

THE NSP SUBSTANTIAL AMENDMENT

Jurisdiction(s): <u>City of Middletown</u> <i>(identify lead entity in case of joint agreements)</i>	NSP Contact Person: Kyle Fuchs Address: One Donham Plaza Telephone: (513)425-7950 Fax: (513)425-7921 Email: kylef@cityofmiddletown.org
Jurisdiction Web Address: http://www.cityofmiddletown.org/nsp <i>(URL where NSP Substantial Amendment materials are posted)</i>	

A. AREAS OF GREATEST NEED

Provide summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction.

Note: An NSP substantial amendment must include the needs of the entire jurisdiction(s) covered by the program; states must include the needs of communities receiving their own NSP allocation. To include the needs of an entitlement community, the State may either incorporate an entitlement jurisdiction's consolidated plan and NSP needs by reference and hyperlink on the Internet, or state the needs for that jurisdiction in the State's own plan. The lead entity for a joint program may likewise incorporate the consolidated plan and needs of other participating entitlement jurisdictions' consolidated plans by reference and hyperlink or state the needs for each jurisdiction in the lead entity's own plan.

HUD has developed a foreclosure and abandonment risk score to assist grantees in targeting the areas of greatest need within their jurisdictions. Grantees may wish to consult this data [LINK – to HUD USER data], in developing this section of the Substantial Amendment.

Response: **The City of Middletown's is utilizing the information provided by HUD that lists the percentages of high cost loans, vacant properties, and the predicted 18 month underlying foreclosure rate in the LMMI census tracts. We have added these 3 percentages for each census tract and sorted the information from highest percentage to the lowest (see TABLE 1 below). The City has also created a map showing the census tracts at $\leq 80\%$ of median income and $\leq 120\%$ of median income (see Map 1 attached). We then pulled a current list of foreclosed properties that were provided by Butler county and overlaid those properties onto the map (see Map 2 attached).**

B. DISTRIBUTION AND USES OF FUNDS

Provide a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures. *Note:* The grantee's narrative must address these three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

Response: We have separated the LMMI census tracts in the city and for each individual tract have added the percentages of: foreclosed/vacant properties, properties financed with Hi-cost financing, and the estimated foreclosure for the next 18 months. Much of our efforts will be focused in the areas with those higher total percentages. However, staff has determined that ALL areas of the City are facing high risk. Therefore, the City will administer all NSP programs on a city-wide basis. Although projects may be in several different census tracts, the vast majority of the work will be in areas with a foreclosure abandonment risk score of at least 9 or higher.

The total percentage data in relation to its corresponding census tract is listed in TABLE 1:

Table 1: Census Tracts Sorted by Total Percentage

Census Tract	Block Group	HUD Risk Score	Total % HMDA, Predicted 18 month, & Vacancy
012800	1	10	96.50%
012800	2	10	96.50%
012900	1	10	83.22%
012200	1	10	80.95%
012200	2	10	80.95%
012200	3	10	80.95%
012200	4	10	80.95%
013200	1	10	79.87%
013200	2	10	79.87%
013000	1	10	71.07%
013000	2	10	71.07%
014000	1	10	70.51%
014000	9	10	70.51%
013900	1	10	70.36%
013900	2	10	70.36%
013900	3	10	70.36%
013900	4	10	70.36%
014100	1	10	64.74%
014100	2	10	64.74%
012300	1	10	64.47%
012300	2	10	64.47%
013100	1	10	63.82%
013100	2	10	63.82%
013100	3	10	63.82%
013500	1	10	60.05%
013500	2	10	60.05%
013500	3	10	60.05%
013500	4	10	60.05%
012700	1	10	57.98%
012700	2	10	57.98%
012700	3	10	57.98%
013600	1	9	45.11%
013600	2	9	45.11%
013600	3	9	45.11%
013400	1	9	41.24%
013400	2	9	41.24%
011300	1	9	40.19%
012600	2	9	39.99%
012600	3	9	39.99%
013300	1	9	38.06%
012500	1	7	33.00%
012500	2	7	33.00%
030700	4	6	25.23%
030700	5	6	25.23%

C. DEFINITIONS AND DESCRIPTIONS

(1) Definition of “blighted structure” in context of state or local law.

Response: The definition of blighted structure can fall under one or several categories that we utilize:

- 1.) The cost to rehab the property to bring it to code must exceed 60% of the tax assessed value.
- 2.) It is deemed unsafe for the area and has to come down due to public safety.
- 3.) The property has been vacant for more than 90 days and is dilapidated and neglected and the cost to bring the property to code could not be justified for the area.

