

**TOWN OF WAREHAM**  
**Department of Planning  
and Community Development**



**REQUEST FOR PROPOSALS FOR  
PUBLIC SOCIAL SERVICES FUNDING FOR  
FY 2021 COMMUNITY DEVELOPMENT BLOCK  
GRANT (CDBG) PROGRAM**

JULY 2021

**SUBMIT PROPOSAL AND APPLICATION TO:**

**DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT  
JAIME REBHAN-BUCKMINSTER, MANAGER, COMMUNITY DEVELOPMENT PROGRAMS  
54 MARION ROAD  
WAREHAM, MA 02571**

**PLEASE READ THIS DOCUMENT THOROUGHLY AS THERE ARE CHANGES FROM PRIOR YEARS.**

**Background Information and Application Instructions**

On behalf of the Wareham Board of Selectmen and Redevelopment Authority, the Department of Planning and Community Development (DPCD) is seeking proposals and applications for Public Social Services (PSS) funding. The Town expects to select **up to five (5) proposals** for Public Social Services activities to include in its FY 2021 CDBG Mini-Entitlement Plan grant application to the Massachusetts Department of Housing and Community Development (DHCD). The deadline for submitting proposals/applications to the DPCD office is **4:00 PM, Monday, August 16, 2021**. In turn, the Town's application to DHCD is due by September 10, 2021.

Under CDBG regulations, the Town is limited to spending a maximum of 20% of its total grant on Public Social Services. The Town has been informed by DHCD that it can apply for up to \$825,000 in total funds; this will enable it to make **up to \$165,000** in Public Social Services funding to subrecipients. The Board of Selectmen (the BoS) are the official applicant for the Town and the BoS will make the decision as to organizations and the funding amounts to include in its grant application to DHCD.

The Town will consider funding requests that range between \$10,000 - \$50,000. This range recognizes that funding needs and capacity to carry out activities vary by different organizations. Applicants are strongly urged to request a funding amount that 1) is proportionate to the level of need that the funding will address and 2) can be spent responsibly and effectively within the contract period. (The contract period is expected to be from December 1, 2021 – December 31, 2022. However, this period is subject to change, depending on the date of the grant award from DHCD and when the Town receives authorization to commit funds.) In short, ***ask for what you need and can spend within the grant period.*** For organizations that have received prior funding, your history in spending your funds in a timely manner will be considered by the Town when it determines which requests and the amounts to include in the FY 2021 grant application.

An entity may submit a limit of two (2) proposals for funding. If it submits more than one proposal, both proposals *may*, but do not need to, serve the same target population (beneficiaries). The proposals must be for a different type of program or service. As an example, an entity may submit two requests for programs/services to elders, one that requests funding for an Outreach Worker and the second to provide financial counseling services.

The Town/Department of Planning and Community Development (DPCD) reserves the right to incorporate a reduced amount of funding in its grant application to DHCD. If funding is reduced from the requested amount, the applicant will be notified of this in advance so that the Town and applicant can determine if the program/service remains viable in light of a reduced funding amount. ***Applicants should be mindful of this when preparing their requests, as it will not be possible for the Town to fully fund five proposals at the maximum amount of \$50,000.***

In order for the Town to consider applications for funding, applicants must comply with the following:

- A. The funding request must serve Wareham residents **exclusively**. If your organization and the program(s) for which you are requesting funding provide services to both Wareham and non-Wareham residents, all funding resulting from this Request for Proposals (RFP)

shall be used to assist Wareham residents only. You may use other available funding to assist non-residents.

