

A hand holding a set of keys in front of a house. The background is a blurred image of a house with a porch and columns. The hand is in the foreground, holding a set of keys. The keys are silver and have a circular head with a logo. The hand is wearing a dark watch.

POLICY MANUAL

**COMMUNITY DEVELOPMENT BLOCK GRANT –
DISASTER RECOVERY (CDBG-DR)**

HOMEOWNER ASSISTANCE PROGRAM (HAP)



This manual may be updated periodically to reflect changes in federal, state, or local requirements, as well as operational updates, program improvements, or clarifications.

PROGRAM OVERVIEW

| | | |
|--|--|---|
| Program Name: | Community Development Block Grant – Disaster Recovery (CDBG-DR) | |
| Grantee Name: | City of Little Rock (CLR) | |
| Entity Designated to Administer the Funds | CLR | |
| Amount of funds allocated in the action plan: | \$20,895,000.00 | |
| HUD Contact (Name): | David Blick | |
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| Grantee Contact (Name): | Kevin Howard, Director of Housing and Neighborhood Programs (HNP) | |
| Grantee Contact (Email/Phone): | khoward@littlerock.gov /501-371-6825 | |
| Grantee Board of Directors: | Frank Scott Jr., Mayor | |
| | Virgil Miller Jr, Ward 1 Ken Richardson, Ward 2 Kathy Webb, Ward 3 Capi Peck, Ward 4 Lance Hines, Ward 5 | Andrea Hogan Lewis, Ward 6 B. J. Wyrick, Ward 7 Vice-Mayor Dr. Dean Kumpuris, Position 8 Antwan Phillips, Position 9 Joan Adcock, Position 10 |
| Grantee City Manager: | Delphone Hubbard | |

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VERSION POLICY & CHANGE CONTROL

This document is subject to version control. Policy updates may be necessary throughout the life of the Program to clarify, add, or remove requirements governing program operations. All policy decisions will be formally documented and incorporated into the relevant program materials. Unless explicitly stated otherwise, revisions apply prospectively and become effective upon approval of the updated document.

All versions and publication dates are recorded in the Version History Table, along with a brief description of changes. Revisions that reflect a substantive change in policy will result in the issuance of a new major version number (for example, Version 1.0 to Version 2.0). Updates that do not alter policy intent, such as editorial revisions, clarifications, or formatting changes, will be reflected through minor version updates (for example, Version 2.1 or 2.2).

| Version | Date | Description |
|----------------|----------------|--|
| Version 1.0 | March 23, 2026 | Prepared by: Department of Housing & Neighborhood Programs |
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ACRONYMS

| Acronym | Full Term |
|------------------|--|
| ADA | Americans with Disabilities Act |
| AFFH | Affirmatively Furthering Fair Housing |
| AMI | Area Median Income |
| AAN | Allocation Announcement Notice |
| BFE | Base Flood Elevation |
| CDBG | Community Development Block Grant |
| CDBG-DR | Community Development Block Grant – Disaster Recovery |
| CE / CEST | Categorically Excluded / Categorically Excluded Subject to §58.5 |
| CFR | Code of Federal Regulations |
| CLR | CLR |
| DOB | Duplication of Benefits |
| DRGR | Disaster Recovery Grant Reporting System |
| DSS | Decent, Safe, and Sanitary |
| EA | Environmental Assessment |
| EIS | Environmental Impact Statement |
| EPA | Environmental Protection Agency |
| FEMA | Federal Emergency Management Agency |
| FFRMS | Federal Flood Risk Management Standard |
| FIRM | Flood Insurance Rate Map |
| FONSI | Finding of No Significant Impact |
| GAO | Government Accountability Office |
| HCDA | Housing and Community Development Act of 1974 |
| HAP | Homebuyer Assistance Program |

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| Acronym | Full Term |
|-----------------|--|
| HNP | Housing and Neighborhood Programs |
| HUD | U.S. Department of Housing and Urban Development |
| LBP | Lead-Based Paint |
| LEP | Limited English Proficiency |
| LMI | Low- and Moderate-Income |
| MID | Most Impacted and Distressed |
| NEPA | National Environmental Policy Act |
| NFIP | National Flood Insurance Program |
| NOI-RROF | Notice of Intent / Request for Release of Funds |
| OIG | Office of Inspector General |
| PII | Personally Identifiable Information |
| RARAP | Residential Anti-Displacement and Relocation Assistance Plan |
| RE | Responsible Entity |
| ROF | Release of Funds |
| RROF | Request for Release of Funds |
| SBA | Small Business Administration |
| SFHA | Special Flood Hazard Area |
| URA | Uniform Relocation Assistance and Real Property Acquisition Policies Act |

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DEFINITIONS

| Term | Definition |
|---|---|
| Affordability Period | The required period during which an assisted property must remain the primary residence of the assisted household and comply with program requirements, including occupancy and resale or recapture provisions. |
| Area Median Income (AMI) | The median income for a geographic area as determined annually by HUD, adjusted for household size, and used to determine program income eligibility. |
| Base Flood Elevation (BFE) | The elevation to which floodwater is expected to rise during the base flood (1% annual chance flood), as shown on FEMA Flood Insurance Rate Maps (FIRMs). |
| Community Development Block Grant (CDBG-DR) | CDBG funds appropriated by Congress and administered by HUD to support long-term recovery from federally declared disasters. |
| Disaster Tie-Back | Documentation demonstrating that an activity directly addresses impacts resulting from the declared disaster (DR-4698). |
| Cost Reasonableness | A determination that costs are necessary, reasonable, and consistent with market conditions and federal cost principles under 2 CFR Part 200. |
| Duplication of Benefits (DOB) | Financial assistance received from multiple sources for the same purpose that exceeds the total need for disaster recovery. Prohibited under federal law. |
| Environmental Review | The process required under the National Environmental Policy Act (NEPA) and 24 CFR Part 58 to evaluate environmental impacts before committing federal funds. |
| Federal Flood Risk Management Standard (FFRMS) | A federal standard requiring the use of higher flood elevation or floodplain standards for federally funded projects to improve resilience. |
| Flood Insurance Rate Map (FIRM) | Official FEMA maps identifying flood hazard areas, including Special Flood Hazard Areas (SFHAs) and Base Flood Elevations. |
| Homebuyer Assistance Program (HAP) | The CLR's CDBG-DR-funded program providing financial assistance to eligible households for the purchase of a primary residence. |
| Housing and Community Development Act (HCDA) | Federal law (42 U.S.C. § 5301 et seq.) authorizing the Community Development Block Grant program. |
| Low- and Moderate-Income (LMI) | Households earning no more than the HUD-established percentage of AMI (typically ≤80% unless otherwise waived). |
| Most Impacted and Distressed (MID) Areas | Geographic areas designated by HUD as having the greatest disaster impact and eligible for prioritized CDBG-DR funding. |



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|--|--|
| National Flood Insurance Program (NFIP) | FEMA-administered program providing flood insurance to property owners in participating communities. |
| National Objective | One of three statutory objectives required for all CDBG-funded activities: LMI benefit, slum/blight elimination, or urgent need. |
| Responsible Entity (RE) | The entity responsible for environmental review and compliance under 24 CFR Part 58. For this program, the CLR. |
| Special Flood Hazard Area (SFHA) | Areas identified by FEMA as having a 1% annual chance of flooding (100-year floodplain), where flood insurance is required. |
| Subrecipient | A non-federal entity that receives CDBG-DR funds from the City to carry out program activities. |
| Subsidy Layering | The process of evaluating multiple funding sources to ensure total assistance does not exceed the amount necessary to complete an eligible activity. |
| Uniform Relocation Assistance Act (URA) | Federal law (49 CFR Part 24) establishing requirements for relocation assistance and protections for displaced persons. |
| Unmet Need | The portion of disaster-related damages that remains after all other sources of assistance (e.g., FEMA, insurance, SBA) have been accounted for. |
| Urgent Need National Objective | A CDBG eligibility category used when an activity addresses a serious and immediate threat to health or welfare and no other resources are available |

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1. INTRODUCTION

The City of Little Rock (CLR) receives and administers funding through the Community Development Block Grant – Disaster Recovery (CDBG-DR) program authorized under Title I of the Housing and Community Development Act of 1974¹. The purpose of CDBG-DR funding is to support long-term recovery in communities impacted by federally declared disasters by restoring housing, strengthening infrastructure, and supporting economic recovery.

The CLR is responsible for administering these funds in a transparent, accountable, and consistent manner with federal requirements. CLR will strategically manage CDBG-DR resources to address the recovery needs resulting from the March 31, 2023, tornado and to strengthen the long-term stability of the City's housing market.

All program activities will be implemented with safeguards to ensure responsible stewardship of federal funds and to minimize the risk of waste, fraud, or misuse. The City is committed to implementing recovery programs that promote resilience, support equitable recovery, and ensure that assistance reaches households most impacted by the disaster.

1.1. PURPOSE OF MANUAL

This Policy Manual establishes the framework for the CLR's CDBG-DR Homebuyer Assistance Program (HAP) for City staff, partners, and program administrators who are responsible for implementing the program. It outlines the policies, eligibility requirements, compliance standards, and administrative procedures necessary to operate the program in accordance with federal regulations and the City's HUD-approved Action Plan.

The policies contained in this Manual establish consistent procedures for application intake, eligibility determination, assistance delivery, and program oversight. These procedures ensure that program funds are administered fairly, efficiently, and in compliance with all applicable requirements.

The City reserves the right to update this Manual as necessary in order to reflect changes in federal guidance, amendments to the CDBG-DR Action Plan, or improvements to program administration.

1.2. BACKGROUND ON CDBG-DR FUNDING

The CDBG-DR program is a special allocation of federal funding provided by the U.S. Department of Housing and Urban Development (HUD) to assist communities in recovering from disasters declared by the President². These funds are intended to support long-term recovery efforts in areas where the scale of damage exceeds the capacity of local resources and traditional disaster response programs, such as those offered by the Federal Emergency Management Agency (FEMA) or the Small Business Administration (SBA).

