (if applicable). Each inspector's Xactimate software will be uploaded with the approved universal price list including sales taxes and Overhead and Profit to ensure that consistent and correct pricing is used throughout the project. Xactimate price lists will be updated at a minimum quarterly.
7. After a complete assessment of the dwelling has been completed, the DA will record the quantities of eligible and damaged items throughout the structure and agree on what will be needed to repair the house in accordance with Program policies.
8. Updating Work Write-up- For properties where the LSHR applies, the Subrecipient will update the initial work write-up to include activities required to address all lead-paint hazards as listed in Risk Assessment.
9. Calculating Federal Rehabilitation Assistance - After the scope of work has been updated to include lead-paint hazard reduction requirements and the cost estimate for repairs, Subrecipient staff will use the "Calculating Level of Federal Rehabilitation Assistance" worksheet(s) [Exhibit-8:

Single-family, Exhibit-9: Multi-family] to determine the total rehabilitation hard cost. The hard cost is then used to determine the level of hazard reduction that is required under the LSHR [see Exhibit-2].

10. After the Scope of Work has been completed, Subrecipient and the homeowner will review and approve it.
11. Once approved the Scope of Work becomes the approved Work Order (WO) it will be sent to the Office of Community Development, along with the duplication of benefits analysis and the proposed grant amount, before being provided to the AGC for action.
12. Once a Scope write-up and "DOB" are produced they will be sent to the Subrecipient Director who will review documents for overall accuracy and completeness. Documents will then be uploaded to the applicant file on the Share Point site, along with a recommendation for reconstruction or rehabilitation.
13. Homes exceeding the thresholds established in Section 7.3 will be referred to the Special Case Panel for disposition determinations.
14. Based on the assessment, the Subrecipient will assign a general contractor (AGC) in accordance with the contractor selection and/or bid policy.
15. After assignment, the Subrecipient, Assigned General Contractor (AGC), and the case manager will finalize a project plan that minimizes the homeowner's time out of the home.

6.2.2 Procedures:

1. Damage Assessment Process (in order of occurrence), including the process to determine Work in Place:
    a. **INSPECTORS ARE NOT TO PLACE THEMSELVES IN HARM'S WAY DUE TO UNSAFE CONDITIONS OR HAZARD** (refer to example of Hazardous Conditions sub-section below). If unsafe or hazardous conditions exist, the inspector is to document the condition via photographs taken from a safe area, and in the Scope of Work coversheet narrative section state a narrative summary of the unsafe existing conditions. Do not continue with the inspection. However, in most cases a structure can be assessed from the exterior by getting a measurement of the exterior perimeter of the house which can be used to determine the estimated cost of repairs. This method is only allowed in cases where the structure is unsafe to enter.
    b. Upon receipt of an assigned property for inspection, the Damage Assessor (DA) assigned by the Subrecipient is to familiarize him/herself with the route(s) required to allow for adequate travel time to arrive at the applicant's dwelling in a timely fashion.
    c. The DA will also coordinate with the case manager to confirm the start time for the site visit.
    d. The DA and any other staff will greet the applicant, present their photo ID badges, explain the purpose of the visit, and provide a brief overview of the assessment process. The DA will provide the applicant with a copy of the approved Program guidelines, fact sheet or pamphlet and answer any follow-on questions the applicant may have.
    e. The DA will document the description of the structure inclusive of roofing type, exterior building envelope type, electrical system size, electrical breaker type, electrical wiring type, plumbing system type, domestic water distribution piping type, water utility type (public service or well), gas utility type (public service or tank), sewer service (municipal service, septic ta or wastewater treatment plant), and Heating/HVAC system.

f. The DA will jointly observe each space within the home to identify damages and repair items to produce a scope write up and duplication of benefits report.
g. Photographs will be taken in each space of the dwelling to adequately document the existing condition of each scope item that is determined.
h. Order of photos should be:
    i. Reference photos from street;
    ii. Exterior photos with address verification, including any accessory structures on the site;
    iii. Roof Photos (from best advantage point to identify damages/no damages), and

2. Interior photos - Damaged and Undamaged Areas to include all areas within the footprint of the home.
    a. The Subrecipient will measure and provide a sketch of the entire structure including each room or space in the house.
    b. The on-site damage assessment will be completed once all damages are observed, measured, and quantified, and each item has been agreed upon by the Subrecipient.
    c. Once the on-site damage assessment is complete, the Subrecipient will produce a Scope of Work and DOB report, which will be sent to the Subrecipient's QA/QC and then sent to the online Grant Management System for entry.

6.2.3 Special Conditions

6.2.3.1 Unsafe Entry:

If a dwelling is deemed unsafe for entry by verbal advice of the applicant or visual confirmation of the Damage Assessor (DA), photos of only the exterior will be taken. The DA is not to enter the property and take pictures. A short narrative describing the unsafe conditions should be included in the narrative of the Scope of Work. The structure can still be assessed from the exterior by getting a measurement of the exterior perimeter of the house, which can be used to determine the estimated cost of repairs. In all instances, if the structure is not safe to enter, the property will be referred to a City Inspector for consultation, unless the recommendation is for demolition and reconstruction.

6.2.3.2 Hazardous Conditions Sub-Section:

This list contains only examples of hazardous conditions. Inspectors are to be cognizant of any hazardous conditions observed.

1. Low headroom ceiling, damaged or failing framing.
2. Fallen trees on the structure.
3. Subflooring removed or open floor joists.
4. Presence of extreme suspected mold or toxic substances
5. Debris
6. Electrical Hazards
7. Severely damaged or undermined Foundation
8. Aggressive Pets

9. Crumbling Foundation
10. Dead/live animals, vermin and/or insect infestation (termites, carpenter ants, carpenter bees) – interior (including attic), exterior, basement/crawl space.
11. Aggressive Neighbors
12. Visibly observed weapons.
13. Condemned signs affixed.
14. Contaminated Soil
15. Poison Ivy or other toxic plants impeding assessment.
16. Suspected asbestos (chipping, friable or converts to dust): heating pipes, siding (clapboards, shakes), floor tiles (usually 9 x 9), some sheet flooring (may be able to tell from the backing), fireplace flues, duct work, ceiling, and wall tiles.

6.3 Estimated Cost of Repairs

The Subrecipient will complete a QA/QC review of damages and a pre-construction inspection; prepare a detailed scope of work including environmental remediation measures and green building and energy efficiency requirements; create bid specifications, a bid schedule, and bid form; and establish a baseline for cost comparison of contractor bids. The cost estimate will utilize Xactimate software.

6.4 Contesting Work in Place or Estimated Cost of Repairs

Differences in allowable repairs will be resolved between the property owner and Subrecipient before the applicant continues in the program. Any significant changes in the repair scope identified after the contractor's site visit will be provided to the homeowner prior to an approval of a final scope of work. The final scope of work will be contained in the Grant Agreement and construction contract.

Any differences that cannot be resolved between the applicant and the Subrecipient will be referred to OCD for resolution.

6.5 Applicant Approval

The Subrecipient will complete a QA/QC review of damages and a pre-construction inspection; prepare a detailed scope of work including environmental remediation measures and green building and energy efficiency requirements; create bid specifications, a bid schedule, and bid form; and establish a baseline for cost comparison of contractor bids.

The Subrecipient will review the scope with the homeowner and answer any questions they may have. The homeowner must agree to the scope of work before the pre-bid conference. Differences in allowable repairs will be resolved between the property owner and Subrecipient before the applicant continues in the program. The final scope of work will be contained in the Grant Agreement and the construction contract.

6.6 Special Case Panel

A Special Case Panel will be formed consisting of two employees of the Office of Community Development, one from Construction and one from Compliance, and one SBP employee. The panel will meet weekly to adjudicate items including but not limited to the following:

- Determination of hardship assistance to be provided to applicant households for voluntary relocation;
- Determination of hardship in instances where program may need to pay for homeowners or flood insurance for a year;
- Determination of hardship in instances where the homeowner is delinquent on utility bills;
- Review of all homes recommended for reconstruction;
- Cost overruns due to termite infestations;
- Cost overruns;
- Change orders exceeding the 10% contingency; and
- Disputes between applicants and SBP related to scope.

Recommendations from the Special Case Panel require approval by the Executive Leadership Team, composed of the Director of the Office of Community Development, the Assistant City Manager for Economic and Community Development, and the Director of Budget and Programs prior to final implementation.

7.0 Builder Assignment

7.1 Procurement of Pool of Qualified Contractors

Following the City of Columbia procurement guidelines, the Subrecipient will develop an RFQu. Based on an evaluation of RFQu responses, the Subrecipient will identify a list of qualified contractors.

Responses will be evaluated and approved by the Subrecipient. All successful General Contractors must hold a valid state builder's license and trades must be registered per City of Columbia requirements. and demonstrate acceptable insurance and bonding as required by the City and HUD. All program-approved contractors must be appropriately licensed be EPA RRP Certified. All electrical work will be completed by an electrician with an approved license from the City of Columbia. A licensed plumber must perform all plumbing work. Abatement work will be performed by appropriately licensed and certified contractors. Building permits are required for all construction work.

All RFQu must be EPA Lead-Based Paint Certified Firms whenever selected for work on repairs to housing containing lead-based paint. EPA certified Lead-Based Paint Abatement Contractors are required for all LBP projects where hard cost exceeds $25,000 per unit. EPA Lead-Based Paint Certified Renovators are required for all LBP projects where hard cost is less than $25,000 but more than $5,000. HUD approved Lead-Safe Practices training is required for all workers on projects where hard cost is less than $5,000.
General Contractors are required to submit copies of their licenses and certifications during their initial application to participate in the City's CDBG/DR program. Subrecipient staff shall maintain bid list to ensure that all licenses and certifications are received during initial application. Bid list shall clearly designate companies that are EPA Lead-Based Paint Certified Firms. Prior to award of any construction contract, Staff shall verify that all licenses and certifications are currently up to date.

All General Contractors are required to have a DUNS# and a debarment check completed before they are eligible to bid on any scope of work. All General Contractors must receive training from the Subrecipient to become fully qualified in the City's CDBG-DR program.

All qualified contractors who meet the RFQu standards will receive an equitable opportunity to compete for projects.

7.2 Bid Process and Contractor Selection

Properties will be placed for bid among the prequalified general contractors and VOADS operating with a state-licensed builder. Contractors must sign in at the pre-bid conference, which will be coordinated through the Subrecipient. Construction staff will provide adequate time for written contractor questions and program responses. Bid invitations must be extended to the list of contractors on the procured contractor pool. Bids will be reviewed by the Subrecipient, and the lowest responsive and responsible contractor will be selected and provided a notice of Intent to Award a contract. The homeowner will receive a construction contract agreement identifying the selected contractor.

Bids must fall within plus or minus 20% of the program cost estimate. If no bids fall within this range, a variance analysis will be performed to determine the differences in scope and costs. Program staff will review the variance report and determine if changes are warranted. Any warranted changes to the scope of work will be made and the revised program estimate will reflect the total amount necessary to repair flood related damages.

If the City decides that reconstruction/replacement is warranted, the construction team will recommend suitable residential designs (including any historical building requirements). Regardless of the size of the existing structure, all replacement housing will have three (3) bedrooms and two (2) full baths. Upon City approval, the homeowner will be presented the replacement alternative(s) for acceptance. Following Homeowner acceptance, the Program will request from the City an ALTA Survey. The survey will be used to develop plans and specs for City Planning approval. Upon approval, the program will issue an Invitation to Bid to residential builders and select the lowest responsive, responsible bidder in accordance with the Disaster Recovery Procurement Policies and Procedures and 2 CFR 200, Uniform Administrative and Cost Principles. If the homeowner declines to accept the replacement alternatives, the Program has the sole discretion to close the application with no further action.

7.3 Feasibility Determination for Repair versus Reconstruction

The completion of the ECR will result in a recommendation of feasibility for rehabilitation or reconstruction:

7.3.1 Reconstruction Thresholds

For homes that have been destroyed or that existing conditions are such that the building cannot be rehabilitated to program standards, or where the total Estimated Cost to Repair (ECR) amount

exceeds 65% of the ratio of the total cost of the ECR repairs to the lowest composite priced standard model house of three bedrooms and two bathrooms will be recommended.

7.3.2 Rehabilitation Thresholds

For homes that appear feasible for habitation after repairs are completed and where repair costs are less than 65% of the ratio of the total cost of the ECR repairs to the lowest composite priced standard model house of equal number of bedrooms, rehabilitation will be recommended.

To comply with FEMA and local floodplain management regulations, building elevation will be required for homes located in floodplains and are below the base flood elevation and where the ECR exceeds 50% of the pre-storm market value (excluding lot value). The ECR will identify quantities and scopes of work required to repair or replace storm-damaged items and to bring the remainder of the structure/site to compliance with program Housing Standards and will produce a high-level cost estimate for obvious repairs.

Exception: For attached dwelling units required to come into compliance with base flood elevation requirements, the feasibility thresholds discussed above are waived because Initial site inspections for attached dwelling units will be completed as rehabilitations by default. Initial site inspections for attached dwelling units must be completed as rehabilitations because traditional reconstruction techniques are not applicable for these units to meet base flood elevation requirements.

7.4 Form of Construction Contracts

All construction contracts must contain the following:

- Detailed Scope of Work
- Line-Item pricing
- Section 3 contract language (required)
- Any bonding and/or insurance requirements
- Specific period of performance
- Project milestones and deliverables
- Change Order process
- Liquidated damages provision
- DUNs number for general contractor and all subs with contracts over $25,000

8.0 Award Determination/Closing: Grant Agreement and Escrow Agreement

8.1 Award Determination/Grant Signing

The Subrecipient, will determine the award amount based on the contractor bid. After subtracting the duplicate funds received or anticipated from the proposed activity cost and offsetting any eligible costs, Subrecipient will calculate the maximum award. In determining the award amount, the City seeks to provide sufficient funding to repair the home to acceptable standards or reconstruct a suitable home while adhering to a transparent approach to calculating need.

Due to limited funding availability, program-paid temporary relocation costs for homeowners will be made available only with documentation of extreme need, and subject to approval of the Special Case Panel and Executive Leadership Team. Cost to implement Uniform Relocation Act requirements should tenants be present in the structure, will not be included in the award calculation, but will be paid from program funds.

After the Program selection has been determined, Subrecipient's case managers will clearly explain the terms of the grant award, the subrogation agreement, and the appeals process. The Program Grant Agreement with the property owner will stipulate the conditions, responsibilities and authorities required to complete the scope of work, which will be reviewed again with the homeowner. The Agreement will also include authorizations of program covenants, deed restrictions (if applicable), and standard language affirming the Program is acting in the best interest of the property owner and the owner holds the program and City harmless. The repayment amount becomes zero as long as the homeowner retains the property for the five-year duration of the grant agreement. The City will place a lien on the property to secure the grant, and a covenant should flood insurance be required to be maintained. Sale of the property prior to the end of the five-year recapture period will result in a recapture of the entire grant amount.

Case managers will conduct the grant and subrogation agreement signing with the applicant and return two copies of the executed notarized documents to OCD, leaving one with the applicant.

The Agreement also requires the applicant to return to the City of Columbia any additional assistance received for the same purpose as the CDBG Disaster Recovery funds. This agreement will be monitored by program compliance staff at least once annually for five years. The Director of the Office of Community Development will execute the grant agreement and other closing documents.

Disaster recovery assistance needs are calculated at a point in time. As a result, subsequent circumstances may occur that affect the need. If, after the assistance has been calculated and/or an award has been made, an applicant can demonstrate a change in circumstances the award calculation may be reevaluated.

Such changes in circumstance include:

- vandalism,
- contractor fraud,
- an increase in the cost of materials or labor,
- a change in local zoning law or building codes, or
- subsequent damage to a home that was partially repaired.

The reevaluation must be completed before the initial need for which assistance was granted has been fully met (e.g., before a damaged house is fully repaired). Unless an additional need is established, disaster recovery funds must be recaptured to the extent they are in excess of the need and duplicate other assistance received by the beneficiary for the same purpose. Protocols for recapturing assistance are

mandatory, will be included in the Grant Agreement, and must be effectively communicated, orally and written, to applicants during this process.

8.2 Recapture Provisions

The grant and subrogation agreement between the homeowner and the City of Columbia will impose the recapture requirements for the CHAP, Minor Repair, and Reimbursement Programs. These enforcement mechanisms ensure that the City recaptures the financial assistance provided if the property is transferred or the property owner fails to meet program requirements for the five-year duration of the recapture agreement.

The recapture requires that all or a portion of the direct subsidy provided to the applicant be recaptured from the net proceeds of the sale. These provisions are imposed for the duration of the period of affordability through a written agreement with the homeowner, and enforced via lien, deed restrictions or covenants running with the land. The recapture provisions are triggered by any transfer of title, either voluntary or involuntary, during the established period of affordability.

If the homeowner sells or transfers the property for any period of time during the term of the grant agreement, repayment will be enforced. If the homeowner fails to meet any contractual obligations of the agreement, the homeowner will be determined to be in a state of noncompliance and Disaster Recovery staff will implement the following recapture procedure:

- Meet with the applicant to document the reason(s) for recapture.
- Issue a 60-day notice requiring full repayment, certification of compliance, or creation of a repayment plan approved by the City of Columbia.
- If a notice is returned, staff will take reasonable actions to locate the applicant.
- Homeowner may be allowed to appeal the recapture based on the City's appeal process. Disaster Recovery staff will gather additional information regarding the appeal and make a determination. The City of Columbia will make the final appeal decision.
- If fraud is suspected, the file will be submitted to the Office of the State's Attorney immediately.

If original applicant died and the heir was not residing in the house at the time of the storm, the property no longer eligible.

8.3 Office of Community Development Approval and Funding Reservations

The Office of Community Development will review and approve each grant agreement. The following documentation must be provided to the Office of Community Development Finance Officer before Notice to Proceed can be given to the contractor:

- One copy of the signed agreement;
- Verification that a copy of the agreement was provided to the applicant;
- One copy to be filed with the County Clerk to memorialize the lien, and any restrictive covenants, placed on the property;
- Copy of construction contract;

- Copies of SAMs check for all contractors;
- Projected additional costs related to voluntary relocation, or URA if tenant was present.

