



CDBG Program Policies and Procedures
August 2023

Table of Contents

- Introduction.....2**
 - Background and Governing Regulations/Policies2
 - Order of Precedence and Applicability2
- Administrative Structure4**
 - Program Staffing4
- Program Specific Guidelines.....5**
 - Housing Rehabilitation Program.....5
 - Utility Assistance Program11
 - Neighborhood Cleanup Program.....14
- Applicant and Beneficiary Grievance Procedures14**
- Conflict of Interest.....15**
- Lead Based Paint15**
- Unacceptable Behavior Policy16**

Introduction

Background and Governing Regulations/Policies

The Town of Marana Community and Neighborhood Services Department (CNSD) administers Community Development Block Grant (CDBG) funded programs. These activities are governed by the CDBG Program Rule (24 CFR Part 570), federal uniform guidance requirements contained in 2 CFR Part 200, Environmental Review Procedures (24 CFR Part 58). These requirements are further clarified and limited by Basically CDBG for Entitlements published by the U.S. Department of Housing and Urban Development (HUD).

These activities are further governed by the Marana Town Code, specifically including Chapter 3-4 Procurement, and Internal Controls handbook for the CDBG Program staff.

Order of Precedence and Applicability

For the purposes of this manual, governing documents are assorted into three broad categories:

1. **Federal Regulations and Notices:** Federal regulations and notices apply to all CDBG activities and, in the event of discrepancies between federal regulations and local policies, supersede local policies except when the local policies and/or these guidelines are more restrictive than the federal regulations and notices. In such cases, the most restrictive policy shall prevail.
2. **Local Policies:** Local policies are adopted by Marana Council which provide policy and practice frameworks for all CDBG activities. This may include allowable activities that are not currently in practice and therefore, not included in these guidelines. Approval of any activities or costs which are defined as eligible in the CDBG Program Policies and Procedures, but not authorized for current implementation by these guidelines, require written approval by the Director of the Community and Neighborhood Services Department or the Director's designee(s).
3. **Local Program Implementation Guidance:** While the local policies define all activities which are allowable under the CDBG Program Rule and establish policy requirements for their implementation, local program implementation guidance such as these guidelines clarify the specific activities that are currently approved for implementation without special approval by the Director of the Community and Neighborhood Services Department or their designee(s), and provide detailed procedures for the fulfillment of the local policies and federal regulations.

The table below identifies the specific governing documents applicable to each of these three categories and their applicability to the CDBG Program. Cross-cutting federal requirements defined within these documents additionally apply.

Federal Regulations & Notices	24 CFR 570 – CDBG Program Rule	Defines federal program requirements for the CDBG Program. Available at https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570 .
	2 CFR 200 – Uniform Guidance	Defines uniform administrative requirements, cost principles, procurement standards, and audits requirements for all federal grant recipients. Available at https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200 .
	24 CFR 58- Environmental Reviews Procedures	Provides instructions and guidance to recipients of HUD assistance and other responsible entities for conducting an environmental review. Available at: https://www.ecfr.gov/current/title-24/subtitle-A/part-58?toc=1
	Basically CDBG for Entitlements	Provides programmatic clarification and implementation requirements for all CDBG recipients funded as an entitlement jurisdiction. Available at https://www.hudexchange.info/resource/19/basically-cdbg-training-guidebook-and-slides/
	HUD CPD Notices	Provide clarification regarding specific program topics and carry the authority of federal regulation. Available at https://www.hudexchange.info/programs/cpd-notices .
Local Policies	Marana Town Code (MTC)	Establishes processes, guidelines, thresholds, and policies for all activities directly administered by the Town of Marana. https://codelibrary.amlegal.com/codes/maranaaz/latest/overview
	MTC Chapter 3-4 Procurement	Establishes procurement processes, guidelines, thresholds, and policies for all activities directly administered by the Town of Marana. Available at https://codelibrary.amlegal.com/codes/maranaaz/latest/maranaaz/0-0-0-548
Local Program Implementation Guidance	Marana CDBG Program Polices and Procedures	Defines the specific activities and eligible costs that are implemented within the CDBG Program, and provides procedural guidance for the implementation of the program in conformity with federal and town program policies.
	Internal Controls Handbook	Establishes policies and internal controls for use by Community and Neighborhood Development Department staff.

