

**Exhibit 1-1  
NYS CDBG Program  
Local Recipient Administrative Plan**

Recipient	
CDBG #	
Prepared by	
Date Initial Submission	
Date Update 1	
Date Update 2	
Date Update 3	

The Administrative Plan is a required document that **must be submitted by the recipient to the OCR prior to requesting funds for the first time for each project.**

Please fill out each section as indicated below. For Section 3.3 (Project Implementation) and 3.4 (Compliance Files and Reporting) certain items may not be complete at the time of submission. Tentative dates may be provided in those cases. As items are completed, please submit evidence to the OCR.

Please send the completed Administrative Plan to your assigned community/economic developer via email.

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## 1. Local Program Summary

### 1.1 Program/Project Description

*Insert/attach program/project description from application*

### 1.2 Program/Project Budget

*Insert/attach Budget from Grant Agreement Schedule B*

### 1.3 Project Schedule

*Insert/attach [Form 7-2 Project Schedule](#)*

### 1.4 Projected Accomplishments

*Insert/attach projected accomplishments from Grant Agreement Schedule B*

### 1.5 Project Team

*Insert/attach [Form 8-1 Project Team](#)*

## 2. Program Requirements & Policies

### 2.1 Eligible Activities

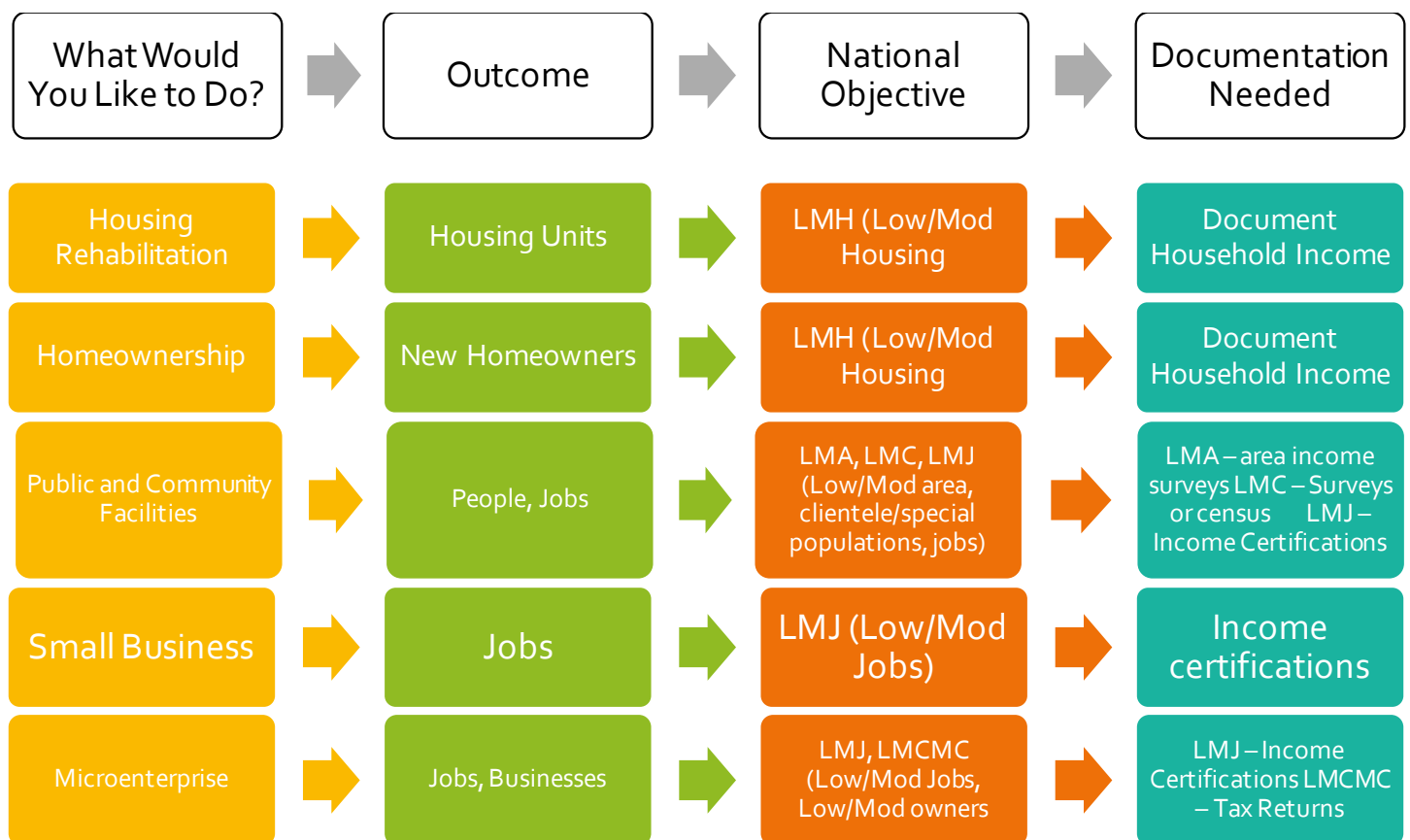
Each CDBG expenditure must be associated with a specific Eligible Activity listed in the regulations. A CDBG project may consist of one or more CDBG Eligible Activities. [Chapter 5 of the OCR GAM](#) identifies the Eligible Activities that typically are associated with each project type. The [CDBG Desk Guide](#) provides details on the requirements for qualifying under each Activity.

