

**FY 2024/25 HUD Annual Action Plan Substantial Amendment
CDBG, CDBG-CV3, HOME and Program Income Reallocation**

Public Comment Period: March 06, 2025 through April 4, 2025

INTRODUCTION

The City of Glendale’s HUD Annual Action Plans (AAP) detail the community’s funding strategy to expend Community Development Block Grant (CDBG), Emergency Solutions Grants (ESG), and HOME Investment Partnerships Program each year. The Plans implement the goals of the City’s Five-Year Consolidated Plan by funding allocations to specific activities that advance these goals, and are developed through significant public input, analysis, and planning.

Title 24 Section 91.505 of the Code of Federal Regulations stipulates that communities shall amend their approved plans whenever they make one or more of the following decisions:

1. To make a change in its allocation priorities or a change in the method of distribution of funds;
2. To carry out an activity, using funds from any program covered by the Consolidated Plan (including program income) not previously described in the action plan; or
3. To change the purpose, scope, location, or beneficiaries of an activity.

The regulation further requires that jurisdictions identify in their Citizen Participation Plans the criteria they will use for determining what constitutes a substantial amendment. As a member of the Maricopa HOME Consortium the City follows the Consortium’s FY Citizen Participation Plan. Consistent with these requirements, the City identified three criteria that will require a substantial amendment:

1. Changes in the use of CDBG/ESG funds from one eligible activity to another; or
2. An activity is undertaken that was not previously included in the Consolidated Plan or subsequent Annual Action Plans; or
3. More than twenty percent of an activity budget is proposed to be reallocated to another eligible program activity.

The proposed substantial amendment triggers all three of these criteria, including: 1. changing the use of CDBG and/or HOME funds from one eligible activity to another; 2. creation of a new activity not previously included in existing Annual Action Plans; and 3. reallocation of 20% or more in CDBG and/or HOME funds from one activity to another eligible activity.

CONTENT OF THE SUBSTANTIAL AMENDMENT

With this Substantial Amendment, the City proposes to allocate or reallocate prior year funding according to the following:

- Reallocate \$85,562.35 in FY 2021-22 and FY 2022-23 CDBG from unspent physical improvement grants to the Tenant Based Rental Assistance (TBRA) program. Specifically, these funds will be used to support case management services to participants in the City’s HOME-funded TBRA program operated by A New Leaf. This activity is eligible under Title 24 of the Code of Federal Regulations, Part 570.201(k), Housing Services.
- Reallocate \$104,172.72 in FY 2023-24 and FY 2024-25 CDBG from unspent program income, and public services grants to the Tenant Based Rental Assistance (TBRA) program. Specifically, these funds will be used to support case management services to participants in the City’s HOME-

funded TBRA program operated by A New Leaf. This activity is eligible under Title 24 of the Code of Federal Regulations, Part 570.201(k), Housing Services. \$1,857.20 of these funds will be reallocated to the Foster Youth to Independence program. These funds have already been expended and will be allocated as part of the final reconciliation of overall program expenses. \$19,165.85 of this will be allocated to Program Administration.

- Reallocate \$18,775.89 in CDBG- CV3 funds currently allocated to the Heath Relief Program to the Glendale Works Program. The Glendale Works Program provides homeless residents with paid day labor opportunities to clean up various city facilities and spaces. Reallocated funding will be used to pay for personnel costs of the program’s case managers to provide street outreach and wraparound services to program participants so that they can obtain housing and self-sufficiency.
- Program \$7,369.03 in HOME FY 23-24 program income and \$14,303.47 in HOME FY 24-25 program income to the City’s TBRA program. Funding will be used for administration and direct assistance to program participants for rent and utilities (including deposits).
- Program \$2,408.06 in HOME FY 24-25 program income to the City’s HOME Administration. This funding will be used for the city’s administration of the HOME grant.

Allocation or reallocation of these funds is necessary to realign final activity expenditures with existing Annual Action Plan allocations and repurpose unexpended funding from completed or cancelled activities. The following table outlines the changes to the PY 2024-25 Annual Action Plan by funding type, organization, activity name, and funding to be reallocated.

FY 2024/25 HUD Annual Action Plan Substantial Amendment
CDBG, CDBG-CV3, & HOME Reallocations

	Activity Name	Funding Year	Current Remaining Allocation	Reallocation
CDBG	Café Lighting Phase II	2021-22	\$ 25,226.31	
	Physical Improvement: Multihousing costs	2022-23	\$ 32,257.14	
	Café Lighting Phase II	2022-23	\$ 28,078.90	
	AZ YWCA	2023-24	\$ 0.05	
	Catholic Charities	2023-24	\$ 7.76	
	One Step Beyond: Hockey Teach Life Skills	2023-24	\$ 3.70	
	Program Income (unallocated)	2024-25	\$ 95,829.26	
	New Pathways for Youth, Inc.	2024-25	\$ 24,462.00	
	AZ Opera	2024-25	\$ 4,893.00	
	PHA Foster Youth to Independence Rental Deposit - previously expended - clean up item			\$ 1,857.20
	Case Management (A New Leaf Tenant-Based Rental Assistance) - currently committed - clean up item			\$ 189,735.07
	Administration			\$ 19,165.85
	Subtotal CDBG to reallocations:			\$ 210,758.12
CDBG-CV3	Phoenix Rescue Mission - Heat Relief Network Case Managers	2020-21	\$ 18,775.89	
	Glendale Works (Case Managers)			\$ 18,775.89
	Subtotal CDBG-CV1 to reallocate:			\$ 18,775.89
HOME	Program Income (unallocated) - Clean up from previous Amendment	2023-24	\$ 7,369.03	\$ -
	Program Income (unallocated)	2024-25	\$ 16,711.53	\$ -
	Administration	2024-25		\$ 2,408.06
	A New Leaf - Tenant-Based Rental Assistance	2023-24	\$ -	\$ 21,672.50
	Subtotal HOME to reallocate:			\$ 24,080.56
Grand Total Amount to Reallocate (all funding sources):			\$ 253,614.57	\$ 253,614.57