AGENDA
CDBG Housing and Public Facilities

- Welcome and introductions
  Applicant _____________________________________________________________
  Date: _______________________ Location _______________________________
  CDFA Staff: __________________________________________________________________________________________________________
  Grantee Staff: _______________________________________________________________________________________________________
  Grant Writer: _________________ Hired yet? __________________________________
  Subrecipient: ________________________________________________________________

- Brief overview of CDFA
  a. Other sources of funds at CDFA

- Overview of CDBG Funding
  a. Federal (HUD) – State (CDFA) – Local (Municipality / Grantee) – Project (Subrecipient) = Beneficiaries (Clients)

- Overview of the proposed project – Summary by the applicant
  a. If Housing - Are there LIHTC funds in the project?
  b. If Infrastructure – Permits from DOT, Letter from DES?

- Meeting the National Objective and Eligible Activity
  a. Who is receiving benefit - Low Mod, Urgent Need, Slum Blight
     • Low Mod – Area, Limited Clientele, Housing, Jobs
     • Urgent Need – Unanticipated emergency, life safety, 18 months
     • Slum Blight – currently state does not qualify projects based on this category
  b. How to meet eligibility and document LMI numbers
     • Area – Census
     • Survey – if not completed should be done starting now. Forms are specific to your community and CDFA can provide them to you. Please keep confidential documents in your files for when we monitor you. You can provide internal code for confidential purposes.
     • Presumed Benefit – 51%

- Presentation of project plan and objectives
  a. Connection to Region, Town or area plan discussion

- Review of CDBG application and approvals timeline
  a. “Complete” application due at CDFA
• Last Monday in January and July – 4:00PM
• This Triggers the Environmental Review Choice Limiting Action

b. 18-month project design criteria – Readiness Criteria, match funds, site control
c. Staff Review and Site Visits
   • Request for clarifying information
   • Limited modifications to the proposed project
   • Reduced funding
   • Elimination of activities
   • Denial of funding for clear failure to comply
   • Scoring of the application
d. Scoring – Projects above funding level line receive funds, below do not. Funding will be contingent upon securing other funds in a timely manner and project specific contingencies. (2 Months for scoring and site visits)
e. CDBG Advisory Committee approval
   • First Thursday April and November
   • Administrative review process – 15 days to request in writing, CDFA 15 days to respond.
f. Contracting process with municipal grantee
   • Approximately 6 weeks
g. State review by Dept. of Administrative Services
h. Governor and Executive Council approval
   • Approximately 4-6 weeks
i. Contracting process with municipal grantee and state
   • Approximately 6 weeks
j. State review by Dept. of Administrative Services – 2 weeks
k. Governor and Executive Council approval
   • Approximately 4-6 weeks
l. Agreement between Grantee and Subrecipient (you the project)
m. Administration of the grant begins – Municipality or Grant administrator or Quasi-Governmental Entities
n. 18-month project design criteria – Readiness Criteria, match funds, site control
   • If no cost claims submitted: After six months, warning will be issued* After twelve months, grant may be cancelled
o. All federal compliance must be adhered to In-order to access funds – funds are released only after work has been completed (CDFA processes invoices every two weeks)
p. All documents and communications are done via CDFA’s Grants Management System through the grant administrator – the process must be documented

Before we move on - CDBG cross cuts the whole project – Project Aggregation - Environmental Review, Procurement / Construction. Even $1 of federal CDBG funds in the project could mean all non-federal funds will need to follow federal regulations. Please start communications with CDFA as soon as possible – prior to pre-development if possible.

• Environmental Review requirements
a. From 1 day to _____ months or more depending on level of review
b. Submission of application has triggered the Environmental Review Choice Limiting Action – all work must stop until the Environmental Review is completed.
c. When determining the level of environmental review ALL activities related to the project must be reviewed including non-CDBG funded project activities.
d. If hiring an engineer to perform the review it is recommended that they have experience with NEPA guidelines.
e. Process Overview
   • Define the Project – Aggregate
   • Determine the Level of Review
   • Conduct the Review
   • Establish Environmental Review Record
   • Complete the Release of Funds Process
     o Newspaper posting / Comment Period
     o Request the release from CDFA / Comment Period
   • Receive release from CDFA
   • Commit or Spend Funds for Project
   • Re-evaluate if Project Changes
f. Non-compliance jeopardizes CDBG funding

- Procurement & Construction restrictions with CDBG funded projects.