This grant document will trigger a funding reservation by OCD for the total repair cost of each project. In addition to construction costs, the anticipated costs for any relocation assistance to be provided, will be reserved as well.

A final reconciliation will be done once the Certificate of Occupancy or Final Card has been received, and the final construction invoices submitted.

8.4 Treatment of Homeowner Required Funds

When a homeowner is assigned a builder from the contractor pool, progress payments are made by the Subrecipient directly to the builder, upon approval by the Subrecipient. The City will reimburse the Subrecipient upon receipt of appropriate documentation. In such cases, the homeowner must provide the funds needed for the complete project scope that are not covered by the grant. This will be done in the form of a cashier's check made payable to the Subrecipient and held by the City. The construction cannot begin until all funds to complete the project have been identified and any homeowner funding required has been receive. A

8.5 Notice to Proceed

Upon notification of the closing on the grant agreement with an applicant, Subrecipient will assemble a form contract to be executed between the Subrecipient and the assigned general contractors pertaining to rehabilitation, reconstruction, elevation, or mitigation construction activities to assist in their recovery from the flood events of 2015. This contract, along with the award documents and other required documentation (Section 8.3) must be provided to the Finance Department before Notice to Proceed is issued.

The Subrecipient is tasked with managing the proper sequencing of construction projects for homeowners to ensure proper controls are in place by the construction contractors to adhere to the terms and conditions of the construction contract. The primary purpose of a Notice to Proceed (NTP) is to control the timing and tempo of the initiation of construction and avoid any construction project progressing without the proper permit or authorization. Only the Subrecipient shall issue an NTP to the general contractor.

9.0 Construction

9.1 Permits

The assigned general contractor (AGC) is responsible for documenting and obtaining all necessary permits for each job site. The cost of any unresolved permits remaining from prior program activity will be paid by the assigned contractor. Outstanding permit cost will be added to the contract and paid upon receipt of appropriate documentation with the first draw request.

The Subrecipient will review and confirm that all required permits were obtained by the contractor. The permits will be posted at each site in plain view. A permit box should be installed in the front yard or the

permit should be posted in the front window of the home.

9.2 Construction Oversight

The AGC will ensure work performed is done pursuant to approved scope of work and satisfies all International Residential Code (IRC), International Energy Conservation Code (IECC), applicable green building standards, and all other Federal, State, and local construction, health and safety code requirements, laws, rules, and ordinances upon project completion.

The Subrecipient Program Director or designee will oversee the work of the construction contractor for each rehabilitation and reconstruction project.

AGC should confirm that a copy of the Scope of Work (SOW) is onsite. Each distinct area will have a copy of the SOW prominently posted in the area. Example: The kitchen would have the SOW for the kitchen area posted in the kitchen.

9.3 Quality Control Inspections

Inspections for the purpose of quality control will be performed for each site by the Subrecipient to determine consistency within the Program and across contractors and inspectors.

Inspections will be conducted weekly for all active construction sites. Each inspection will include inspection notes and photographs, and inspection results will be recorded with photographs and log notes and uploaded into the system of record. The AGC is responsible for scheduling and notifying the Subrecipient of any inspections required by City ordinances and/or Code Enforcement.

Inspections serve four primary purposes: 1) Evaluate the contractor's progress and confirm that work is on schedule; 2) Confirm that local building codes, standards and City inspections requirements have been satisfactorily met; 3) Confirm that all LSHR safety and confinement measures are in place at sites undergoing LBP hazard remediation activities; and 4) Confirm that all other contract requirements have been met.

Subrecipient staff shall perform weekly monitoring of site to ensure that containment/protection measures are in place and that home remains vacant during environmental remediation work. Staff assigned to field inspections shall possess HUD's "Lead-Based Paint Visual Assessment Certification". Subrecipient staff are to use the City's inspection form for these inspections. These reports are to be forwarded to the City's construction staff on a weekly basis.

In addition, an inspection report will accompany each draw request, and confirm that the work claimed has been done to the program standards and all materials claimed are attached to the home.

City construction staff will periodically conduct unannounced inspections of construction sites. See City Inspection Form in Appendix.

9.4 Construction Change Orders

The Subrecipient will conduct all due diligence activities prior to starting construction to discover any potential unforeseen circumstances.

In the event any unforeseen conditions are discovered during the course of construction, the contractor will then prepare a *Change Order,* with supporting documentation, and submit to the area Subrecipient for review and determination.

All change orders must be approved by City construction staff and reported to the CD Coordinator. All change orders exceeding the 10% contingency must be approved by the City Manager. Change orders that exceed the 10% contingency must also be approved by City construction staff and the CD Coordinator prior to referring to the City Manager. Change orders under the 10% contingency will be approved by the SBP program director and documented in the SOR. If approved, the revised amount will be added to the contract, provided the costs are reasonable and in accordance with similar services provided on other construction projects as determined by the Subrecipient. Documentation of all change orders, along with the determination of "cost reasonableness" must be included in the applicant's construction record.

The Special Case Panel will review and approve/deny the *Change Order* and supporting documentation and update the SOW with versioned ECR and adjustments to award. Any work done prior to receipt of written approval of the change order will not be eligible for repayment.

9.5 Draw Requests

The AGC will submit draw requests on a schedule to be determined by the Subrecipient. The AGC will notify the Subrecipient of the need for any interim/draw inspections and shall schedule a date and time during normal business hours [Monday thru Friday 8:30-5:00] that is also convenient for the homeowner. The Subrecipient will pay contractors on a weekly basis. The Subrecipient will notify homeowner of the appointed date and time. All areas of the home must be accessible, and the contractor should be prepared to answer any questions concerning the construction and/or rehabilitation of the home.

Each draw request submitted to the Subrecipient for payment must include the following:

- Trade payment breakdown (AIA form preferred)
- Unconditional release of lien for work of General Contractor and all subs to be paid.
- Permits and all copies of all cards.
- Invoices, receipts as needed.
- Section 3 report, indicating any new hires.
- Any updates to FFATA report (addition of additional subcontracts in excess of $25,000)

These requirements also apply to reimbursement requests from Subrecipient to the City. It is anticipated that the Subrecipient will bill the City monthly. The Subrecipient intends to submit only one draw request

to the City for each property. That will be the final draw request upon project completion, inspection, and acceptance by the homeowner.

9.6 Final Inspection and Draw Request

The Subrecipient will coordinate all required file documentation with owners and general contractors necessary for verification of completion of construction to program requirements and submit for OCD approval of completion and closeout and proper record keeping. In accordance with OCD approved policies and procedures, the Subrecipient will ensure compliance with program construction requirements.

The final documents are required to accompany the final payment request by the Subrecipient on each Homeowner project:

Each draw request submitted to the Subrecipient for payment must include the following:

- Trade payment breakdown (AIA form preferred) reflecting actual costs.
- Unconditional release of lien for all work (General Contractor and all subs) to be paid.
- Final inspection report documenting that all costs to be paid are appropriate and the work has been completed to program standards.
- Green building certifications
- Permits and all copies of all cards.
- Documentation of proper disposal of all hazardous materials
- Warranties
- Homeowner checklist and signoff (completed)
- LSHR lead and asbestos clearances, with all required documents (final environmental clearances will be billed directly to OCD)
- Invoices, receipts as needed.
- Final card or Certificate of Occupancy
- Section 3 report, indicating any new hires.
- Photo documentation of completed project.

At the completion of all repairs, Subrecipient will contact a third-party testing company to conduct a lead-based paint clearance examination, if the LSHR applies. An EPA Certified Lead-Based Paint Risk Assessor will conduct the clearance examination following EPA guidelines to ensure that the site is safe for the occupants to return to the home. Once clearance is obtained, Staff shall fill out “Re-Occupancy Authorization” form [Exhibit-10] and “Lead-based Paint Evaluation Notice” form [Exhibit-6] and attach copy of clearance examination test results to the form. A copy of previously mentioned documents shall be delivered to applicant, with receipt of notice, within fifteen days from Staff’s receipt of test results. Copies of all previously mentioned documents shall be placed in file.

After LBP Clearance is achieved, the Subrecipient shall confirm receipt of the following documents to be provided by Contractor prior to final payment / closeout of project:

- Protection of Occupants’ Belongings & Worksite Preparation for Projects with Lead

Hazard Reduction Activities [Exhibit-11]
- Lead Based Paint Renovation Recordkeeping Checklist [Exhibit-12]
- Lead Based Paint Post Construction Safe Work Practices Certification [Exhibit-13]
- Lead-Based Paint Contractor/Employee Certification of Worker Training [Exhibit-14]

When work is nearing completion, the AGC will notify program staff of a specific date when the job will be ready for punch list inspection, which will guarantee that all work has been completed according to contract specifications. The AGC and the Subrecipient will develop the punch list, which constitutes the work necessary to complete the contract. If the punch list contains more than ten (10) items, the contractor is not ready for a final inspection.

Upon completion of all items identified on the punch list, a final inspection shall be conducted by the Subrecipient. City construction staff will accompany the Subrecipient on these inspections. The final inspection shall insure that all contractual items including any work covered by change order(s) has been satisfactorily completed at the home and all local permit inspections have been completed and approved. The construction inspector will either pass or fail the inspection and document on the final inspection checklist. In the event that the final inspection fails, all parties will be notified of the deficiencies and a request for completion will be documented.

Upon final completion of the work, the Subrecipient shall schedule a Homeowner walk through with the AGC. The walk through may be conducted simultaneously with the final inspection. Upon acceptance of work, the Homeowner and Subrecipient must acknowledge, in writing, that the contract has been fulfilled and that work at the home is 100% complete.

The Subrecipient will certify that the Contractor has provided, and the Homeowner received, all warranties and instruction booklets for installed equipment and that Homeowner has received a copy of the final inspection report along with signature of final acceptance of work. Immediately after this, the Subrecipient will assume control of the keys and coordinate with the case manager for key turnover.

The key turnover with the homeowner authorizes the homeowner to move into the home. The key turnover is not complete until the homeowner receives the document package for all new appliances and equipment, a copy of construction documentation including permits and Certificate of Occupancy or Final Card and a magnet with the case manager's contact information, including phone number, and warranty expiration date.

Disbursement of the final payment to the contractor will be made pending receipt of a Final Affidavit of lien from the Contractor and from each subcontractor [Contractor must provide an updated list of sub-contractors used on project if there are any changes from those listed in original contract documents].

9.7 Project Closeout

Once the Subrecipients have verified that all draw requests have been paid, the program manager uploads the following required documents to the applicant's file for OCD review:

- Certificate of Occupancy or Final Card,

- Certificate of Elevation, if applicable,
- Photos of Completed Project,
- Lead-Based Paint Notices and verification of lead paint clearance, if applicable
- Draw Request Checklist,
- Final Site Inspection Form, signed and completed by Subrecipient demonstrating passed inspection, and
- Project Close Out Checklist.

Once the documents are uploaded, the file will move to a "Final Closeout" stage where the OCD staff will conduct a final review in the following order:

- Construction staff signoff
- Compliance and Monitoring team signoff
- Finance department signoff;
- Director of OCD signoff.

The file will then be archived in the Share Point system.

9.8 Warranty Issues and Construction Complaints

The Case Manager is responsible for addressing and correcting all warranty issues and construction complaints. All communications pertaining to warranty issues or construction complaints received by the case manager are forwarded to the AGC and OCD no later than one business day from receipt.

All warranty issues and construction complaints must be corrected within 7 business days of receiving the initial complaint. All issues must be documented in the applicant's file within 1 business day of initial complaint, at every interval of the process involving communication with the citizen, and after the issue has been corrected. Citizens must be contacted within 2 business days to confirm the issues and schedule corrective actions.

Issues that cannot be corrected within the designated 7 business days must be reported to the Subrecipient via email. If the AGC identifies any failure pattern in products or services, they must notify the Program Director of such pattern and the AGC's course of action for resolving the failure pattern within two business days.

The Subrecipient Program Manager will provide weekly reports documenting, at minimum, the following:

- Open Warranty Issus/Complaints with date received, client name, issue, and status.
- Open Warranty Issues/Complaints as a percentage of total homes completed.

The Case Manager (CM) will receive warranty and construction complaint calls. The call will be logged in the appropriate case file in the System of Record (SOR) within 1 business day of receiving the initial call. The applicable AGC will contact the homeowner within 2 business days to confirm the issues and schedule

corrective actions if necessary. The report call must be reported to the CM and recorded in the SOR.

The AGC will correct the issue within 7 business days of the initial call and provide documentation to the CM for inclusion in the SOR.

If the AGC believes that the issue has been addressed but the homeowner has further concerned, the CM will forward the issue to the Subrecipient for review and adjudication.

Homeowners will receive a notification as the one-year warranty expiration date approaches as a reminder that any unresolved warranty issues should be brought to the attention of the Subrecipient prior to the expiration of the warranty. Formal notification will be provided to homeowners at six (6) months and the one month prior to the expiration date of the warranty.

9.9 Record Retention by Subrecipient

The Subrecipient shall maintain all records related to products, transactions, or services under this contract for a period of five (5) years after the City's grant is closed by HUD pursuant to 24 CFR 570.490(d). Such records shall be made available to HUD, OCD, or to other authorized parties for audit and review, for a period of five (5) years from the date of final payment or applicable City requirements, whichever is longer. The following documents will be maintained by the Subrecipient for each homeowner assigned to them over the course of the program:

- Initial Work in Place inspection;
- Lead-Based Paint Notification, risk assessments, and clearance reports;
    - LSHR Compliance Checklist
    - LSHR Applicability Form
    - Lead Safe Housing Requirements Screening Worksheet Parts 1 thru 4.
    - Lead-Based Paint Evaluation Notice
    - Lead Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities
    - Calculating Level of Rehabilitation Assistance: Worksheet #1 Single-Family Unit
    - Calculating Level of Rehabilitation Assistance: Worksheet #2 Multi-Family – All units Federally Assisted
    - Re-Occupancy Authorization
    - Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities
    - Lead Based Paint Renovation Recordkeeping Checklist
    - Lead Based Paint Post Construction Safe Work Practices Certification
    - Lead-Based Paint Contractor/Employee Certification of Worker Training
    - Lead-Based Paint – Ongoing Monitoring Schedule for Rental Property
- Determination of Rehabilitation or Reconstruction;
- Estimated Cost to Repair;

- Scope of Work and Related Drawings for Rehabilitation Projects;
- Scope of Work, Design Drawings and Approved Plans for Reconstruction Projects;
- Zoning Approvals and any Variances;
- Construction Permits;
- Construction Contract;
- Bonds (performance, payment, and maintenance);
- Insurance Certificates;
- Notice to Proceed;
- Inspection Request Forms;
- Draw Request Forms along with all supporting documentation;
- Failed Progress Inspection (if applicable);
- Change Orders;
- Final Housing Inspection;
- Lien Waivers;
- Contract Closing Notice;
- Construction Warranty;
- Subcontractor Releases;
- Section 3 report and
- Certificate of Occupancy or Final Card.

10.0 Project Closeout

10.1 Award Reconciliation

Once all construction costs have been documented by the Subrecipient and approved by OCD, the program managers will conduct a final grant agreement reconciliation. This reconciliation will involve confirming that the construction costs upon which the grant agreement was predicated remain accurate and that no additional benefits were received by the applicant since the grant agreement was executed.

This process confirms that amount received on behalf of the applicant and ensures that no recapture of funds is required.

10.2 Award Agreement Amendment

A grant agreement amendment may be necessitated if the amount of the award changed. When the grant award amount changes, the Case Manager, or appropriate Subrecipient staff member may request an amendment. The Subrecipient will update the award calculation and submit to the Director of OCD for review and approval. Upon approval, the Case Manager will schedule a meeting with the homeowner to sign the amended award calculation and confirm the amendment request was successfully completed.

Grant agreement amendments that occur due to the homeowner's receipt of new Duplication of Benefits funds after grant award signing follow the policy and procedures outlined in Section 3.4.

10.3 File Checklist for Compliance and Monitoring

Before a project file can be moved to archive, there must be a final review by OCD Compliance and Monitoring to ensure all program requirements are covered and supported by the required documentation. The following key homeowner program requirements must be supported by the necessary documentation:

- Application;
- Eligibility determination documents (identify, occupancy, ownership, residency, income, property tax status);
- Income verification;
- DOB information and supporting documents;
- Owner certifications and authorizations required for interim steps including but not limited to, reimbursement, design and zoning approval, enhancements, and pre-existing contractor-related documents;
- Environmental review and clearance documents
- Compliance Checklist to track the steps that are required to comply with the LSHR and verify that all documentation is in electronic and hard files.
- All grant agreement and closing documents;
- All OCD approvals and authorizations; and
- All correspondence letters, including appeals and citizen complaint notices.

Appendices

Forms and Brochures– Lead Safe Housing Rules

Exhibit 1: Brochures

Exhibit 2: Level of Lead Hazard Reduction Activities

1. Property receiving less than or equal to $5,000 per unit	Pre-1978	• Safe work practices in rehab. • Repair disturbed paint. • Clearance of the worksite.
2. Property receiving more than $5,000 and up to $25,000	Pre-1978	• Risk assessment. • Interim controls.
3. Property receiving more than $25,000 per unit	Pre-1978	• Risk assessment. • Abatement of LBP hazards. • Interim controls allowed for exterior only as listed at 35.930(d)(3)

Exhibit-3: Lead-Safe Housing Rule Checklist for General Compliance Documentation

Property Address: _____

(Program participants can use this checklist as a guide for determining whether or not they are proceeding in a manner required by the LSHR, and that they are maintaining documentation for each CPD-assisted project. Field Office staff can use the checklist as a means for familiarizing themselves with the kinds of documentation that should be maintained in order to demonstrate LSHR compliance. Compliance with the program-specific requirements may not be substantiated solely by the documents included on this general checklist. Additional guidance is provided as referenced in the checklist.)

As appropriate, the following documents should be maintained in CPD-assisted project files for properties constructed before January 1, 1978, in order to demonstrate general knowledge and compliance with basic LSHR requirements. Standard forms are available in the Federal Register (FR), as indicated by the sources noted below. Citations from 24 CFR part 35 are also provided as additional references.