- B. CDBG funding shall be used to create a new or expand an existing program or service, or to continue prior CDBG-funded activities. This funding may not be used to replace existing funding. Under certain conditions, CDBG funding can be used to restore “lost” funding. If the latter situation appears to apply, you must contact the Wareham Department of Planning and Community Development (DPCD) to discuss this matter, as there are specific conditions that dictate this determination.
- C. Only applications that are consistent with the governing regulations of the Code of Federal Regulations, Title 24, Sections 570.201(e) “Eligible Activities” (see **Appendix A**) can be considered for funding. The application form found on **Page 5** lists examples of eligible activities; these are not exhaustive, but identify the most commonly used ones. If an entity is considering a service or program not listed on the application, contact the DPCD to determine if it is eligible.
- D. The Community Development Block Grant (CDBG) program is a federal program administered by the U.S. Department of Housing and Community Development (HUD) and the Massachusetts Department of Housing and Community Development (DHCD). It is designed to improve the quality of life for all community residents, but principally for those with low- and moderate-incomes (see **Appendices B and C**). Therefore, applicants should detail, to the extent possible, how the proposed project will benefit lower income Wareham residents.
- E. Proposals will be evaluated by how the application addresses the target population’s needs, the clarity of the proposal, how the applicant can measure and evaluate outcomes, past performance and timeliness (if applicable), the degree of collaboration with other agencies, availability of matching funds, and leveraging of other resources (including in-kind and volunteer participation). Applicants are encouraged to include letters from stakeholders that 1) demonstrate support for their proposals, or 2) describe how their programs and services have positively affected them.
- F. The Department of Planning and Community Development is available to provide technical assistance to parties considering submitting a proposal. To ensure fairness to all applicants, the assistance will be limited to providing answers to questions concerning the eligibility of an activity/program for funding, how to determine/document compliance with the National Objective requirement, or similar. During the application stage, the DPCD will not provide feedback relating to the “design,” content or delivery of a service or program. Entities seeking technical assistance should contact Jaime Rebhan-Buckminster, telephone: 508.291.3100, ext. 3171, or email: [jrebhan@cogincorp.com](mailto:jrebhan@cogincorp.com).
- G. All applicants must respond to the questions to be considered for funding. Applicants **must submit one (1) signed original and one (1) copy of their application, including any attachments**. The original shall be bound by a clip. The copy may be stapled, bound, or submitted in one three-ring binder. Also, please submit the application in a digital format, either on a CD or flash drive, or via email to [jrebhan@cogincorp.com](mailto:jrebhan@cogincorp.com) **with the subject line: “Wareham Public Social Services Application”**.
- H. A stand-alone application template (Pages 5-9 below) is available for interested parties. It is available by request or on the Town’s website at [www.wareham.ma.us/bids-rfps](http://www.wareham.ma.us/bids-rfps).
- I. The deadline for submitting proposals/applications is **Monday, August 16, 2021**. All applications are due at the Department of Planning and Community Development no later than **4:00 PM**.

- J. Applications may be mailed or hand-delivered to: **Department of Planning and Community Development**, 54 Marion Road, Wareham, MA 02571. If applications are mailed, it will be the applicant's responsibility to ensure that the application is received in the office by the deadline.

This Request for Proposals is for funding for direct delivery of public social services, assistance, or programs to Wareham residents; or for operating support to agencies that provide direct services. **If an agency has capital needs** ("bricks and mortar"), it should contact the office directly to discuss this. Funding for capital projects is an eligible use of the CDBG funds under another type of budget category than Public Social Services. The Town will consider capital projects for inclusion in the FY 2021 or future grant applications. Such requests are not subject to an established funding cap; however, other requirements apply.

**APPLICATION FOR PUBLIC SOCIAL SERVICES FUNDING  
GRANT YEAR FY 2021 – TOWN OF WAREHAM**

**I. Applicant Information**

Project Title: \_\_\_\_\_

Project Address (Location): \_\_\_\_\_

Brief Project Description: \_\_\_\_\_  
\_\_\_\_\_

CDBG Funding Requested: \$ \_\_\_\_\_

Matching Funds (if any): \$ \_\_\_\_\_

Organization Name: \_\_\_\_\_

Address: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email Address: \_\_\_\_\_ Website: \_\_\_\_\_

Contact Person(s): \_\_\_\_\_

**II. Eligible Activity:** Check the category that best describes the type of funding being requested:

- ABE/GED classes
- Domestic Violence Prevention Services
- Economic Self-Sufficiency Services
- Elder Services (including Elder Self-Sufficiency)
- English for Speakers of Other Languages (ESOL)
- Financial Literacy Services
- Food Pantry
- Homebuyer Counseling or Mortgage Foreclosure Prevention Counseling
- Homelessness Prevention Services
- Literacy Programs/Literacy Training
- Supportive Services (Specify... \_\_\_\_\_)
- Transportation
- Job-related Transportation Assistance
- Job-related Childcare Assistance
- Workforce Training
- Youth Services
- Other: \_\_\_\_\_

## Project Narrative

### A. Project Eligibility - National Objective Compliance

Every Project receiving funding must meet the HUD National Objective of *benefitting low- and moderate-income [LMI] individuals/households*. A National Objective is a statutory requirement of the CDBG Program. This National Objective can be met either under the “area-wide benefit” or “limited clientele” sub-categories. National objectives and related documentation requirements are discussed in this section.