Administrative Structure

The CDBG Program is administered by the Community and Neighborhood Services Department.

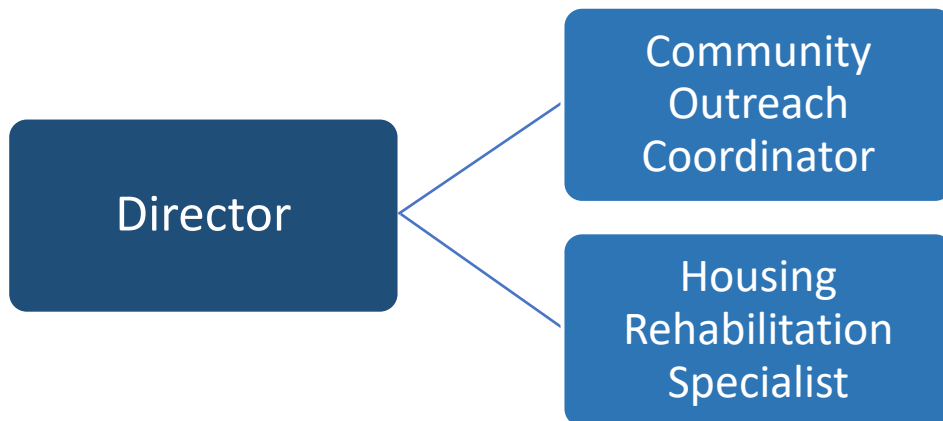
The CDBG Program includes three sub-programs which are described in greater detail later in this document. The three sub-programs are:

- I. Housing Rehabilitation Program
- II. Utility Assistance Program
- III. Neighborhood Cleanup Program

Specific requirements that apply to each of these sub-programs are described in the section of this document titled, "Program Specific Guidelines". These program-specific guidelines provide unique requirements and procedures for each sub-program and supplement the guidelines and procedures described in the section of this document titled, "Uniform Guidelines and Procedures", which apply to all CDBG Programs administered by the Town.

Program Staffing

The organizational chart below provides the staffing structure for Town of Marana personnel with significant responsibilities related to the administration and implementation of the CDBG Program.



In addition to the above Town employees, the following Town departments and their employees are involved in the administration and implementation of the program:

- Town of Marana Town Clerk's Office: Staff prepare legal notices and other documents on behalf of the program.
- Town of Marana Attorney's Office: Staff provide consultation on program policies, contract and agreement development.
- Town of Marana Finance Department: Staff coordinate procurement activities on behalf of the program in partnership with personnel identified in the staffing chart above.
- Town of Marana Planning and Development Services Department: Staff assist personnel identified in the staffing chart above with permits, plans, and code-related activities.

Program Specific Guidelines

Housing Rehabilitation Program

Overview and Applicability

The guidelines in the section apply only to activities funded and administered through the Town of Marana Housing Rehabilitation Program. The Housing Rehabilitation Program is a sub-project of the CDBG Program and is administered by the Town of Marana Community and Neighborhood Services Department.

Household Eligibility

- Household income must be equal to or less than 80% of Area Median Income and verified by Town of Marana project staff using the annual income determination standards established by 24 CFR 5.609.
- Household must have a verifiable annual income for the current year.
- Household may not have received owner-occupied housing rehabilitation assistance through any Town of Marana home repair program during the 5 years (60 months) immediately preceding the household's application for assistance. *Previous assistance under Town of Marana Houses to Homes Program as a subrecipient to Pima County will not be considered.*

Property Eligibility

- The property must be owned and occupied as the primary residence of the applicant for at least one year at the time of application.
- If the property has a mortgage, mortgage payments must be current at the time of program enrollment.
- Property taxes must be paid and current.
- The property must be located within the Town of Marana limits.
- The property must be free of clutter and maintain an overall cleanliness.
- Mobile homes must be legally affixed to the property (recreational vehicles, utility camper trailers, and similar are ineligible).
- Town employees and contractors must be able to access the home during reasonable business hours to perform inspections and repairs.