Key Takeaway
- What is being done and how will you hire / purchase these services / products
- For profit vs. non-profit
- Avoid conflict of interest
- Davis Bacon is triggered
- Cannot Hire Debarred & Suspended Contractors
- Secretary of State Registration
- Insurance and Bonding Requirements
- MBE/WBE, Section 3 Forms
- Open and fair competition – defend it legally, document your selection process

a. Competitive Negotiation
   • Advertise RFP or RFQ
   • Qualification based/ proposals evaluated
   • Price negotiated
   • Service contracts: architect, engineer, construction manager, CDBG administrator

b. Procurement Micro-Purchase
   • $3,000 or less in aggregate (non-construction)
   • $2,000 or less for construction activities (subject to Davis Bacon Regulations)
   • No competitive quotes required if cost deemed reasonable

c. Small Purchases
   • $150,000 or less in aggregate
- At least 2 documented quotes
- Small contracts, equipment

d. **Sealed Bids**
   - Has to be Published in newspaper
   - 2 or more bids required
   - Fixed price contract
   - Construction projects
   - Detailed specifications and plans
   - Include wage rates and federal regulations
   - Public bid opening
   - Project awarded to lowest, responsible bidder

e. **Non-Competitive Proposals**
   - Sole source
   - Urgent
   - Emergency situations (emergency grants)
   - NEEDS CDFA APPROVAL

f. **If using Construction Manager Method**
   - Hire CM through competitive negotiation
   - CM bids out sub-trades
     - Advertised
     - Sealed Bids
     - Davis-Bacon wage rates and other fed regulations apply
     - Insurance and bonding requirements (subs or CM?)

g. **If using General Contractor (GC) Method**
   - Hire GC through sealed bid process
   - The general contractor will submit a bid package that includes all subs
   - Advertised
   - Sealed Bids
   - Davis-Bacon wage rates and other fed regulations apply
   - GC should be bonded to cover the subs

- **Financial / Claims / Release of Funds**
  a. All claims must be submitted through the grantee via GMS
     a. Please check and see that the list is up to date at the municipality level.
  b. COMPLETED Claims must be submitted Thursday before drawdown week
  c. Drawdowns take place on Tuesday every other week
  d. Electronic Transfer Option Available
  e. Subrecipient Responsibilities
     - Reflect budget and expenses
     - Matching Funds must be spent in proportion to CDBG
• Backup construction documents must be provided and signed by authorized individual (Architect, Engineer, CM)
• Reimbursement in non-interest bearing account
• Grantee and Subrecipient must minimize the time elapsing between the transfer of grant funds and disbursement of funds. If paying vendors - ledgers, receipts & expenditures
• Security document must be documented prior to the release of 1st claim

f. Grantee Requirements
   • Financial Management Plan
   • Financial Responsibilities Form
   • Authorized Signatures for Claims
   • Form for Electronic Payment
   • At least three (3) different people should be involved in financial transactions
   • Time sheets, if employees (Signed by supervisor & employee)
   • Ledgers, receipts & expenditures (3 days)
   • Fiscal controls and accounting procedures must be in place to comply with 2 CFR part 200

• Additional items and requirements for project management
   a. Security/collateral requirements – what is it? ________________
      • Performance Lien will be required prior to release of CDBG funds.
      • Needs to be registered at the registry of Deeds.
      • Commit to providing public benefit for X number of years
   b. Progress Public Hearing
   c. Reports
      • Semi-Annual Reporting Due January 15 & July 15
        o Progress Reports, Data, Narrative
        o MBE / Section 3 (Contractor)
      • Closeout Report
   d. Amendments & Revisions - Amendments & Revision requests due no later than 90 days before project end date. Retroactive requests will NOT be accepted
      • Revisions are smaller changes approved by CDFA
        o Change of 10% < of total grant (cumulative)
        o No more than a 10% decrease in beneficiaries or units
      • Amendments are larger changes that also need G&C approval
        o Time Extension
        o Change > 10% of total grant
        o New activity created
        o Change in target area
        o Decrease >10% in beneficiaries or units
        o Change of > 25% requires a public hearing
   e. Grant Closeout
      • Grant must be completed within 18 months
      • Maximum one extension - Reviewed on a case-by-case basis
• If no cost claims submitted: After six months, warning will be issued. After twelve months, grant may be cancelled
• Close-out Certification and Documentation Form
• Applicant and Beneficiary Characteristics
• Monitoring by CDFA / Grantee
• If not done so already Property Register / Security