If the property falls under 1 or more of the above mentioned, then it fits our definition of a blighted structure.

(2) Definition of “affordable rents.” ***Note:*** Grantees may use the definition they have adopted for their CDBG program but should review their existing definition to ensure compliance with NSP program –specific requirements such as continued affordability.

Response: For the purposes of the NSP program, the City will utilize the definition of low-HOME rents from the HOME Investment Partnerships program.

(3) Describe how the grantee will ensure continued affordability for NSP assisted housing.

Response: On all the properties that are acquired, rehabbed, and resold, the city will provide a repayable second mortgage on the property at 20% of its purchase price. The buyer would then only have to finance 80% of the purchase property through conventional means. The second mortgage with the city will be at a 10 year term with an interest rate ranging from 0 to 3% depending on the buyer’s percentage of median income.

(4) Describe housing rehabilitation standards that will apply to NSP assisted activities.

Response: We will use the same standards utilized under the HOME program. All code and insipient code violations will be addressed and repaired. The City will adhere to the International Property Maintenance Code (IPMC) as well as local building codes and ordinances.

D. LOW INCOME TARGETING

Identify the estimated amount of funds appropriated or otherwise made available under the NSP to be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50 percent of area median income: **\$536,095**.

Note: At least 25% of funds must be used for housing individuals and families whose incomes do not exceed 50 percent of area median income.

Response: Although this number may be higher, we are only committing to utilize 25% of the NSP funds to purchase and redevelop abandoned or foreclosed upon homes for sale to households at or below 50% of area median income.

E. ACQUISITIONS & RELOCATION

Indicate whether grantee intends to demolish or convert any low- and moderate-income dwelling units (i.e., $\leq 80\%$ of area median income).

If so, include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities.
- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion).
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income.

Response: The City of Middletown does intend to demolish vacant low and moderate income dwelling units as well as rehabbing some of the properties.

- We plan to target at least 50% of our efforts (demolition and rehab) in census tracts that are less than or equal to 80% of area median income.
- We estimate 11 NSP affordable housing units to be made available to LMMI households. To reach this goal in our time frame, 1 to 2 properties will have to be completed every 2 months.
- An additional estimated 9 units are expected to be made available for households whose income does not exceed 50% of area median income.
- Although there is a slight possibility, we are not planning on new construction activity. We are only looking for projects involving acquisition-rehab.

F. PUBLIC COMMENT

Provide a summary of public comments received to the proposed NSP Substantial Amendment.

Response: The City published a public notice announcing the availability of the NSP Substantial Amendment for review and comment in the Middletown Journal on 11/10/2008 as well as 11/13/2008. In addition, on 11/7/2008 the City posted a copy of the amendment on its website at: <http://www.cityofmiddletown.org/nsp> as well as public postings being placed in the city's library, community center, and senior center.

The city is allowing 15 days for citizen comments. The comment period will expire on 11/22/2008. All written comments received by the city will be considered before submitting the final amendment to HUD. All comments should be addressed to:

City of Middletown
Community Revitalization Division, 4th Floor
Attn: Kyle Fuchs
One Donham Plaza
Middletown, OH 45042

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

- (1) Activity Name: **NSP Administration**
- (2) Activity Type: **CDBG eligible activity: 24 CFR 570.205 and 206 General Planning and Administration**
- (3) National Objective: **Not Applicable for Administration**
- (4) Projected Start Date: **January 1, 2009**
- (5) Projected End Date: **July 1, 2010 (Initial grant only. Not counting program income)**
- (6) Responsible Organization: **The City of Middletown will implement all NSP activities. The city building is located at:**

**One Donham Plaza
Middletown, OH 45042**

**Contact person = Kyle Fuchs (513)425-7950
Email: kylef@cityofmiddletown.org**
- (7) Location Description: **Not Applicable for Administration**
- (8) Activity Description: **The City will pay for staff and other delivery costs to ensure the NSP program is run efficiently and adhering to the guidelines of the program.**

I. Total Budget: **\$214,437 = Administration**
\$960,000 = Acquisition and Rehab (≤ 120% LMHI)
\$536,095 = Acquisition and Rehab (≤ 50% LMI)
\$433,847 = Demolition of Blighted Properties