¹ <https://www.congress.gov/bill/93rd-congress/senate-bill/3066>

² [U.S. Department of Housing and Urban Development \(HUD\), CDBG-DR Program Overview](#)

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CDBG-DR is not an emergency response program. Instead, it is designed to address the unmet needs (see CLR's [Action Plan](#)) that remain after initial disaster relief has been provided. These needs often include rebuilding homes, restoring infrastructure, revitalizing local economies, and supporting vulnerable populations through public services. While CDBG-DR funds are flexible and can be used for a wide range of recovery activities, all funded activities must be directly tied to disaster-related impacts and must meet one of HUD's three National Objectives³:

- Benefit to LMI Persons – This is the main objective of the CDBG-DR Program. At least 51% of the beneficiaries of an activity are LMI individuals or households.
- Prevention or Elimination of Slums or Blight – Activities aimed at reducing, preventing, or eliminating conditions of slum or blight in a designated area, or on a spot basis (e.g., demolition of a dangerous, deteriorated building).
- Urgent Need – May be used when an activity addresses a serious and immediate threat to the health or welfare of the community, and no other financial resources are available.

Congress appropriates CDBG-DR funds through special legislation in response to major disasters. Once funding is approved, HUD allocates the funds to eligible states, cities, or counties based on the severity of damage and the extent of unmet needs. HUD also issues detailed guidance, through Federal Register Notices and the CDBG-DR Universal Notice, that outlines how the funds must be used. This includes requirements for public engagement, financial oversight, civil rights compliance, and environmental review.

In January 2025, HUD allocated \$20,895,000 in CDBG-DR funding to the CLR to support recovery from the March 31, 2023, EF-3 tornado. This funding is governed by the requirements outlined in the Federal Register (90 FR 4759)⁴ and the CDBG-DR Universal Notice (90 FR 1754), as amended by Memorandum 2025-025. These documents establish the rules, waivers, and alternative requirements that grantees must follow to ensure that funds are used effectively, equitably, and in compliance with federal law.

The CLR's CDBG-DR program includes several components, housing, infrastructure, economic revitalization, mitigation, and public services, all designed to help the community recover and build resilience against future disasters. The Housing Programs described in this Manual represent a major component of the City's long-term recovery strategy and focus on stabilizing impacted neighborhoods, supporting homeowners, and increasing the supply of affordable, resilient housing.

1.3. OVERVIEW OF DISASTER IMPACT IN LITTLE ROCK

On March 31, 2023, an EF-3 tornado struck the CLR, causing widespread damage to residential areas, displacing hundreds of households, and disrupting community infrastructure. More than \$85 million in

³ 24 CFR § 570.208; HUD Universal Notice, 90 FR 1754

⁴ <https://www.federalregister.gov/citation/90-FR-4759>

⁵ HUD Memorandum 2025-02, "Revisions to the Universal Notice," published March 19, 2025.

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property damage occurred across multiple neighborhoods, including areas with limited financial capacity to recover without federal assistance.



Figure 1. Housing Damage Conditions Following DR - 4698

Homes experienced structural loss, major habitability issues, and long-term displacement impacts. Several residents continue to face unmet housing needs due to insufficient insurance payouts, delays in rebuilding, and the unavailability of safe, affordable housing options. The disaster disproportionately affected vulnerable populations, including LMI households, renters, and individuals with limited access to recovery resources.

1.4. ALIGNMENT WITH HUD ALLOCATION AND CITY ACTION PLAN

HUD allocated \$20,895,000 in CDBG-DR funds to the CLR to address long-term recovery needs resulting from the March 31, 2023, tornado (DR-4698). These funds are governed by the HUD Allocation Announcement Notice (AAN) and the Federal Register Universal Notice.

Consistent with HUD requirements and the City’s HUD-approved Action Plan, housing recovery represents a primary recovery priority. Approximately 53 percent of the total grant allocation is dedicated to housing-related activities. Of that amount, **\$1,000,000** has been allocated to HAP to support the development of new affordable housing units within the CLR.

HAP directly aligns with the Action Plan’s documented housing unmet need and the identified shortage of affordable housing that existed prior to the disaster and was further exacerbated by storm-related destruction. The program is designed to increase the long-term supply of resilient, safe, and affordable housing for income-eligible households, including Low- and Moderate-Income (LMI) households, in compliance with statutory LMI benefit requirements.

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All HAP activities will be implemented within the HUD-designated Most Impacted and Distressed (MID) area, which includes the entire CLR. The program supports the Action Plan’s goals to:

- Address disaster-related housing loss and displacement;
- Expand the supply of affordable housing through new construction;
- Incorporate resiliency and mitigation measures to reduce future disaster risk; and
- Promote equitable long-term recovery for impacted households.

2. Roles and Responsibilities

This section describes the roles and responsibilities of the CLR and all entities involved in administering the CDBG-DR HAP. The CLR serves as the Responsible Entity (RE) and lead agency for the administration of CDBG-DR funds allocated under Disaster Recovery grant DR-4698. As the Responsible Entity, the City maintains full authority and accountability for program implementation, including environmental review responsibilities, financial management, procurement, compliance monitoring, and reporting requirements.

While the City maintains overall responsibility for compliance with federal requirements, program implementation may involve coordination with subrecipients, contractors, consultants, and other program partners. These entities support program delivery and must operate in accordance with program policies, federal regulations, and all applicable cross-cutting requirements.

All participating entities must ensure that program activities comply with the City’s HUD-approved Action Plan, the CDBG-DR Universal Notice, and other applicable federal requirements governing the use of disaster recovery funds.

Table 1. Roles and Responsibilities Table

| Entity | Role | Primary Responsibilities | Regulatory / Compliance Authority |
|-------------------------------|-------------------------------------|---|---|
| CLR – Responsible Entity (RE) | Lead Agency & Program Administrator | <ul style="list-style-type: none"> • Overall oversight and accountability for HAP implementation • Conducts and approves environmental reviews for assisted properties, when applicable • Ensures compliance with site eligibility, floodplain management, and environmental requirements • Establishes program policies, eligibility criteria, and funding limits • Evaluates applicant eligibility, income qualification, and national objective compliance • Ensures all activities demonstrate tie-back to disaster DR-4698 • Manages program budgeting, financial controls, and DRGR reporting and drawdowns • Conducts procurement in accordance with federal requirements • Enforces duplication of | Housing and Community Development Act (HCDA); 24 CFR Part 58; 24 CFR Part 570; 2 CFR Part 200; HUD Universal Notice |

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| Entity | Role | Primary Responsibilities | Regulatory / Compliance Authority |
|--|--------------------------------|--|---|
| | | <ul style="list-style-type: none"> benefits (DOB) requirements Ensures compliance with fair housing, nondiscrimination, and accessibility requirements Executes program agreements and affordability restrictions, when applicable Conducts monitoring, risk assessments, and internal compliance reviews Maintains program records and reporting documentation | |
| Subrecipients (if applicable) | Program Delivery Support | <ul style="list-style-type: none"> Support intake, eligibility review, and program administration activities Maintain documentation supporting eligibility and national objective compliance Assist with applicant communication and file management Submit required performance and financial reports Participate in monitoring and risk assessment activities | Subrecipient Agreement; 2 CFR Part 200; HUD Universal Notice |
| Contractors/ Vendors | Program Services | <ul style="list-style-type: none"> Provide contracted services such as housing counseling, application intake support, inspections, or program administration support Deliver services in accordance with approved scopes of work Maintain documentation required for compliance with program guidelines | Federal Procurement Standards; CLR Procurement Policies; 2 CFR Part 200 |
| Consultants / Technical Assistance Providers | Compliance & Technical Support | <ul style="list-style-type: none"> Provide technical assistance related to program design, underwriting guidance, and compliance Assist with environmental review documentation and compliance procedures Support DRGR reporting, data tracking, and program performance reporting Assist with monitoring preparation and program compliance reviews | Procured under 2 CFR Part 200; City Procurement Policies |

3. ELIGIBLE GEOGRAPHIC AREAS

All projects assisted under the CLR’s CDBG-DR Program must be located within a HUD-identified MID area. For this allocation, the entire CLR has been designated by HUD as a MID area in the applicable AAN and the City’s HUD-approved Action Plan. As a result, only properties located within the city limits of Little Rock are eligible to receive CDBG-DR assistance, unless HUD expressly authorizes assistance

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outside the MID area through a waiver or alternative requirement.