**Check one of the two boxes below** that best describes how your request meets the National Objective “benefits low/moderate income [LMI] individuals/households.” Answer the corresponding questions under the item you selected.

- Area-wide Benefit Activities:** The proposed project or activity meets the needs of low/moderate income [LMI] persons residing in an **area** where at least 51% of those residents have incomes within 80% of the Area Median Income. *The benefits of this activity are available to all persons regardless of income.*

A CDBG-assisted project will meet the National Objective of benefit to low- and moderate-income persons if its benefits extend generally to all of residents of an area where the project is located (the “service area”), AND if 51% or more of those residents are LMI. The application must clearly document how this requirement will be met. *If you are submitting a request where the National Objective will be met through the “area-wide benefit” provision, you are advised to discuss this in advance with the office staff.*

**If you checked the box for “Area-Wide Benefit,” answer the following questions:**

1. Explain the methodology for establishing geographical boundaries of the service area and the percentage of low- and moderate-income persons.
2. Applicants must furnish a parcel map of the service area, showing the Census Block Groups and the corresponding LMI (low- and moderate-income) statistics.

- Limited Clientele Activities:** The proposed project benefits a specific **group** of people (rather than all residents in a particular geographic area), where at least 51% of those who are served are documented or presumed to be low/moderate income persons. (Examples include services for the homeless, “Meals on Wheels” for the elderly, or job training for LMI individuals.)

A CDBG-assisted project will meet the “Limited Clientele” sub-category if it can be demonstrated that the project is designed so that the benefits are limited to certain groups. There are four group types, listed below. Refer to **Appendix C**, which provides additional important information relating to each of these types of groups.

1. Groups that are presumed by HUD to be low- and moderate-income.
2. Groups of persons already documented as low- and moderate-income.
3. Location of services or groups whose composition is such that it can be concluded that a majority of their clientele will be low- and moderate-income persons.
4. Groups that can be documented to be predominantly low- and moderate-income (at least 51% of those served).

Compliance for “Limited Clientele” projects must be documented by one of the following methods:

- For projects that do not provide monetary, “income payment” forms of assistance, beneficiaries may “self-declare” their eligibility, generally by completing and signing a form declaring their household size and income. For projects where the user (beneficiary) profile is low- and moderate-income, a description of the profile must be presented so that the conclusion, without a doubt, will be to benefit low- and moderate-income persons.
- For projects that offer “income payments” or subsidies to a third party (e.g., rental assistance, emergency utility payments), income eligibility must be determined using *source documentation* that provides evidence of the household’s income falling within the income limits. Assistance involving income payments requires a more complex process than that for the types of assistance that do not provide income payments. **NOTE:** For income payment types of assistance, CDBG funds must be limited to only those individuals/households who have been determined to meet income CDBG income limits.

**If you checked the box for “Limited Clientele,” answer the following questions:**

1. Explain how the project will meet the National Objective: “benefits low/moderate income individuals/households.”
2. Describe what type(s) of documentation will be available to show that the project meets the National Objective: “benefits low/moderate income individuals/households.” The compliance documentation must be one of the two bulleted methods described above.

Answer the questions below. Provide concise but clear answers. Please double-check to make sure that you have provided answers to all questions in Sections B-D.

#### **B. Information on the Proposed Program or Service**

1. **Who will be served by your program or service?** (e.g., individuals, families, youth, any LMI person/household, or special population groups or segments?) Describe the degree of severity of the need of those to be served.
2. **What is the need that will be addressed with CDBG funding? Why and how is the target population underserved, or not served currently?** To the extent possible, provide data to document this. If appropriate, supplement data with anecdotal information.
3. **What is the program or service that you will provide with the requested funding?** In a few paragraphs, clearly describe the program or service, including any key elements that are part of it. What will CDBG funds be used for? Is this a new, continuing, or expanded program or service? (*As appropriate, you can provide both a narrative and bullet list of services or program components. It is important to clearly describe your proposed use of CDBG funds.*) How frequently do you expect that an individual or household will receive your services?
4. **How will the proposed project address this need?** Be specific in describing the direct relationship between the need and how the program/service responds to it. To what degree will the program or service meet the need? How will you measure success, as well as determine areas for where future improvement is needed? Will you be able to

track the impact on clients of this program/service over both the short- and long-term?

