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Division of Federal Financial Assistance

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CDBG Management Memo #22-07

Date: October 7, 2022

To: Community Development Block Grant (CDBG) and CDBG-CV Grantees

Subject: Additional Documentation for Requested Agreement Revisions / Amendments

Purpose

The purpose of this memo is to further clarify additional documentation requirements for Grantees requesting revisions or amendments to previously established CDBG Standard Agreements. This memo provides additional clarification to **Management Memo #21-02, Requesting Agreement Revisions / Amendments** and **Management Memo 21-02 Addendum 1**.

Expanded Listing of Revision / Amendment Documentation

ALL Grantees must complete a CA HCD Revision / Amendment Request Form provided by their HCD Representative or Grant administrator for all revisions and/or amendments. This form must be uploaded to the Grants Network Portal as outlined in the original CDBG Management Memo #21-02. The requirements for additional documentation depend on the nature of the requested change as shown in Exhibit 1 below. Note that this table expands upon the one presented in Management Memo 21-02 Addendum 1.

Grantees should note that true revisions, as shown on the **CA HCD Revision / Amendment Request Form**, do not require the completion of additional forms or a revised resolution. The requirements for amendments depend on the nature of the requested change. Grantees should work with their HCD Representative or Grant Administrator to complete any additional required documentation.



Requests for revisions or amendments are not guarantees of receiving them.

Requests are subject to CA HCD review and approval and are subject to the terms in the original authorizing Notice of Funding Availability (NOFA), the language of the Standard Agreement, and eligibility of the revision or amendment under HUD regulations, any Federal Registers associated with the fund, and under state statute and guidelines.

Exhibit 1 below provides information about typical documentation that will be required to support revisions or amendments. The table is not exhaustive, and the circumstances of individual awards will vary. Therefore, Grantees should work with their HCD Representative or Grant Administrator to complete any additional required documentation.



Exhibit 1. Expanded Listing of Revision / Amendment Documentation

Type of Change Request	Revision or Amendment?	eCivis Notation*	Typical New Threshold Documentation Required	Documents Required
Scope of Work Change WITHOUT change to national objective or activity type	Revision	Amendment DOES NOT Include Financial Change	<ul style="list-style-type: none"> NEPA Environmental Review Record (ERR)¹ 	<ul style="list-style-type: none"> Revision / Amendment Request form only No additional forms required
Scope of Work Change WITH change to national objective	Amendment *May add to scope of work or reduce scope of work including materially changing the activity	Amendment DOES NOT Include Financial Change	<p>*May add to scope of work or reduce scope of work including materially changing the activity</p> <ul style="list-style-type: none"> Detailed Scope of Work (not a separate file) Updated Program Guidelines New Public Noticing Updated Duplication of Benefits Policy NEPA Environmental Review Record (ERR) Site Control Relevant Memorandums of Understanding (MOUs), Subrecipient Agreements and/or contracts, and associated Debarment Checks 	<ul style="list-style-type: none"> Revision / Amendment Request form STD 213A** New resolution if type of activity has changed and new activity cannot fall under umbrella of original activity description Replacement Exhibit E

¹ Environmental Review Record to demonstrate compliance with the National Environmental Policy Act (NEPA)



Type of Change Request	Revision or Amendment?	eCivis Notation*	Typical New Threshold Documentation Required	Documents Required
Scope of Work Change WITH change to activity type (essentially full project change)	<p>Amendment</p> <p>*May add to scope of work or reduce scope of work including materially changing the activity</p>	<p>Amendment DOES NOT Include Financial Change</p>	<p>*May add to scope of work or reduce scope of work including materially changing the activity</p> <ul style="list-style-type: none"> ■ Detailed Scope of Work ■ Program Guidelines ■ Public Noticing ■ Duplication of Benefits Policy ■ NEPA Environmental Review Record (ERR) ■ Site Control ■ Relevant Memorandums of Understanding (MOUs), Subrecipient Agreements and/or contracts, and associated Debarment Checks 	<ul style="list-style-type: none"> ■ Revision / Amendment Request form ■ STD 213A ■ New resolution if type of activity has changed and new activity cannot fall under umbrella of original activity description ■ Replacement Exhibit E
Beneficiary Change WITHOUT reducing estimated number of beneficiaries	<p>Revision</p>	<p>Amendment DOES NOT Include Financial Change</p>	<ul style="list-style-type: none"> ■ Not applicable 	<ul style="list-style-type: none"> ■ Revision / Amendment Request form only ■ No additional forms required
Beneficiary Change WITH a reduction in the estimated number of beneficiaries	<p>Amendment</p>	<p>Amendment DOES NOT Include Financial Change</p>	<ul style="list-style-type: none"> ■ Not applicable 	<ul style="list-style-type: none"> ■ Revision / Amendment Request form ■ STD 213A