Additional Conditions

- Property must have a visible address.
- The homeowner agrees to allow photographs to be taken of the home before and after repairs are completed.
- Any dogs on the property must be licensed and confined during inspection and work.
- Property must have no open code violations.
- The homeowner must agree to complete a Program Evaluation Form upon completion of work.
- The homeowner must agree to allow access to the property for audits conducted by the funding agency to inspect the completed work.

Funding Caps

Assistance provided through the Housing Rehabilitation Program is capped at a maximum per household as defined below:

- For qualifying properties located within a Special Flood Hazard Area (SFHA), assistance is capped at a maximum of \$9,999. SFHA is an area having special flood, mudflow or flood-related erosion hazards and shown on a Flood Hazard Boundary Map (FHBM) or a Flood Insurance Rate Map (FIRM) Zone A, AO, A1-A30, AE, A99, AH, AR, AR/A, AR/AE, AR/AH, AR/AO, AR/A1-A30, V1-V30, VE or V.

- For all other qualifying properties, assistance is capped at \$20,000. Exceptions to the maximum amount may be approved by the CNSD Director on a case-by-case basis.

Eligible Repairs

The Housing Rehabilitation Program limits eligible repairs to major systems that prevent safe and healthy habitability of the property. Consistent with this approach, the following repairs are eligible under this program.

- **Roof Damage**: If the roof covering the primary occupied residence on the property is causing serious damage to the home and/or jeopardizing the health and safety of occupants, the cost of repair or replacement is eligible.
- **Electrical System**: The cost of repairing and/or replacing hazardous main electrical service, circuits, and/or wiring in the home is eligible.
- **Energy Efficiency Upgrades**: The cost of energy efficient upgrades such as water conservation efforts and window sunscreens is eligible.
- **ADA Adaptations**: The cost of ADA adaptations such as grab bars and wheelchair ramps is eligible.
- **Heating and Cooling Systems**: The repair and replacement of heating and cooling systems is eligible when the existing unit is inoperable. New installation of heating and cooling systems is eligible when the home does not have such systems. In the event that heating and cooling systems are replaced or newly installed with CDBG assistance, such systems must be energy- efficient. New air conditioning units shall, optimally, be minimum 16 SEER. NOTE: 15 SEER is acceptable where 16 SEER is not available in appropriate size/tonnage AND contractor secures acknowledgement from assigned CNSD staff that 15 SEER will suffice. CNSD staff will document this in the project file.
- **Water Heaters**: The cost of repair, or replacement of, inoperable, faulty, or deteriorated water heaters is eligible.
- **Water Leaks**: The cost of repair, replacement, and/or installation of piping and other components within the household is eligible, including piping that leads to and from the water heater. Any repairs that require ground disturbance are ineligible.
- **Security**: The cost of repairing and/or installing exterior doors, fire-safe window and door security screens, and exterior lighting, including but not limited to motion activated lighting, is eligible if needed to secure the safety of the property and its occupants.
- **Special Conditions**: Emergency conditions which threaten the habitability of the home and/or the life and safety of its occupants which are not included in the list of eligible repairs above will be

reviewed on a case-by-case and may be undertaken with written approval of the Director of the Community and Neighborhood Services Department or their designee(s).