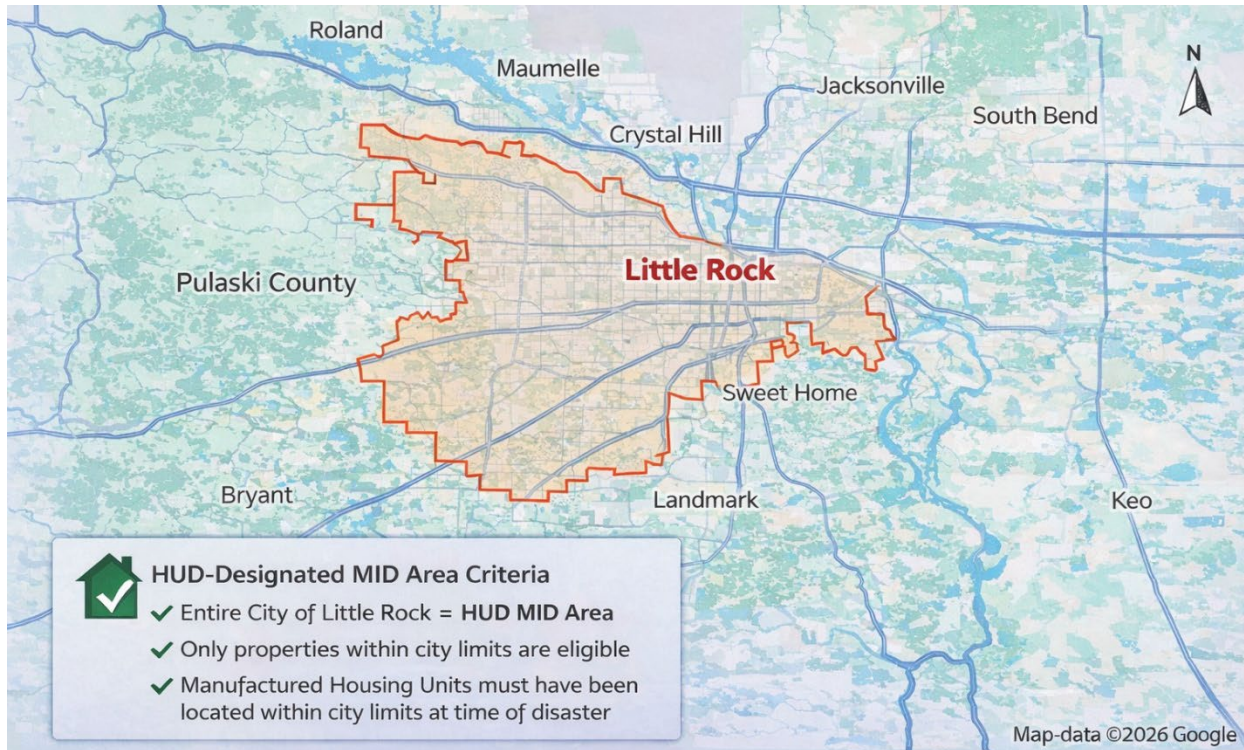


Figure 2. CDBG-DR Assistance Geographic Eligibility - Little Rock

4. CROSS-CUTTING IMPLEMENTATION POLICIES

This section establishes cross-cutting policies and requirements that apply to all CDBG-DR Housing Programs administered by the CLR. These policies ensure compliance with federal rules, promote consistent implementation, and create a clear operational framework for staff, subrecipients, contractors, and partners. The requirements outlined here support accountability, cost control, quality of construction, and documentation needed for HUD monitoring and long-term recovery. Section 3 requirements are not applicable. URA provisions are waived, as permitted by HUD guidance. Environmental Reviews falls under categorically excluded not subject to 58.5, and not exempt⁶.

4.1. FLOOD INSURANCE ENFORCEMENT

For properties in a Special Flood Hazard Area (SFHA), the CLR requires flood insurance coverage to protect the CDBG-DR investment and ensure compliance with federal requirements⁷. Coverage must be maintained in an amount equal to the lowest of:

⁶ [eCFR :: 24 CFR 58.35 -- Categorical exclusions](#)

⁷ Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. § 4012a); 24 CFR 570.605 (NFIP requirements for CDBG); and Applicable CDBG-DR Federal Register Notices governing disaster recovery funds.

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- the total CDBG-DR assistance invested in the structure,
- the outstanding balance of any loan secured by the structure, or
- The maximum amount of coverage available under the NFIP for that type of property.

Flood insurance must remain in place for the life of the structure, including during any required affordability period, and regardless of changes in ownership. Proof of active coverage must be provided before closeout and may be verified periodically. Property owners are responsible for informing future buyers or transferees of the ongoing flood insurance requirement, which runs with the property.

If required flood insurance is not obtained or maintained, the property may be deemed out of compliance; the City may initiate enforcement actions, including recapture of assistance; and the owner may be ineligible for future federal disaster assistance for flood-related damage.

4.2. CIVIL RIGHTS, ACCESSIBILITY, AND LANGUAGE ACCESS

4.2.1. Fair Housing and Equal Opportunity

The CLR will administer all CDBG-DR programs in a manner that ensures fair housing, equal opportunity, and nondiscrimination. The City is committed to providing disaster recovery assistance in a way that allows all eligible individuals and households to access and benefit from recovery programs without discrimination or unnecessary barriers.

All CDBG-DR activities will be implemented in compliance with applicable federal civil rights laws and regulations, including but not limited to:

- Title VI of the Civil Rights Act of 1964
- The Fair Housing Act (42 U.S.C. 3601–3619)
- Section 504 of the Rehabilitation Act of 1973
- The Americans with Disabilities Act (ADA)
- Age Discrimination Act of 1975
- Executive Order 13166 regarding access for individuals with Limited English Proficiency
- HUD regulations at 24 CFR Part 8 and other applicable federal requirements

No person shall be excluded from participation in, denied the benefits of, or subjected to discrimination under any CDBG-DR program or activity on the basis of race, color, national origin, religion, sex (including gender identity and sexual orientation), disability, familial status, age, or any other protected class under federal law.

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All staff, contractors, and partners involved in the administration of CDBG-DR programs must implement policies and procedures in a manner consistent with these civil rights obligations.

4.2.2. Affirmatively Furthering Fair Housing

CLR will administer CDBG-DR programs in a manner that affirmatively furthers fair housing in accordance with the Fair Housing Act and HUD guidance.

Affirmatively furthering fair housing requires the City to take meaningful actions to support inclusive communities and expand access to housing opportunities for disaster-impacted residents.

Program allocations, project selection criteria, and administrative procedures are designed to reduce barriers to participation and ensure that disaster recovery resources are accessible to individuals, vulnerable populations, protected classes, and other underserved communities within the Most Impacted and Distressed (MID) areas.

Funding allocations across housing, infrastructure, mitigation, and other recovery activities prioritize investments within MID areas where disaster impacts were greatest. By directing resources to these areas, CLR seeks to ensure that recovery assistance reaches residents and neighborhoods that experienced the most significant damage and disruption.

Project selection criteria and program guidelines are structured to promote equitable access to recovery assistance and avoid policies that could unintentionally exclude eligible households or communities. Selection criteria may consider disaster impact, housing damage, and documented community recovery needs to ensure recovery investments address the most critical needs within MID areas.

CLR will periodically review program policies and participation data to ensure that program implementation does not create or perpetuate discriminatory impacts or disproportionate barriers for protected classes or underserved populations.

Reducing Barriers to Participation

Disaster recovery programs must be accessible to the communities most affected by the disaster. CLR will structure program allocations, eligibility requirements, project selection criteria, and administrative procedures in a manner that promotes equitable access to recovery assistance for individuals, vulnerable populations, protected classes, and underserved communities.

To reduce barriers to participation, CLR will implement the following actions:

Targeted Outreach

The City will conduct outreach within MID areas to ensure that disaster-impacted residents are aware of available recovery programs and application opportunities. Outreach will involve collaboration with community organizations, housing service providers, nonprofit partners, and other local institutions that serve vulnerable populations.

Outreach efforts will prioritize engagement with:



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- Low- and moderate-income households
- Racial and ethnic minority populations
- Elderly residents
- Individuals with disabilities
- Persons with Limited English Proficiency (LEP)

Outreach activities may include community meetings, informational sessions, partnerships with community organizations, printed materials, and digital communications.

Accessible Application and Intake Processes

CLR will offer multiple methods for application submission and program intake in order to reduce barriers related to transportation, technology access, literacy, or mobility limitations.

Application options may include:

- Online application portals
- In-person application assistance
- Telephone assistance
- Assistance provided through partner organizations

These options help ensure that eligible residents are able to apply for assistance regardless of technological or physical limitations.

Monitoring Program Access

CLR will periodically review program participation data to assess whether eligible populations are accessing recovery programs equitably. If participation trends suggest barriers for certain groups, the City will evaluate outreach strategies and program procedures and implement adjustments when necessary.

4.2.3. [Accessibility for Individuals with Disabilities \(Section 504\)](#)

CLR will administer all CDBG-DR programs in compliance with the Americans with Disabilities Act and Section 504 of the Rehabilitation Act to ensure individuals with disabilities have equal opportunity to participate in and benefit from disaster recovery programs.

Programs will be implemented in the most integrated setting appropriate and will include measures to ensure accessibility of program services.

Accessible Program Administration

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Program offices, outreach events, and public meetings will be conducted in facilities that meet accessibility standards. When necessary, reasonable accommodations will be provided to ensure individuals with disabilities can fully participate in program activities.

Examples of accommodations may include:

- Assistance completing applications
- Alternative communication methods
- Additional time for documentation submission
- Accessible meeting arrangements

Accessible Information

Critical program information will be made available in formats accessible to individuals with disabilities upon request. These formats may include large-print materials, screen-reader compatible electronic documents, audio formats, or other communication aids.

Accessible Housing

Housing programs funded through CDBG-DR may include accessibility improvements when necessary to allow a household member with a disability to safely occupy and use the home.

Accessibility improvements may include:

- Ramps or zero-step entrances
- Widened doorways and hallways
- Accessible bathrooms and showers
- Grab bars and safety features
- Accessible kitchen surfaces and controls

Housing programs supported by CDBG-DR funds will comply with applicable federal accessibility standards where required.

Reasonable Accommodation Requests

Applicants or program participants who require an accommodation due to a disability may request assistance at any time during the application or program process.

Requests may be made verbally or in writing to program staff. Verbal requests will be documented by staff in the applicant's file.

- Review of Requests: Program staff will review accommodation requests to determine whether the requested accommodation is necessary to allow the individual to access or participate in the program. If the disability or need for accommodation is not readily apparent, the City may

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request limited verification from a qualified professional or service provider confirming the need for accommodation. Where practicable, CLR will provide a determination regarding the accommodation request within ten (10) business days of receiving all required information.

- **Approval and Implementation:** Accommodation requests will be reviewed by program staff and approved by the appropriate program supervisor or program manager. When practicable, determinations will be made promptly to avoid delays in program participation. Approved accommodation(s) will be documented and implemented as part of the applicant's participation in the program.
- **Denial of Requests:** If CLR determines that the requested accommodation cannot be granted because it would impose an undue administrative or financial burden or would fundamentally alter the nature of the program, the City will notify the applicant in writing. The denial notice will include: The reason for the denial; Information regarding the applicant's right to request reconsideration or submit an appeal; Contact information for submitting the appeal. Where possible, CLR will work with the applicant to identify alternative accommodation that may provide meaningful access to the program.
- **Appeals:** Applicants may submit a written request for reconsideration of a denied accommodation request within twenty (20) calendar days of receiving the denial notice. CLR will review the appeal and provide a written response within ten (10) business days, where practicable.