_____ **Applicability Form** [§35.115] – A copy of a statement indicating that the property is covered by or exempt from Lead Safe Housing Rule. [1]

(Note: (A) If the property is exempt, the file should include the reason for the exemption and no further documentation is required; (B) if the property is covered by the Rule, the file should include the appropriate documentation to indicate basic compliance, as listed below.)

_____ **Summary Paint Testing Report or Presumption Notice** [§35.930(a)] – A copy of any report to indicate the presence of lead-based paint (LBP) for projects receiving up to $5,000 per unit in rehabilitation assistance. If no testing was performed, then LBP is presumed to be on all disturbed surfaces. [2]

_____ **Risk Assessment Report** [§35.930(c)(2)] – A copy of a report (in addition to the requirements of §35.930(a)) to indicate any presence of lead-based paint hazards for projects receiving more than $5,000 per unit in rehabilitation assistance. [4] (Note: If the property receives more than $25,000 in assistance, more stringent requirements apply, including compliance with applicable state requirements, as appropriate. [See §35.930(d)].

_____ Notice **of Evaluation** [§35.125(a)] – A copy of a notice demonstrating that an evaluation summary was provided to residents following a lead-based-paint inspection, risk assessment or paint testing. [3, 4]

_____ **Clearance Report** [§35.930(b)(3)]– A report indicating a "clearance examination" was performed of the work- site upon completion.

_____ **Notice of Hazard Reduction Completion** [§35.125(b)] – Upon completion, a copy of a notice to show that a LBP remediation summary was provided to residents. [5]

Source: Federal Register (FR), 64 FR 50139-50231, published September 15, 1999 -- Requirements for Notification, Evaluation and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance. The appendices are on pages 50230-50231.

[1] LSHR Regulation Applicability Form (See Attachment B to this memorandum.)
[2] Appendix C--Sample Summary Presumption Notice Format
[3] Appendix A--Sample Summary Inspection Notice Format
[4] Appendix B--Sample Summary Risk Assessment Notice Format
[5] Appendix D--Sample Hazard Reduction Completion Notice Format

Exhibit-4: Lead-Safe Housing Rule – Applicability Form

Address/location of subject property:

Regulation Eligibility Statements (check all that apply):

_____Property is receiving Federal funds.

_____Unit was built prior to 1978. [attach support document(s) if available]

Note: If both Eligibility Statements above have been checked, continue with the Exemption Statements below. Otherwise, the regulation does not apply, sign and date the form.

Regulation Exemption Statements [24 CFR 35.115] (check all that apply):

_____ Emergency repairs to the property are being performed to safeguard against imminent danger to human life, health, or safety, or to protect the property from further structural damage due to natural disaster, fire, or structural collapse. The exemption applies only to repairs necessary to respond to the emergency.

_____ The property will not be used for human residential habitation. This does not apply to common areas such as hallways and stairways of residential and mixed-use properties.

_____ Housing "exclusively" for the elderly or persons with disabilities, with the provision that children less than six years of age will not reside in the dwelling unit.

_____ An inspection performed according to HUD standards found the property contained no lead-based paint.

_____ According to documented methodologies, lead-based paint has been identified and removed; and the property has achieved clearance.

_____ The rehabilitation will not disturb any painted surface.

_____ The property has no bedrooms.

_____ The property is currently vacant and will remain vacant until demolition.

If any of the above Exemption Statements have been checked, the Regulation does not apply. In all cases, sign, and date the form.

I certify that the information listed above is true and accurate to the best of my knowledge.
(print name)

Signature: _____ Date:

Organization: City of Columbia, SC – Office of Community Development

Exhibit-5: Lead-Safe Housing Requirements Screening Worksheet

This worksheet should be placed in the project file for any residential property that is assisted with Federal funds. Parts 1 and 2 should be completed for all projects. Parts 3 and 4 should be completed for rehabilitation projects.

Property Owner:

Address of Property:

Part 1: Exemptions from All Requirements of 24 CFR Part 35

If the answer to any of the following questions is yes, the property is exempt from the requirements of 24CFR Part The regulatory citation of each exemption is cited as additional guidance.

- ❖ Was the property constructed after January 1, 1978? [35.115(a)(1)] □YES □NO
- ❖ Is this a zero-bedroom unit? (e.g., SRO, efficiency) [35.115(a)(2)] □YES □NO
- ❖ Is this dedicated elderly[1] housing? (i.e., over age 62) [35.115(a)(3)] □YES □NO
- ❖ Is this housing dedicated for the disabled[2]? [35.115(a)(3)] □YES □NO
- ❖ Has a paint inspection conducted in accordance with 35.1320(a) established that the property is free of lead-based paint? [35.115(a)(4)] □YES □NO
  - The date of the original paint inspection was_____. An optional paint inspection conducted on confirmed this prior finding.
- ❖ Has all lead-based paint in the property been identified and removed, and has clearance been achieved as cited below? [35.115(a)(5)] □YES □NO
  - Clearance was achieved prior to September 15, 2000, and the work was done in accordance with 40CFR Part 745.227(b). □YES □NO
  - Clearance was achieved after September 15, 2000, and the work was done in accordance with 24CFR Part 35.1320, 1325 and 1340. □YES □NO
- ❖ Will a currently vacant unit remain vacant until it is demolished? [35.115(a)(6)] □YES □NO
- ❖ Is the property used for non-residential purposes?[3] [35.115(a)(7)] □YES □NO
- ❖ Will rehab **exclude** disturbing painted surfaces? [35.115(a)(8)] □YES □NO
- ❖ Are emergency actions immediately necessary to safeguard against imminent danger to human life, health, or safety, or, to protect the property from further structural damage? (e.g., after natural disaster or fire) [35.115(a)(9)] □YES □NO

- ❖ Will the unit be occupied for less than 100 days under emergency leasing assistance to an eligible household?[4] [35.115(a)(11)] □YES □NO

Part 2: Limited Exemptions from Specific Hazard Reduction Requirements

The HUD Final Rule allows for limited exemptions from specific requirements due to the characteristics of the rehabilitation work, the structure, or the occupants. If the answer to any of the following questions is yes, the grantee and/or occupant may waive certain requirements as described below.

- Is the amount of painted surface that is being disturbed below "de minimis" levels, as defined below? If so, safe work practices and clearance are not required in that work area.
  - Less than 20 square feet on an exterior surface [35.1350(d)(1)] □YES □NO
  - Less than 2 square feet in any single interior room [35.1350(d)(2)] □YES □NO
  - Less than 10% of surface area of an interior/exterior component [35.1350(d)(3)] □YES □NO

- Is the unit occupied by an elderly person(s)? If so, relocation of the elderly Occupant(s) is not required if complete disclosure of the nature of the work is provided and informed consent is obtained prior to rehabilitation.[5] □YES □NO

- Is a unit that is subject to abatement requirements listed or eligible for listing on the National Register of Historic Places, or does it contribute to a National Register Historic District? If so, the State Historic Preservation Office may request that interim controls be implemented rather than abatement. On-going maintenance and re-evaluation is required. [35.115(13)] □YES □NO

I have evaluated the site and property, the work specifications, and interviewed the occupants. In my professional opinion, this unit qualifies for the indicated exemption(s).

Signature
_____Date_____

[1] Defined as retirement communities or similar types of housing reserved for households composed of one or more persons over age 62, or other age if recognized by a specific Federal housing assistance program. However, if a child under age 6 resides or is expected to reside in such a unit, the unit is not exempt.

[2] The housing must be a residential property designated exclusively for persons with disabilities, defined as any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of impairment, or is regarded by others as having such an impairment. However, if a child under age 6 resides or is expected to reside in such a unit, the unit is not exempt.

[3] Except that spaces such as entryways, hallways, stairways, etc. serving both residential and non-residential uses in a mixed-use property are not exempt.

[4] When a household is provided short-term emergency leasing assistance and will occupy a unit for less than 100 days, the unit is exempt from lead paint regulations. This emergency leasing exemption is attached to the unit, not the family, and is a one-time exemption. After being assisted for a total of 100 consecutive days, the unit becomes subject to regular Subpart K requirements. Multiple families cannot be cycled through the same unit at intervals of less than 100 days under this exemption.
[5] HUD Interpretive Guidance, April 16, 2001, question # J-24.

Addendum for Rehabilitation Projects Parts 3 and 4

Parts 3 and 4 of this worksheet should be completed for any residential property that is to undergo rehabilitation with Federal funds. The completed form should be placed in the project file with Parts 1 and 2.

. Part 3: Per Unit Level of Rehabilitation Assistance

- Average Federal Funding Per Unit $_____
- Average Per Unit Rehabilitation Hard Costs $ (not including costs of lead hazard evaluation and reduction) _____
- Lower of A or B $_____
-

. Part 4: Approach Required (Based on answer to 3.C., above)

_____$0 – $5,000

_____$5,001 - $25,000

_____$25,001 and above

_____Do No Harm (Test & Repair)

_____Identify and Control Lead Hazards

_____Identify and Abate Lead Hazards

Calculated by (Print Name) _____ Date_____

I have evaluated the site, the specifications, estimated the rehab hard costs and interviewed the occupants. In my professional opinion, this project meets the above requirement for federal lead hazard reduction under 24 CFR Part 35.

Signature _____ Date _____

Exhibit-6: Lead-Based Paint Evaluation Notice

Address/location of property or structure(s) this summary Notice applies to:

_____

Lead-based paint assessment type (circle one):

Paint Testing Risk Assessment Assumption Clearance Testing

Date of assessment: _____

Summary of assessment results (check all that apply):

_____No lead-based paint hazards were found.

_____Lead-based paint hazards were found.

____Lead-Based Paint hazards are assumed present.

A brief summary of the findings of the assessment is provided below (required if any lead-based paint hazards were found).
Summary of types and locations of lead-based paint hazards. List at least the housing unit numbers and common areas (for multifamily housing), bare soil locations, dust-lead locations, and/or building components (including type of room or space, and the material underneath the paint), and types of lead-based paint hazards found:

_____
_____
_____
_____

Person who prepared this summary:

Printed name: _____
Signature: _____

Contact person for more information about the risk assessment:

Printed name: _____ Signature: _____
Organization: _____ Phone: _____
Address: _____

Exhibit-7: Lead Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities

Property Address:

Homeowner(s):

Relocation for this project is: (check one)

_____ Required (All items listed in Section A will be performed and appropriate documents will be attached)

_____ Not required due to circumstances listed in Section B.

Note: If circumstances change during the course of City's involvement with above-mentioned property, relocation may be required!

Relocation of occupants is required, and the following activities will occur for occupant protection:

- ❖ Occupant(s) will not be permitted to enter the worksite during hazard reduction activities.
- ❖ Occupant(s) will temporarily relocate to a lead-safe unit before and during hazard reduction activities for their own safety and protection.
- ❖ Dwelling unit and worksite will be secured against unauthorized entry.
- ❖ Occupant(s) belongings located in a containment area will be relocated to a secure area outside the containment area or will be covered with appropriate materials.
- ❖ Relocation of occupant(s) is not required due to the following circumstances:
    - Work will not disturb lead-based paint or involve any lead dust hazard reduction activities.
    - Work in the interior of the unit will be completed within one period in eight daytime hours, the site will be contained, and the work will not create other safety, health, or environmental hazards.
    - Only the building's exterior will be treated, the windows, doors, ventilation intakes, and other openings near the worksite will be sealed during hazard reduction activities and cleaned afterward; and a lead-free entry will be provided.
    - Treatment will be completed within five calendar days; the work area will be sealed; at the end of each day, the area within 10 feet of the containment area will be cleared of debris and cleaned; at the end of each day, occupants will have safe access to sleeping areas, bathroom, and kitchen facilities; and treatment will not create other safety, health, or environmental hazards.
    - Occupants are elderly and have signed an Elderly Waiver for Relocation (attached)

Homeowner(s) Signature _____Date _____
City of Columbia [Representative] Signature_____Date _____

Co-owner(s) Signature _____Date _____
City [Representative] Printed Name & Job Title_____

Exhibit-8: Calculating Level of Rehabilitation Assistance: Worksheet #1 - Single Family Unit

This worksheet should be used to calculate the level of assistance for single family units only. For assistance to multifamily units, see Worksheet #2 or #3.

To determine the level of rehabilitation assistance, remember to take the lower of Federal assistance per unit OR rehabilitation hard costs per unit.

A. What is the total amount of federal assistance dollars contributed to the project? _____

B. What are the total rehabilitation hard costs to this project? (To calculate hard costs, see page 2 of this worksheet) _____

C. Write the amount that is lower of question A or B above _____

36. Check appropriate category.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

Single Family Unit

Calculating Rehabilitation Hard Costs

A. Enter the total job cost in line 1

1. Total Job Cost	1._____

B. Enter the costs in each corresponding box for lines 2 through 14

2. Financing Fees	2._____
3. Credit Reports	3._____
4. Title Binders & Insurance	4._____
5. Recordation Fees & Transaction Taxes	5._____
6. Legal & Accounting Fees	6._____
7. Appraisals	7._____
8. Architectural & Engineering Fees	8._____
9. Project Costs incurred by PJ directly related to the project	9._____
10. Administrative Costs	10._____
11. Relocation Costs	11._____
12. Environmental Reviews	12._____
13. Acquisition of the Property	13._____
14. Lead Hazard Evaluation & Reduction Costs*	14._____
15. Other Soft Costs	15._____
16. Total Soft Costs (add lines 2 through 15)	16._____
17. **Total Rehabilitation Hard Costs** (**Line 1** – (minus) **Line 16**) (Enter this number as "B" on prior page)	17._____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Exhibit-9: Calculating Level of Rehabilitation Assistance: Worksheet #2 - Multi Family—All units Federally Assisted

This worksheet should be used to calculate the level of assistance for **multi-family buildings** where **all** of the **units** are **federally assisted**. If dealing with a multi-family building where only *some* of the units are federally assisted, please use Worksheet #3.

To determine the level of rehabilitation assistance, remember to take the lower of Rehabilitation hard costs per unit OR Federal assistance per unit.

A. Are all units federally assisted? yes no If no, go to Worksheet #3.

B. What is the total amount of federal assistance dollars per unit? _____ (Use the amount from line 3 from the calculation on page 2 of this worksheet.)

C. What is the total rehabilitation hard costs per unit? _____ (Use the amount from line 6 from the calculation on page 2 of this worksheet.)

D. Write the amount that is lower of question B or C. _____

E. Check appropriate category.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

Calculating Level of Rehabilitation Assistance: Worksheet #2 - Multi Family—All units Federally Assisted

1. Federal Dollars in the Project	$_____
2. Number of Units in project	$_____
3. **Federal Assistance Per Unit** (line 1 ÷ line 2)	$_____
4. Rehab Hard Costs in the Project (line 23)	$_____
5. Number of Units in project	$_____
6. **Rehab Hard Cost Per Unit** (line 4 ÷ line 5)	$_____
7. Total Job Cost	$_____

Enter the costs in each corresponding box for lines 8 through 20:

8. Financing Fees	$_____
9. Credit Reports	$_____
10. Title Binders & Insurance	$_____
11. Recordation Fees & transaction Taxes	$_____
12. Legal & Accounting Fees	$_____
13. Appraisals	$_____
14. Architectural & Engineering Fees	$_____
15. Project Costs incurred by PJ directly related to the project	$_____
16. Administrative Costs	$_____
17. Relocation Costs	$_____
18. Environmental Reviews	$_____
19. Acquisition of the Property	$_____
20. Lead Hazard Evaluation & Reduction Costs*	$_____
21. Other Soft Costs	$_____
22. Total Soft Costs (add lines 8 through 21)	$_____
23. Total Rehabilitation Hard Costs (line 7 minus line 22)	$_____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Calculating Level of Rehabilitation Assistance: Worksheet #3 - Multi Family—Projects that include both Federally-assisted and non-assisted units.

This worksheet should be used to calculate the level of assistance **for multi-family buildings** where **some** of the units are **federally assisted**. If dealing with a multi-family building where *all* of the units are federally assisted, please use Worksheet #2.
To determine the level of rehabilitation assistance, remember to take the lower of Rehabilitation hard costs per unit OR Federal assistance per unit.

A. What is the amount of federal assistance dollars per unit? _____

(Use the amount from line 3 from the calculation on page 2 of this worksheet.)

B. What are the total rehabilitation hard costs per unit? _____

(Use the amount from line 10 from the calculation on page 2 of this worksheet.)

C. Write the amount that is lower of question A or B. _____

D. Check appropriate category

.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

Calculating Level of Rehabilitation Assistance: Worksheet #3 - Multi Family—Projects that include both Federally-assisted and non-assisted units.

1. Federal Dollars in the Project 1. _____
2. Number of Units receiving assistance 2. _____
3. **Federal Assistance Per Unit** (line 1 ÷ line 2) 3. _____
4. Rehab hard costs for all assisted dwelling units 4. _____
(not including common/exterior areas) (line 29)
5. Number of Federally assisted units in the project 5. _____
6. Dwelling unit costs (Line 4 ÷ line 5) 6. _____
7. Rehab hard costs for common areas and exterior surfaces (line 30) 7. _____
8. Total Number of units in the project 8. _____
9. Common Area Costs (Line 7 ÷ line 8) 9. _____
10. **Rehab Hard Costs Per Unit** (line 6 + line 9) 10. _____
11. Total Job Cost 11. _____

Enter the costs in each corresponding box for lines 12 through 24.