Total = \$2,144,379

J. Performance Measures: **Not Applicable for Administration**

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

- (1) **Activity Name:** **Acquisition & Rehab for Sale to Homebuyers**
- (2) **Activity Type:** NSP eligible use: 2301(c)(3)(B) – Purchase and rehabilitate homes and residential properties that have been abandoned or foreclosed upon, in order to sell, rent, or redevelop such homes and properties. CDBG eligible activity: 24 CFR 570.201(a) Acquisition and 570.202 Rehabilitation.
- (3) **National Objective:** **Low-Mod-Middle Income Housing (LMMH)** - These acquired properties will be rehabbed to address any blight and code violations on the property. They will then be resold to households whose income is at 120% of area median income or less. Approximately 11 properties will be sold to individuals at or below 120% of area median income and an estimated additional 9 properties will be sold to individuals at or below 50% of area median income.
- (4) **Projected Start Date:** **January 1, 2009**
- (5) **Projected End Date:** **July 1, 2010** (Initial grant only. Not counting program income)
- (6) **Responsible Organization:** The City of Middletown will implement all NSP activities. The city building is located at:
One Donham Plaza
Middletown, OH 45042
Contact person = Kyle Fuchs (513)425-7950
Email: kylef@cityofmiddletown.org
- (7) **Location Description:** At this time, specific addresses are not known. The City of Middletown's primary focus will be in census tracts that have a foreclosure abandonment risk score of 9 or higher.
- (8) **Activity Description:** This program will primarily focus on areas that have a foreclosure abandonment risk score of 9 or higher as mentioned above. The purpose of this acquisition and rehab program is to alleviate blight and run down properties to encourage home ownership to LMMI households. We will be acquiring and rehabbing an estimated 20 units. 9 of which will be sold to households at or below 50% of area median income.

For housing related activities:

- We are utilizing homeownership only (no rental). The tenure of the beneficiaries will be 10 years in the property,
- The City of Middletown will provide a repayable second mortgage on the property at 20% of its purchase price. The buyer would then only have to finance 80% of the purchase property through conventional means. The second mortgage with the city will be at a 10 year term with an interest rate

- ranging from 0 to 3% depending on the buyer's percentage of median income.
- Continued affordability will be enforced with the 10 year note and mortgage.

For acquisition activities:

- The portfolio of acquired properties will be purchased at an average discount of 15% off appraised value. The City of Middletown's target per house is a discount of 10-25%

For financing activities, include:

- n/a – bank financing only to be approved by this entity

I. Total Budget: **\$214,437 = Administration**

\$960,000 = Acquisition and Rehab (≤ 120% LMMI)

\$536,095 = Acquisition and Rehab (≤ 50% LMI)

\$433,847 = Demolition of Blighted Properties

Total = \$2,144,379

J. Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent): **The City of Middletown will be acquiring and rehabbing an estimated 20 units. Of those properties, approximately 9 will be sold to households at or below 50% of area median income and an estimated 11 will be sold to households at or below 120% of area median income. The city will also demolish an estimated 54 blighted properties.**

G. NSP INFORMATION BY ACTIVITY (COMPLETE FOR EACH ACTIVITY)

- (1) Activity Name: **Demolition of blighted properties**
- (2) Activity Type: NSP eligible use: 2301(c)(3)(D) – Demolish blighted structures. CDBG eligible activity: 24 CFR 570.201(d) Clearance for blighted structures only.
- (3) National Objective: **Low-Mod-Middle Income Area (LMMA).** The City of Middletown intends to demolish in estimated 54 blighted properties that exist in census tracts where at least 51% of the residents are at \leq 120% of area median income.
- (4) Projected Start Date: **January 1, 2009**
- (5) Projected End Date: **July 1, 2010** (Initial grant only. Not counting program income)
- (6) Responsible Organization: **The City of Middletown will implement all NSP activities.** The city building is located at:
**One Donham Plaza
Middletown, OH 45042**
Contact person = Kyle Fuchs (513)425-7950
Email: kylef@cityofmiddletown.org
- (7) Location Description: At this time, specific addresses are not known. The City of Middletown's primary focus will be in census tracts that have a foreclosure abandonment risk score of 9 or higher.
- (8) Activity Description: This program will primarily focus on areas that have a foreclosure abandonment risk score of 9 or higher as mentioned above. The purpose of this demolition program is to alleviate blight and density in LMMA areas to help stabilize neighborhoods and property values. In turn this will help increase demand for home ownership in LMMA areas where demand had been weak.