Recordkeeping

All requests and determinations related to reasonable accommodations will be recorded in the applicant file and maintained in accordance with program record retention requirements.

Disability Advocacy and Support Resources

Individuals who may need disability-related support, advocacy, or assistance navigating the program application or participation process may contact external advocacy organizations for additional resources.

The City encourages individuals who may benefit from disability-related guidance or advocacy to contact the following organization:

- [Arkansas Inclusive Communities and Advocacy Network \(AR-ICAN\)](#)
- TTY/Relay Services: Arkansas Relay 711

AR-ICAN provides information, advocacy, and support services that may assist individuals with disabilities in accessing housing, community resources, and other services.

Contacting this organization is voluntary and does not affect eligibility for any CDBG-DR program administered by the CLR.

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4.2.4. Language Access and Limited English Proficiency

CLR will take reasonable steps to ensure meaningful access to disaster recovery programs for individuals with Limited English Proficiency.

Language assistance services will be provided free of charge and may include:

- Oral interpretation services
- Telephone interpretation services
- Translation of key program materials
- Language assistance during intake and application processes

The City will evaluate community language needs periodically to determine whether additional translation services are necessary. Minor children or accompanying individuals will not be used as interpreters except in emergency situations.

For assistance in Spanish, call City of Little Rock Office of Engagement and Opportunity: 501-565-7233.

4.3. CITIZEN PARTICIPATION

Citizen participation activities are designed to promote transparency, encourage community engagement, and ensure that disaster recovery programs reflect the needs of residents impacted by the March 31, 2023 tornado, particularly those located in the MID areas.

Consistent with HUD CDBG-DR requirements, the City provides opportunities for residents, community organizations, and other stakeholders to participate in the development of the Action Plan, Action Plan Amendments, and other major program decisions. Participation opportunities may include public hearings, public comment periods, community outreach, and public notices distributed through the City's website, social media platforms, and other communication channels.

Citizen participation activities are conducted in a manner that promotes accessibility and inclusive participation. Public meetings and program information are provided in accessible formats when requested, and language assistance services are available for individuals with LEP in accordance with the City's Language Access Plan.

Additional details regarding CLR CDBG-DR Citizen Participation Plan is available on the City's [CDBG-DR website](#).

4.4. FINANCIAL MANAGEMENT

The CLR will maintain complete and accurate records sufficient to demonstrate compliance with all applicable CDBG-DR requirements. Documentation must support program eligibility determinations, income verification, award calculations, environmental review clearance, DOB analysis, affordability compliance, financial transactions, and project closeout. Program files must also demonstrate compliance with the applicable CDBG-DR National Objective and disaster tie-back to DR-4698.

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In accordance with 2 C.F.R. § 200.334⁸ and 24 C.F.R. §§ 570.502⁹ and 570.506¹⁰, all records related to CDBG-DR-funded activities shall be retained for a minimum of five (5) years following HUD’s formal grant closeout or the termination of a subrecipient agreement, whichever occurs later. If any audit, litigation, claim, monitoring review, or investigation is initiated before the expiration of the retention period, records shall be maintained until all findings are resolved and final action has been taken. The City may require a longer retention period if mandated by federal guidance, state law, or specific grant conditions.

Records may be maintained in electronic and/or hard-copy format. Electronic records shall be stored in approved City systems, including the City’s grant management platform, financial management system, and secure network or document management systems. Electronic documentation must be complete, legible, protected against unauthorized alteration or deletion, backed up in accordance with City information security protocols, and readily retrievable upon request. Program documentation must also be consistent with records maintained in HUD’s Disaster Recovery Grant Reporting (DRGR) system.

The U.S. Department of Housing and Urban Development (HUD), the HUD Office of Inspector General (OIG), the U.S. Government Accountability Office (GAO), and other authorized representatives shall have the right to access, examine, copy, and audit all records related to CDBG-DR activities. This right of access applies to the City, subrecipients, contractors, consultants, and any other entity receiving CDBG-DR funds.

Compliance with recordkeeping requirements is a condition of participation in the Program. Failure to maintain required documentation may result in suspension of payments, repayment of funds, termination of agreements, or other remedies permitted under federal regulations and applicable law. Additional guidance is available in the Financial Certification on the [CLR CDBG-DR website](#).

4.4.1. Cost Reasonableness

Homes purchased with assistance through HAP must not exceed the maximum purchase price limits established by HUD. The City will apply the HUD HOME Homeownership Value Limits¹¹ for Pulaski County unless otherwise approved by HUD. The City reserves the right to disallow costs that are determined to be excessive, unreasonable, or inconsistent with program requirements.

The City will review all transactions to ensure that:

- The purchase price reflects reasonable market value

⁸ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR4acc10e7e3b676f/section-200.334>

⁹ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-J/section-570.502>

¹⁰ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-J/section-570.506>

¹¹ <https://www.hudexchange.info/resource/2312/home-maximum-purchase-price-after-rehab-value/>

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- Assistance amounts are reasonable and necessary
- Program funds are used only for eligible costs associated with the home purchase

Exception to Value Limits

In limited circumstances, the City may consider exceptions to the established maximum purchase price limits on a case-by-case basis, subject to HUD approval where required. To request an exception, the lender must submit a written justification demonstrating that the exception is necessary and reasonable. The City will evaluate exception requests using the following criteria:

- **Market Conditions:** Documentation that the purchase price reflects current market conditions, supported by comparable sales (comps) or an appraisal.
- **Availability of Housing:** Evidence that no comparable, eligible housing options are available within standard value limits in the target area.
- **Program Need:** Demonstration that the exception supports recovery goals, including access to safe, decent, and sanitary housing within the disaster-impacted area.
- **Cost Reasonableness:** Verification that the purchase price and total assistance amount are necessary and do not exceed what is required for the transaction to proceed.
- **Subsidy Layering Review:** Confirmation that total assistance does not exceed the amount needed to close the gap after accounting for all other funding sources.

All exception determinations will be:

- Documented in the project file
- Supported by third-party documentation (e.g., appraisal, market analysis)
- Approved by authorized City personnel prior to commitment of funds
- Submitted to HUD for review and approval when required

The City will not approve exceptions that cannot be justified as necessary and reasonable or that would result in undue enrichment.

4.4.2. Layering and Cost Reasonableness

Subsidy layering occurs when multiple sources of public funding are combined in a manner that results in assistance exceeding the amount necessary to complete the eligible activity. Excessive subsidy is prohibited under federal requirements.

The CLR will review all HAP applications to ensure that the amount of CDBG-DR assistance provided does not exceed the minimum amount necessary to facilitate the purchase of the property.

As part of this review, the City will evaluate the home purchase transaction to confirm that:

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- The purchase price is reasonable and supported by an independent appraisal;
- The amount of financial assistance requested is necessary to complete the transaction;
- Other sources of public assistance are properly accounted for; and
- The total subsidy provided does not exceed program limits or result in an excessive benefit to the homebuyer.

The City may reduce the amount of CDBG-DR assistance if other available resources are sufficient to complete the purchase transaction. The final award amount will reflect only the level of assistance necessary to ensure affordability and program compliance.

All subsidy layering and cost reasonableness determinations will be documented and maintained in the official program file.

4.4.3. Monitoring And Compliance

The CLR monitors all activities funded through the CDBG-DR HAP to ensure compliance with federal regulations, the HUD-approved Action Plan, and City policies. Monitoring verifies that activities are implemented as intended, that costs are eligible and properly documented, and that required records are maintained. Reviews may include desk-based file and financial reviews, as well as on-site or virtual monitoring when necessary. Monitoring applies to City-administered activities, subrecipients, contractors, and other participating entities. The City may provide technical assistance during monitoring to support compliance and effective program delivery.

If monitoring identifies deficiencies or noncompliance, the City may issue written findings and require corrective actions within a specified timeframe. Failure to resolve issues may result in increased oversight, suspension of payments, repayment of funds, or other remedies allowed under applicable regulations.

Monitoring activities are conducted in accordance with 24 CFR Part 570¹² and HUD guidance, including the CPD Monitoring Handbook 6509.2. The City may use risk-based monitoring to prioritize reviews of activities or entities that present higher financial, operational, or compliance risk. Additional procedures are detailed in the City's CDBG-DR Subrecipient Manual.

The City also tracks timeliness and performance to ensure CDBG-DR Housing activities meet federal requirements and the HUD-approved Action Plan. Performance monitoring may include internal reporting, DRGR data entry, construction progress checks, obligation tracking, and expenditure analysis. The CLR will compare expenditures and outcomes to projections to assess program impact within the MID area. Applicants, contractors, and subrecipients must meet established milestones for

¹² <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570>

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project initiation, progress, and completion. Failure to demonstrate reasonable progress may result in corrective action, scope modification, payment withholding, or reallocation of funds.

4.5. DUPLICATION OF BENEFITS (DOB)

The CLR follows HUD's standard DOB framework¹³ to ensure that CDBG-DR funds are not used to pay for costs that have been compensated by other sources. In accordance with federal law, a DOB analysis must be conducted prior to the commitment of CDBG-DR funds.

In accordance with federal law and applicable HUD guidance, a DOB analysis must be conducted prior to the commitment of CDBG-DR funds under the HAP. The purpose of the DOB review is to ensure that disaster recovery assistance is used only to address unmet needs resulting from the qualifying disaster event (DR-4698). For additional details, refer to the DOB Policy and Procedures Manual available on the [CLR CDBG-DR website](#). Under Section 312 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5155¹⁴), federal assistance cannot duplicate benefits already received; therefore, CDBG-DR funds cannot cover costs paid by insurance, FEMA, SBA, NFIP, or other sources. A DOB occurs when total disaster assistance exceeds the verified eligible need for the same purpose.

4.5.1. Household DOB and Determination

For the HAP, the City will conduct a household-level DOB review to ensure assistance does not duplicate disaster-related funds received by the applicant, including insurance, FEMA, SBA, NFIP, and other public or private sources. CDBG-DR funds will be used only for eligible costs not covered by these sources.