12. Financing Fees	12. _____
13. Credit Reports	13. _____
14. Title Binders & Insurance	14. _____
15. Recordation Fees & transaction Taxes	15. _____
16. Legal & Accounting Fees	16. _____
17. Appraisals	17. _____
18. Architectural & Engineering Fees	18. _____
19. Project Costs incurred by PJ directly related to the project	19. _____
20. Administrative Costs	20. _____
21. Relocation Costs	21. _____
22. Environmental Reviews	22. _____
23. Acquisition of the Property	23. _____
24. Lead Hazard Evaluation & Reduction Costs*	24. _____
25. Other Soft Costs	25. _____
26. Total Soft Costs (add lines 12 through 25)	26. _____
27. **Rehabilitation Hard Costs** (Line 11 – (minus) Line 26)	27. _____
28. Determine the percentage of costs attributable to dwelling units	28. _____%
29. Rehab hard costs for dwelling units (not including **common/exterior areas)** (line 27 X line 28)	29. _____
30. **Rehab hard costs for common & exterior areas** (line 27– (minus) line 29)	30. _____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Exhibit-10: Re-Occupancy Authorization

Applicant's Name:
Property Address:
Columbia, SC 29_ _ _

Dear Applicant:

RE: HAZARD REDUCTION COMPLETION NOTICE

Your house successfully passed a clearance examination with confirmation received from (testing company) at (time) on (date).

You are hereby authorized to re-enter your house as of (time) on (date).

Sincerely,

CDBG-DR Representative's Printed Name: _____

CDBG-DR Representative's Signature: _____

Date: _____

Applicant's Signature of Receipt of Re-Occupancy Notice: _____
Date: _____

Exhibit-11: Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities

Homeowner: _____
Property Address: _____+_____
Name of Individual Completing this Form: _____
Organization: _____ Date form Completed: _____

Instructions: Check all activities performed to protect occupants' belongings and prepare the worksite. Whether or not relocation of occupants is required before & during lead hazard reduction activities, the worksite must be carefully prepared & occupants' belongings protected. Check all that apply.

- □ Occupants were appropriately notified that their belongings would be protected during the work and what, if anything, they would need to do to prepare the project.
  - □ Occupants' belongings in the containment area were (check one)
  - □ Relocated to a safe and secure area outside the containment area

  OR
  - □ Covered with an impermeable covering with all seams and edges taped or otherwise sealed

- □ Worksite was prepared to prevent the release of leaded dust and contain lead-based paint chips and other debris from hazard reduction activities until they were safely removed. Practices that minimize the spread of leaded dust, paint chips, soil, and debris were used during worksite preparation.
- □ A warning sign was posted:
  - □ At each entry to a room where hazard reduction activities were conducted when occupants were present,

OR

- □ At each main and secondary entryway to a building from which the occupants had been relocated,

OR

- □ For any exterior hazard reduction work, where it was easily read 20 feet from the edge of the worksite.

- □ The warning sign was in:
  - □ The occupants' primary language, or
  - □ Another language [specify language, & why occupants' primary language was not used].

_____

- □ Final clearance was achieved before occupants' belongings were uncovered or returned to the unit.

____ I certify under penalty of law that the above information is true and complete.

Printed Name, Job Title, & Company Name_____

_____
Signature & Date

Exhibit-12: Lead Based Paint Renovation Recordkeeping Checklist

Name of Firm: Date and Location of Renovation:
Brief Description of Renovation:
Name of Assigned Renovator:
Name(s) of Trained Worker(s), if used:
Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used:

_____ Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file

_____ Posting warning signs _____Setting up plastic containment barriers
_____ Maintaining containment _____Avoiding spread of dust
_____ Post-renovation cleaning to adjacent areas ____Waste handling

_____Test kit or test results from an EPA recognized laboratory on collected paint chip sample used by certified renovator to determine whether lead was present on components affected by renovation (identify method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling locations and results)

_____ Warning signs posted at entrance to work area.
_____ Work area contained to prevent spread of dust and debris.
_____ All objects in work area removed / covered (interior)
_____ HVAC ducts in work area closed and covered (interiors)
_____ Windows in the work area closed (interiors)
_____ Windows in/within 20' of work area closed & sealed (exteriors)
_____ Doors in the work area closed and sealed (interiors)
_____ Doors in/within 20' of work area closed & sealed (exteriors)
_____ Doors that must be used in the work area covered to allow passage but to prevent spread of dust to outside of work area.
_____ Floors in the work area covered with taped-down plastic (interiors)
_____ Ground covered by plastic extending 10' from work area & anchored to building & weighed down by heavy objects (exteriors)
_____ Vertical containment installed if property line prevents 10' of ground covering, or if necessary, to prevent migration of dust and debris to adjacent property (exteriors)
_____ Waste contained on-site & while transported off-site Work site properly cleaned after renovation.
_____ All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal.
_____ Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloths or mops (interiors)
_____ Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloth's used):

_____ If dust clearance testing was performed instead of cleaning verification (attach copy of clearance report)

_____ **I certify under penalty of law that the above information is true and complete.**

Printed Name, Job Title, & Company Name _____

Signature & Date _____

Exhibit-13: Lead Based Paint Post Construction Safe Work Practices Certification

I _____ (name) an employee of _____(company), certify that we followed safe work practices on _____ (property address).

Items 1A-1D below were adhered to in compliance with Federal, State, and Local regulations except for in cases where the work was exempt from safe work practice requirements as described at Item 2 below.
Check Number 1 or 2 below to show compliance level used at above-listed property:
____ 1. The following safe work practices were applied as appropriate:

A. The prohibited work methods listed below were not used:

- Open flame burning or torching.
- Machine sanding or grinding without a high-efficiency particulate air (HEPA) local exhaust control.
- Abrasive blasting or sandblasting without HEPA local exhaust control.
- Heat guns operating above 1,100 degrees Fahrenheit, or those that operate high enough to char the paint.
- Dry sanding or dry scraping [for exceptions to this rule see 24 CFR 35.140(e)]
- Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous substance in accordance with regulations of the Consumer Product Safety Commission at 16 CFR 1500.3 and/or a hazardous chemical in accordance with the Occupational Safety and Health Administration at 29 CFR 1010.1200 or 1926.59 as applicable to the work performed at the above-listed property.

B. Protection of occupants and preparation of the worksite as described below:

- Occupant Protection
  - Occupants were not permitted to enter the worksite during hazard reduction activities until final clearance was achieved.
  - Occupants were temporarily relocated before and during hazard reduction activities if necessary.
  - Dwelling unit and worksite were secured against unauthorized entry and occupants belongings were protected from contamination by dust-lead hazards and debris during hazard reduction activities.
  - Occupants' belongings in a containment area were relocated to a secure area outside the containment area or were covered with appropriate materials.
- Worksite Preparation
  - Worksite was prepared to prevent release of leaded dust and to contain lead-based paint chips and other debris [from the hazard reduction activities] to within the prepared worksite.
  - A warning sign was posted at each entry to rooms where hazard reduction activities were conducted whenever occupants were present.

C. Specialized cleaning after hazard reduction activities to include:

- Used HEPA vacuum cleaners or other method of equivalent efficacy.
- Used lead-specific cleaning detergents or equivalents.

D. Clearance of unit achieved before re-occupancy was permitted.

_____ 2. Safe work practices and clearance were not required when activities do not disturb painted surfaces below the deminimus thresholds defined below:

- The maintenance or rehab. hazard reduction activities did not disturb painted surfaces that totaled more than:
  - □ 20 square feet on exterior surfaces
  - □ 2 square feet in any one interior room or space
  - □ 10 percent of the total surface area on an interior or exterior type of component with a small surface area such as windowsills, baseboards, and trim
  -

_____ _____
Contractor Signature & Date

_____
Assigned staff [City Representative] Signature & Date

Exhibit-14: Lead-Based Paint Contractor/Employee Certification of Worker Training

The use of this form is optional. It can be used after all work is complete to document that workers who worked on the rehabilitation project were properly qualified to do the work.

I, _____[name], an employee of _____ [contractor or organization], certify that the employees listed below, who worked on the building located at _____ were properly trained to use safe work practices and to perform interim controls on a project known or presumed to have lead-based paint or lead-based paint hazards.

Proper training courses include the following. Each person listed below completed at least one of these courses.

- A lead-based paint abatement supervisor course accredited in accordance with 40 CFR 745.225;
- A lead-based paint abatement worker course accredited in accordance with 40 CFR 745.225;
- The Lead-Based Paint Maintenance Training Program- "Work Smart, Work Wet, & Work Clean to Work Lead Safe", prepared by the National Environmental Training Association for EPA & HUD;
- The "Remodeler's and Renovator's Lead-Based Paint Training Program" developed by HUD and the National Association of the Remodeling Industry;
- "Addressing Lead-Based Paint Hazards during Renovation, Remodeling, and Rehabilitation in Federally Owned and Assisted Housing", HUD's adaptation of the EPA model curriculum for renovators and remodelers; or
- An equivalent course approved by HUD. _____ [specify title of course]

Names of Trained Employees:

_____ _____
_____ _____
_____ _____
_____ _____
_____ _____
_____ _____

Contractor / Supervisor Signature Date

Note: Attach copies of applicable certifications

Exhibit-15: Lead-Based Paint - Ongoing Monitoring Schedule for Rental Property

Note: Property owner must follow lead-based paint regulations as required by HUD and the EPA. Any dates listed below are for use as guidance in complying with the above-mentioned regulations and should be verified by the property owner to ensure compliance with regulations.

Property Owner:
Property Address:

Initial lead-based paint and risk assessment was performed at this property by:
_____on _____

Clearance testing was performed by _____on _____

- Visual Assessment Survey required annually and whenever information indicates a possible problem. The next visual survey shall be performed no later than_____.

- Reevaluation required every two years unless the property fails two consecutive reevaluations which will trigger more frequent testing. The next reevaluation on this property shall be conducted prior to _____.

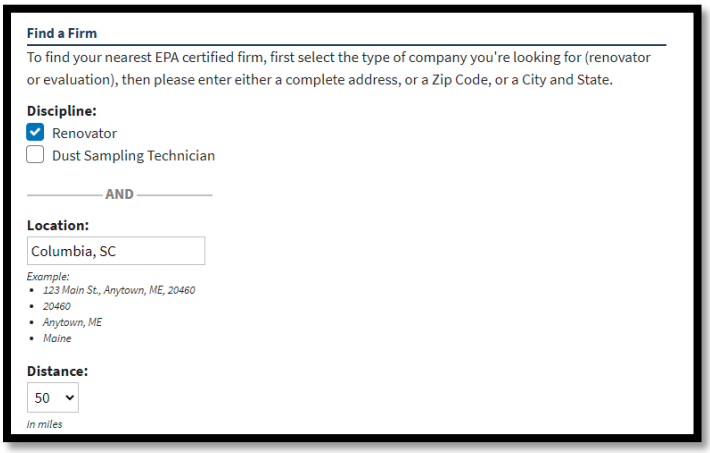
Received by,

Property Owners Signature _____

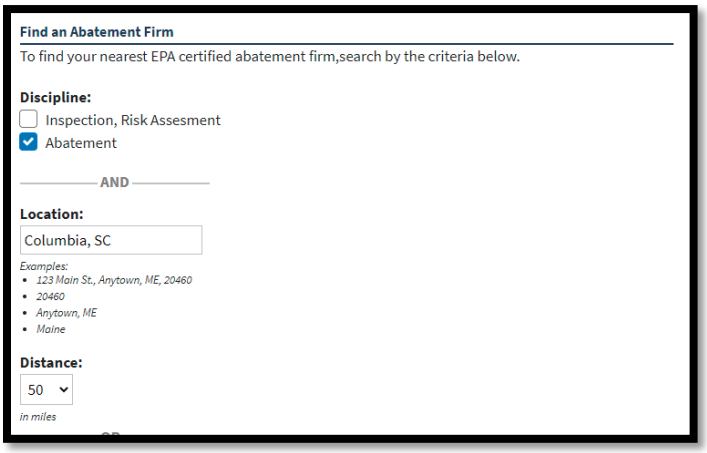
Date _____

Exhibit 16: Contractor Selection Criteria for Lead-Safe Housing Rule Compliance

All contractors performing work that disturbs paint in pre-1978 housing must be EPA Lead-Based Paint Certified Firms (certified renovators). To find a list of **certified renovation firms**, follow this link:
https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearch
Site lists 129 firms within 50 miles of Columbia, SC on February 16, 2021



Additionally, pre-1978 housing with over $25,000 in rehabilitation hard costs requires abatement of all lead hazards. Abatement must be carried out by EPA-certified Lead-Based Paint Abatement Contractors (abatement contractor firms). To find a list of **abatement firms**, follow this link:
https://cfpub.epa.gov/flpp/pub/index.cfm?do=main.firmSearchAbatement
Site lists 12 firms within 50 miles of Columbia, SC on February 16, 2021



Subrecipient Printed Name, Job Title, & Company Name

_____

Signature & Date

_____

Exhibit 17 CPD Green Building Retrofit Checklist

Modified for the City of Columbia SC CDBG-DR Program.

HUD CPD Green Building Retrofit Checklist

Adapted to meet the Construction Standards for Columbia SC's CDBG-DR Program

The CPD Green Retrofit Checklist promotes energy efficiency and green building practices for residential retrofit projects. Grantees must follow the checklist in its entirety and apply all measures within the Checklist to the extent applicable to the particular building type being retrofitted. The phrase "when replacing" in the Checklist refers to the mandatory replacement with specified green improvements, products, and fixtures only when replacing those systems during the normal course of the retrofit.

Note: CPD recognizes that not all elements of the checklist will be applicable in all climates and geographies. Because of this, CPD will consider exceptions to these standards based on climate or geography, if a grantee identifies the specific standards that are not applicable, including offering alternatives if available, and CPD's Office of Environment and Energy accepts the grantees request.

WATER AND ENERGY CONSERVATION MEASURES

☐ **Water-Conserving Fixtures**

Install or retrofit water conserving fixtures in any unit and common facility, use the following specifications: Toilets-- 1.28 gpf; Urinals-- 0.5 gpf; Showerheads-- 2.0 gpm; Kitchen faucets-- 2.0 gpm; and Bathroom faucets-- 1.5gpm. [gpf = gallons per flush; gpm = gallons per minute]

☐ **ENERGY STAR Appliances**

Install ENERGY STAR-labeled clothes washers, dishwashers, and refrigerators, if the appliance is replaced in a single-family home, or if these appliance categories are provided in units or common areas of rental properties.

☐ **Air Sealing: Building Envelope**

Seal all accessible gaps and penetrations in the building envelope. Use low VOC caulk or foam.

☐ **Insulation: Attic** (if applicable to building type)

For attics with closed floor cavities directly above the conditioned space, blow in insulation per manufacturer's specifications to a minimum density of 3.5 Lbs. per cubic foot (CF). For attics with open floor cavities directly above the conditioned space and less than R30 insulation, install insulation to meet or exceed IECC levels, which is R38 per the 2018 IECC.

☐ **Insulation: Flooring** (if applicable to building type)

Install ≥ R-19 insulation in contact with the subfloor in buildings with floor systems over vented crawl spaces or insulate the perimeter foundation walls with rigid foam board with a minimum R value of 10, rated for exposure, including a termite inspection strip at the top. Install a 6-mil vapor barrier in contact with 100% of the floor of the crawl space (the ground), overlapping seams and piers at least 6 inches and sealing.

☐ **Duct Sealing** (if applicable to building type)

In buildings with ducted forced-air heating and cooling systems, seal all penetrations of the air distribution system to reduce leakage in order to meet or exceed ENERGY STAR for Homes' duct leakage standard.

☐ **Air Barrier System**

Ensure continuous unbroken air barrier surrounding all conditioned space and dwelling units. Align insulation completely and continuously with the air barrier.

☐ **Radiant Barriers: Roofing**

When replacing or making a substantial repair to the roof, use radiant barrier sheathing or other radiant barrier material; if economically feasible, also use cool roofing materials.

☐ **Windows**

When replacing windows, install geographically appropriate ENERGY STAR rated windows.

☐ **Sizing of Heating and Cooling Equipment**

When replacing, size heating and cooling equipment in accordance with the Air Conditioning Contractors of America (ACCA) Manuals, Parts J and S, or 2012 ASHRAE Handbook--HVAC Systems and Equipment or most recent edition.

☐ **Domestic Hot Water Systems**

When replacing domestic water heating system(s), ensure the system(s) meet or exceed the efficiency requirements of ENERGY STAR for Homes' Reference Design (ENERGY STAR Certified). Insulate pipes by at least R-4.

☐ **Efficient Lighting: Interior Units**

Follow the guidance appropriate for the project type: install the ENERGY STAR Advanced Lighting Package (ALP); ***OR*** follow the ENERGY STAR MFHR program guidelines, which require that 80% of installed lighting fixtures within units must be ENERGY STAR-qualified or have ENERGY STAR-qualified lamps installed; ***OR*** when replacing, new fixtures and ceiling fans must meet or exceed ENERGY STAR efficiency levels.

☐ **Efficient Lighting: Common Areas and Emergency Lighting** (if applicable to building type)

Follow the guidance appropriate for the project type: use ENERGY STAR-labeled fixtures or any equivalent high-performance lighting fixtures and bulbs in all common areas; ***OR*** when replacing, new common space and emergency lighting fixtures must meet or exceed ENERGY STAR efficiency levels. For emergency lighting, if installing new or replacing, all exist signs shall meet or exceed LED efficiency levels and conform to local building codes.

☐ **Efficient Lighting: Exterior**

Follow the guidance appropriate for the project type: install ENERGY STAR-qualified fixtures or LEDs with a minimum efficacy of 45 lumens/watt; ***OR*** follow the ENERGY STAR MFHR program guidelines, which require that 80% of outdoor lighting fixtures must be ENERGY STAR-qualified or have ENERGY STAR-qualified lamps installed; ***OR*** when replacing, install ENERGY STAR compact fluorescents or LEDs with a minimum efficacy of 45 lumens/watt.

INDOOR AIR QUALITY

☐ **Air Ventilation: Single Family and Multifamily** (three stories or fewer)

Bathrooms without windows, or with mold or moisture problems (regardless of the presence of a window), must have mechanical ventilation ducted to the exterior (not the attic, basement, or crawl space) rated at a minimum of 50 CFM for half baths and a minimum of 80 CFM for full baths.
Kitchen range hoods, vented to the exterior (not the attic, basement, or crawl space), are required for all gas fired ranges, and highly encouraged for all kitchens. Ductwork must be smooth galvanized steel. The installation of enclosed soffits above kitchen wall cabinets to enclose ductwork is an approved treatment.

☐ **Air Ventilation: Multifamily** (four stories or more)

Install apartment ventilation systems that satisfy ASHRAE 62.2 for all dwelling units and common area ventilation systems that satisfy ASHRAE 62.1 requirements. If economically feasible, consider heat/energy recovery for 100% of corridor air supply.