f. Monitoring and Access to Records
   • CDFA will monitor via GMS and a possible site visit
   • Monitor for compliance in administrative, financial and programmatic operations
   • Monitor to assure schedule, budget and beneficiaries are within objectives
   • Access to records - Representatives of CDFA, HUD, the Inspector General, and the General Accounting Office shall have access to all books, accounts, records, reports, files, and other papers, or property pertaining to the administration, receipt and use of CDBG funds and necessary to facilitate such reviews and audits.
   • Record Retention
   • Right to Know

g. Audit - 24 CFR 200.501
   • Single audit required if the municipality expends $750,000 or more in any federal funds in a calendar year
   • Audit conducted by independent CPA – procurement process
   • CDFA must get a copy of the audit
   • CDFA can cover the cost of the audit based on CDBG %

• Acquisition - Voluntary vs. Non-Voluntary
  • Appraisal
  • URA
• Housing Rehabilitation
• Public Relations - Project parties agree to CDFA publicity
• Questions
• Summary of tasks or action items
• Adjourn
ADDITIONAL INFORMATION FOR REFERENCE

Grantee Responsibilities

As the grant applicant, Grantee is responsible for the successful completion of the project.

An Agreement with the Subrecipient does not relieve the Grantee of its responsibilities.

Grantee shall make good faith efforts to enforce the legal obligations entered into with the Subrecipient … and exercise due diligence in its efforts in bringing about the satisfaction of the grant obligations.

Grant Administration

- Municipality to Administer
  - Keep time sheets that is signed by employee and supervisor
  - No overtime
  - Submit with claims
  - Can't pay CEO
  - Experience with similar CDBG administration advised

- Quasi Governmental Administrators
  - Regional Planning Commission / Housing Authority (if not recipient)
  - No RFP required however there must be a contractual relationship with RPC or HA (professional services agreement)
  - Staff time needs to be tracked

- Consultant Grant Administrator
  - Information on how to hire will be sent to municipality with grant award letter
  - Request for Proposals (RFP) – distribute / publish
  - RFP must identify all significant evaluation considerations (price, experience, availability).
  - Award may be made to responsible party whose proposal may be most advantageous to Grantee (price and other considerations, i.e. experience, availability factored into selection.)
  - You can negotiate price
  - Check for Secretary of State and Debarment Status
  - Sign professional services agreement – Municipality and the Grant administrator
  - You should have a process to hire them to write the application and complete the ERR at the time

Municipal Adoption / Approval / Documents

- Code of Ethics - Maximizes open & free competition
  - No decision making if have financial interest
  - Avoid conflict of interest (appearance of)

- MBE/WBE

Section 3
Public procurement  
Copy of municipal bond  
Limited English Proficiency Assistance Information  
Civil Rights  

**504 Self-Evaluation & 504 Plan**  
- Designate Compliance Coordinator  
- If more than 15 employees adopt 504 Grievance Procedure  
- Personnel policies, which includes grievance procedure (if more than 15 employees)  

**Fair Housing** - Posters & brochures (certification), Follow-up on complaints, Check rental advertisements for discrimination, Check new multi-family units for accessibility  

**Municipal Job Ad EOE**  

**Municipal Composition Form (or EE04)**  

**Financial**  
- Financial Management Plan - Details financial process for project at the municipal level  
- Financial Responsibilities Form - Details who is responsible for each part of financial process  
- Authorizing Signatures - Authorized Signatures for Claim Form  

**Grant Agreement: General State Provisions**  
Comprehensive general liability insurance against all claims of bodily injury, death or property damage, in amounts of not less than $250,000 per claim and $2,000,000 per occurrence.
Environmental Review Process
(To Be Conducted by Responsible Entity)

Define Project. Consider entire project, even if HUD funding is only going to part of the project

Determine level of review, based on project description

Exempt
(By Definition)
→ 58.34(a)
- No Request for Release of Funds (RROF) Needed
- No RROF needed
- Record Determination in Environmental Review Record (ERR)
- Environmental Review Complete!