The City will reassess unmet need before funding commitment and prior to final disbursement and will complete a DOB review before approval and home purchase closing to confirm that prior assistance has not already met the need. CLR staff will follow HUD-approved procedures to verify assistance, review documentation, determine unmet need, and calculate the final award. Applicants may be required to document how prior funds were used; misuse may result in reduced assistance or repayment.

CLR may also conduct post-award monitoring to ensure no additional duplication occurs. If duplication is identified after award, repayment or other corrective action may be required. All DOB documentation will be maintained in accordance with federal record retention requirements.

¹³ <https://www.hudexchange.info/news/duplication-of-benefits-collection-policy/>

¹⁴ [https://uscode.house.gov/view.xhtml?req=\(title:42%20section:5155%20edition:prelim\)](https://uscode.house.gov/view.xhtml?req=(title:42%20section:5155%20edition:prelim))

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5. PROGRAM OVERVIEW

5.1. PURPOSE

The CLR's HAP provides direct financial assistance to eligible homebuyers purchasing a primary residence within the City. The program reduces financial barriers to homeownership and supports long-term recovery from the March 31, 2023, tornado (DR-4698). The City may provide assistance to cover part of the down payment and reasonable closing costs. Payments are made on behalf of the homebuyer at closing to reduce the amount the buyer must contribute. Eligible households get assistance as a grant if they meet program rules, including income limits. The amount depends on the guidelines and funds available. To protect the public investment, the City will record a deed restriction or other mechanism. The terms will match the subsidy amount and require the home to stay the household's primary residence during the affordability period. The HAP will follow the City's HUD-approved Action Plan and all needed CDBG-DR rules.

5.2. MAXIMUM AMOUNT OF ASSISTANCE PER BENEFICIARY

The maximum assistance for HAP is \$15,000 per unit. Program maximum assistance may also be increased where necessary and on a case-by-case basis to comply with federal and State accessibility standards or to reasonably accommodate a person with a disability. See Section 4.8.1., Cost Reasonableness for additional details.

5.3. NATIONAL OBJECTIVE

All activities funded under the HAP shall meet a CDBG-DR National Objective in accordance with Section 105(c) of the Housing and Community Development Act of 1974¹⁵, as amended, 24 CFR § 570.208¹⁶, applicable waivers and alternative requirements, and the HUD-approved CDBG-DR Action Plan. The National Objective of the HAP is to:

- Benefit LMI persons; or
- Address an Urgent Need (meeting a need having a particular urgency).

5.4. ELIGIBLE ACTIVITIES

The CLR's HAP provides financial assistance to eligible households purchasing a primary residence within the CLR. All activities funded through this program must comply with the HUD-approved Action Plan, applicable CDBG-DR regulations, and all federal cross-cutting requirements. Eligible activities under the HAP are intended to reduce financial barriers to homeownership and support long-term housing recovery following the March 31, 2023, tornado (DR-4698). Program funds may be used for the following eligible activities:

¹⁵ <https://www.govinfo.gov/content/pkg/COMPS-10382/pdf/COMPS-10382.pdf>

¹⁶ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-C/section-570.208>

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5.4.1. Down Payment Assistance

The program may provide assistance to cover a portion of the down payment required to purchase a home. Eligible down payment assistance includes:

- Financial assistance applied toward the required down payment for an eligible home purchase
- Payments made directly at closing on behalf of the homebuyer
- Assistance structured to reduce the amount of funds the homebuyer must contribute to completing the purchase transaction

5.4.2. Closing Cost Assistance

The program may provide assistance for reasonable and customary closing costs associated with purchasing a home. Eligible closing costs may include, but are not limited to:

- Loan origination fees
- Title search and title insurance
- Appraisal fees
- Credit report fees
- Recording and filing fees
- Settlement or escrow fees
- Attorney fees associated with the closing process
- Prepaid property taxes and homeowners' insurance required at closing

All closing costs must be reasonable, customary, and necessary to complete the purchase transaction.

5.4.3. Homebuyer Education and Housing Counseling

To support sustainable homeownership, program participants may be required to complete homebuyer education or housing counseling prior to receiving assistance. Eligible counseling activities may include:

- HUD-approved homebuyer education courses
- Financial readiness counseling
- Credit and budgeting counseling
- Mortgage readiness counseling

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Housing counseling must be provided by a HUD-approved housing counseling agency or other qualified provider.

5.4.4. Program Administration and Delivery

The City may incur reasonable administrative and program delivery costs necessary to implement and oversee the HAP. Eligible administrative activities may include:

- Application intake and eligibility review
- Income verification and file documentation
- Environmental review documentation, when required
- Program compliance monitoring
- Financial management and reporting
- Data management and DRGR reporting

Administrative costs will be managed in accordance with applicable CDBG-DR and federal cost principles.

5.4.5. Rehabilitation and New Construction Standards

Where assistance provided through the HAP is used in conjunction with rehabilitation or the purchase of newly constructed housing, the applicable construction and rehabilitation standards established by the CLR shall apply.

Rehabilitation activities must comply with the requirements outlined in the CLR CDBG-DR Housing Rehabilitation Program Manual, including applicable property standards, environmental review requirements, lead-based paint regulations, procurement requirements, and construction oversight procedures.

New construction homes purchased with assistance through the HAP must comply with the requirements outlined in the CLR CDBG-DR New Housing Construction Program Policy Manual, including applicable building standards, environmental compliance requirements, resiliency standards, and affordability requirements. Applicants, contractors, and participating entities must comply with all applicable standards contained in those manuals when rehabilitation or new construction activities are funded in whole or in part with CDBG-DR assistance.

5.5. INELIGIBLE ACTIVITIES

The following activities are not eligible under the HAP:

- Activities not tied to DR-4698 or documented unmet housing need;
- Purchase of investment properties or second homes

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- Properties located outside the CLR
- Refinancing of an existing mortgage
- Payment of personal debts or non-housing related expenses
- Assistance for properties that will not be used as the buyer's primary residence
- Purchase of properties that do not meet applicable property standards
- The City reserves the right to determine eligibility of specific costs in accordance with applicable federal regulations and program guidelines. Costs prohibited under 24 CFR 570.207 or 570.482(e);
- Costs that fail to meet federal allowability standards under 2 CFR Part 200, Subpart E.

All expenditure must be necessary, reasonable, allocable, and directly related to approved HAP activities. Funds may only be used for eligible recovery purposes consistent with Title I of the Housing and Community Development Act and the HUD Universal Notice.

5.6. PROGRAM STANDARDS

The CLR's HAP provides financial assistance to eligible homebuyers purchasing a primary residence within the HUD- MID area, which includes the entire CLR. All activities funded through HAP must comply with the Housing and Community Development Act (HCDA), applicable Federal Register Notices including the HUD Universal Notice, 24 CFR Part 570 (as modified by waiver), 2 CFR Part 200, and all other applicable federal, state, and local requirements. The type and level of assistance provided will be determined through applicant eligibility review, income verification, lender underwriting, and compliance with the program standards outlined below. All mortgage financing must be determined by the City to support sustainable homeownership and not place the assisted household at risk of foreclosure.

5.7. APPLICATION PROCESS

The CLR will administer the HAP through a structured application and review process to ensure that all assistance provided complies with program requirements and applicable federal regulations. Applicants must complete the required application process and provide documentation sufficient to verify eligibility prior to the commitment of CDBG-DR funds. Advancement through any stage of the review process does not constitute approval of assistance.

All applications are subject to eligibility verification, duplication of benefits review, environmental compliance requirements, and availability of program funding.

1. Application Submission

Applications for assistance must be submitted using forms provided by the CLR and must be initiated through the applicant's mortgage lender. Applications may only be submitted after the mortgage

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lender has completed underwriting and determined that the applicant qualifies for the mortgage loan, contingent upon the HAP assistance.

The application must include documentation verifying:

- Applicant household income
- Mortgage loan qualification
- Property eligibility
- Homebuyer counseling completion
- Purchase agreement and loan documentation

Applications must be submitted to the CLR Department of HNP for review. Incomplete applications may delay the review process or result in denial of assistance.

All communication regarding application status will be conducted between the City and the mortgage lender only. Applicants must direct all status inquiries to their mortgage lender. The City will not provide application updates directly to applicants.

2. Program Eligibility Review

Upon receipt of a complete application, City staff will conduct a review to determine whether the applicant and property meet program eligibility requirements. Eligibility review may include the verification of:

- First-time homebuyer status
- Household income eligibility
- Mortgage loan qualification
- Property location within the HUD-designated MID area
- Compliance with program property standards
- Completion of required homebuyer counseling
- DOB review

The City may request additional documentation as needed to verify eligibility. Submission of an application or progression through review does not constitute approval of assistance.

3. Property Inspection

Once the application has been preliminarily approved, the City will schedule a property inspection to verify that the home meets applicable housing standards. Inspection requirements include:

- Verification that the property meets the CLR Minimum Housing Code Standards

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- Identification of any deficiencies that must be corrected prior to closing
- Confirmation that the property is safe and suitable for occupancy

If the property does not meet required standards:

- The mortgage lender will be notified, and
- The seller is responsible for correcting all deficiencies

All required repairs must be completed prior to closing. A re-inspection may be required to confirm that all required repairs have been completed.

4. Pre-Closing Requirements

The following must be completed and submitted to the Department of Housing and Neighborhood Programs prior to closing:

- Final inspection confirming compliance with Minimum Housing Code Standards
- All required lead-based paint documentation (if applicable)
- Complete loan and eligibility documentation

Failure to meet these requirements will delay or prevent closing.

5. Final Approval and Closing Coordination

Once all eligibility requirements, inspections, and documentation reviews have been completed, the City will issue an approval for assistance.

Prior to closing:

- The title company will submit the Closing Disclosure (CD) and other required closing documents to the City for review.
- The City will prepare required program documents, including the promissory note and deed restriction associated with the assistance.

Upon verification that all program requirements have been satisfied, the City will authorize closing. Program funds will be provided at closing on behalf of the homebuyer and applied to eligible purchase costs.

Post-Closing Documentation

Following closing, the lender or closing agent must submit final documentation to the CLR and invoice for payment. Invoice must be sent 10 days in advance to ensure timely payment.