☐ **Composite Wood Products that Emit Low/No Formaldehyde**

Composite wood products must be certified compliant with California 93120. If using a composite wood product that does not comply with California 93120, all exposed edges and sides must be sealed with low-VOC sealants.

☐ **Environmentally Preferable Flooring**

When replacing flooring, use environmentally preferable flooring, including the FloorScore certification. Any carpet products used must meet the Carpet and Rug Institute's Green Label or Green Label Plus certification for carpet, pad, and carpet adhesives.

☐ **Low/No VOC Paints and Primers**

All interior paints and primers must be less than or equal to the following VOC levels: Flats--50 g/L; Non-flats--50 g/L; Floor--100 g/L. [g/L = grams per liter; levels are based on a combination of the Master Painters Institute (MPI) and GreenSeal standards.]

☐ **Low/No VOC Adhesives and Sealants**

All adhesives must comply with Rule 1168 of the South Coast Air Quality Management District. All caulks and sealants must comply with regulation 8, rule 51 of the Bay Area Air Quality Management District.

☐ **Clothes Dryer Exhaust**
Vent clothes dryers directly to the outdoors using rigid-type, smooth metal duct work.

☐ **Mold Inspection and Remediation**
Inspect the interior and exterior of the building for evidence of moisture problems. Document the extent and location of the problems and implement the proposed repairs according to the Moisture section of the EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.

☐ **Combustion Equipment**

New central heating and cooling systems shall be ENERGY STAR® Certified, have a minimum AFUE rating of 95% if it is a furnace and a minimum SEER rating of 15 if it is a heat pump, and include ductwork insulated to a minimum R- 8 value. [Installer shall certify that the system meets the minimum requirements.] City Community Development staff reserves the right to make exceptions to the above requirements as long as installed system meets ENERGY STAR® requirements for the Columbia, SC region, which is a minimum 90% AFUE for furnaces.

☐ **Mold Prevention: Water Heaters**
Provide adequate drainage for water heaters that includes drains or catch pans with drains piped to the exterior of the dwelling for new water heaters.

☐ **Mold Prevention: Surfaces**
When replacing or repairing bathrooms, kitchens, and laundry rooms, use materials that have durable, cleanable surfaces.

☐ **Mold Prevention: Tub and Shower Enclosures**
When replacing or repairing tub and/or shower enclosures, use non-paper-faced backing materials such as cement board, fiber cement board, or equivalent in bathrooms.

☐ **Integrated Pest Management**
Seal all wall, floor, and joint penetrations with low-VOC caulking or other appropriate sealing methods to prevent pest entry. [If applicable, provide training to multifamily buildings staff.]

☐ **Lead-Safe Work Practices**

For properties built before 1978, if the project will involve disturbing painted surfaces or cleaning up lead contaminated dust or soil, use certified renovation or lead abatement contractors and workers using lead-safe work practices and clearance examinations consistent with the more stringent of EPA's Renovation, Repair, and Painting Rule and HUD's Lead Safe Housing Rule.

Exhibit 18 Mold Remediation Protocol

Mold Remediation Protocol

This protocol was developed with assistance from the National Center for Healthy Housing (NCHH.org) and is based on the EPA document Worker and Employer Guide to Hazards and Recommended Controls.
https://www.epa.gov/mold/worker-and-employer-guide-hazards-and-recommended-controls

Use the following protocols for mold remediation work, whenever it is either specified in the scope of work, or when mold is discovered in the course of housing rehabilitation activities.

Worker protection must conform with:

- Occupational Safety and Health Administration (OSHA) Safety and Health Topics page on Molds: http://www.osha.gov/SLTC/molds/index.html
- OSHA Respiratory Protection standard (29 CFR 1910.134) at http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=12716
-

Here are two additional resources regarding mold and flood cleanup:

- The Rebuild Healthy Homes Guide from HUD https://nchh.org/resource-library/hud_rebuild-healthy-homes.pdf
- The National Center for Healthy Housing, Field Guide for Flooded Home Cleanup http://bit.ly/NCHHFloodGuide

1. Specified and/or discovered building components, with mold present, shall be treated as follows regardless of the size of the area affected. Addressing the source(s) of moisture that caused the mold must be accomplished prior to the mold remediation. If moisture problems are allowed to persist, it is very likely that the mold will reappear. For containment requirements specific to the size of the area affected, see items 2 through 5 below.
   a. Prior to cleaning, cover the floor and wall surfaces adjacent to the mold affected work areas with plastic sheets, to collect dust, debris and to keep mold spores from contaminating other surfaces. Seal ventilation ducts/grills in the work area, and in areas directly adjacent, with plastic sheeting.
   b. Use dust-suppression methods, e.g., misting (not soaking) surfaces prior to remediation, to control the spread of mold spores.
   c. Porous materials, such as drywall, carpets, insulation, and fabrics with mold present, shall be removed and disposed of per local ordinance.

d. Mold on semi-porous materials, such as wood and concrete, shall be cleaned with a non-phosphate, multipurpose cleaner or detergent mixed in a bucket, and applied with scrub brushes, following the instructions on the cleaning product label. Cleaning shall always be completed prior to any additional treatments.
e. If specified, treat wood framing with a borate-based product, designed to address mold, such as:
    i. Nisus Tim-bor®
    ii. Harris Termite Powder
f. An alternate Borate treatment with DDAC may be specified instead of those listed above in item e, such as Nisus BORA-CARE with MOLD-CARE®.
g. Non-porous materials, such as metal, glass, hard plastics, and porcelain plumbing fixtures, shall be first cleaned with a multipurpose cleaner or detergent mixed in a bucket, following the instructions on the cleaning product label. Cleaning shall always be completed prior to the application of disinfectants. After the non-porous surface is free from dirt, debris, any organic matter, treat with a with a disinfectant approved (registered) by the U.S. EPA for bacteria, such as Escherichia (E. coli), Salmonella, Shigella, and Staphylococcus (https://www.epa.gov/pesticide-registration/selected-epa-registered-disinfectants). Household bleach is an approved disinfectant. For dilution ratios ratio of bleach to water, and for the recommended contact time, follow the manufacturer's instructions on the label. Do not add ammonia in any formulation to a bleach mixture. If using bleach, mix in one-gallon batches as its effectiveness diminishes with time.
h. After wet cleaning is complete, let the surface dry and let any airborne dust and mold spores settle for at least 90 minutes.
i. Clean all surfaces with a vacuum equipped with a high-efficiency particulate air (HEPA) filter to remove the settled dust and mold spores.
j. Wood components, such as wall framing or floor framing members, must be dried to a moisture content of less than 15% before being enclosed with wall or floor coverings.
k. Leave the area clean, dry, and free of debris.
l. Document before and after with clear, in-focus digital photographs.

2. For areas with under 10 square feet (SF) of mold contamination:
    a. The immediate work area (e.g., a room) must be unoccupied except for workers.
    b. Removing people from adjacent spaces is not necessary but is recommended for infants, persons recovering from surgery, immune-suppressed people, or people with asthma, hypersensitivity pneumonitis, and severe allergies.
    c. Containment of the work area is unnecessary, but care should be taken to avoid the spread of mold spores to other areas of the building.

3. For areas with between 10 and 30 SF of mold contamination:
    a. The immediate work area (e.g., a room) must be unoccupied except for workers.

   b. Removing people from adjacent spaces is not necessary but is recommended for infants, persons recovering from surgery, immune-suppressed people, or people with asthma, hypersensitivity pneumonitis, and severe allergies.
   c. Containment of the work area is unnecessary, but care should be taken to avoid the spread of mold spores to other areas of the building.
   d. The work area, and areas used by remediation workers for egress, should be cleaned with a damp cloth or mop and a detergent solution.

4. For areas with between 30 and 100 SF of mold contamination:
   a. The immediate work area and directly adjacent areas (e.g., a room) must be unoccupied except for workers.
   b. If remediation procedures are expected to generate significant dust (e.g., abrasive cleaning of contaminated surfaces, demolition of plaster walls) or where mold growth is heavy (i.e., blanket versus patchy coverage), follow the extensive contamination procedures and guidelines for protecting workers listed below.

5. For areas with greater than 100 SF of mold contamination:
   a. The immediate work area and directly adjacent areas (e.g., a rooms) must be unoccupied except for workers.
   b. Use exhaust fans with high-efficiency particulate air (HEPA) filtration to ventilate the work area.
   c. Use airlocks, decontamination rooms, and negative-pressure enclosures as needed to prohibit the spread of mold spores to uncontaminated areas.

Homeowner Repair Program Forms

Adjusted Gross Income Worksheet

Affidavit of Ownership

Affidavit of Principal Residence

Communication Designee

Conflict of Interest – COI

Homeowner Programs General Affidavit

Household Income Certification

Household Member Composition

Lender Notice

Name Affidavit

Self-Certification of Repairs

Third Party Homeowner Assistance Oral Verification Form

Zero Income Certification

Policy and Procedures for compliance with

HUD Lead-Safe Housing Rule,24 CFR part 35 & EPA Lead-Based Paint RRP Rule,40 CFR part 745

as adopted by the City of Columbia for the Disaster Recovery Program

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   C. Lead Safe Housing Requirements Screening Worksheet Parts 1 thru 4 [Exhibit-5]
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1. OVERVIEW

The workflow procedures contained in this document are to be used in implementing the City of Columbia's Lead-Based Paint policies. These procedures were developed to ensure that the City's disaster recovery programs are carried out in compliance with 24 CFR Part 35, which is commonly referred to as HUD's Lead-Safe Housing Rule (LSHR) and 40 CFR Part 745, which is commonly referred to as EPA's Lead-Based Paint Renovation, Repair, and Painting (RRP) Rule.

2. DESCRIPTION OF PROGRAM EVALUATION and COMPLIANCE TOOLS

The following forms will be used to track overall compliance and to document the steps that were taken to apply LSHR regulations to CDBG/DR housing projects. Some of these forms will be utilized by assigned staff to help determine the level of testing and remediation that is necessary for each project in order to meet requirements of the LSHR.

A. LSHR Compliance Checklist [Exhibit-3] – This form will be used to document the completion of certain tasks in order to comply with the Lead Safe Housing Rule. Assigned staff shall use this form starting with applicant intake up until final closeout in order to record receipt of required documentation.

B. LSHR Applicability Form [Exhibit-4] – This form will be used by assigned staff as an initial assessment tool in order to determine if the LSHR applies to each project. Staff shall perform this assessment immediately following approval for applicant to participate in the CDBG/DR program. This form may require periodic updates based upon results of any required lead paint testing.

C. Lead Safe Housing Requirements Screening Worksheet Parts 1 thru 4 [Exhibit-5] – These forms will be completed by assigned staff immediately after required lead paint testing has been performed on pre-1978 housing and after initial inspection/assessment of damage has been completed at property. Parts 1 thru 2 shall be completed prior to completing scope of work. Parts 3 thru 4 shall be completed after scope of work and cost estimate have been finalized. Staff will use the "Calculating Level of Rehabilitation Assistance: Worksheet 1 Single Family Unit" form [Exhibit-8] or the "Calculating Level of Rehabilitation Assistance: Worksheet 2 thru 3 Multi Family" forms [Exhibit-9] to determine hard cost and the required level of hazard reduction [See chart- Exhibit-2].

D. Lead-Based Paint Evaluation Notice [Exhibit-6] – This form will be used by assigned staff to notify applicant of any LBP Evaluation that is performed at Applicant's home. A copy of the evaluation /report along with this notice will be delivered to and receipt noted by applicant within fifteen days of Staff receiving report from LBP testing company [*If subject property is rental unit, then all Tenants must sign for receipt of LBP Evaluation Notice and receive copy of evaluation/report].

E. Lead Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities [Exhibit-7] – This form will be used by assigned staff to determine if Applicant's relocation will be necessary as a result of addressing any lead-based paint hazards in the home.

F. Calculating Level of Rehabilitation Assistance: Worksheet #1 Single-Family Unit [Exhibit-8] - This form will be used by assigned staff to calculate the "hard cost" of repairs to single-family housing in order to determine level of lead hazard reduction activities required to comply with the LSHR.

G. Calculating Level of Rehabilitation Assistance: Worksheet #2 Multi-Family – All units Federally Assisted [Exhibit-9] - These form will be used by assigned staff to calculate

the “hard cost” of repairs to Multi-Family unit housing in order to determine level of lead hazard reduction activities required to comply with the LSHR.

H. Re-Occupancy Authorization [Exhibit-10]- This form will be used by Assigned staff to notify any Applicant that was temporarily relocated due to LBP hazard remediation activities, that it is safe to return home. A copy of the LBP Clearance Test along with an LBP Evaluation Notice will be included with this notice.

I. Protection of Occupants’ Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities [Exhibit-11] - This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is used to document Contractor’s methods used to protect occupant belongings and methods used to secure the site during LBP hazard remediation activities.

J. Lead Based Paint Renovation Recordkeeping Checklist [Exhibit-12] – This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This checklist form is used to document steps taken by Contractor to insure that site was secure, proper containment was in place, and site was thoroughly cleaned as part of the LBP hazard remediation activities.

K. Lead Based Paint Post Construction Safe Work Practices Certification [Exhibit-13]- This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is used to document that workers used Safe Work Practices during LBP hazard remediation activities.

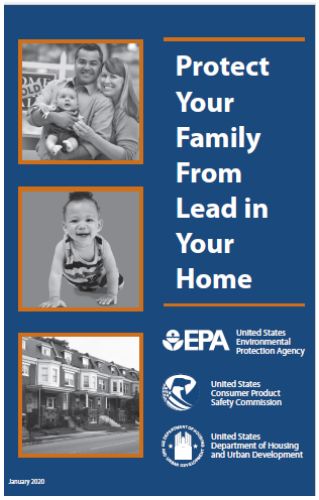
L. Lead-Based Paint Contractor/Employee Certification of Worker Training [Exhibit-14]- This form is to be filled out by Contractor performing LBP hazard remediation work and returned to assigned staff prior to final payment/closeout of project. This form is completed by the Contractor after all work is complete and is used to document that all persons who worked on the rehabilitation project were properly qualified to do LBP hazard remediation work.

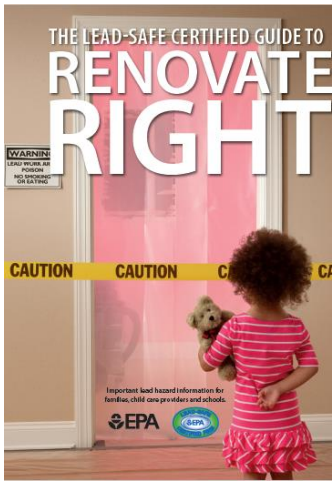
M. Lead-Based Paint – Ongoing Monitoring Schedule for Rental Property [Exhibit-15]- This form will be filled out by assigned staff and given to Applicant / Owner of any rental property where lead-based paint has not been abated. Staff shall encourage Applicant /Owner to perform the recommended LBP re-assessments on the dates as listed on this document.

3. PROCESS

A. Initial Intake – Prior to meeting with applicant, assigned staff will obtain information from Richland County Tax Assessor's records to determine the approximate year as to when applicant's house was built. During the first meeting with applicant/owner of housing built prior to 1978, Staff will provide applicant with the "Protect Your Family From Lead in Your Home" and "The Lead-Safe Certified Guide To Renovate Right" brochures [Exhibit-1] and obtain signature(s) for receipt of brochures from applicant. Staff shall verify that the applicant has listed the names and ages of all occupants of the home on applicants' initial application for assistance in the CDBG/DR program.

Exhibit-1





B. Documenting the Compliance Checklist

Assigned staff shall use the Compliance Checklist to track the steps that are required to comply with the LSHR and verify that all documentation is in electronic and hard files.

C. Evaluation of Properties

Assigned staff shall use the LSHR Applicability form and Screening Worksheets to determine if the property or project are exempt from the Rule.

- If upon initial view, the project is determined to be exempt from the Rule, staff will fill out and sign the LSHR Applicability Form listing approximate date home was constructed as determined by tax documents. Attach tax document/information to form and place in file.
- If the project is initially not exempt from the rule, staff shall proceed with obtaining lead-based paint test results in order to make a determination on required activity. Initial work write-up is forwarded to testing company to assist with determining area(s) to be tested for lead-based paint. An EPA certified Risk Assessor performs testing following EPA guidelines and forwards results to assigned staff. Upon receipt of test results, staff use the Screening Worksheet(s) to determine if project is exempt from the LSHR.
- If project is exempt after testing, staff will fill out and sign LSHR Applicability form, sign all applicable Screening Worksheets, and attach lead-based paint test

result documentation to the Screening Worksheets. Staff will fill out "Lead-based Paint Evaluation Notice" and forward notice and a copy of the LBP Risk Assessment to applicant. The applicant signs for receipt of all documents within fifteen days after staff receives results from LBP testing Company.

- If project is not exempt after testing, staff will fill out the "Lead-Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities" sheet and "LBP Evaluation Notice" and forward to applicant along with copy of Risk Assessment and obtain signatures prior to placing documents in file(s).
- If project is not exempt after testing, staff will place the signed LSHR Applicability form, signed applicable Screening Worksheets, test results, signed Lead-Based Paint Evaluation Notice", and "Lead-Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities" sheet in project file(s) and move forward with addressing any lead-based paint hazards noted on Risk Assessment [lead-paint test] as required by the LSHR.

D. Updating Work Write-up- Assigned staff will update the initial work write-up to include activities required to address all lead-paint **hazards** as listed in Risk Assessment.

E. Calculating Federal Rehabilitation Assistance
After the scope of work has been updated to include lead-paint hazard reduction requirements and the cost estimate for repairs, assigned staff will use the "Calculating Level of Federal Rehabilitation Assistance" worksheet(s) [Exhibit-8: Single-family, Exhibit-9: Multi-family] to determine the total rehabilitation hard cost. The hard cost is then used to determine the level of hazard reduction that is required under the LSHR [see Exhibit-2].