Ineligible Repairs

Any repairs not defined as eligible in the list above or approved in writing by the Director of the Community and Neighborhood Services Department or their designee(s) are ineligible for CDBG assistance. While some repairs not listed above may be authorized on a case-by-case basis, the following repairs are never eligible under this program:

- **Appliance Repairs**: The costs of repairing or replacing refrigerators, ranges and ovens, washers and dryers, dishwashers, garbage disposal systems, microwaves, and other appliances are not eligible.
- **Minor Plumbing**: The costs of repairing dripping faucets, running toilet tanks, clogged drain, minor fixture leaks, and other minor plumbing issues are not eligible unless completed as part of a larger water heater or water leak repair or replacement project.
- **Minor Electrical**: The costs of repairing electrical outlets, switches, light fixtures, and other minor electrical equipment are not eligible unless completed as part of a larger electrical system, heating and cooling system, and/or security repair or replacement project.
- **Ground Disturbance**: Any repairs and replacements that require ground disturbance are not eligible.
- **General Mechanical Maintenance**: The costs of seasonal and routine furnace, air conditioning, and evaporative cooling services are not eligible. The costs of igniting and cleaning furnaces are not eligible. The costs of repairing and/or replacing plumbing, blower motors, evaporative cooling pads, and water distribution systems are not eligible unless completed as part of a larger heating and cooling system repair or replacement project.
- **Cosmetic and General Maintenance Repairs**: The costs of plastering, patching and painting, and other routine and ongoing maintenance work are not eligible except when required to bring the home back to its original condition as a result of damages caused during the rehabilitation process. The costs of doors and hardware are not eligible unless completed as part of a larger security project. The costs of general repairs to accessory structures including, but not limited to, car ports, sheds, walls, fencing, and outbuildings are not eligible.
- **Homeowner Responsibility Maintenance Repairs**: The costs of repairs and replacements to any system due to the lack of general maintenance and upkeep by the homeowner.

Application Processing

Applications for assistance are processed on a first-come, first-served basis. Once qualified, a project may be assessed and ranked against other qualified applications in terms of priorities as further described under the Waitlist Management section below. On occasion, CNSD must reject applications despite the presence of eligible work. Reasons for this may include lack of program funds, conditions requiring substantial rehabilitation beyond scope of the program, and/or costs exceeding program limits. The application is revised annually to incorporate new income guidelines, new program requirements, and any other changes that are deemed necessary and approved by the Community and Neighborhood Services Department Director.

Waitlist Management

CNSD maintains individual waitlists for each of its programs. Applicants are placed on the waitlist based on the date a completed and eligible application for assistance is received. However, the date the application was completed does not assure that the applicant will be assisted in sequential order. Instead, applications are further ranked based on the following criteria, in the following order:

- (1) health and safety issues (emergency);
- (2) existence of the following populations living in the household: (a) elderly persons (62 years or older), (b) persons with disabilities, and/or (c) female-headed households with child/children under the age of eight; and
- (3) application completion date.

Additionally, contractor availability may affect the order of assistance. When applications exceed available resources, CNSD may, at its discretion, establish specific priorities at the direction of the Department Director or their designee(s).

Application Contents and Submittal

Homeowners seeking assistance are required to complete an online or telephone application to register their interest in participating in the Housing Rehabilitation Program. The program application requests basic information about the applicant, the applicant’s property, and the occupants sufficient to establish preliminary eligibility prior to wait list placement. The submission of an application does not guarantee assistance under the Housing Rehabilitation Program. If an applicant meets the basic eligibility criteria, the application will be placed on the wait list. Once the applicant's number is reached on the wait list, the case will move forward to the next steps in the process which include final verification of eligibility and initiation of services.

Accommodations for Applicants with Disabilities and Non-English Speakers

The purpose of this section is to set forth procedures for the Reasonable Accommodation of qualified applicants with disabilities. This policy shall be consistent with existing state and federal laws. It is the

policy of the Town of Marana to provide reasonable accommodations to qualified applicants with disabilities ensuring equal opportunity in the Housing Rehabilitation application process.

CNSD accommodates the needs of applicants with disabilities in multiple ways. The program application is available online in machine-readable formats. Alternatively, applicants with visual, motor, or other disabilities may complete the application by phone with a member of the CNSD staff. CNSD is equipped to complete telephonic applications with individuals using TTY/TDD devices and, when necessary, can conduct interviews using video meeting software or in person.

Applicants and program participants may request additional accommodations in writing or by communicating their request to the staff. All reasonable accommodations requested are reviewed with program management and documented in the case file along with the final determination.