Categorically Excluded, Not Subject to §58.5
→ 58.35(b)

Categorically Excluded and subject to review with §58.5
→ 58.35(a)
- Complete Statutory Checklist (1 of 2 results)

Complete Statutory Checklist (1 of 2 results)

Either

No compliance/consultation with regulatory authorities required
- Project converts to exempt

Compliance/consultation required

- RE must publish NOI/RROF
- 7/10 days public notice (publish/post & mail)
- After conclusion of public comment period, RE sends RROF (7015.15) and proof of public notice to HUD/State

If Finding of No Significant Impact is made, publish combined NOI/RROF and Notice of FONSI for 15 days (18 days if posted/mailed)

If Finding of Significant Impact made, then require Environmental Impact Statement (EIS)
- Publish Notice of Intent to Prepare EIS
- Prepare and publish Draft EIS
- Prepare and publish Final EIS

*Note that 24 CFR §58.6 – Flood Insurance, Coastal Barrier Resources Act, and Runway Clear Zone Requirements – apply to all projects, whether exempt, categorically excluded, or requiring the EA or EIS level of review.
Activity/Project is Exempt per 24 CFR 58.34(a)

<table>
<thead>
<tr>
<th></th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>☐</td>
<td>58.34(a) (1). Environmental &amp; other studies, resource identification &amp; the development of plans &amp; strategies;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (2) Information and financial services;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (3) Administrative and management activities;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (4) Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (5) Inspections and testing of properties for hazards or defects;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (6) Purchase of insurance;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (7) Purchase of tools;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (8) Engineering or design costs;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (9) Technical assistance and training;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (10) Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration;</td>
</tr>
<tr>
<td>☐</td>
<td>58.34(a) (11) Payment of principal and interest on loans made or obligations guaranteed by HUD;</td>
</tr>
</tbody>
</table>

Other

___________________________________________________

Requires CDFA approval
Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b):

<table>
<thead>
<tr>
<th></th>
<th>58.35(b).1. Tenant-based rental assistance;</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>58.35(b) 2. Supportive services including, but not limited to, health care, housing services, permanent housing placement, day care, nutritional services, short-term payments for rent/mortgage/utility costs, and assistance in gaining access to local, State, and Federal government benefits and services;</td>
</tr>
<tr>
<td></td>
<td>58.35(b) 3. Operating costs including maintenance, security, operation, utilities, furnishings, equipment, supplies, staff training and recruitment and other incidental costs;</td>
</tr>
<tr>
<td></td>
<td>58.35(b) 4. Economic development activities, including but not limited to, equipment purchase, inventory financing, interest subsidy, operating expenses and similar costs not associated with construction or expansion of existing operations; without change in size, or capacity of less than 20 percent.</td>
</tr>
<tr>
<td></td>
<td>58.35(b) 5. Activities to assist homebuyers to purchase existing dwelling units or dwelling units under construction, including closing costs and down payment assistance, interest buy-downs, and similar activities that result in the transfer of title.</td>
</tr>
<tr>
<td></td>
<td>58.35(b). 6. Affordable housing pre-development costs including legal, consulting, developer and other costs related to obtaining site options, project financing, administrative costs and fees for loan commitments, zoning approvals, and other related activities which do not have a physical impact.</td>
</tr>
<tr>
<td></td>
<td>58.35(b). 7. Approval of supplemental assistance (including insurance or guarantee) to a project previously approved under this part, if the approval is made by the same responsible entity that conducted the environmental review on the original project and re-evaluation of the environmental findings is not required under §58.47.</td>
</tr>
</tbody>
</table>
Form 3-C

Categorically Excluded Subject to §58.5 Determination or Assessment Determination for Activities Listed at 24 CFR §58.35(a)