Exhibit-2
Level of Lead Hazard Reduction Activities

1. Property receiving less than or equal to $5,000 per unit	Pre-1978	• Safe work practices in rehab. • Repair disturbed paint. • Clearance of the worksite.
2. Property receiving more than $5,000 and up to $25,000	Pre-1978	• Risk assessment. • Interim controls.
3. Property receiving more than $25,000 per unit	Pre-1978	• Risk assessment. • Abatement of LBP hazards. • Interim controls allowed for exterior only as listed at 35.930(d)(3)

F. Bid Solicitation

Assigned staff will prepare bid package which includes the work write-ups, instructions to bidders, a list of required licenses and certifications, and copies of all environmental testing results. All Companies bidding must be EPA Lead-Based Paint Certified Firms whenever bidding on repairs to housing containing lead-based paint. EPA certified Lead-Based Paint Asbestos Abatement Contractors are required for all LBP projects where hard cost exceeds $25,000 per unit. EPA Lead-Based Paint Certified Renovators are required for all LBP projects where hard cost is less than $25,000 but more than $5,000. HUD approved Lead-Safe Practices training is required for all workers on projects where hard cost is less than $5,000.

G. Verification of Lead Remediation Contractor Certifications

Companies/Contractors are required to submit copies of their licenses and certifications during their initial application to participate in the City's CDBG/DR program. Assigned staff shall maintain bid list to insure that all licenses and certifications are received during initial application. Bid list shall clearly designate companies that are EPA Lead-Based Paint Certified Firms. Prior to award of any construction contract, Staff shall verify that all licenses and certifications are currently up to date.

H. Monitoring Lead Remediation Work

Assigned staff shall perform weekly monitoring of site to insure that containment/protection measures are in place and that home remains vacant during environmental remediation work.

I. Lead Clearance Examinations

At the completion of all repairs, assigned staff will contact a third party testing company to conduct a lead-based paint clearance examination. An EPA Certified Lead-Based Paint Risk Assessor will conduct the clearance examination following EPA guidelines to ensure that the site is safe for the occupants to return to the home. Once clearance is obtained, Staff shall fill out "Re-Occupancy Authorization" form [Exhibit-10] and "Lead-based Paint Evaluation Notice" form [Exhibit-6] and attach copy of clearance examination test results to the form. A copy of previously mentioned documents shall be delivered to applicant, with receipt of notice, within fifteen days from Staff's receipt of test results. Copies of all previously mentioned documents shall be placed in file.

J. Contractor Paperwork

After LBP Clearance is achieved, assigned staff shall confirm receipt of the following documents to be provided by Contractor prior to final payment / closeout of project:

- Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities [Exhibit-11]
- Lead Based Paint Renovation Recordkeeping Checklist [Exhibit-12]
- Lead Based Paint Post Construction Safe Work Practices Certification [Exhibit-13]
- Lead-Based Paint Contractor/Employee Certification of Worker Training [Exhibit-14]

4. QUALIFICATIONS for LBP HAZARD EVALUATORS

Lead-based Paint Inspectors and Risk Assessors must be EPA certified to conduct evaluations. Staff assigned to field inspections shall possess HUD's "Lead-Based Paint Visual Assessment Certification". The following specific certification requirements apply to EPA certified evaluators (from 40 CFR 745.226):

Certified Paint Inspectors must:

- Successfully complete an EPA accredited training program;
- Pass the exam required by the certifying authority;
- Apply for and be certified by the EPA.

Risk assessors must:

- Successfully complete an EPA accredited training program;
- Pass the exam required by the certifying authority;
- Apply for and be certified by the EPA;

Clearance must be performed by the following:

- EPA Certified Risk Assessor;
- EPA Certified Lead-based Paint Inspector;

5. Exhibits 3-15

Exhibit-3

LEAD-SAFE HOUSING RULE CHECKLIST for GENERAL COMPLIANCE DOCUMENTATION

Property Address:

_____

(Program participants can use this checklist as a guide for determining whether or not they are proceeding in a manner required by the LSHR, and that they are maintaining documentation for each CPD-assisted project. Field Office staff can use the checklist as a means for familiarizing themselves with the kinds of documentation that should be maintained in order to demonstrate LSHR compliance. Compliance with the program-specific requirements may not be substantiated solely by the documents included on this general checklist. Additional guidance is provided as referenced in the checklist.)

As appropriate, the following documents should be maintained in CPD-assisted project files for properties constructed before January 1, 1978, in order to demonstrate general knowledge and compliance with basic LSHR requirements. Standard forms are available in the Federal Register (FR), as indicated by the sources noted below. Citations from 24 CFR part 35 are also provided as additional references.

____ **Applicability Form** [§35.115] – A copy of a statement indicating that the property is covered by or exempt from Lead Safe Housing Rule. [1]

(Note: (A) If the property is exempt, the file should include the reason for the exemption and no further documentation is required; (B) if the property is covered by the Rule, the file should include the appropriate documentation to indicate basic compliance, as listed below.)

____ **Summary Paint Testing Report or Presumption Notice** [§35.930(a)] – A copy of any report to indicate the presence of lead-based paint (LBP) for projects receiving <u>up to $5,000 per unit</u> in rehabilitation assistance. If no testing was performed, then LBP is presumed to be on all disturbed surfaces. [2]

____ **Risk Assessment Report** [§35.930(c)(2)] – A copy of a report (in addition to the requirements of §35.930(a)) to indicate any presence of lead-based paint hazards for projects receiving <u>more than $5,000 per unit</u> in rehabilitation assistance. [4] (Note: If the property receives more than $25,000 in assistance, more stringent requirements apply, including compliance with applicable state requirements, as appropriate. [See §35.930(d)].

____ **Notice of Evaluation** [§35.125(a)] – A copy of a notice demonstrating that an evaluation summary was provided to residents following a lead-based-paint inspection, risk assessment or paint testing. [3, 4]

____ **Clearance Report** [§35.930(b)(3)]– A report indicating a "clearance examination" was performed of the work-site upon completion.

____ **Notice of Hazard Reduction Completion** [§35.125(b)] – Upon completion, a copy of a notice to show that a LBP remediation summary was provided to residents. [5]

Source: Federal Register (FR), 64 FR 50139-50231, published September 15, 1999 -- Requirements for Notification, Evaluation and Reduction of Lead-Based Paint Hazards in Federally Owned Residential Property and Housing Receiving Federal Assistance. The appendices are on pages 50230-50231.

[1] LSHR Regulation Applicability Form (See Attachment B to this memorandum.)

[2] Appendix C--Sample Summary Presumption Notice Format

[3] Appendix A--Sample Summary Inspection Notice Format

[4] Appendix B--Sample Summary Risk Assessment Notice Format

[5] Appendix D--Sample Hazard Reduction Completion Notice Format

Exhibit-4

LEAD-SAFE HOUSING RULE -- APPLICABILITY FORM

Address/location of subject property:

_____

Regulation Eligibility Statements (check all that apply):

____ Property is receiving Federal funds.

____ Unit was built prior to 1978. [attach support document(s) if available]

Note: If both Eligibility Statements above have been checked, continue with the Exemption Statements below. Otherwise, the regulation does not apply, sign and date the form.

Regulation Exemption Statements [24 CFR 35.115] (check all that apply):

____ Emergency repairs to the property are being performed to safeguard against imminent danger to human life, health or safety, or to protect the property from further structural damage due to natural disaster, fire or structural collapse. The exemption applies only to repairs necessary to respond to the emergency.

____ The property will not be used for human residential habitation. This does not apply to common areas such as hallways and stairways of residential and mixed-use properties.

____ Housing "exclusively" for the elderly or persons with disabilities, with the provision that children less than six years of age will not reside in the dwelling unit.

____ An inspection performed according to HUD standards found the property contained no lead-based paint.

____ According to documented methodologies, lead-based paint has been identified and removed; and the property has achieved clearance.

____ The rehabilitation will not disturb any painted surface.

____ The property has no bedrooms.

____ The property is currently vacant and will remain vacant until demolition.

If any of the above Exemption Statements have been checked, the Regulation does not apply. In all cases, sign and date the form.

I, _____, certify that the information listed above is true and accurate to the best of my knowledge.
(print name)

Signature: X _____Date: _____

Organization: _____

Exhibit-5

LEAD SAFE HOUSING REQUIREMENTS SCREENING WORKSHEET

This worksheet should be placed in the project file for any residential property that is assisted with Federal funds. Parts 1 and 2 should be completed for all projects. Parts 3 and 4 should be completed for rehabilitation projects.

Property Owner: _____

Address of Property: _____

Part 1: Exemptions from All Requirements of 24 CFR Part 35

If the answer to any of the following questions is yes, the property is exempt from the requirements of 24CFR Part 35. The regulatory citation of each exemption is cited as additional guidance.

- ❖ Was the property constructed after January 1, 1978? [35.115(a)(1)] □YES □NO
- ❖ Is this a zero-bedroom unit? (e.g. SRO, efficiency) [35.115(a)(2)] □YES □NO
- ❖ Is this dedicated elderly[1] housing? (i.e. over age 62) [35.115(a)(3)] □YES □NO
- ❖ Is this housing dedicated for the disabled[2]? [35.115(a)(3)] □YES □NO
- ❖ Has a paint inspection conducted in accordance with 35.1320(a) established that the property is free of lead-based paint? [35.115(a)(4)] □YES □NO
  - The date of the original paint inspection was _____. An optional paint inspection conducted on_____ confirmed this prior finding.
- ❖ Has all lead-based paint in the property been identified and removed, and has clearance been achieved as cited below? [35.115(a)(5)] □YES □NO
  - Clearance was achieved prior to September 15, 2000, and the work was done in accordance with 40CFR Part 745.227(b). □YES □NO
  - Clearance was achieved after September 15, 2000, and the work was done in accordance with 24CFR Part 35.1320, 1325 and 1340. □YES □NO
- ❖ Will a currently vacant unit remain vacant until it is demolished? [35.115(a)(6)] □YES □NO
- ❖ Is the property used for non-residential purposes?[3] [35.115(a)(7)] □YES □NO
- ❖ Will rehab **exclude** disturbing painted surfaces? [35.115(a)(8)] □YES □NO
- ❖ Are emergency actions immediately necessary to safeguard against imminent danger to human life, health or safety, or, to protect the property from further structural damage? (e.g. after natural disaster or fire) [35.115(a)(9)] □YES □NO
- ❖ Will the unit be occupied for less than 100 days under emergency leasing assistance to an eligible household?[4] [35.115(a)(11)] □YES □NO

Part 2: Limited Exemptions from Specific Hazard Reduction Requirements

The HUD Final Rule allows for limited exemptions from specific requirements due to the characteristics of the rehabilitation work, the structure or the occupants. If the answer to any of the following questions is yes, the grantee and/or occupant may waive certain requirements as described below.

- ❖ Is the amount of painted surface that is being disturbed below "de minimis" levels, as defined below? If so, safe work practices and clearance are not required in that work area.
  - Less than 20 square feet on an exterior surface [35.1350(d)(1)] □YES □NO
  - Less than 2 square feet in any single interior room [35.1350(d)(2)] □YES □NO
  - Less than 10% of surface area of an interior/exterior component [35.1350(d)(3)] □YES □NO

- ❖ Is the unit occupied by an elderly person(s)? If so, relocation of the elderly occupant(s) is not required if complete disclosure of the nature of the work is provided and informed consent is obtained prior to rehabilitation.[5] □YES □NO

- ❖ Is a unit that is subject to abatement requirements listed or eligible for listing on the National Register of Historic Places, or does it contribute to a National Register Historic District? If so, the State Historic Preservation Office may request that interim controls be implemented rather than abatement. On-going maintenance and re-evaluation is required. [35.115(13)] □YES □NO

I have evaluated the site and property, the work specifications, and interviewed the occupants. In my professional opinion, this unit qualifies for the indicated exemption(s).

_____ _____

Signature Date

[1] Defined as retirement communities or similar types of housing reserved for households composed of one or more persons over age 62, or other age if recognized by a specific Federal housing assistance program. However, if a child under age 6 resides or is expected to reside in such a unit, the unit is not exempt.

[2] The housing must be a residential property designated exclusively for persons with disabilities, defined as any person who has a physical or mental impairment that substantially limits one or more major life activities, has a record of impairment, or is regarded by others as having such an impairment. However, if a child under age 6 resides or is expected to reside in such a unit, the unit is not exempt.

[3] Except that spaces such as entryways, hallways, stairways, etc. serving both residential and non-residential uses in a mixed-use property are not exempt.

[4] When a household is provided short-term emergency leasing assistance and will occupy a unit for less than 100 days, the unit is exempt from lead paint regulations. This emergency leasing exemption is attached to the unit, not the family, and is a one-time exemption. After being assisted for a total of 100 consecutive days, the unit becomes subject to regular Subpart K requirements. Multiple families cannot be cycled through the same unit at intervals of less than 100 days under this exemption.

[5] HUD Interpretive Guidance, April 16, 2001, question # J-24.

LEAD SAFE HOUSING REQUIREMENTS SCREENING WORKSHEET
Addendum for Rehabilitation Projects
Parts 3 and 4

Parts 3 and 4 of this worksheet should be completed for any residential property that is to undergo rehabilitation with Federal funds. The completed form should be placed in the project file with Parts 1 and 2.

. Part 3: Per Unit Level of Rehabilitation Assistance

A. Average Federal Funding Per Unit $_____

B. Average Per Unit Rehabilitation Hard Costs $_____
(not including costs of lead hazard evaluation and reduction)

C. Lower of A or B $_____

. Part 4: Approach Required (Based on answer to 3.C., above)

$0 – $5,000	_____Do No Harm (Test & Repair)
$5,001 - $25,000	_____Identify and Control Lead Hazards
$25,001 and above	_____Identify and Abate Lead Hazards

Calculated by _____ _____
Print Name Date

I have evaluated the site, the specifications, estimated the rehab hard costs and interviewed the occupants. In my professional opinion, this project meets the above requirement for federal lead hazard reduction under 24 CFR Part 35.

_____ _____
Signature Date

Exhibit-6

LEAD-BASED PAINT EVALUATION NOTICE

Address/location of property or structure(s) this summary notice applies to:

_____

Lead-based paint assessment type (circle one):

Paint Testing Risk Assessment Assumption
Clearance Testing

Date of assessment: _____

Summary of assessment results (check all that apply):

a) ____ No lead-based paint hazards were found.

b) ____ Lead-based paint hazards were found.

c) ____ Lead-Based Paint hazards are assumed present

d) ____ A brief summary of the findings of the assessment is provided below (required if any lead-based paint hazards were found).

Summary of types and locations of lead-based paint hazards. List at least the housing unit numbers and common areas (for multifamily housing), bare soil locations, dust-lead locations, and/or building components (including type of room or space, and the material underneath the paint), and types of lead-based paint hazards found:

_____

_____

_____

Person who prepared this summary:

Printed name: _____ ***Signature:*** _____

Date:

Contact person for more information about the risk assessment:

Printed name: _____ ***Signature:*** _____

Organization: _____ Phone: _____

Address: _____

_____

Exhibit-7

Lead Based Paint Relocation Screening Sheet for projects with Lead Hazard Reduction Activities

Property Address:

_____

Homeowner(s):

_____

Relocation for this project is: (check one)

____ Required (All items listed in Section A will be performed and appropriate documents will be attached)

____ Not required due to circumstances listed in Section B

Note: If circumstances change during the course of City's involvement with above-mentioned property, relocation may be required!

A. Relocation of occupants is required and the following activities will occur for occupant protection:
   - Occupant(s) will not be permitted to enter the worksite during hazard reduction activities.
   - Occupant(s) will temporarily relocate to a lead-safe unit before and during hazard reduction activities for their own safety and protection
   - Dwelling unit and worksite will be secured against unauthorized entry
   - Occupant(s) belongings located in a containment area will be relocated to a secure area outside the containment area or will be covered with appropriate materials

B. Relocation of occupant(s) is not required due to the following circumstances:
   - Work will not disturb lead-based paint or involve any lead dust hazard reduction activities
   - Work in the interior of the unit will be completed within one period in eight daytime hours, the site will be contained, and the work will not create other safety, health, or environmental hazards
   - Only the building's exterior will be treated, the windows, doors, ventilation intakes, and other openings near the worksite will be sealed during hazard reduction activities and cleaned afterward; and a lead-free entry will be provided
   - Treatment will be completed within five calendar days; the work area will be sealed; at the end of each day, the area within 10 feet of the containment area will be cleared of debris and cleaned; at the end of each day, occupants will have safe access to sleeping areas, bathroom, and kitchen facilities; and treatment will not create other safety, health, or environmental hazards
   - Occupants are elderly and have signed an Elderly Waiver for Relocation (attached)

_____ _____

Homeowner(s) Signature & Date | City of Columbia [Representative] Signature & Date

_____ _____

Co-owner(s) Signature & Date (if applicable) | City [Representative] Printed Name & Job Title

Exhibit-8

Calculating Level of Rehabilitation Assistance: Worksheet #1
Single Family Unit

This worksheet should be used to calculate the level of assistance for single family units only. For assistance to multifamily units, see Worksheet #2 or #3.

To determine the level of rehabilitation assistance, remember to take the lower of Federal assistance per unit OR rehabilitation hard costs per unit.

A. What is the total amount of federal assistance dollars contributed to the project?

_____

B. What are the total rehabilitation hard costs to this project? _____
(To calculate hard costs, see page 2 of this worksheet)

C. Write the amount that is lower of question A or B above _____

D. Check appropriate category.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

Single Family Unit
Calculating Rehabilitation Hard Costs

A. Enter the total job cost in line 1

1. Total Job Cost 1. _____

B. Enter the costs in each corresponding box for lines 2 through 14

2. Financing Fees 2. _____

3. Credit Reports 3. _____

4. Title Binders & Insurance 4. _____

5. Recordation Fees & Transaction Taxes 5. _____

6. Legal & Accounting Fees 6. _____

7. Appraisals 7. _____

8. Architectural & Engineering Fees 8. _____

9. Project Costs incurred by PJ directly related to the project 9. _____

10. Administrative Costs 10. _____

11. Relocation Costs 11. _____

12. Environmental Reviews 12. _____

13. Acquisition of the Property 13. _____

14. Lead Hazard Evaluation & Reduction Costs* 14. _____

15. Other Soft Costs 15. _____

16. Total Soft Costs (add lines 2 through 15) 16. _____

17. **Total Rehabilitation Hard Costs**
(**Line 1** – (minus) **Line 16**) (Enter this number as "B" on Page 1) 17. _____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Calculating Level of Rehabilitation Assistance Worksheet #1 – page 2 of 2

Exhibit-9

Calculating Level of Rehabilitation Assistance: Worksheet #2

Multi Family—All units Federally Assisted

This worksheet should be used to calculate the level of assistance for **multi-family buildings** where **all** of the **units** are
federally assisted. If dealing with a multi-family building where only *some* of the units are federally assisted, please
use Worksheet #3.