I. Total Budget: **\$214,437 = Administration**
\$960,000 = Acquisition and Rehab (\leq 120% LMMA)
\$536,095 = Acquisition and Rehab (\leq 50% LMI)
\$433,847 = Demolition of Blighted Properties

Total = \$2,144,379

J. Performance Measures (e.g., units of housing to be acquired, rehabilitated, or demolished for the income levels of households that are 50 percent of area median income and below, 51-80 percent, and 81-120 percent): **The City of Middletown will demolish an estimated 54 blighted properties. The city will also be acquiring and rehabbing an estimated 20 properties. Of those properties, approximately 9 will be sold to households at or below 50% of area median income and an estimated 11 will be sold to households at or below 120% of area median income.**

DRAFT

CERTIFICATIONS

- (1) **Affirmatively furthering fair housing.** The jurisdiction will affirmatively further fair housing, which means that it will conduct an analysis to identify impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting the analysis and actions in this regard.
- (2) **Anti-lobbying.** The jurisdiction will comply with restrictions on lobbying required by 24 CFR part 87, together with disclosure forms, if required by that part.
- (3) **Authority of Jurisdiction.** The jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and other program requirements.
- (4) **Consistency with Plan.** The housing activities to be undertaken with NSP funds are consistent with its consolidated plan, which means that NSP funds will be used to meet the congressionally identified needs of abandoned and foreclosed homes in the targeted area set forth in the grantee's substantial amendment.
- (5) **Acquisition and relocation.** The jurisdiction will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended (42 U.S.C. 4601), and implementing regulations at 49 CFR part 24, except as those provisions are modified by the Notice for the NSP program published by HUD.
- (6) **Section 3.** The jurisdiction will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u), and implementing regulations at 24 CFR part 135.
- (7) **Citizen Participation.** The jurisdiction is in full compliance and following a detailed citizen participation plan that satisfies the requirements of Sections 24 CFR 91.105 or 91.115, as modified by NSP requirements.
- (8) **Following Plan.** The jurisdiction is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.
- (9) **Use of funds in 18 months.** The jurisdiction will comply with Title III of Division B of the Housing and Economic Recovery Act of 2008 by using, as defined in the NSP Notice, all of its grant funds within 18 months of receipt of the grant.
- (10) **Use NSP funds ≤ 120 of AMI.** The jurisdiction will comply with the requirement that all of the NSP funds made available to it will be used with respect to individuals and families whose incomes do not exceed 120 percent of area median income.
- (11) **Assessments.** The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by

assessing any amount against properties owned and occupied by persons of low- and moderate-income, including any fee charged or assessment made as a condition of obtaining access to such public improvements. However, if NSP funds are used to pay the proportion of a fee or assessment attributable to the capital costs of public improvements (assisted in part with NSP funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. In addition, with respect to properties owned and occupied by moderate-income (but not low-income) families, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than NSP funds if the jurisdiction certifies that it lacks NSP or CDBG funds to cover the assessment.

(12) Excessive Force. The jurisdiction certifies that it has adopted and is enforcing: (1) a policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and (2) a policy of enforcing applicable State and local laws against physically barring entrance to or exit from, a facility or location that is the subject of such non-violent civil rights demonstrations within its jurisdiction.

(13) Compliance with anti-discrimination laws. The NSP grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3619), and implementing regulations.

(14) Compliance with lead-based paint procedures. The activities concerning lead-based paint will comply with the requirements of part 35, subparts A, B, J, K, and R of this title.

(15) Compliance with laws. The jurisdiction will comply with applicable laws.

Signature/Authorized Official

Date

Title

NSP Substantial Amendment Checklist

For the purposes of expediting review, HUD asks that applicants submit the following checklist along with the NSP Substantial Amendment and SF-424.

Contents of an NSP Action Plan Substantial Amendment

Jurisdiction(s): <u>City of Middletown</u> Lead Agency Jurisdiction Web Address: http://www.cityofmiddletown.org/nsp <i>(URL where NSP Substantial Amendment materials are posted)</i>	NSP Contact Person: Kyle Fuchs Address: One Donham Plaza Telephone: (513)425-7950 Fax: (513)425-7921 Email: kylef@cityofmiddletown.org
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The elements in the substantial amendment required for the Neighborhood Stabilization Program are:

A. AREAS OF GREATEST NEED

Does the submission include summary needs data identifying the geographic areas of greatest need in the grantee's jurisdiction?

Yes No Verification found on page 1.

B. DISTRIBUTION AND USES OF FUNDS

Does the submission contain a narrative describing how the distribution and uses of the grantee's NSP funds will meet the requirements of Section 2301(c)(2) of HERA that funds be distributed to the areas of greatest need, including those with the greatest percentage of home foreclosures, with the highest percentage of homes financed by a subprime mortgage related loan, and identified by the grantee as likely to face a significant rise in the rate of home foreclosures?

Yes No Verification found on page 2.

Note: The grantee's narrative must address the three stipulated need categories in the NSP statute, but the grantee may also consider other need categories.

C. DEFINITIONS AND DESCRIPTIONS

For the purposes of the NSP, do the narratives include:

- a definition of "blighted structure" in the context of state or local law,
Yes No Verification found on page 4.