☐ 58.35(a) (1). Acquisition, repair, improvement, reconstruction, or rehabilitation of public facilities and improvements (other than buildings) when the facilities and improvements are in place and will be retained in the same use without change in size or capacity of more than 20 percent (e.g., replacement of water or sewer lines, reconstruction of curbs and sidewalks, repaving of streets);

☐ 58.35(a) (2). Special projects directed to the removal of material and architectural barriers that restrict the mobility of and accessibility to elderly and handicapped persons;

☐ 58.35(a) (3). Rehabilitation of buildings and improvements when the following conditions are met:

☐ 58.35(a) (3) (i). In the case of a building for residential use (with one to four units), the density is not increased beyond four units, the land use is not changed, and the footprint of the building is not increased in a floodplain or in a wetland;

☐ 58.35(a) (3) (ii). In the case of multifamily residential buildings: (A) Unit density is not changed more than 20 percent; (B) The project does not involve changes in land use from residential to non-residential; and (C) The estimated cost of rehabilitation is less than 75 percent of the total estimated cost of replacement after rehabilitation.

☐ 58.35(a) (3) (iii). In the case of non-residential structures, including commercial, industrial, and public buildings:

☐ (A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; **AND**

☐ (B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.

☐ 58.35(a) (4) (i) An individual action on up to four dwelling units where there is a maximum of four units on any one site. The units can be four one-unit buildings or one four-unit building or any combination in between; or

☐ 58.35(a) (4) (ii) An individual action on a project of five or more housing units developed on scattered sites when the sites are more than 2,000 feet apart and there are not more than four housing units on any one site.

☐ 58.35(a) (iii) Paragraphs (a) (4) (i) and (ii) of this section do not apply to rehabilitation of a building for residential use (with one to four units) (see paragraph (a) (3) (i) of this section).

☐ 58.35(a) (5). Acquisition (including leasing) or disposition of, or equity loans on an existing structure, or acquisition (including leasing) of vacant land provided that the structure or land acquired, financed, or disposed of will be retained for the same use.

☐ 58.35(a) (6). Combinations of the above activities.

☐ Project fits none of the above categories. **ENVIRONMENTAL ASSESSMENT IS REQUIRED.**
<table>
<thead>
<tr>
<th>Statute, Authority, Executive Order Cited at 24 CFR §58.5</th>
<th>A</th>
<th>B</th>
<th>COMPLIANCE FINDING</th>
<th>SOURCE DOCUMENTATION</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. 58.5(a) Historic Properties [36 CFR 800]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2. 58.5(b)(1) Floodplain Management [24 CFR 55, Executive Order 11988]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3. 58.5(b)(2) Wetland Protection [24 CFR 55, Executive Order 11990]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4. 58.5(c) Coastal Zone Management [Coastal Zone Management Act sections 307(c) &amp; (d)]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. 58.5(d) Sole Source Aquifers [40 CFR 149]</td>
<td></td>
<td></td>
<td>NA – None in NH</td>
<td></td>
</tr>
<tr>
<td>6. 58.5(e) Endangered Species [50 CFR 402]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>7. 58.5(f) Wild and Scenic Rivers [36 CFR 297]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8. 58.5(g) Air Quality [40 CFR parts 6, 51, 61, 93]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9. 58.5(h) Farmland Protection [7 CFR 658]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10. 58.5(i)(1) Noise Control and Abatement [24 CFR 51B]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>11. 58.5(i)(1) Explosive and Flammable Operations [24 CFR 51C]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12. 58.5(i)(1) Airport Hazards (Runway Clear Zones and Clear Zones/Accident Potential Zones) [24 CFR 51D]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>---</td>
<td>---</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13. <strong>58.5(i)(2)(i-iv)</strong> Contamination and Toxic Substances [24 CFR 58.5(i)(2)]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14. <strong>58.5(j)</strong> Environmental Justice [Executive Order 12898]</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Administrative Review Procedure and Time Limits

From the State of New Hampshire Code of Administrative Rules,
Chapter Cdfa 300, Part Cdfa 304.02, Administrative Review

(a) **Applicability.** Eligible municipalities and counties which have applied for CDBG funds for housing rehabilitation, public facilities, economic development and emergency grants and which either received no funds or fewer funds than requested, may request an Administrative Review.