To determine the level of rehabilitation assistance, remember to take the lower of Rehabilitation hard costs per unit OR
Federal assistance per unit.

A. Are all units federally assisted? _____yes _____no
If no, go to Worksheet #3.

B. What is the total amount of federal assistance dollars per unit? _____
(Use the amount from line 3 from the calculation on page 2 of this worksheet.)

C. What are the total rehabilitation hard costs per unit? _____
(Use the amount from line 6 from the calculation on page 2 of this worksheet.)

D. Write the amount that is lower of question B or C. _____

E. Check appropriate category.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

Calculating Level of Rehabilitation Assistance: Worksheet #2

Multi Family—All units Federally Assisted

1. Federal Dollars in the Project	$_____
2. Number of Units in project	$_____
3. **Federal Assistance Per Unit** (line 1 ÷ line 2)	$_____
4. Rehab Hard Costs in the Project (line 23)	$_____
5. Number of Units in project	$_____
6. **Rehab Hard Cost Per Unit** (line 4 ÷ line 5)	$_____
7. Total Job Cost	$_____

Enter the costs in each corresponding box for lines 8 through 20

8. Financing Fees	$_____
9. Credit Reports	$_____
10. Title Binders & Insurance	$_____
11. Recordation Fees & transaction Taxes	$_____
12. Legal & Accounting Fees	$_____
13. Appraisals	$_____
14. Architectural & Engineering Fees	$_____
15. Project Costs incurred by PJ directly related to the project	$_____
16. Administrative Costs	$_____
17. Relocation Costs	$_____
18. Environmental Reviews	$_____
19. Acquisition of the Property	$_____
20. Lead Hazard Evaluation & Reduction Costs*	$_____
21. Other Soft Costs	$_____
22. Total Soft Costs (add lines 8 through 21)	$_____
23. Total Rehabilitation Hard Costs (line 7 minus line 22)	$_____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Calculating Level of Rehabilitation Assistance: Worksheet #3
Multi Family—Projects that include both Federally-assisted and non-assisted units

This worksheet should be used to calculate the level of assistance **for multi-family buildings** where **some** of the units are **federally assisted**. If dealing with a multi-family building where *all* of the units are federally assisted, please use Worksheet #2.
To determine the level of rehabilitation assistance, remember to take the lower of Rehabilitation hard costs per unit OR Federal assistance per unit.

---

1 of 3

A. What is the amount of federal assistance dollars per unit? _____
(Use the amount from line 3 from the calculation on page 2 of this worksheet.)

B. What are the total rehabilitation hard costs per unit? _____
(Use the amount from line 10 from the calculation on page 2 of this worksheet.)

C. Write the amount that is lower of question A or B. _____

D. Check appropriate category
.

_____ < $5,000 (Less than or equal to $5,000)
Safe Work Practices and Work Site Clearance

_____ >$5,000 - < $25,000 (Greater than $5,000 but less than or equal to $25,000)
Risk Assessment and Interim Controls

_____ > $25,000 (Greater than $25,000)
Risk Assessment and Hazard Abatement

---

2 of 3

Calculating Level of Rehabilitation Assistance: Worksheet #3
Multi Family—Projects that include both Federally-assisted and non-assisted units

1. Federal Dollars in the Project 1. _____

2. Number of Units receiving assistance 2. _____

3. **Federal Assistance Per Unit** (line 1 ÷ line 2) 3. _____

4. Rehab hard costs for all assisted dwelling units (not including common/exterior areas) (line 29) 4. _____

5. Number of Federally assisted units in the project 5. _____

6. Dwelling unit costs (Line 4 ÷ line 5) 6. _____

7. Rehab hard costs for common areas and exterior surfaces (line 30) 7. _____

8. Total Number of units in the project 8. _____

9. Common Area Costs (Line 7 ÷ line 8) 9. _____

10. **Rehab Hard Costs Per Unit** (line 6 + line 9) 10. _____

Calculating Level of Rehabilitation Assistance: Worksheet #3
Multi Family—Projects that include both Federally-assisted and non-assisted units
3 of 3

11. Total Job Cost 11. _____

Enter the costs in each corresponding box for lines 12 through 24.

12. Financing Fees 12. _____

13. Credit Reports 13. _____

14. Title Binders & Insurance 14. _____

15. Recordation Fees & transaction Taxes 15. _____

16. Legal & Accounting Fees 16. _____

17. Appraisals 17. _____

18. Architectural & Engineering Fees 18. _____

19. Project Costs incurred by PJ directly related to the project 19. _____

20. Administrative Costs 20. _____

21. Relocation Costs 21. _____

22. Environmental Reviews 22. _____

23. Acquisition of the Property 23. _____

24. Lead Hazard Evaluation & Reduction Costs* 24. _____

25. Other Soft Costs 25. _____

26. Total Soft Costs (add lines 12 through 25) 26. _____

27. **Rehabilitation Hard Costs** (Line 11 – (minus) Line 26) 27. _____

28. Determine the percentage of costs attributable to dwelling units 28. _____%

29. **Rehab hard costs for dwelling units (not including common/exterior areas)** (line 27 X line 28) 29. _____

30. **Rehab hard costs for common & exterior areas** (line 27– (minus) line 29) 30. _____

* Lead hazard evaluation and reduction costs include costs associated with site preparation, occupant protection, relocation, interim controls, abatement, clearance, and waste handling attributable to lead-based paint hazard reduction.

Exhibit-10

Re-Occupancy Authorization

Applicant's Name

Property Address

Columbia, SC 29_ _ _

Dear Applicant:

RE: HAZARD REDUCTION COMPLETION NOTICE

Your house successfully passed a clearance examination with confirmation received from (testing company) at (time) on (date).

You are hereby authorized to re-enter your house as of (time) on (date).

Sincerely,

_____

CDBG-DR Representative's Printed Name

_____

CDBG-DR Representative's Signature

Date: _____

X_____ _____

Applicant's Signature of Receipt of Re-Occupancy Notice Date

Exhibit-11

Protection of Occupants' Belongings & Worksite Preparation for Projects with Lead Hazard Reduction Activities

Homeowner: _____

Property Address: _____+_____

Name of Individual Completing this Form: _____

Organization: _____ Date form Completed: _____

Instructions: Check all activities performed to protect occupants' belongings and prepare the worksite.

Whether or not relocation of occupants is required before & during lead hazard reduction activities, the worksite must be carefully prepared & occupants' belongings protected. Check all that apply.

□ Occupants were appropriately notified that their belongings would be protected during the work and what, if anything, they would need to do to prepare the project.

□ Occupants belongings in the containment area were (check one)
- □ Relocated to a safe and secure area outside the containment area
  OR
- □ Covered with an impermeable covering with all seams and edges taped or otherwise sealed

□ Worksite was prepared to prevent the release of leaded dust, and contain lead-based paint chips and other debris from hazard reduction activities until they were safely removed. Practices that minimize the spread of leaded dust, paint chips, soil, and debris were used during worksite preparation.

□ A warning sign was posted:
- □ At each entry to a room where hazard reduction activities were conducted when occupants were present,
  OR
- □ At each main and secondary entryway to a building from which the occupants had been relocated,
  OR
- □ For any exterior hazard reduction work, where it was easily read 20 feet from the edge of the worksite.

□ The warning sign was in:
- □ The occupants' primary language, or
- □ Another language [specify language, & why occupants' primary language was not used].
  _____
- □ Final clearance was achieved before occupants' belongings were uncovered or returned to the unit.

____ **I certify under penalty of law that the above information is true and complete**

Printed Name, Job Title, & Company Name_____

_____

Signature & Date

Exhibit-12

Lead Based Paint Renovation Recordkeeping Checklist

Name of Firm: _____

Date and Location of Renovation: _____

Brief Description of Renovation: _____

Name of Assigned Renovator: _____

Name(s) of Trained Worker(s), if used: _____

Name of Dust Sampling Technician, Inspector, or Risk Assessor, if used: _____

____ Copies of renovator and dust sampling technician qualifications (training certificates, certifications) on file

____ Certified renovator provided training to workers on (check all that apply)

____Posting warning signs ____Setting up plastic containment barriers

____ Maintaining containment ____Avoiding spread of dust ____Waste handling

____Post-renovation cleaning to adjacent areas

____Test kit or test results from an EPA recognized laboratory on collected paint chip sample used by certified renovator to determine whether lead was present on components affected by renovation (identify method used, type of test kit used (if applicable), laboratory used to conduct paint chip analysis, describe sampling locations and results)

_____

____ Warning signs posted at entrance to work area

____ Work area contained to prevent spread of dust and debris

____ All objects in work area removed / covered (interior)

____ HVAC ducts in work area closed and covered (interiors)

____ Windows in the work area closed (interiors)

____ Windows in/within 20' of work area closed & sealed (exteriors)

____ Doors in the work area closed and sealed (interiors)

____ Doors in/within 20' of work area closed & sealed (exteriors)

____ Doors that must be used in the work area covered to allow passage but to prevent spread of dust to outside of work area

____ Floors in the work area covered with taped-down plastic (interiors)

____ Ground covered by plastic extending 10' from work area & anchored to building & weighed down by heavy objects (exteriors)

____ Vertical containment installed if property line prevents 10' of ground covering, or if necessary to prevent migration of dust and debris to adjacent property (exteriors)

____ Waste contained on-site & while transported off-site ____ Work site properly cleaned after renovation

____ All chips and debris picked up, protective sheeting misted, folded dirty side inward, and taped for removal

____ Work area surfaces and objects cleaned using HEPA vacuum and/or wet cloth's or mops (interiors)

____ Certified renovator performed post-renovation cleaning verification (describe results, including the number of wet and dry cloth's used):

_____

____ If dust clearance testing was performed instead of cleaning verification (attach copy of clearance report)

____ **I certify under penalty of law that the above information is true and complete.**

_____

Printed Name, Job Title, & Company Name

_____

Signature & Date

Exhibit-13

Lead Based Paint Post Construction Safe Work Practices Certification

I _____ (name) an employee of _____(company), certify that we followed safe work practices on _____ (property address).
Items 1A-1D below were adhered to in compliance with Federal, State, and Local regulations except for in cases where the work was exempt from safe work practice requirements as described at Item 2 below.
Check Number 1 or 2 below to show compliance level used at above-listed property:

____ 1. The following safe work practices were applied as appropriate:

A. The prohibited work methods listed below were not used:
- Open flame burning or torching
- Machine sanding or grinding without a high-efficiency particulate air (HEPA) local exhaust control
- Abrasive blasting or sandblasting without HEPA local exhaust control
- Heat guns operating above 1,100 degrees Fahrenheit, or those that operate high enough to char the paint
- Dry sanding or dry scraping [for exceptions to this rule see 24 CFR 35.140(e)]
- Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous substance in accordance with regulations of the Consumer Product Safety Commission at 16 CFR 1500.3 and/or a hazardous chemical in accordance with the Occupational Safety and Health Administration at 29 CFR 1010.1200 or 1926.59 as applicable to the work performed at the above-listed property

B. Protection of occupants and preparation of the worksite as described below:
- Occupant Protection
  - Occupants were not permitted to enter the worksite during hazard reduction activities until final clearance was achieved
  - Occupants were temporarily relocated before and during hazard reduction activities if necessary
  - Dwelling unit and worksite were secured against unauthorized entry and occupants belongings were protected from contamination by dust-lead hazards and debris during hazard reduction activities
  - Occupants belongings in a containment area were relocated to a secure area outside the containment area or were covered with appropriate materials
- Worksite Preparation
  - Worksite was prepared to prevent release of leaded dust and to contain lead-based paint chips and other debris [from the hazard reduction activities] to within the prepared worksite
  - A warning sign was posted at each entry to rooms where hazard reduction activities were conducted whenever occupants were present

C. Specialized cleaning after hazard reduction activities to include:
- Used HEPA vacuum cleaners or other method of equivalent efficacy
- Used lead-specific cleaning detergents or equivalents

D. Clearance of unit achieved before re-occupancy was permitted

_____ 2. Safe work practices and clearance were not required when activities do not disturb painted surfaces below the deminimus thresholds defined below:
- The maintenance or rehab. hazard reduction activities did not disturb painted surfaces that totaled more than:
  - 20 square feet on exterior surfaces
  - 2 square feet in any one interior room or space
  - 10 percent of the total surface area on an interior or exterior type of component with a small surface area such as windowsills, baseboards, and trim

_____ _____

Contractor Signature & Date | Assigned staff [City Representative] Signature & Date

Exhibit-14

Lead-Based Paint Contractor/Employee Certification of Worker Training

The use of this form is optional. It can be used after all work is complete to document that workers who worked on the rehabilitation project were properly qualified to do the work.

I, _____[name], an employee of

_____

[contractor or organization], certify that the employees listed below, who worked on the building located at _____ were properly trained to use safe work practices and to perform interim controls on a project known or presumed to have lead-based paint or lead-based paint hazards.

Proper training courses include the following. Each person listed below completed at least one of these courses.

- A lead-based paint abatement supervisor course accredited in accordance with 40 CFR 745.225;
- A lead-based paint abatement worker course accredited in accordance with 40 CFR 745.225;
- The Lead-Based Paint Maintenance Training Program- "Work Smart, Work Wet, & Work Clean to Work Lead Safe", prepared by the National Environmental Training Association for EPA & HUD;
- The "Remodeler's and Renovator's Lead-Based Paint Training Program" developed by HUD and the National Association of the Remodeling Industry;
- "Addressing Lead-Based Paint Hazards during Renovation, Remodeling, and Rehabilitation in Federally Owned and Assisted Housing", HUD's adaptation of the EPA model curriculum for renovators and remodelers; or
- An equivalent course approved by HUD. _____ [specify title of course]

Names of Trained Employees:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
Contractor / Supervisor Signature	Date

Note: Attach copies of applicable certifications

Lead-Based Paint - Ongoing Monitoring Schedule for Rental Property:

Note: Property owner must follow lead-based paint regulations as required by HUD and the EPA. Any dates listed below are for use as guidance in complying with the above-mentioned regulations and should be verified by the property owner to insure compliance with regulations.

Property Owner: _____

Property Address: _____

- Initial lead-based paint and risk assessment was performed at this property by _____ on _____
- Clearance testing was performed by _____ on _____

1) Visual Assessment Survey required annually and whenever information indicates a possible problem. The next visual survey shall be performed no later than _____.

2) Reevaluation required every two years unless the property fails two consecutive reevaluations which will trigger more frequent testing. The next reevaluation on this property shall be conducted prior to _____.

Received by,

_____ _____

Property Owners Signature Date

Columbia Housing Programs
Adjusted Gross Income (AGI) Worksheet

An Adjusted Gross Income (AGI) Worksheet should be completed by each household member that does NOT file a tax return, but DOES receive earned or unearned income.

If 1040 tax document not available, please provide an explanation below. **(Include attempts made to obtain tax document.)**

Applicant Name:		**Application ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	
Name of Household Member: *Completing This AGI Worksheet*			

Household Member Annual Adjusted Gross Income (AGI)

ANNUAL INCOME	*Other Annual Income*			Annual AGI Income
1. Wages, salaries, tips				
2. Interest income	*Annual Tax Exempt Interest:*		**Annual Taxable Interest:**	
3. Dividend income	*Annual Qualified Dividends:*		**Annual Ordinary Dividends:**	
4. Taxable refunds/ credits/offsets of state/ local income taxes				
5. Alimony received				
6. Business income (or loss)				
7. Capital gain (or loss)				
8. Other gains (or losses)				
9. IRA Distributions	*Total Annual Amount:*		**Annual Taxable Amount:**	
10. Pensions and Annuities	*Total Annual Amount:*		**Annual Taxable Amount:**	
11. Rental real estate, royalties, partnerships, S corporations, trusts, etc.				
12. Farm income (or loss)				
13. Unemployment compensation				
14. Social Security benefits	*Total Annual Amount:*		**Annual Taxable Amount:**	
15. Other income	*Type of Income:*			
16. Subtotal (lines 1-15)				$ 0.00

ANNUAL EXPENSES	Annual AGI Expenses
17. Educator expenses	
18. Certain business expenses	
19. Health savings account deduction	
20. Moving expenses	
21. Deductible part of self-employment tax	
22. Self-employed SEP, SIMPLE, and qualified plans	
23. Self-employed health insurance deduction	
24. Penalty on early withdrawal of savings	
25. Alimony paid	
26. IRA deduction	
27. Student loan interest deduction	
28. Tuition and fees	
29. Domestic production activities deduction	
30. Subtotal (lines 17-29)	$ 0.00
31. Subtract line 30 from line 16. This is the Household Member's ***Annual Adjusted Gross Income (AGI)****	$ 0.00

**The income inclusions and exclusions allowed under the IRS 1040 definition of income are subject to change from tax year to tax year. This worksheet is a general representation of the IRS Form 1040, and as such cannot reflect all updated inclusions and exclusions each tax year. The user is advised to consult the IRS Web site for the most current version of this form at www.irs.gov.*

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Affidavit of Ownership

Applicant Name:		**Application ID #:**	
Co-Applicant Name *(If Applicable)*:		**Damaged Property:**	

STATEMENT OF FACTS

I/We, being first duly sworn, do affirm the facts presented herein are true and complete (*please check one):*

☐ There is no other person entitled to claim any ownership interest in the property and I/we will serve as the authorized signatory in relation to the property interest; **OR**

☐ Each person who may be entitled to claim any ownership interest in the property was not located after a reasonable effort, or has signed giving consent to the application and that I/we will serve as the authorized signatory in relation to the property interest:

A. Co-Owner 1 Name *(Printed)*:_____
   - ☐ Not Located After Reasonable Effort; OR
   - ☐ Co-Owner 1 Signature:_____Date: _____
   - ☐Yes ☐ No Have you been in contact with this individual regarding your application submission?