Retaliation against applicants or employees because they requested accommodation or made an Americans with Disabilities Act (ADA)-related complaint is prohibited. Additionally, discrimination against non-disabled applicants or employees because of any association or relationship they might have with individuals with disabilities is prohibited.

For non-English speakers, CNSD maintains a directory of multi-lingual staff and contracts with language interpretation services.

Property Inspection Process

Upon assignment of a project, the Housing Rehabilitation Specialist (HRS) will schedule an inspection at the residence. During the inspection, the HRS will review the specific rehabilitation request of the homeowner and complete a full inspection of the home to identify any additional rehabilitation that is necessary to address threats to life, safety, and/or habitability.

Upon completion of the inspection, the HRS will complete an inspection form and prepare a Summary of Services for eligible rehabilitation activities and review with the homeowner. CDBG funds shall only be used to address household needs which threaten the life, safety, and/or habitability of the property and its occupants, and which are eligible for the applicable program as defined in the Program Specific Guidelines section of this manual. Cosmetic and luxury repairs or replacement will not be authorized. The homeowner may decline any or all of the assistance provided. The homeowner's acknowledgment and approval of the Summary of Services shall be documented and maintained in the case file.

Write Up and Estimation Process

Upon completion of the Summary of Services, the HRS will request project approval from the Community and Neighborhood Services Director or the Director's designee. All work will be performed by the HRS, or a licensed contractor, depending on the nature of the work, and in compliance with the current International Building Codes adopted by the Town of Marana, HUD Lead Safe Housing requirements, and any other rehabilitation standards set forth by the funding source. If the project is expected to exceed

procurement thresholds for small purchases established in Marana Town Code (MTC) Section 3-4-19(C), the HRS will then prepare a scope of services document inclusive of all rehabilitation work to be done including any special conditions. The scope of services will clearly establish the nature of the work to be done, the time allowed for completion of work, if applicable, and the materials and equipment required. Pursuant to MTC 3-4-19(B), the HRS will solicit bids from a minimum of three eligible contractors to submit proposals for the project. Eligible contractors are contractors who have been through all required training, and possess the necessary certifications, licenses, insurance, and qualifications to be eligible for consideration. Once an eligible contractor has been selected, a contractor agreement will be created and signed by both Town of Marana and the eligible contractor.

Contractor Payment Process

When the project is completed, the HRS does the final inspection. If a permit was issued for the project, a permit inspection must be performed by a Town of Marana Building Inspector. The homeowner and HRS then both sign off on the final inspection. At this time, the homeowner also must sign the Notice of Completion document and is given an opportunity to complete a Homeowners Questionnaire. An invoice is then requested and sent to accounts payable, where they ensure the contractor gets paid within 30 days of receipt.

Change Order Review and Approval Procedures

Change orders are discouraged, and all project change orders must be reviewed and receive a recommendation by the HRS. Change orders are limited to unanticipated changes in the project scope of work during completion and unanticipated price fluctuations in supplies needed for performance of the scope of work. All change orders must be approved in writing by Director or designee prior to execution of any work or cost encumbrance not included in the original scope of work.

Utility Assistance Program

Overview and Applicability

The guidelines in this section apply only to activities funded and administered through the Utility Assistance Program. The Utility Assistance Program is a sub-project of the CDBG Program and is administered by the Town of Marana Community and Neighborhood Services Department.

Program Eligibility

- Applicant must be listed on the utility bill.
- The applicant's Household income must be equal to or less than 80% of Area Median Income and verified by Town of Marana project staff using the annual income determination standards established by 24 CFR 5.609.

- The applicant's Household may not have received utility assistance through any Town of Marana utility assistance program during the 1 year (12 months) immediately preceding the household's application for assistance.
- The applicant's Household must have a verifiable annual income for the current year.
- The applicant's property must be located within the Town of Marana limits.
- Must have a late notice in applicant's name for the requested utility.