Confirm the eligibility of an activity by reviewing:

- \*The rule section at the [Electronic Code of Federal Regulations](#)
- \*\*The State [CDBG Desk Guide Chapter 2](#)

### 2.2 National Objectives

Identify the applicable National Objectives (NO) for the program/project/activity



Confirm that the program/project/activity will meet the applicable National Objective and that the documentation has been or will be assembled. The following are references:

- The rule section at the [Electronic Code of Federal Regulations](#)
- The State [CDBG Desk Guide Chapter 3](#)

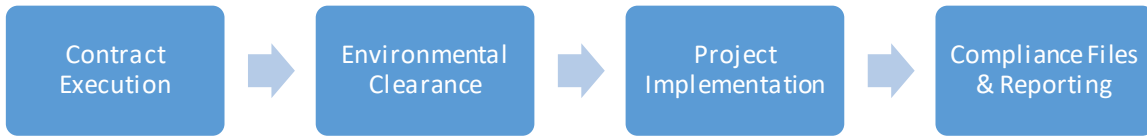
For activities that qualify under the LMA National Objective, evidence must be submitted with this plan. If income surveys were used to demonstrate NO Compliance, provide the location of the surveys.

## 2.3 Required Program Policies

The following Policies are required for the CDBG Program and must be attached to this Administrative Plan. Please insert (following this section or attach to end of document) all applicable policies:

- ✓ Fair Housing Plan – Recipients must document efforts to Affirmatively Further Fair Housing (AFFH). See [Chapter 7 of the OCR GAM](#) or visit the [Fair and Equitable Housing Office](#) website.
- ✓ Section 504 Accessibility – Recipients must have documentation of self-evaluation in place. Recipients with fifteen (15) or more employees must have a grievance procedure for ADA-related complaints in place. See [Chapter 7 of the OCR GAM](#) or HUD's [Fair Housing](#) website for further information.
- ✓ Section 3 – Recipients must have approved Section 3 Plan on file with the OCR. See [Chapter 7 of the OCR GAM](#) or the HCR [Section 3 Compliance](#) website.
- ✓ Procurement – Recipient must have a local procurement policy that addresses each item listed in [2 CFR 200.318 - .326](#) in place. *See Chapter 7 of the OCR GAM for further information. As the recipient completes individual procurements, evidence thereof must be submitted to the assigned community/economic developer.*
- ✓ EEO – Recipients must include Equal Employment Opportunity language in all procurements and the language must also be included in the local procurement policy. See [Chapter 7 of the OCR GAM](#) for further information.
- ✓ EEO4 compliance – Recipients with over one hundred (100) employees, or those that have been selected, must provide the most recently submitted [EEO-4 Survey](#). See [Chapter 7 of the OCR GAM](#) or the [Federal EEO-4 website](#) for further information.
- ✓ Minority and Women's Business Enterprises (MWBE) – Recipient must demonstrate good-faith efforts to contract with M/WBE firms. See [Chapter 7 of the OCR GAM](#) for additional information.

### 3. Grant Administrative Cycle



#### 3.1 Contract Execution & Start-Up

Date Executed Contract received from OCR	
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##### 3.1.1 Special Conditions (Schedule A)

If Schedule A of the Grant Agreement contained special provisions, list the requirement(s) and note date completed or condition(s) met. If no Special Conditions, note “none”.

Schedule A Special Condition	Date Completed/Submitted
1.	
2.	
3.	
4.	
5.	

##### 3.1.2 Financial Start-Up

Note when the following financial start-up tasks are completed, and requirements are met.

Financial Management Requirement	Refer to <a href="#">Chapter 1</a> and <a href="#">Chapter 3</a> of the OCR GAM	
	GAM Citation	Date Completed
Non-interest-bearing account established	Chapter 1	
<a href="#">Authorized Signature Form for Request for Funds</a>	Chapter 1	
<a href="#">ACH/Direct Deposit Authorization of NYS CDBG Funds Form</a>	Chapter 1	
Financial management system <a href="#">2 CFR 200.302-.303</a>	Chapter 3	
Firm commitment of other funds	Chapter 3	
Program income account (if applicable)	Chapter 3	

### 3.2 Environmental Review

The following steps must be followed to complete the Environmental Review. See Exhibit 2-7 of the OCR GAM for flowchart overview.