(b) **Initiation of Review – Time Limits.** A municipality or county may apply for an administrative review of the scoring of its application by filing a written request within fifteen (15) calendar days of the date the director announces which applications have been approved by the committee.

(c) **Contents of Request.** The request for an administrative review shall be signed by the chief executive officer of the municipality or county and shall contain the reasons for the requested review. The request shall not introduce new information, but shall only explain or clarify information contained in the application submitted.

(d) **Agency Action on Request – Time Limits.** The executive director shall review the written request and shall also review the evaluation process and award recommendations previously made. Within fifteen (15) calendar days of receipt of the request, the executive director, based on the information on the request as well as the scoring criteria, shall recommend to the committee that it affirm or modify its prior decision.

(e) **Committee Action on Requests – Time Limits.** Within thirty (30) days of the executive director’s recommendation, the committee, based on the executive director’s review of the scoring criteria, shall affirm or modify its prior decision.
Privacy Policy

In connection with your potential use of the financial resources provided through CDFA, the disclosure of certain confidential information will be required. CDFA is committed to protecting your privacy and the confidentiality of your information. However, as a public instrumentality of the State of NH, CDFA is subject to NH’s Right-to-Know law, RSA 91-A. Accordingly, all information and documents created, accepted, or obtained by CDFA, or on behalf of CDFA by third parties, shall be potentially subject to disclosure in compliance with RSA 91-A.

Information We Collect

CDFA collects and stores personally identifiable information (PII) that you provide to us, directly or indirectly, about yourself or others.

For example, this could include:

- Information about transactions with us, such as payment history and loan balance.
- Information we receive on applications and other forms.

CDFA may also collect non-personally identifiable information about you and your electronic devices (such as your computer) when you access our website. Examples include your Internet Protocol (IP) address, the type of web browser you use, and information we obtain from a “cookie,” pieces of data that are placed on a web browser by our web server when visiting our web site. This information helps us evaluate how users navigate our web pages, including the number and frequency of visitors to each page, and the length of each visit.

Information We Share

We do not sell any confidential information belonging to our grantees, borrowers, or recipients. In connection with the evaluation of applications, administration of our programs, and reporting of our activities, we do share confidential information with unaffiliated third parties belonging to our grantees, borrowers, or recipients as permitted by law, which includes sharing such information with:

- Third parties that help us perform our administrative functions, such as mailing or copying.
- Third parties necessary to process your transaction, such as underwriters or credit agencies.
- Third parties as required by the New Hampshire Right to Know Law, NH RSA 91-A, and with the Governor and Council as required by NH RSA 162-L.
- Third parties as otherwise permitted by law.
Our Security Procedures

We maintain physical, electronic, and procedural safeguards in order protect all information received in compliance with applicable state and federal law.

Records are retained until the required retention period for that record has expired. Retention requirements vary amongst programs at the CDFA, please see our record retention policy for specific details.

Our web site provides links to other web sites. These other sites are not subject to our privacy policy. We strongly recommend that you review each web site’s privacy policy when visiting it.

Corrections or Concerns

If you believe any of your personal information maintained at the CDFA is incorrect, or if you have a privacy-related concern, please call us at (603) 226-2170.

Updates

This policy may be amended from time to time. You may view the most current version of this policy at any time by requesting a copy from CDFA, or by visiting this page: http://www.nhcdfa.org/.

Accuracy of Information

All information provided on the CDFA web site is for informational purposes only and does not constitute a legal contract between the institution and any other person or entity otherwise specified. Although every reasonable effort is made to present current and accurate information and to monitor web content for compliance with policy, CDFA makes no guarantees of any kind, nor does it take responsibility for undetected, noncompliant conditions created without its knowledge or consent and in violation of its policy.

Acceptance of Privacy Policy

By using our web site or submitting information to us, you agree to this policy. Your continued use of our web site or submission of information to us following an amendment to this policy constitutes your consent to the amended policy.
Community Development Finance Authority

Record Retention Policy

Effective January 1, 2018

The Record Retention Policy identifies the organization’s record retention responsibilities for maintaining and documenting the storage and destruction of the organization’s documents and records.