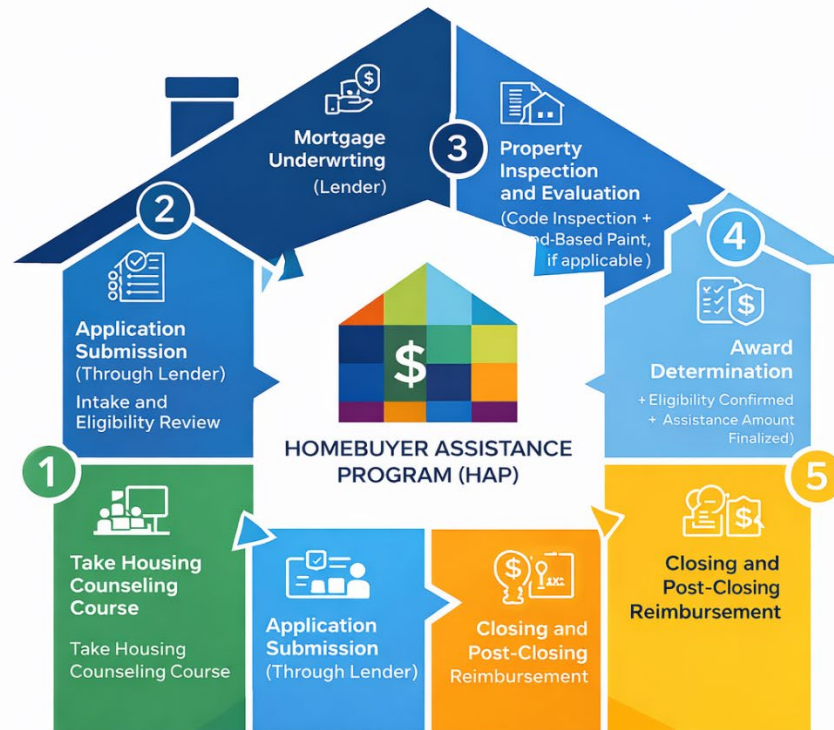
Required documentation may include:

- Recorded deed restriction or lien documents
- Final closing documents

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- Settlement statement
- Invoice for the approved assistance amount

All documentation must be maintained in the program file in accordance with CDBG-DR recordkeeping requirements.



5.7.1. Waiting List

If demand for the HAP exceeds available funding, the CLR will establish and maintain a waiting list until program funds are fully committed and the program is closed. Applicants will be placed on the waiting list based on the date and time a complete application is received through the mortgage lender. As funding becomes available, applications will be selected for processing in the same chronological order. Placement on the waiting list does not constitute program approval or eligibility. Applicants will not be fully evaluated for income or other eligibility requirements until they are selected from the waiting list for processing. All eligibility determinations must be based on current information at the time of review.

The City will make reasonable efforts to confirm continued interest from applicants on the waiting list. This may include outreach by phone, email, or written correspondence at periodic intervals. Applicants who do not respond within a specified timeframe or indicate they are no longer interested

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may be removed from the waiting list. The City reserves the right to update or modify waiting list procedures as necessary to ensure efficient administration of the program and compliance with applicable requirements.

5.8. APPLICANT ELIGIBILITY REQUIREMENTS

This section establishes eligibility standards for applicants and beneficiary households participating in the CLR's HAP. These requirements are designed to ensure that CDBG-DR funds are provided only to qualified households purchasing eligible homes that support long-term disaster recovery within the HUD-designated MID area.

Eligibility determinations under this program occur at two levels:

- Applicant Eligibility – the homebuyer applying for assistance;
- Property Eligibility – the residential property being purchased with program assistance.

All applicable requirements must be satisfied prior to the commitment of CDBG-DR funds.

Meeting minimum eligibility requirements does not guarantee assistance. All awards remain subject to income verification, lender underwriting, duplication of benefits review, environmental compliance requirements, and availability of program funds.

5.8.1. Eligible Applicants

The HAP is intended to assist first-time homebuyers purchasing a primary residence within the CLR. Eligible applicants must meet the following requirements:

- Applicants must be a U.S. citizen, U.S. noncitizen national, or a “qualified alien,” as defined in Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), to receive CDBG-DR assistance, consistent with Executive Order 14218 (90 FR 10581), signed February 19, 2025.
- The applicant must qualify as a first-time homebuyer, defined as a household that has not owned a residential property during the three (3) years preceding the purchase of the assisted property.
- Household income must be at or below 120 percent of Area Median Income (AMI), adjusted for household size.
- The applicant must complete a homebuyer counseling course approved by the CLR prior to closing.
- The applicant must provide documentation necessary to verify income eligibility, mortgage qualification, and compliance with program requirements.

The following documents are required:

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| Requirement | Standard | Documentation Required |
|--|---|--|
| Applicant Identification | Primary applicant(s) and all household members must establish identity. | Government-issued photo ID (required for primary applicant); birth certificate or other acceptable documentation for household members. |
| Citizenship / Lawful Presence | Primary applicant must be eligible to receive federal public benefits under PRWORA. | U.S. Passport, Birth Certificate, Naturalization Certificate, Citizenship Certificate, or other lawful presence documentation. |
| Income Eligibility | Household income must meet HUD limits and program thresholds. | Tax returns, pay stubs (3 months), W-2s, benefit letters, bank statements, profit and loss statements, rental agreements, unemployment letters, court orders, or Certification of No Income. |
| Duplication of Benefits (DOB) | Applicant must demonstrate unmet need after accounting for all disaster assistance. | Insurance policy, claim information, FEMA award letter, SBA award letter showing structural vs. contents payments and net claim amount. |
| Property Eligibility & Valuation | Property must meet program requirements and be suitable for purchase. | Appraisal Real Estate Contract (executed purchase agreement) |
| Loan Qualification | Applicant must be qualified by a mortgage lender prior to assistance. | Uniform Residential Loan Application (Form 1003) Commitment Letter from Mortgagee Loan Estimate and/or Closing Disclosure (CD) |
| Program Compliance | Applicant must complete required program activities prior to assistance. | Homebuyer Counseling Certificate (HUD-approved counseling agency) Notice to Homebuyer (acknowledgment form) |
| Closing Coordination | Required documentation must be provided to facilitate closing and funding. | Closing agent/title company contact information (including phone number) |
| Additional Documentation (If Applicable) | Required based on household composition or legal status. | Birth certificates for minors, disability verification, Power of Attorney documentation. |

5.8.2. Homebuyer Financial Contribution

To demonstrate financial readiness and commitment to homeownership, applicants may be required to contribute a minimum amount of their own funds toward the purchase transaction. Unless otherwise approved by the City, the homebuyer must contribute a minimum of \$500 of personal funds toward the purchase of the property. The City may waive or reduce this requirement on a case-by-case basis when necessary to ensure affordability or to accommodate documented financial hardship.

5.8.3. HUD Income Limits

The CLR HAP uses HUD-published household income limits to determine eligibility. HUD updates income limits annually based on Area Median Income (AMI) by household size and county. Unless otherwise specified in Program Guidelines, households must have incomes at or below 120 percent of AMI at the time of eligibility determination. Where required to meet the Low- and Moderate-Income

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Housing (LMH) National Objective, certain units may be restricted to households at or below 80 percent of AMI.

The Program will apply the HUD income limits in effect at the time income is verified and will not retroactively adjust limits for previously approved households. Program staff will update income tables each year upon HUD's publication of revised limits. HUD income limits are available at: <https://www.huduser.gov/portal/datasets/il.html>.

Income eligibility must be verified before assistance is approved and before closing on the home purchase. Household income will be calculated using a HUD-approved method outlined in Program policy, including:

- Annual (Part 5) income methodology;
- Adjusted gross income as defined for federal income tax purposes; or
- Another HUD-approved method permitted under applicable waivers.

All adult household members must disclose their income, and sufficient third-party documentation—such as pay statements, tax returns, benefit letters, bank statements, or employer verifications—must be collected. Documentation must be current at the time of eligibility determination and retained in the Program file.

If closing does not occur within the timeframe established by Program policy, the City may require updated income documentation to confirm continued eligibility. Income eligibility is determined once at the time assistance is provided; ongoing income recertification is not required after closing.

5.8.4. Mortgage Requirements

All home purchases assisted through the HAP must be financed with a first mortgage from a qualified lender, demonstrating the borrower's ability to sustain long-term homeownership.

Mortgage financing must meet the following requirements:

- The mortgage must be a fixed-rate mortgage.
- Balloon payment loans are not permitted.
- Interest-only loans are not permitted.
- The loan must be fully amortized over the loan term.
- All mortgage products must comply with federal lending regulations and be responsibly underwritten.

The City reserves the right to review mortgage terms and deny assistance for loan products that present an unreasonable risk to the homebuyer or the CDBG-DR investment.

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5.8.5. Eligible Loan Products

The HAP may be used in conjunction with the following mortgage loan types:

- Federal Housing Administration (FHA) loans
- Veterans Affairs (VA) loans
- U.S. Department of Agriculture (USDA) Rural Development loans
- Conventional mortgage loans issued by qualified lenders

Mortgage products must comply with federal lending regulations and standard underwriting practices. The following financing structures are not permitted:

- Seller-financed mortgages
- Balloon payment mortgages
- Interest-only loans
- Mortgage structures that do not fully amortize over the loan term

5.8.6. Lender Requirements

Mortgage lenders participating in the HAP must meet the following requirements:

- Be properly licensed to originate mortgage loans in the State of Arkansas
- Comply with all applicable federal and state lending regulations
- Provide written mortgage approval demonstrating that the borrower qualifies for the loan
- Provide required documentation necessary for the City to verify loan terms and closing costs

The City may require lenders to provide additional documentation to confirm compliance with program guidelines.

5.8.7. Property Eligibility Standards

Homes assisted through the HAP must be located within the HUD-designated MID area (including CLR) and be a single-family residential property with no more than four units, purchased as the homebuyer's principal residence. Eligible property types include single-family homes, condominiums, townhomes, and qualifying manufactured housing.