5. **Estimate the number of low and moderate-income persons or households who will benefit from the project/services and provide the following information:**

a. **Total number of beneficiaries.** Estimate number of unduplicated beneficiaries and total (duplicated or repeat clients) beneficiaries (if different) that will be served with your requested funding *regardless of income*. Below select either Individuals or Households (If your service primarily assists households or families, check that box, even though it may include individuals [households of one person]).

Unduplicated:       Individuals, Est. #: \_\_\_\_\_       Households, Est. #: \_\_\_\_\_

Total (Duplicated):       Individuals, Est. #: \_\_\_\_\_       Households, Est. #: \_\_\_\_\_

b. **Total low- and moderate-income (LMI) beneficiaries** (duplicated and unduplicated). Estimate both households (if applicable) and individuals.

Unduplicated:       Individuals, Est. #: \_\_\_\_\_       Households, Est. #: \_\_\_\_\_

Total (Duplicated):       Individuals, Est. #: \_\_\_\_\_       Households, Est. #: \_\_\_\_\_

c. **Percentage of low- and moderate-income beneficiaries.**

\_\_\_\_\_ %

d. **Cost per beneficiary** (based on total number of beneficiaries, both duplicated and unduplicated).

\$ \_\_\_\_\_

C. **Organizational Capacity & Experience** (Please respond to the questions below):

1. **Provide an overview of your organization including: mission statement, length of time in existence, services provided** (including those not related to this application), **and other relevant information.** Identify the person responsible for program operations and financial management of the proposed project. List all other people who will be directly involved in your proposed project, along with their skills and qualifications and note whether these positions are current, new, or pending this award (attach resumes or describe the experience and qualifications for each staff person or contractor who will be involved in delivering the program/service). Attach brochures and outreach or other prepared materials if appropriate.
2. **Describe your organization's prior experience with successfully conducting this type of project.**
3. **If applicable, identify partners in your proposed project and describe their roles and responsibilities.**



#### D. Detailed Budget Requirements

1. Complete the Budget Form that follows.
2. **On a separate sheet, provide an itemized budget that relates to the Budget Form.** Describe **all existing** funding sources and amounts for your proposed project, and how those funding sources will be used. Provide an itemized budget for your project (use the template below). Identify all staff positions for which funding is being requested and specify the hourly wage (or other basis of compensation) being paid.<sup>1</sup> If more than one staff position has the same title, list them separately.
3. **Identify the person who prepared the budget and that person's qualifications.**

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<sup>1</sup> In developing a budget that includes staffing/consultant costs, remember to factor in salary increases (if any) that will be in effect during the expected contract period.

## PUBLIC SOCIAL SERVICES BUDGET SUMMARY SHEET

Program/Project Name: \_\_\_\_\_

CATEGORY	CDBG \$ REQUESTED	MATCHING \$ (if any)	TOTAL \$
<b>PERSONNEL SERVICES</b>			
SALARY & WAGES			
FRINGE			
<b>SUBTOTAL – PERSONNEL</b>			
<b>NON-PERSONNEL SERVICES</b>			
ADVERTISING			
COMMUNICATION			
EQUIPMENT *			
INSURANCE			
SUPPLIES AND MATERIALS *			
MEETINGS			
PRINTING			
RENT			
TRAINING			
POSTAGE			
TRAVEL COSTS			
OTHER (Specify...)			
<b>SUBTOTAL – NON-PERSONNEL</b>			
<b>DIRECT SERVICES</b>			
COMMODITIES (e.g., Food, Clothing)			
OTHER (e.g., Rent, Utilities, Transportation)			
OTHER (Specify...)*			
<b>SUBTOTAL – DIRECT SERVICES</b>			
<b>TOTAL</b>			

\* Equipment, supplies and materials that will be used directly by program participants should be listed under the “Direct Services” subcategory, not under “Non-Personnel Services,” which are for the agency’s general operating costs.