Funding Caps and Forms of Assistance

Assistance provided through the Utility Assistance Program shall be limited to one time per year (12 months) and up to \$500 per household.

Eligible Utilities

- Electric Utility
- Gas Utility
- Water Utility

Ineligible Utilities

- Cable
- Phone
- Internet
- Rent/Mortgage
- Trash
- Car Payments
- Insurance

Application Processing

Applications for assistance are processed on a first-come, first-served basis. Once qualified, an application may be assessed and ranked against other qualified applications in terms of priorities as further described under the Waitlist Management section below. On occasion, CNSD must reject applications despite eligibility. Reasons for this may include lack of program funds and/or costs exceeding program limits. The application is revised annually to incorporate new income guidelines, new program requirements, and any other changes that are deemed necessary and approved by the Community and Neighborhood Services Department Director.

Waitlist Management

CNSD maintains individual waitlists for each of its programs. Applicants are placed on the waitlist based on the date a completed and eligible application for assistance is received. However, the date the application was completed does not assure that the applicant will be assisted in sequential order. Instead, applications are further ranked based on the following criteria, in the following order:

- (1) health and safety issues (emergency);
- (2) existence of the following populations living in the household: (a) elderly persons (62 years or older), (b) persons with disabilities, and/or (c) female-headed households with child/children under the age of eight; and
- (3) application completion date.

Additionally, contractor availability may affect the order of assistance. When applications exceed available resources, CNSD may, at its discretion, establish specific priorities at the direction of the Department Director or their designee(s).

Application Contents and Submittal

Homeowners seeking assistance are required to complete an online or telephone application to register their interest in participating in the Utility Assistance Program. The program application requests basic information about the applicant, the applicant's property, and the occupants sufficient to establish preliminary eligibility prior to wait list placement. The submission of an application does not guarantee assistance under the Utility Assistance Program. If an applicant meets the basic eligibility criteria, the application will be placed on the wait list. Once the applicant's number is reached on the wait list, the case will move forward to the next steps in the process which include final verification of eligibility and initiation of services.

Accommodations for Applicants with Disabilities and Non-English Speakers

The purpose of this section is to set forth procedures for the Reasonable Accommodation of qualified applicants with disabilities. This policy shall be consistent with existing state and federal laws. It is the policy of the Town of Marana to provide reasonable accommodations to qualified applicants with disabilities ensuring equal opportunity in the Housing Rehabilitation application process.

CNSD accommodates the needs of applicants with disabilities in multiple ways. The program application is available online in machine-readable formats. Alternatively, applicants with visual, motor, or other disabilities may complete the application by phone with a member of the CNSD staff. CNSD is equipped to complete telephonic applications with individuals using TTY/TDD devices and, when necessary, can conduct interviews using video meeting software or in person.

Applicants and program participants may request additional accommodations in writing or by communicating their request to the staff. All reasonable accommodations requested are reviewed with program management and documented in the case file along with the final determination.

Retaliation against applicants or employees because they requested accommodation or made an Americans with Disabilities Act (ADA)-related complaint is prohibited. Additionally, discrimination against non-disabled applicants or employees because of any association or relationship they might have with individuals with disabilities is prohibited.

For non-English speakers, CNSD maintains a directory of multi-lingual staff and contracts with language interpretation services.

Neighborhood Cleanup Program

Overview and Applicability

The guidelines in the section apply only to activities funded and administered through the Neighborhood Cleanup Program. The Neighborhood Cleanup Program is a sub-project of the CDBG Program and is administered by the Town of Marana Community and Neighborhood Services Department.

Neighborhood Eligibility

Qualifying neighborhoods are primarily residential areas where at least 51 percent of the residents are low- and moderate-income persons. These neighborhoods have been established using a combination of data from the Low Moderate Income Summary Data (LMISD) in accordance with CPD Notice 19-02 and Local Income Surveys in accordance with CPD Notice 14-013.

Eligible Neighborhoods

Eligible Neighborhoods can be found [here](#).

Application Procedures

Application procedures are not applicable for this program.