All properties must be suitable for long-term occupancy, comply with local zoning and building codes, and meet applicable environmental review requirements. The home must be inspected by the City and meet CLR Minimum Housing Code Standards, with all identified deficiencies corrected prior to assistance approval. For homes built before 1978, a lead-based paint inspection and risk assessment may be required if deteriorated paint is present.

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Manufactured housing is permitted only if it is installed on a permanent foundation, complies with HUD construction standards, and is allowed under local zoning regulations.

5.8.8. Property Condition Standards

All homes assisted through the HAP must meet basic life-safety and minimum property condition standards. Properties must:

- Meet HUD Decent, Safe, and Sanitary (DSS) standards¹⁷
- Meet Housing Quality Standards (HQS)¹⁸, where applicable
- Be free of major structural deficiencies
- Have functioning plumbing, electrical, and HVAC systems
- Have safe and operable roofing, windows, and doors
- Have safe water, sewer, and utility connections

Homes must be in move-in ready condition at the time of purchase. The City may require a home inspection or housing quality inspection to verify that the property meets program standards prior to closing.

5.8.9. Floodplain Requirements

Properties located within a Special Flood Hazard Area (SFHA) must meet applicable floodplain management standards.

When applicable:

- Structures must comply with local floodplain development standards
- Flood insurance may be required for properties located in flood hazard areas
- Documentation demonstrating compliance with floodplain requirements must be maintained in the program file

See Section 4.3. NFIP & Flood Insurance Enforcement , for more details.

5.8.10.

¹⁷ <https://www.ecfr.gov/current/title-25/chapter-IV/part-700/subpart-A/subject-group-ECFRa66e266610f6340/section-700.55>

¹⁸ eCFR :: 24 CFR 982.401 -- Housing quality standards.

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5.9. AFFORDABILITY PERIOD

All households receiving assistance through the CLR's HAP shall be subject to an affordability period to ensure that CDBG-DR funds provide a long-term benefit to income-eligible households within the HUD-designated MID area. The affordability period begins upon closing of the home purchase and execution of the assistance agreement. The homeowner must comply with the affordability requirements for the duration of the required term.

5.9.1. Owner-Occupied Housing

Homes purchased with assistance through HAP shall be subject to a five (5) year affordability period.

| Activity Type | Affordability Period | Enforcement Method |
|---------------------------------------|----------------------|--|
| Homebuyer Assistance (Owner-Occupied) | 5 Years | Recorded Promissory Note / Mortgage / Deed Restriction |

During the five (5) year affordability period:

- The assisted property must remain the homeowner's principal residence.
- The property may not be converted to rental, commercial, or short-term rental use.
- The property may not be sold, transferred, or encumbered in violation of Program requirements.
- The homeowner must remain in compliance with all material Program conditions.

Affordability requirements shall be secured through execution and recording of a Promissory Note and Mortgage, Deed of Trust, or other legally enforceable instrument as determined by the City. The recorded instrument will remain in effect for the full affordability term and will run with the property.

5.9.2. Forgiveness of Assistance

Assistance provided under the HAP will be structured as a forgivable grant, forgiven on a straight-line basis over the sixty-month affordability period. Each full year of verified compliance will forgive an equal portion of the original assistance. If the homeowner remains in compliance for the entire period, the remaining balance will be forgiven and the City will release the recorded lien. After the five-year period ends and compliance is verified, the City will issue written confirmation of completion and release the recorded affordability instrument.

5.9.3. Recapture Requirements

If, during the five-year affordability period, the property is sold or transferred, converted to rental or investment use, no longer used as the homeowner's principal residence, abandoned, or found in

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material noncompliance with Program requirements, the CLR may recapture the remaining unforgiven portion of the CDBG-DR assistance.

The recapture amount will be calculated on a straight-line basis and will equal the remaining unforgiven balance of the original assistance. Recapture will not exceed the net proceeds from the sale, defined as the sales price minus repayment of superior loans and customary closing costs. This limitation does not apply in cases of fraud, material misrepresentation, or intentional misuse of funds, in which the City may pursue full recovery as permitted by law.

The City may consider written requests for an exception to recapture in cases such as the homeowner's death, divorce, or court-ordered transfer, documented financial hardship, involuntary transfer (such as foreclosure), or other circumstances the City determines warrant consideration. All exceptions must be reviewed, documented, and approved in writing in accordance with Program procedures.

5.9.4. Sale or Transfer During Affordability Period

Homes bought with CLR's HAP must be the owner's principal residence for the entire affordability period. To sell, transfer, or refinance the property during this time, the homeowner must submit a written request to the CLR Department of HNP. The City will review the request and provide a written determination based on program policies and federal requirements.

If the property is sold, transferred, or otherwise conveyed before the end of the affordability period, the homeowner may be required to repay all or part of the CDBG-DR assistance. For voluntary sales or transfers, repayment of the remaining unforgiven assistance is generally required unless the City approves an exception. The recapture amount is based on the outstanding forgivable balance at the time of sale or transfer and must be paid from the net proceeds at closing, after repayment of superior liens and standard closing costs. If the property is transferred to someone who does not meet the program eligibility requirements, the unforgiven assistance becomes immediately due, unless the City authorizes the transfer and determines that the new owner meets all requirements.

Recapture will not exceed net proceeds. Net proceeds equal the sales price minus repayment of superior loans and closing costs. This limit applies except for cases of fraud, misrepresentation, or misuse of program funds.

Refinancing of the primary mortgage may be allowed during the affordability period with prior written approval from the City, provided the homeowner continues to own and occupy the property, the refinancing does not generate cash-out proceeds, and the City's lien remains in a secured position unless otherwise approved. Refinancing without prior approval may result in recapture of the original loan amount.

If the property undergoes foreclosure, deed-in-lieu, or another involuntary transfer, the City will review the situation to determine whether recapture is required. Recapture may be waived if the homeowner demonstrates good-faith efforts to maintain ownership and occupancy.

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6. GENERAL ELIGIBILITY REQUIREMENTS

6.1. LEAD-BASED PAINT REQUIREMENTS

All properties assisted through the CLR's CDBG-DR HAP must comply with federal lead-based paint (LBP) requirements, including Title X and 24 CFR Part 35¹⁹. For homes built before 1978, the City will ensure all required LBP disclosures and notifications are provided before closing. Homebuyers must receive the EPA/HUD Lead-Based Paint Disclosure Form, the "Protect Your Family from Lead in Your Home" pamphlet, and any known information about lead-based paint or hazards at the property. If deteriorated paint is identified during inspection of a pre-1978 home, the City may require additional evaluation or mitigation to ensure the property meets HUD [Decent, Safe, and Sanitary \(DSS\)](#) standards before assistance is approved. All lead-based paint compliance documentation will be maintained in the program file in accordance with federal recordkeeping requirements.

6.2. DATA SECURITY AND PROTECTION OF PERSONALLY IDENTIFIABLE INFORMATION (PII)

The CLR will safeguard all personally identifiable information (PII) collected through CDBG-DR activities. Access to applicant and beneficiary data will be limited to authorized personnel with a legitimate program-related need. Program files containing PII will be stored in secure electronic systems and, when applicable, in secured physical locations. Electronic records must comply with City cybersecurity standards, including access controls, password protection, and data-backup protocols. Sensitive documents may not be transmitted through unsecured methods. Subrecipients, contractors, and program partners must follow all applicable City privacy policies, information security standards, and record-retention requirements. Unauthorized access, disclosure, or misuse of PII may result in corrective action, termination of agreements, recovery of funds, or referral to appropriate authorities.

6.3. PROGRAM TRANSPARENCY AND OUTREACH

6.3.1. Marketing and Outreach

The City will conduct outreach to inform community members affected by the March 31, 2023 tornado about available CDBG-DR Housing Programs. Outreach may include public notices, community meetings, website postings, printed materials, social media, direct engagement with neighborhood associations, and coordination with community-based partners.

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<https://www.bing.com/ck/a?!&&p=275b9122ccf22cffee8023cdb12b2815bcad36122d0c9da8a025edb28e5e81fbJmltdHM9MTc3NDEzNzYwMA&ptn=3&ver=2&hsh=4&fclid=04ebba5-55ce-6aec-19f2-adce54d46b77&psq=Title+X+and+24+CFR+Part+35&u=a1aHR0cHM6Ly93d3cuZWNmci5nb3YyY3VyY3VycmVudC90aXR sZS0yNC9zdWJ0aXRzS1BL3BhcnQtMzU>

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The City will use its website and social media platforms to notify residents when applications open, deadlines approach, and when public hearings or community meetings related to CDBG-DR programs are scheduled. These platforms will also provide updates on program availability, application procedures, and opportunities for public participation.

Outreach may be conducted in partnership with community organizations, housing providers, advocacy groups, faith-based organizations, and other local institutions that serve residents with limited access to traditional communication channels

Special outreach efforts will focus on reaching:

- LMI households
- Racial and ethnic minority communities
- Elderly residents and older adults
- Individuals with disabilities
- Persons with LEP
- Households that may face barriers related to transportation, technology access, or mobility limitations

All outreach materials will be accessible and provided in languages consistent with the City's Language Access Plan and applicable civil rights requirements. Public meetings and application activities will be held in physically accessible locations, with reasonable accommodations provided upon request.

The City will periodically evaluate outreach efforts and participation data to ensure equitable access to recovery programs. If underrepresented groups are identified, the City may adjust outreach strategies or application assistance efforts to improve accessibility.

Additional information on public engagement and citizen participation procedures is available in the CLR Citizen Participation Plan on the [CLRs CDBG-DR website](#).

6.3.2. Public Website and Transparency

The City will maintain a publicly accessible CDBG-DR webpage to ensure transparency and public access to program information. The site will include key documents such as Program Guidelines, application materials, procurement opportunities, amendments, and performance reports, as applicable. Program updates and policy changes will be posted to provide accurate and timely public information.

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7. ADMINISTRATIVE CLOSEOUT AND PROJECT COMPLETION

Administrative closeout for CLR's HAP occurs once all requirements for the assisted home purchase are met and the City verifies compliance with federal regulations and program policies. Closeout ensures each transaction is fully documented, funds were used for eligible purposes, and the activity meets the applicable CDBG-DR National Objective.