B. Co-Owner 2 Name *(Printed)*: _____
   - ☐ Not Located After Reasonable Effort; OR
   - ☐ Co-Owner 2 Signature:_____Date: _____
   - ☐Yes ☐ No Have you been in contact with this individual regarding your application submission?

C. Co-Owner 3 Name *(Printed)*: _____
   - ☐ Not Located After Reasonable Effort; OR
   - ☐ Co-Owner 3 Signature:_____Date: _____
   - ☐Yes ☐ No Have you been in contact with this individual regarding your application submission?

D. Co-Owner 4 Name *(Printed)*: _____
   - ☐ Not Located After Reasonable Effort; OR
   - ☐ Co-Owner 4 Signature:_____Date:_____
   - ☐Yes ☐ No Have you been in contact with this individual regarding your application submission?

*Supporting documentation of consent and/or reasonable effort made required for each co-owner.

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Affidavit of Principal Residence

Applicant Name:		**Application ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

STATEMENT OF FACTS

In the absence of a homestead exemption at the time of the storm, by completing this Affidavit, you hereby affirm your principal residency and occupancy was at:_____
on October 1, 2015 as evidenced by: *(Physical Address)*

A. *One* of the following to prove Primary Residency: *All documents must be valid on October 1, 2015

- ☐ Voter registration card
- ☐ Homeowners insurance policy showing as primary residence
- ☐ Texas Driver's license or State issued ID showing damaged property address
- ☐ Other verifiable government issued documentation corresponding to damaged property address
- ☐ Copy of electric, gas, water, trash, sewage, cable or land line phone bill. The bill must confirm that service was provided in the month preceding or the month of the applicable flood event and must match name and address on the program application. Bills must reflect usage of services indicative of occupancy.
- ☐ Letter from electric, gas, water, trash, sewage, cable or land line Phone Company. The letter must confirm that service was provided in the month preceding or month of the flood event and must match name and address on the program application.
- ☐ Other documentation acceptable by Program: _____

EQUAL HOUSING OPPORTUNITY

City of Columbia Homeowner Assistance Program (CHAP)

Voluntary Withdrawal Request

Applicant Name:		Application ID #	
Co-Applicant Name		Date:	
Damaged Property Address: *(Street, City, State, Zip)*			
Mailing Address (if different from above address): *(Street, City, State, Zip)*			
Contact Phone:		Contact Email:	

Withdrawal Request:

I, _____ (name), wish to voluntarily withdraw my application from the City of Columbia Homeowner Assistance Program (CHAP). My reason for withdrawing is:

_____ I no longer need assistance

_____ I do not think this program will provide the assistance that I need

_____ I do not intend to remain in my home once repaired

_____ I no longer own my home

_____ I do not wish to provide the required documentation

_____ Other (please explain below)

Signature – Applicant	Signature – Co-Applicant
Date:	Date:

Community Development Department Housing Programs

Communication Designee Form

SECTION 1: APPLICANT INFORMATION		
Applicant Name:	Program Applicant is applying to:	
Co-Applicant Name:	Applicant ID Number (if available):	
Physical Address:		
City: Columbia	State: South Carolina	Zip code:

SECTION 2: EXTERNAL PARTY INFORMATION	
Is this party an: ☐ Individual ☐ Local Representative ☐ Other:	
Name of Individual authorized to request/obtain information:	
Mailing Address:	
Phone Number:	Email Address:
Specific verbal information authorized by applicant to be released:	

SECTION 3: STATEMENT OF FACTS	
I/we agree to the following:	
☐	The City of Columbia, Community Development Homeowner program is hereby granted my/our express permission to provide the individual listed above with the specific verbal information identified above related to my/our application to the above referenced program.
☐	I/We understand that while I/we agree to grant access to provide information to the individual identified above. The individual does not have the right or the ability to make decisions on my/our behalf as it relates to my/ our application to the Homeowner Program.
☐	I/We understand that the Homeowner program will not provide any information that is "sensitive personal information" .
☐	I/we are authorizing the release of verbal information because the above-named individual needs to know this information to assist with my/our application for the above referenced program.
☐	I/we understand that, once information is released under this authorization, the recipient could re-release it and the information may no longer be protected by Federal privacy regulations. I/we release the Homeowner program from legal responsibility or liability for the disclosure of the information as authorized on this form.
☐	I understand that I may withdraw or revoke my consent to release information granted herein at any time. If I withdraw my consent, my information may no longer be used or released by the program for the reasons covered by this authorization. However, any information disclosures previously made with my consent are unable to be taken back. I may revoke this Consent to Release Information by notifying the Homeowner program in writing.

Applicant Name:	
Applicant Signature:	Date:

EQUAL HOUSING OPPORTUNITY

Columbia Homeowner Assistance Program (CHAP)
Conflict of Interest

PROJECT INFORMATION		
ICF Representative:		
Applicant ID #:		
Applicant Name:	**Co-Applicant Name:**	
Damaged Property:		
City: Columbia	**State: South Carolina**	**Zip Code:**

AFFECTED PERSON		
Applicant's application for Disaster Recovery Assistance is subject to Conflict-of-Interest regulations as a result of his/her relationship with the following Affected Person who is associated with the City of Columbia.		
Affected Person's Name:		
Affected Person's Position with City:	☐	Employee
	☐	Agent
	☐	Consultant
	☐	Officer
	☐	Elected or appointed official
	☐	Other:
Affected Person's Relationship to Applicant:	☐	Self
	☐	Member of Applicant's immediate family
	☐	Partner with Applicant
	☐	Associated with an organization that employs or is about to employ Applicant
	☐	Has a financial or other interest in or with Applicant
	☐	Other:

Is the Affected Person in a decision-making role with the City? Describe role:

☐ No – If No, complete Part 2 - "Certification of No Conflict" and submit to the City for approval.

☐ Yes – **If Yes, a prohibited conflict exists,**

- See Part 3 written statement from Director of Office of Community Development granting "Request for Exemption".

Is the Affected Person in a position in which he/she may have gained inside information regarding the City's Disaster Recovery Program? Describe Position:

☐ No – If No, complete Part 2 – "Certification of No Conflict" and submit to the City for approval.

☐ Yes – **If Yes, a prohibited conflict exists,**

- See Part 3 written statement from Director of Office of Community Development granting "Request for Exemption".

EQUAL HOUSING OPPORTUNITY

SECTION 3: REQUEST FOR EXCEPTION TO CONFLICT OF INTEREST
Attach written statement from the Director, Department of Community Development confirming that no state or local law would be violated as a result of the issuance of an exception to the conflict-of-interest requirements.

EQUAL HOUSING OPPORTUNITY

CITY OF COLUMBIA, S.C.

COMMUNITY DEVELOPMENT DEPARTMENT
POST OFFICE BOX 147
COLUMBIA, SOUTH CAROLINA 29217
(803)545-3373

DATE	CASE NUMBER
PROJECT	
LOCATION	
CONTRACTOR	OWNER
WEATHER	TEMP. (DEGREES) AT A.M. / AT: P.M.
PRESENT AT SITE	

TO: MASTER FILE

BASED ON A BRIEF INSPECTION THE FOLLOWING WAS NOTED:

CC:	ROUTING ACKNOWLEDGMENT	INITIAL	DATE

FIELD REPORT

INSPECTOR'S SIGNATURE:

Columbia Housing Programs
General Affidavit

BEFORE ME, the undersigned authority, on this day personally appeared

_____,

[PRINT the first and last names of the person who will sign this statement.], who swore or affirmed to tell truth, and stated as follows:

"My name is_____

[PRINT the first and last names of the person who will sign this statement.]

I am of sound mind and capable of making this sworn statement. I have personal knowledge of the facts written in this statement. I understand that if I lie in this statement, I may be held criminally responsible. This statement is true.

I certify that, to the best of my knowledge, the following documents are valid and accurate representations of fact:

☐ AGI Worksheeet and/or Household Income certification

☐ Household member composition

☐ Affidavit of Principal Residency on October 1, 2015

☐ Affidavit of Ownership on October 1, 2015

☐ Name Affadavit

☐ Zero Income Certification

☐ Oral Verification

☐ Lender Consent

☐ Conflict of Interest Form

☐ Communication Designee

☐ Self certification of insurance, expenditures and assistance received

☐ Other (specify)

_____

EQUAL HOUSING OPPORTUNITY

Under penalties of perjury, I certify that the information presented in this Affidavit is true and accurate to the best of my knowledge and belief. I further understand that providing false representations herein constitutes an act of fraud. False, misleading or incomplete information may result in my ineligibility to participate in Programs that will accept this Affidavit. 18 U.S.C. Section 1001 states that a person is guilty of a FELONY if he/she knowingly and willfully makes false statements to any department of the United States Government.

_____

Name (Print)

_____

Signature

_____

Date

[The person who has personal knowledge of this statement must sign it. DO NOT SIGN this statement until you are in front of a notary.]

State of South Carolina
County of Richland

SWORN to and SUBSCRIBED before me, the undersigned authority, on the_____day of_____,_____year, by

_____.

[PRINT the first and last names of the person who is signing this affidavit.]

Notary Public, State of South Carolina
[Notary's signature]

[Notary's seal must be included]

Disclaimer: The City of Columbia has made every effort to ensure the information contained on this form is accurate and in compliance with the most up-to-date CDBG-DR federal rules and regulations, as applicable. It should be noted that the City of Columbia assumes no liability or responsibility for any error or omission on this form that may result from the interim period between the publication of amended and/or revised federal rules and regulations and the City of Columbia's standard review and update schedule.

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs

Household Income Certification (HIC)

Required Form

Applicant Name: *(Head of Household)*		**Application ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

SECTION 1: ALL HOUSEHOLD MEMBERS

	1A: Household Members with Earned & Unearned Income *Included in Household Adjusted Gross Income (AGI)*	Relation to Head	Date of Birth	Supporting Income Documentation Provided*
a				☐ Most current IRS 1040 ☐ Other:
b				☐ Most current IRS 1040 ☐ Other:
c				☐ Most current IRS 1040 ☐ Other:
d				☐ Most current IRS 1040 ☐ Other:
e				☐ Most current IRS 1040 ☐ Other:
f				☐ Most current IRS 1040 ☐ Other:

*For ***each*** household member providing **Other** Supporting Income Document(s), a ***HoAP Adjusted Gross Income Worksheet*** must be submitted along with ***any applicable*** income and expense documents listed in the Income Information section of the ***HoAP Application Document Checklist.***

	1B: Household Members With ***NO*** Income *NOT included in Household Adjusted Gross Income (AGI)*	Relation to Head	Date of Birth	Supporting Income Documentation Provided**
1				☐ N/A – Minor/Dependent ☐ Certification of Zero Income
2				☐ N/A – Minor/Dependent ☐ Certification of Zero Income
3				☐ N/A – Minor/Dependent ☐ Certification of Zero Income
4				☐ N/A – Minor/Dependent ☐ Certification of Zero Income
5				☐ N/A – Minor/Dependent ☐ Certification of Zero Income

Household members that are *Minors* (under age 18) or are claimed as a qualified *Dependent* on a Tax Return require ***NO* further documentation. All other household members claiming zero income must submit a ***HoAP Certification of Zero Income***.

Total Household Members:	

SECTION 2: HOUSEHOLD ANNUAL ADJUSTED GROSS INCOME (AGI)

	Household Members with Earned & Unearned Income						Total *(Sum a-f)*
	a	b	c	d	e	f	
Household AGI* **							$ 0.00

If a ***HoAP Adjusted Gross Income Worksheet*** is completed, Household AGI is from *row 31* on the ***HoAP Adjusted Gross Income Worksheet***.

SECTION 3: CERTIFICATION SIGNATURE(S)

Warning: Any person who knowingly makes a false claim or statement to HUD may be subject to civil or criminal penalties under 18 U.S.C. 287, 1001 and 31 U.S.C. 3729. Under penalties of perjury, I/we certify that the information presented above is true and accurate to the best of my/our knowledge and belief. I/We further understand that providing false representations herein constitutes an act of fraud. False, misleading or incomplete information may result in my ineligibility to participate in this program or any other programs that will accept this document. Title 18, Section 1001 of the U.S. Code states that a person is guilty of a FELONY if he/she knowingly and willfully makes a false statement to any department of the United States Government.

APPLICANT: I/We certify that the information presented on this form is true and complete to the best of my/our knowledge and belief. I/We agree to provide income source verification to the City of Columbia upon request. I/We understand that this certification is part of the application process and does not guarantee eligibility for the Columbia Housing Programs.

Signature - Applicant	*Signature - Co-Applicant*	*Date*

SUBRECIPIENT: I have reviewed, verified, and confirmed the information presented on this form in accordance with the requirements of the Columbia Housing Programs. I hereby certify that the information presented herein is complete and accurate to the best of my knowledge.

Signature - City of Columbia	*Date*

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Household Member Composition

Applicant Name:		**Applicant ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

SECTION 1: INSTRUCTIONS

You have applied for home repair assistance that is governed by the City of Columbia Community Development Department. This Program requires us to certify all members of the household. I hereby declare that the following represents the current composition of my household.

SECTION 2: HOUSEHOLD COMPOSITION

Household Member Names	Relationship to Head of Household	Gender	Date of Birth	Marital Status	Disability? (Y/N)

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Lender Notice of Participation

Applicant Name:		**Applicant ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

SECTION 1: LENDING INSTITUTION INFORMATION

Institution Name:	
Mailing Address:	
County Legal Description:	
Account Number:	**Current Mortgage Statement *(Required)*** ☐ Is Attached
Email Address:	**Phone Number:**
The following to be provided by lending institution:	
Current Balance	$
Are the mortgage payments on the property current?	☐ Yes ☐ No
If no, is the home in foreclosure?	☐ Yes ☐ No

SECTION 2: STATEMENT OF FACTS

I/we agree that the above-referenced property may be rehabilitated and/or reconstructed with the use of Community Development Block Grant – Disaster Recovery (CDBG-DR) funds. If applicable, the City of Columbia may also use CDBG-DR funds to reimburse applicants for certain housing repairs completed prior to their CHAP application. Any prior loan on the current dwelling shall remain in effect and transfer directly to the newly repaired or reconstructed structure. The Applicant and/or Co-Applicant acknowledges and understands that they remain subject to the duties and obligations presented under the existing agreement with the above referenced lending institute.

A lien may be placed on the property if the homeowner executes the necessary legal documents to receive CHAP assistance, and depending on the total dollar value of assistance provided. The lien placed by the City of Columbiais based upon a zero interest Forgivable Loan. The lending institution will maintain its position as the superior lienholder.

I/We authorize the City of Columbia and any of its duly authorized representatives to communicate directly with the lending institution to inform the institution of my participation in the Housing Programs and to verify the information provided in Section 1 of this form, and any information within the current mortgage statement I/we provided.

Lending Institution Representative Signature	**Lending Institution Representative Printed Name**	**Date**

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Name Affidavit

Applicant Name:		**Application ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

NAME AFFIDAVIT
I _____do affirm that I am the one and the same person listed below and set forth in the application under the _____ Program relating to the property located at _____
Government Name: _____
Name variations on official documents: _____
Please list any additional name variations: _____

Columbia Housing Programs
Self-Certification Statement of Repairs

Applicant Name:		**Application ID #:**	
Co-Applicant Name: ***(If Applicable)***		**Damaged Property:**	

Project Legal Description:	
Project Type (Rehabilitation, Reconstruction, etc.):	

To verify that repairs were performed on the damaged home due to the recent event(s), identify all eligible items below. Provide a description of the item that was repaired, the amount paid for the repair, and indicate if a receipt is present.

Description of Repairs	Amount	Receipts: Yes or No
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
	$	
Total	$ $ 0.00	

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Third Party Homeowner Assistance Oral Verification Form

Applicant Name:		**Application ID #:**	
Co-Applicant Name: *(If Applicable)*		**Damaged Property:**	

SECTION 1: VERBAL VERIFICATION	
Subject/Regarding:	

SECTION 2: NON-PROFIT VERIFICATION		
Non-Profit Organizations		
Has applicant for and/or received any assistance for their damaged property related to Harvey?	**Third-Party Benefit Information**	
☐ Have NOT Applied ☐ Applied, but not assisted ☐ Applied, and application is pending ☐ Applied and received	**Organization Names:** *(List all organizations)*	
	Funds Received for All Non-Profit Organizations: *(if Applied and received)*	

EQUAL HOUSING OPPORTUNITY

Columbia Housing Programs
Certification of Zero Income

A "Certification of Zero Income" should be completed by adult household members only (if appropriate).

SECTION 1: THIS SECTION TO BE COMPLETED BY HOUSEHOLD MEMBER CLAIMING ZERO INCOME	
Applicant/Co-Applicant:	**Application ID #:**
HH Member:	
Damaged Property:	**Phone:**
Email Address:	

SECTION 2: THIS SECTION TO BE COMPLETED BY APPLICANT/RESIDENT

I_____, hereby certify that:

A. I ***do not*** individually receive income from ***any*** of the following sources:
- Wages from employment (including commissions, tips, bonuses, fees, etc.);
- Income from operation of a business;
- Rental income from real or personal property;
- Interest or dividends from assets;
- Social Security payments;
- Supplemental Security Income payments;
- Payments from annuities, insurance policies, retirement funds, pensions, or death benefits;
- Unemployment or disability payments;
- Public assistance payments (other than food stamps);
- Periodic allowances from alimony or child support;
- Gifts received from persons not comprising the household;
- Sales from self-employed resources (Avon, Mary Kay, Pampered Chef, Shaklee, etc.);
- Any other source not named above; **AND**

B. I currently *do not* have income of any kind and there is no imminent change expected in my financial or employment status during the next 12 months; **AND**

C. I will be using the following sources of funds to pay for rent, utilities, and/or other necessities:

_____

_____