- a definition of "affordable rents,"
Yes No Verification found on page 4.

- a description of how the grantee will ensure continued affordability for NSP assisted housing,
Yes No Verification found on page 4.

- a description of housing rehabilitation standards that will apply to NSP assisted activities?
Yes No Verification found on page 4.

D. INFORMATION BY ACTIVITY

Does the submission contain information by activity describing how the grantee will use the funds, identifying:

- eligible use of funds under NSP,
Yes No Verification found on page 7, 8, & 10.
- correlated eligible activity under CDBG,
Yes No Verification found on page 7, 8, & 10.
- the areas of greatest need addressed by the activity or activities,
Yes No Verification found on page 7, 8, & 10.
- expected benefit to income-qualified persons or households or areas,
Yes No Verification found on page 8 & 10.
- appropriate performance measures for the activity,
Yes No Verification found on page 9 & 11.
- amount of funds budgeted for the activity,
Yes No Verification found on page 7, 9, & 10.
- the name, location and contact information for the entity that will carry out the activity,
Yes No Verification found on page 7, 8, & 10.
- expected start and end dates of the activity?
Yes No Verification found on page 7, 8, & 10.

E. SPECIFIC ACTIVITY REQUIREMENTS

Does each activity narrative describe the general terms under which assistance will be provided, including:

If the activity includes acquisition of real property,

- the discount required for acquisition of foreclosed upon properties,
Yes No Verification found on page 9.

If the activity provides financing,

- the range of interest rates (if any),
Yes No Verification found on page 9.

If the activity provides housing,

- duration or term of assistance,
Yes No . Verification found on page 8.
- tenure of beneficiaries (e.g., rental or homeownership),
Yes No . Verification found on page 8.
- does it ensure continued affordability?
Yes No . Verification found on page 8.
- does the applicant indicate which activities will count toward the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
- Yes No . Verification found on page 8 & 9.

F. LOW INCOME TARGETING

- Has the grantee described how it will meet the statutory requirement that at least 25% of funds must be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals and families whose incomes do not exceed 50% of area median income?
Yes No . Verification found on page 5.
- Has the grantee identified how the estimated amount of funds appropriated or otherwise made available will be used to purchase and redevelop abandoned or foreclosed upon homes or residential properties for housing individuals or families whose incomes do not exceed 50% of area median income?
Yes No . Verification found on page 5.
Amount budgeted = \$536,095

G. DEMOLISHMENT OR CONVERSION OF LOW- AND MODERATE-INCOME UNITS

Does grantee plan to demolish or convert any low- and moderate-income dwelling units?

Yes No . (If no, continue to next heading)
Verification found on page 5.

Does the substantial amendment include:

- The number of low- and moderate-income dwelling units—i.e., $\leq 80\%$ of area median income—reasonably expected to be demolished or converted as a direct result of NSP-assisted activities?
Yes No . Verification found on page 5.

- The number of NSP affordable housing units made available to low-, moderate-, and middle-income households—i.e., $\leq 120\%$ of area median income—reasonably expected to be produced by activity and income level as provided for in DRGR, by each NSP activity providing such housing (including a proposed time schedule for commencement and completion)?

Yes No Verification found on page 5.
- The number of dwelling units reasonably expected to be made available for households whose income does not exceed 50 percent of area median income?

Yes No Verification found on page 5.

H. PUBLIC COMMENT PERIOD

Was the proposed action plan amendment published via the grantee jurisdiction's usual methods and on the Internet for no less than 15 calendar days of public comment?

Yes No Verification found on page 6.

Is there a summary of citizen comments included in the final amendment?

Yes No Verification found on page 6.

I. WEBSITE PUBLICATION

The following Documents are available on the grantee's website:

• SF 424	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
• Proposed NSP Substantial Amendment	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
• Final NSP Substantial Amendment	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
• Subsequent NSP Amendments	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Website URL: <http://www.cityofmiddletown.org>

K. CERTIFICATIONS

The following certifications are complete and accurate:

(1) Affirmatively furthering fair housing	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(2) Anti-lobbying	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(3) Authority of Jurisdiction	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(4) Consistency with Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(5) Acquisition and relocation	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(6) Section 3	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(7) Citizen Participation	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(8) Following Plan	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(9) Use of funds in 18 months	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(10) Use NSP funds $\leq 120\%$ of AMI	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(11) No recovery of capital costs thru special assessments	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(12) Excessive Force	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(13) Compliance with anti-discrimination laws	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(14) Compliance with lead-based paint procedures	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
(15) Compliance with laws	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>