It is CDFA’s policy that its records be retained only so long as they are (a) necessary to the current conduct of our business; (b) required to be retained by statute or government regulation; or (c) relevant to pending or foreseeable investigations or litigation. In furtherance of this policy, CDFA has adopted the attached Record Retention Schedule and the following principles and procedures for its program which shall be strictly observed by CDFA officers, board, and staff:

1. It is the practice of CDFA to keep all records in electronic form, unless otherwise required by the Single Audit Act or other statute. When original records are paper, documents that can be converted to electronic form will be converted, provided that such records meet the standards for source documentation as required, are subject to periodic quality control reviews, and remain readable.

2. Paper documents containing original signatures that are recorded in the Registry of Deeds, or otherwise officially recorded, shall be retained in electronic form unless otherwise required by statute. Promissory Notes containing original signatures shall be retained in their original paper form.

3. Documents to be destroyed shall first be reviewed by the applicable Program Director to determine if any portion(s) of those records should be retained due to their historical value. If no reason exists to maintain the record beyond the retention schedule, then the documents shall be destroyed as follows:
   a. Non-confidential documents – shall be disposed of with other paper recycled products or shredded.
   b. Confidential documents – shall be shredded.
   c. Electronic files – shall be deleted from the individual’s computer as well as from any backup or permanent media storage.

4. Documents being shredded in mass quantities shall be done so by the Division of Archives & Records Management.

5. A Document Destruction Log shall be maintained which shall contain the following minimum information:
   a. Department destroying the record
   b. What record was destroyed
   c. The date the record was destroyed
   d. Who destroyed the record
e. RSA or authority giving the right to destroy record(s)

6. Unauthorized Activities: Records shall not be destroyed, maliciously damaged or retained by any person not entitled to do so by state and/or federal regulations.

7. Computers that will no longer be used by CDFA in its business shall have all records on the hard drive deleted.

8. Convenience Copies: A convenience copy of a record is either a duplicate of the official record/copy, maintained for ease of access or reference, or a draft copy. Convenience copies must be destroyed no later than at the time the official copy is being destroyed (refer to the schedule). Convenience copies should be destroyed as soon as they are no longer needed, but in no instance should they be kept longer than the official copy.

   a. All documents uploaded separately on staff personal devices or drives are considered convenience copies and should be destroyed once they are no longer needed. No original documents should ever be kept on staff personal devices or drives.

9. Drafts: Draft copies are considered convenience copies and should be destroyed as soon as they are no longer needed (such as when the document reaches the final stage), but in no instance should drafts be kept longer than the finalized record.

CDFA’s Record Retention Officer:
Chief Financial Officer

<p>| Community Development Finance Authority |</p>
<table>
<thead>
<tr>
<th>Record Retention Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
</tr>
<tr>
<td>Corporate Records</td>
</tr>
<tr>
<td>Articles of Incorporation &amp; Amendments</td>
</tr>
<tr>
<td>Bylaws &amp; Amendments</td>
</tr>
</tbody>
</table>