Refer to [Chapter 2 of the OCR GAM](#) and [HUD Environmental Review website](#) for guidance, sample formats and forms for [NEPA](#) compliance.

<b>Environmental Review</b>	Refer to <a href="#">Chapter 2</a> of the OCR GAM	
	<b>GAM Citation</b>	<b>Date Completed</b>
1. <a href="#">Designation of Certifying Officer</a> (should be established resolution)	Chapter 2	
2. Establish the Environmental Review Record		
3. Submission of ERR and Request for Release of Funds to OCR		
4. Release of Funds/Concurrence received from OCR		

**Until the release of funds has been approved by OCR, neither other Federal nor non-Federal funds may be committed to or expended for the activity or project, unless the activity is exempt under 58.34.**

### 3.3 Project Implementation

Identify and document compliance with the following program requirements. You may leave blank if the requirement does not apply to your activity. Tentative dates may be provided. Retain documentation in project files as these items are completed.

<b>Project Implementation Requirement</b>	<b>GAM Citation</b>	<b>Date Completed</b>
<b>General Implementation</b>		
Participation in Program Implementation Webinar		
Getting Started	N/A	
Environmental Review	N/A	
Financial Management	N/A	
General Program Administration	N/A	
Lead Based Paint Compliance (Housing Only)	N/A	
Procurement (required based on use of NYS CDBG funds) Refer to <a href="#">Chapter 4</a> of the OCR GAM		
Subrecipient		
Subrecipient Agreement reviewed by OCR		
Consultant		
Request for Proposal reviewed by OCR		
Engineer		
Request for Qualification reviewed by OCR		
<b>Construction (infrastructure/facility only)</b>	Refer to <a href="#">Chapter 4</a> and <a href="#">Chapter 6</a> of the OCR GAM	
Construction Disbursement file review		
<b>Housing Rehabilitation/Homeownership</b>		
First file review		
<b>Microenterprise</b>		
First file review		
<b>Small Business Assistance</b>		
First file review		
<b>Economic Development</b>		
First file review		

### 3.4 Compliance Files & Reporting

The following files and reports need to be completed to document compliance with CDBG requirements. Tentative dates can be provided. All files, records and other associated documentation may be retained electronically. See [Chapter 8](#) of the OCR GAM for more information. File labels and instructions are available by activity type:

- | <u>Labels</u>  | <u>Instructions</u>                                       |
|--|---|
| 1. <a href="#">Public Infrastructure/Public Facility</a> | <a href="#">PI/PF Label Instructions</a>                  |
| 2. <a href="#">Homeownership</a>                         | <a href="#">Homeownership Label Instructions</a>          |
| 3. <a href="#">Housing Rehabilitation</a>                | <a href="#">Housing Rehabilitation Label Instructions</a> |
| 4. <a href="#">Microenterprise</a>                       |   |
| 5. <a href="#">Economic Development</a>                  |   |

<b>Compliance Requirement</b>	<b>Manual Citation</b>	<b>Date Completed/ File Created</b>
<b>Files</b> (as applicable)		
Grant/Project Files	Refer to <a href="#">Chapter 8</a> of the OCR GAM	
<b>Reports</b>		
<a href="#">Project Status Report</a> (PSR) Due July of each year	Refer to <a href="#">Chapter 11</a> of the OCR GAM	
	PSR #1	
	PSR #2	
Annual Performance Report (APR) Due January of each year or within 30 days of completion of project <a href="#">APR for PI/PF</a> <a href="#">APR for all Housing</a> <a href="#">APR ED/Small Business/Microenterprise</a>	APR #1	
	APR #2	
	Final APR	
<a href="#">Annual Program Income Report</a> Due by April 30 of each year (follows State fiscal year)	Refer to <a href="#">Chapter 3</a> of the OCR GAM	
	Year 1	
	Year 2	
	Year 3	
<a href="#">Federal Assistance Expenditure Report</a> Due 60 days after end of local fiscal year	Refer to <a href="#">Chapter 3</a> and <a href="#">Chapter 11</a> of the OCR GAM	
	Year 1	
	Year 2	
	Year 3	
Federal Single Audit (if applicable) Due nine (9) months following end of local fiscal year	Year 1	
	Year 2	
	Year 3	
Davis-Bacon      Semi-Annual      Labor Standards	Refer to <a href="#">Chapter 6</a> and <a href="#">Chapter 11</a> of the OCR GAM	
Period 1 October 1 to March 31 due April of each year	Year 1	
	Year 2	
	Year 3	
Period 2 April 1 to September 30 due October of each year	Year 1	
	Year 2	
	Year 3	