Type of Change Request	Revision or Amendment?	eCivis Notation*	Typical New Threshold Documentation Required	Documents Required
Budget Change WITHOUT change to overall budget (only allocation changes – same total budget)	Revision	Amendment Includes Financial Change	<ul style="list-style-type: none"> Not applicable 	<ul style="list-style-type: none"> Revision / Amendment Request form only No additional forms required
Budget Change WITH change to overall budget	Amendment	Amendment Includes Financial Change	<ul style="list-style-type: none"> Categorically Excluded Not Subject To (CENST) form 	<ul style="list-style-type: none"> Revision / Amendment Request form STD 213A New resolution (only if funds are being added beyond original authorization)
Timeline or Milestone Change that DOES NOT affect project start and end dates	Revision May affect only intermediate milestones	Amendment DOES NOT Include Financial Change	<ul style="list-style-type: none"> Not applicable 	<ul style="list-style-type: none"> Revision / Amendment Request form only No additional forms required
Timeline or Milestone Change that DOES affect project start and/or end dates	Amendment	Amendment DOES NOT Include Financial Change	<ul style="list-style-type: none"> Not applicable 	<ul style="list-style-type: none"> Revision / Amendment Request form 213A

* This column refers to the way the amendment or revision will be entered in the Grants Network Portal (on the Grantee side) or viewed in the eCivis Grants Management Network (by HCD Representatives or Grant Administrators). Both revisions and amendments are called “Amendments” in the system. Grantees will need to indicate whether or not the “Amendment” includes a financial change.

** Completed STD 213A form will be provided for signature after HCD routing.
 Not required with initial request.



Grantees should be aware that in some cases, especially those where the national objective or activity has changed, it is likely that some new threshold documentation will be required. Additional subrecipient agreements (Memorandums of Understanding, contracts, etc.) will also be required in all instances where contactors or other supporting organizations are changing.

Threshold Documentation

While the requirement for additional threshold documentation will be reviewed on a case-by-case basis, **ALL** Grantees requesting revisions or amendments will be required to have a complete set of threshold documentation on file, whether this was provided in support of the revision/amendment or of the original agreement. Exhibit 2 provides a list of threshold documentation for the CDBG-CV program. **Amendments will not be granted for Grantees who have outstanding threshold documentation owed to CA HCD.**

Exhibit 2. Threshold Documentation

Threshold Documentation
<ul style="list-style-type: none">■ Application with complete:<ul style="list-style-type: none">• Budget• National objective• Scope of work• Milestone timeline(Application should be in Exhibit E.)
■ Resolution
■ Executed copy of the Standard Agreement (STD 213)
■ Taxpayer Identification Number (TIN) form
■ Program Guidelines <ul style="list-style-type: none">• Must include Duplication of Benefits Policy or this must be supplied as a separate document
■ Site Control documentation (deed or lease) (if applicable)



Threshold Documentation	
<ul style="list-style-type: none">■ Verified good standing with the California Department of Housing and Community Development<ul style="list-style-type: none">• (CA HCD verification, not a document.)	
<ul style="list-style-type: none">■ Debarment documentation for Grantee	
<ul style="list-style-type: none">■ Debarment documentation for subrecipients, contractors, or other jurisdiction partners (if applicable)	
<ul style="list-style-type: none">■ Copies of any Memorandums of Understanding (MOUs) or agreements associated with the project (if applicable)	
<ul style="list-style-type: none">■ Certifications and Statement of Assurances (Appendix J) signed by authorized representative, including:<ul style="list-style-type: none">• Growth control certification• Compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 relocation requirements (if applicable)	
<ul style="list-style-type: none">■ Compliance with requirement for Housing Element (HSC § 50829)<ul style="list-style-type: none">• (CA HCD verification, not a document.)	
<ul style="list-style-type: none">■ Citizen participation documentation	
<ul style="list-style-type: none">■ Most recent single audit documentation<ul style="list-style-type: none">• No outstanding findings or plan in place to resolve	
<ul style="list-style-type: none">■ Environmental (NEPA) and Historical Review	

Questions

If you have general process questions, please contact your HCD Representative or Grant Administrator. If you have specific questions about the information in this Management Memo, or any other questions regarding the CDBG Program, please contact Felicity Gasser at felicity.gasser@hcd.ca.gov or 916-820-1187.