



MEMORANDUM

**To:** Alice Kennedy, Commissioner, Housing and Community Development

**CC:** Susan Ronk Moriarty, Chief, CDBG Compliance

**From:** Mary Correia, Deputy Commissioner, Consolidated Planning

**Date:** January 8, 2024

**Subject:** CDBG CD Year 49/CFY24/PY23 Non-Substantial Amendment – Planning

Outlined below for your review and approval is the Consolidated Planning Division’s recommendation for a non-substantial amendment (see definition below) to CDBG CD Year 49/CFY24/PY23 funds to re-allocate funding from DHCD’s general Planning set aside to specific Planning activities.

	Activity	IDIS Acct	Amendment Amount	Justification
<b>From</b>	Community Supports Program Admin/General Admin	9509	\$183,055	Funding set aside for planning activities that arise during the program year, including, but not exclusive to, consultant and staff costs for development of the Consolidated Plan, Annual Action Plan, or other planning activities and related expenses deemed relevant and necessary.
<b>To</b>	Community Supports Program Admin/Planning	TBD		

	Activity	IDIS Acct	Amendment Amount	Justification
<b>From</b>	Community Supports Program Admin/General Admin	9509	\$87,875	Funding for DHCD’s share of Fair Housing Equity Plan being conducted by Baltimore Metropolitan Council on behalf of the regional Fair Housing consortium’s members.
<b>To</b>	Baltimore Metropolitan Council	TBD		

	Activity	IDIS Acct	Amendment Amount	Justification
<b>From</b>	Community Supports Program Admin/General Admin	9509	\$29,070	To fund Baltimore City's FY24 share of the regional Fair Housing consortium's coordinator position. (Year 1 of 3-year agreement)
<b>To</b>	Baltimore Metropolitan Council	TBD		

In accordance with HUD 25 CFR, Part 91, CDBG grantees are required to define their guidelines for non-substantial amendments, which do not require HUD approval, as part of their Citizen Participation Plan.

**Changes that are not considered substantial amendments include:**

- *Liquidation of unspent dollars for completed activities. These funds may be reallocated to increase up to 51% of the existing activities' budget, consistent with the rules governing substantial amendments;*
- *Consolidated Plan data updates such as census data, income limits, and fair market rents;*
- *A minor change in location of a specific property is not considered a substantial change as long as the purpose, scope, and intended beneficiaries remain essentially the same;*
- *The transfer of some (but not all) funds within a project from one approved budget line item to another approved budget line item (e.g., construction rather than engineering).*
- *Adjustments to budgets of activities or projects of less than 51% of the original budget as found in the approved AAP.*

Approval:   
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 Alice Kennedy  
 Commissioner  
 DHCD

Date: 01/09/2024