# APPENDICES

## APPENDIX A

### SUMMARY OF ELIGIBLE AND INELIGIBLE ACTIVITIES

#### COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

#### FY 2021 CDBG Application

This is a summary of the Public Service activities that are eligible and ineligible for assistance under the Community Development Block Grant (CDBG) Program pursuant to governing regulations of the Code of Federal Regulations, Title 24, Part 570, and Sections 570.200 - 570.207. This summary is based upon the Final Rules published in March 1996.

#### **General Policies 570.200**

The primary objective of the CDBG Program is the development of viable communities by providing decent housing, sustainable living environments, and expanding economic opportunities, principally for persons of low- and moderate-income. Funds must be used so as to give maximum feasible priority to activities that will carry out the national objective of: benefit to low- and moderate-income families. At least 70% of the total CDBG funds must be used for activities that benefit low and moderate-income persons; at least 70% of the beneficiaries of the individual activities must be low- and moderate-income persons.

#### **Basic Eligible Activities 570.201(e)**

CDBG funds may be used for the following activities:

- a. Public Services. Provision of public services (including labor, supplies, and materials) including but not limited to those concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation, or recreational needs. To be eligible for CDBG assistance, a public service must meet each of the following criteria:
  - A new service or a quantifiable increase in the level of an existing service above that which has been provided with State and Local funds in the previous 12 calendar months; and
  - The amount of CDBG funds obligated for public services shall not exceed 20 percent of the annual grant, and 15% of program income received during the immediately preceding program year.

#### **Ineligible activities 570.207**

The general rule is that any activity that is not authorized under the provisions of 570.207 is ineligible to be assisted with CDBG funds. This section identifies specific activities that are ineligible and provides guidance in determining the eligibility of other activities frequently associated with housing and community development.

- (a) The following activities **may not** be assisted with CDBG funds:
  - Buildings or portions thereof, used for the general conduct of government
  - General government expenses;
  - Political activities
- (b) The following activities **may not** be assisted with CDBG funds unless carried out as a special economic development activity, or as a public service, or by an eligible community-based development organization, or by the recipient as specifically authorized.

- Purchase of equipment;
- Construction equipment;
- Fire protection equipment. Fire protection equipment is considered for this purpose to be an integral part of a public facility and thus, purchase of such equipment would be eligible under 570.201(c);
- Furnishings and personal property;
- Operating and maintenance expenses;
- Payment of salaries for staff, utility costs and similar expenses necessary for the operation of public works and facilities;
- New housing construction;
- Income payments

**National Objective 570.208**

The Primary objective of the CDBG program is to benefit low- and moderate-income persons who earn at or below 80% of the median income and/or reside in census tracts with at least 51% low and moderate-income levels. Without exception, all proposed public social services activities/projects must meet the National Objective listed below:

- National Objective of principally benefitting low- and moderate-income (lower income) persons** (or households). These are individuals or households whose total annual household income is equal to or less than 80% of the area median income (AMI), adjusted for household size. See table in Appendix B.

**APPENDIX B**

**Town of Wareham, MA  
Community Development Block Grant Program  
FY 2021 CDBG Application**

**HUD CDBG Income Limits\***

**Area Median Family Income (AMI): \$120,800.**

	Household Size							
Income Category	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
<b>Extremely Low</b> (<30% of AMI)	\$28,200	\$32,200	\$36,250	\$40,250	\$43,500	\$46,700	\$49,950	\$53,150
<b>Very Low</b> (>31% - <50% of AMI)	\$47,000	\$53,700	\$60,400	\$67,100	\$72,500	\$77,850	\$83,250	\$88,600
<b>Low/“Moderate”</b> (>51% - <80% of AMI)	\$70,750	\$80,850	\$90,950	\$101,050	\$109,150	\$117,250	\$125,350	\$133,400

**Boston – Cambridge – Quincy, MA – NH MSA: HUD Metro Fair Market Area (HMFA)**

*Source:* U.S. Department of Housing and Urban Development

\* These income limits became effective as of April, 2021. The limits change annually and the limits that are in effect at the time that funding becomes available is likely to be different than the limits shown above. Any household that makes less than or equal to the amount shown in “Low Income” category line for the corresponding household size is considered lower income (“lower income” is an informal term used to capture all three of the categories shown). For example, a 4-person with annual income of \$81,100 or less is considered lower income, a term that encapsulates the three income categories above.