Applicant and Beneficiary Grievance Procedures

Applicants and participant homeowners have the right to fair and equitable treatment throughout their participation in the program. All applicants and participant homeowners are informed of their right to appeal program decisions which they believe to be unfair, illegal, and/or unethical. This includes the right to appeal application and selection decisions, treatment by project staff and contractors, the nature and scope of work authorized by the program, the quality of work and/or supplies used, and other relevant matters.

All applicants are informed of their right to appeal program decisions at the time of placement on the

waitlist and again at the time of contract execution. Any disagreement arising out of this contract, or from a breach thereof, shall be submitted in writing to the CNSD management team and should contain information about the grievance such as name, address, phone number of complainant and location, date, and description of the problem. Alternative means of filing complaints, such as personal interviews or a tape recording of the complaint, will be made available for persons with disabilities upon request.

The complaint should be submitted by the grievant and/or his/her designee as soon as possible, but no later than 180 calendar days after the alleged violation. Within 15 calendar days after receipt of the complaint, CNSD management will contact the complainant to discuss the complaint and resolution options(s). Within 15 calendar days after contact the complainant, CNSD management will respond in writing and, where applicable, in a format accessible to the complainant, such as large print, Braille, or audio tape. The written response will explain the position of the Town of Marana and offer options for substantive resolution of the complaint. If the response by CNSD management does not satisfactorily resolve the issue, the complainant and/or his/her designee may appeal the decision within 30 calendar days after receipt of the response to the Town Manager or designee.

Within 15 calendar days after receipt of the appeal, the Town Manager/Designee will meet with the complainant to discuss the complaint and possible resolutions. Within 15 calendar days after the meeting, the Town Manager/Designee will respond in writing, and, where applicable, in a format accessible to the complainant such as large print, Braille, or audio tape. The written response shall address the final resolution of the complaint. The written response from the Town Manager/Designee shall be admissible in a court of law.

Conflict of Interest

The conflict of interest requirements apply to the procurement of supplies, equipment, construction services and professional services; the acquisition or disposition of real property; and direct benefits provided to municipal officials, sub-recipient officials, or persons administering the CDBG project. The general rule is that an employee, agent, consultant, officer, or elected official or appointed official of the Town of Marana, or of any designated public agencies, who exercise or have exercised any functions or responsibilities with respect to CDBG activities, 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-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter. Upon the written request of the recipient, HUD may grant an exception of this section on a case-by-case basis. [24 CFR §570.611](#)

Lead Based Paint

To reduce lead-based paint hazards, the Town of Marana takes the following actions:

- Include lead testing and abatement procedures, if necessary, for residential rehabilitation activities for units built prior to January 1, 1978.
- Disseminate brochures about lead hazards through the Town's residential rehabilitation programs.

HUD requires the dissemination of brochures provided by the U.S. Environmental Protection Agency to all applicants as part of the transmittal of the program application. Units receiving CDBG assistance that were built prior to January 1, 1978 are addressed in accordance with the Lead-Safe Housing Rule. If testing is required and lead-based paint is present, appropriate abatement procedures are implemented as part of the rehabilitation contract consistent with the requirements of [24 CFR Part 35 Subpart J](#).

Unacceptable Behavior Policy

We are here to serve the public and we believe that everyone has the right to be heard, understood and respected. Staff also have the right to work in a safe environment, free from abuse or harm caused by others. We understand that people can become upset and/or angry when their matter is not being dealt with as they might wish. However aggressive or abusive behavior is unacceptable. Unacceptable behavior may include threats, verbal abuse, derogatory or insulting remarks, rudeness, profanity and yelling. It may also include excessive calls, emails or other communications. Unacceptable behavior may result in any of the following actions:

- Provide a single point of contact
- Limit contact to a single form i.e. to writing, email or telephone only
- Cease contact for a reasonable period of time
- Report incidents to the police (for example, if violence has been threatened)
- Any other action deemed appropriate by the CNSD Director or designee (in extreme cases, this may include ending contact permanently, rejecting an application and/or voiding any signed agreements).