After the home purchase closes, the CLR Department of HNP will collect and review all required documents to confirm eligibility, environmental review, duplication of benefits, and other compliance requirements. Staff will verify that assistance was applied to eligible costs and that all agreements and affordability instruments were properly executed and recorded.

Before closing the activity file, the City will complete a final review to confirm documentation of National Objective compliance, disaster tie-back to DR-4698, and cost reasonableness. This review also ensures that mortgage documents, closing statements, and all other required compliance materials are included.

Once the review is complete, the City will update program records and reporting systems. Documentation will be retained in accordance with federal record-retention requirements and City policies to support HUD monitoring, audits, or other oversight.

Administrative closeout does not end the City's responsibility to monitor ongoing affordability requirements. Homes assisted through the HAP remain subject to recorded occupancy and affordability restrictions for the full affordability period. The City will maintain records and conduct follow-up verification as needed to ensure continued compliance.

8. Audit and Oversight Requirements

CDBG-DR funds are subject to federal, state, and local audit. All staff, subrecipients, developers, and contractors must cooperate with monitoring reviews, audits, and investigations conducted by the City, HUD, the State of Arkansas, or federal oversight agencies. Documentation requested for audit purposes must be made available promptly. Corrective actions resulting from audits or monitoring will be tracked until resolved.

8.1. CONFLICT OF INTEREST

The CLR will follow the CLR's Conflict of Interest Policy and applicable federal regulations, including 24 CFR § 570.611²⁰ and 2 CFR §§ 200.112²¹ and 200.318(c)(1)²². All City employees, elected officials, subrecipients, contractors, consultants, and any person involved in CDBG-DR decision-making must comply with federal, state, and local conflict-of-interest requirements. No covered person may receive

²⁰ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-K/section-570.611>

²¹ <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-B/section-200.112>

²² <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.318>

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a financial benefit from a CDBG-DR-assisted activity or have an interest in any contract, property, or agreement funded with CDBG-DR during their service or for one (1) year after, unless HUD approves an exception. Any actual or potential conflict must be disclosed in writing as soon as it is identified. Individuals with a conflict may not participate in related decisions, procurement actions, or contract administration. The City may request a formal exception from HUD when permitted under 24 CFR § 570.611(d)²³, but no exception is valid without written HUD approval. Failure to disclose or comply with conflict-of-interest requirements may result in removal from the activity, termination of agreements, repayment of funds, or other corrective action.

8.2. FRAUD, WASTE, AND ABUSE PREVENTION

The CLR HNP maintains policies and internal controls to prevent, detect, and respond to fraud, waste, abuse, misappropriation, and other fiscal irregularities in all CDBG-DR activities. These safeguards apply to employees, applicants, subrecipients, contractors, consultants, vendors, beneficiaries, and any entity administering or receiving CDBG-DR funds. All participants are required to provide accurate and complete information, comply with program requirements, avoid conflicts of interest, maintain documentation sufficient to support eligibility and expenditures, and cooperate fully with monitoring, audits, and investigations conducted by the City, HUD, HUD's Office of Inspector General (OIG), or other authorized oversight entities.

The City implements preventative controls including verification of applicant income, ownership, residency, and disaster tie-back; DOB review using FEMA, SBA, NFIP, and other available data; competitive procurement and contractor due diligence; licensing and debarment checks; required inspections prior to payment; documented draw approval procedures; and risk-based monitoring of subrecipients and contractors. All applicants and funding recipients execute certifications acknowledging that information provided is true and correct and agreeing to repay funds if duplication, misrepresentation, or ineligible activity is later identified.

Suspected fraud, waste, or abuse may be reported to the Program Manager, Assistant Director, Director, Procurement Manager, City Attorney, or directly to HUD OIG. Reports may be submitted anonymously, and retaliation against individuals who report concerns in good faith is prohibited in accordance with applicable whistleblower protections. All substantiated cases involving federal funds will be referred to HUD OIG and appropriate enforcement authorities as required.

If misuse of funds, material misrepresentation, duplication of benefits, or noncompliance is identified, the City has the authority to suspend payments, terminate participation or contracts, require repayment of improperly received or expended funds, offset future payments, and pursue recovery through legal action. Intentional false statements or fraudulent claims may result in civil or criminal penalties under applicable federal statutes, including 18 U.S.C. §§ 287²⁴ and 1001, 31 U.S.C. § 3729²⁵,

²³ <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-K/section-570.611>

²⁴ <https://www.justice.gov/archives/jm/criminal-resource-manual-922-elements-18-usc-287>

²⁵ <https://uscode.house.gov/view.xhtml?req=civil+cause+of+actions&f=treesort&num=409>

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and other relevant laws. All investigative actions, findings, and enforcement decisions will be documented and retained in accordance with federal record retention requirements.

The full Fraud, Waste, and Abuse Policy may be found on [CLR CDBG-DR Webpage](#) in the Financial Certification.

9. COMPLAINTS AND APPEALS

The city will respond in writing to written complaints and appeals. Complaints and appeals should be submitted to the CLR. They may also be received verbally, and by other means, as necessary. If the City determines that a complainant or appellant is unable to submit a written complaint due to a physical or intellectual impairment, the City may assist by converting the complaint into written form. The City will respond to all complaints within fifteen (15) working days, when practicable. Complaints may be submitted as follows:

Tracey Shine
CLR
Housing & Neighborhood Programs
500 W. Markham Street, Suite 120W
Little Rock, AR 72201

Complaints may also be submitted by email to: tshine@littlerock.gov.

To file a written complaint or appeal, contact Tracey Shine at 501-371-6825.

Any person that feels that the Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d)²⁶ and Executive Order 13166 regulations²⁷ were not complied with may file a complaint directly to the Assistant Secretary for Fair Housing and Equal Opportunity at the following links (or as otherwise directed):

| | | |
|--|---|---|
| FORT WORTH REGIONAL OFFICE U.S. Department of Housing and Urban Development Southwest Office 819 Taylor Street Fort Worth, TX 76102 | Ashlea Quinonez, Regional Administer | (817) 978-5965 Fax: (817) 978-5876 |
|--|---|---|

Or Contact (888) 560-8913 and for the hearing impaired, please call TTY (800) 927-9275.

The Arkansas Fair Housing Commission can be reached toll-free at (800) 340-9108.

²⁶ <https://www.justice.gov/crt/fcs/TitleVI-Overview>

²⁷ <https://www.federalregister.gov/documents/2000/08/16/00-20938/improving-access-to-services-for-persons-with-limited-english-proficiency>

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10. REFERENCES

Federal Statutes

- **Housing and Community Development Act of 1974 (42 U.S.C. § 5301 et seq.)**
<https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter69&edition=prelim>
- **Robert T. Stafford Disaster Relief and Emergency Assistance Act (42 U.S.C. § 5121 et seq.)**
<https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter68&edition=prelim>
- **Flood Disaster Protection Act of 1973 (42 U.S.C. § 4001 et seq.)**
<https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter50&edition=prelim>
- **Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X)**
https://www.hud.gov/program_offices/healthy_homes/enforcement/lshr

Federal Regulations

- **2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards**
<https://www.ecfr.gov/current/title-2/part-200>
- **24 CFR Part 8 – Nondiscrimination Based on Disability**
<https://www.ecfr.gov/current/title-24/part-8>
- **24 CFR Part 35 – Lead-Based Paint**
<https://www.ecfr.gov/current/title-24/part-35>
- **24 CFR Part 55 – Floodplain Management and Protection of Wetlands**
<https://www.ecfr.gov/current/title-24/part-55>
- **24 CFR Part 58 – Environmental Review Procedures**
<https://www.ecfr.gov/current/title-24/part-58>
- **24 CFR Part 75 – Section 3 Requirements**
<https://www.ecfr.gov/current/title-24/part-75>
- **24 CFR Part 570 – Community Development Block Grant Regulations**
<https://www.ecfr.gov/current/title-24/part-570>
- **49 CFR Part 24 – Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA)**
<https://www.ecfr.gov/current/title-49/part-24>

Federal Register Notices and HUD Guidance

- **HUD CDBG-DR Universal Notice (90 FR 1754)**
<https://www.federalregister.gov/documents/2025/01/08/2024-30973/community-development-block-grant-disaster-recovery-universal-notice>
- **HUD Allocation Announcement Notice (90 FR 4759)**
<https://www.federalregister.gov/documents/2025/01/15/2025-00654/allocations-for-community-development-block-grant-disaster-recovery-and-implementation-of>
- **HUD Memorandum 2025-02 – Revisions to the Universal Notice**

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- **HUD CPD Monitoring Handbook 6509.2**
https://www.hud.gov/program_offices/comm_planning/library/monitoring/handbook
- **HUD Duplication of Benefits Guidance**
<https://www.hudexchange.info/programs/cdbg-dr/duplication-of-benefits/>

Federal Agencies and Programs

- **U.S. Department of Housing and Urban Development (HUD)**
<https://www.hud.gov>
- **Federal Emergency Management Agency (FEMA)**
<https://www.fema.gov>
- **U.S. Environmental Protection Agency (EPA)**
<https://www.epa.gov>
- **U.S. Small Business Administration (SBA)**
<https://www.sba.gov>

State and Local Documents

- **Arkansas Residential Anti-Displacement and Relocation Assistance Plan (RARAP)**
<https://adfa.arkansas.gov/wp-content/uploads/2024/12/Attachment-45-RARAP-ADFA-Final-Residential-Anti-Displacement-Relocation-Assistance-Plan.pdf>
- **City of Little Rock CDBG-DR Action Plan and Amendments**
<https://littlerock.gov/government/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/>
- **CLR CDBG-DR Action Plan and Amendments**
<https://littlerock.gov/government/city-departments/housing-and-neighborhood/community-development-block-grant-disaster-recovery/>
- **City of Little Rock Down Payment Assistance Program**
<https://littlerock.gov/government/city-departments/housing-and-neighborhood/community-development/>