**NOTE:** Agencies with current CDBG funding should note the above limits, which are in effect presently. Agencies should incorporate these limits into informational materials, and intake, eligibility or self-declaration forms.

## APPENDIX C

### Town of Wareham, MA Community Development Block Grant Program FY 2021 CDBG Application

#### **CDBG National Objective of “Benefit to Low- and Moderate-Income Persons”**

#### **Information Relating to Compliance under the “Limited Clientele” Sub-Category**

Every project or activity receiving Public Social Services (PSS) funding must meet the HUD National Objective of *benefitting low/moderate income [LMI] individuals or households*. A National Objective is a statutory requirement of the CDBG Program. The “LMI” National Objective can be met either via “area-wide benefit” or “limited clientele” sub-categories. This appendix provides information on how to document compliance when using the “limited clientele” sub-category, which is the most common method for PSS activities.

**Limited Clientele Activities:** The proposed project benefits a specific **group** of people (rather than all residents within a defined area), where at least 51% of those served are documented or presumed to be low- or moderate-income persons. (Examples include public services for the homeless, “Meals on Wheels” for the elderly, or job training for the low- and moderate-income individuals.)

A CDBG-assisted project will meet the “Limited Clientele” sub-category if it can be demonstrated that the project is designed so that the benefits are limited to certain groups. There are four (4) group types:

1. **Groups presumed by HUD to be low- and moderate-income.** These include the elderly (62+), severely disabled persons<sup>2</sup>, abused children, battered spouses, homeless persons, persons with HIV/AIDS, illiterate persons, and migrant farm workers. HUD accepts these presumptions unless there is evidence to the contrary. No income verification is required for these groups unless an “income payment,” such as fuel assistance, childcare subsidies, or tuition payments, etc. is being provided.

**NOTE:** Persons are classified as having a **severe disability** if they: (a) used a wheel-chair or had used another special aid for six months or longer; (b) are unable to perform one or more “functional activities” or need assistance with an “ADL (Activity of Daily Living) or IADL (Instrumental Activity of Daily Living)”; (c) are prevented from working at a job or doing housework; or (d) have a selected condition including autism, cerebral palsy, Alzheimer’s disease, senility or dementia, or mental retardation. Also, persons who are under 65 years of age and who are covered by Medicare/Medicaid or who receive SSI are considered to have a severe disability.

**NOTE:** For purposes of this definition, the term “functional activities” includes seeing, hearing, having one’s speech understood, lifting and carrying, walking up a flight of stairs, and walking. An ADL is an “activity of daily living” which includes getting around inside the home, getting in or out of bed or a chair, bathing, dressing, eating, and toileting. An ADL is an

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<sup>2</sup> This categorization is limited to adults, not minors.

“instrumental activity of daily living” and includes going outside the home, keeping track of money or bills, preparing meals, doing light housework, and using the telephone;

2. Groups of persons already documented as low- and moderate-income. For example, a recreation program for the exclusive use of residents in a low-income housing development complies because as a condition of their residency, they have been determined to be lower income. Normally, no further income documentation is required for this type of project;
3. Groups whose composition or the location of the service is such that it can be concluded that a majority of their clientele will be low- and moderate-income persons. For example, projects involving soup kitchens or homeless shelters will usually qualify under this provision without further proof of income eligibility. *A profile of the clientele must be presented so that it is clear that the beneficiaries are/will be low- and moderate-income persons;*
4. Groups that can be documented to be predominantly low and moderate-income (at least 51%). Such projects must be designed to collect information on household size and income so that the program will document clientele income eligibility. For example, a project that provides well-child medical care would meet the national objective if the applicant will determine income eligibility through source documentation.

“Limited clientele” projects must document compliance by one of the following methods:

- A. For projects that do not provide monetary, “income payment” forms of assistance, beneficiaries may “self-declare” their eligibility, generally by completing and signing a form declaring household sizes and income ranges;
- B. For projects that offer income payments or subsidies, income eligibility must be determined using source documentation;
- C. For projects where the user profile will be low- and moderate-income, a description of the profile must be presented so that the determination can be made conclusively that the beneficiary is a low- or moderate- income person or household.