2:\CDBG ADMIN\Forms & Templates\CDBG Housing Public Facilities Pre-post Application Materials\Post Award Meeting\CDBG H. PF Post Application Site Visit Agenda 2018.docx 2.12.18MG
<table>
<thead>
<tr>
<th>Department</th>
<th>Items</th>
<th>Retention</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Meeting Minutes - Board, Committees</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Annual Reports &amp; Filings</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Other Corporate Filings</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>IRS Applications &amp; Determinations</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>State Applications &amp; Determinations</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Licenses &amp; Permits</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Employer Identification Number - IRS Letter</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Accounting &amp; Finance</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Accounts Payable Invoices</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Accounts Receivable Invoices</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Audited Financial Statements</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Bank Statements, Reconciliations, Deposit Slips</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Cancelled Checks</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Employee Business Expense Reports</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>General Ledger &amp; Supporting Journals</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Interim Financial Statements</strong></td>
<td></td>
<td>3 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Insurance Policies</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Leases &amp; Rental Contracts</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From end of Lease</td>
</tr>
<tr>
<td><strong>Property Purchase &amp; Sale Agreements</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td><strong>IRS Filings (1099's)</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From close of fiscal year</td>
</tr>
<tr>
<td><strong>Human Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Benefit Plan Documents</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Employment Applications</strong></td>
<td></td>
<td>3 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From date of application</td>
</tr>
<tr>
<td><strong>Employee Records - Active</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Employee Records - Terminated</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From termination date</td>
</tr>
<tr>
<td><strong>Payroll Records</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From end of fiscal year</td>
</tr>
<tr>
<td><strong>IRS Tax Filings (W2, 941)</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From end of fiscal year</td>
</tr>
<tr>
<td><strong>Retirement Plan Documents</strong></td>
<td></td>
<td>Permanent</td>
</tr>
<tr>
<td><strong>Grant</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Contracts with Funders</strong></td>
<td></td>
<td>7 Years</td>
</tr>
<tr>
<td></td>
<td></td>
<td>From date of grant closeout</td>
</tr>
<tr>
<td>Category</td>
<td>Retention Period</td>
<td>Retention Criteria</td>
</tr>
<tr>
<td>----------------------------------------------------------------</td>
<td>------------------</td>
<td>-------------------------------------------------------</td>
</tr>
<tr>
<td>Contracts with Recipients/Subrecipients</td>
<td>7 Years</td>
<td>From date of grant closeout</td>
</tr>
<tr>
<td>Applications &amp; Supporting Documentation</td>
<td>3 Years</td>
<td>From date of grant closeout</td>
</tr>
<tr>
<td>Claims</td>
<td>3 Years</td>
<td>From date of grant closeout</td>
</tr>
<tr>
<td>Correspondence with Recipient/Sub</td>
<td>3 Years</td>
<td>From date of grant closeout</td>
</tr>
<tr>
<td>Mortgage &amp; UCC Filings &amp; Supporting Documentation</td>
<td>7 Years</td>
<td>From date of expiration of filing</td>
</tr>
<tr>
<td>Emails</td>
<td>3 Years</td>
<td>From date of grant closeout</td>
</tr>
</tbody>
</table>

**Loans**

<table>
<thead>
<tr>
<th>Category</th>
<th>Retention Period</th>
<th>Retention Criteria</th>
</tr>
</thead>
<tbody>
<tr>
<td>Applications &amp; Supporting Documents</td>
<td>7 Years</td>
<td>From closeout of loan</td>
</tr>
<tr>
<td>Promissory Notes, Agreements, Commitments</td>
<td>7 Years</td>
<td>From closeout of loan</td>
</tr>
<tr>
<td>Deeds, UCC Filings</td>
<td>Permanent</td>
<td></td>
</tr>
</tbody>
</table>

**Other Records (Paper or Electronic)**

<table>
<thead>
<tr>
<th>Category</th>
<th>Retention Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Correspondence</td>
<td>3 Years</td>
</tr>
<tr>
<td>Solicitations, Junk Mail, Newsletters</td>
<td>Immediate</td>
</tr>
<tr>
<td>Program Area</td>
<td>Action</td>
</tr>
<tr>
<td>----------------------------------------------</td>
<td>----------------------------------------------------</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 1</td>
<td>Applications will be accepted.</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 1</td>
<td>Awards announced</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 1</td>
<td>Deadline for Administrative Review</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 2</td>
<td>Applications will be accepted.</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 2</td>
<td>Awards announced</td>
</tr>
<tr>
<td>Housing and Public Facilities – Round 2</td>
<td>Deadline for Administrative Review</td>
</tr>
<tr>
<td>Feasibility – Round 1</td>
<td>Applications will be accepted.</td>
</tr>
<tr>
<td>Feasibility – Round 1</td>
<td>Awards announced</td>
</tr>
<tr>
<td>Feasibility – Round 2</td>
<td>Applications will be accepted.</td>
</tr>
<tr>
<td>Feasibility – Round 2</td>
<td>Awards announced</td>
</tr>
<tr>
<td>Micro</td>
<td>Awards announced</td>
</tr>
</tbody>
</table>