

CHDO Guidelines and Sample Application for Certification

Department of Community Development– Housing Development Office

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OVERVIEW OF THE CHDO SET ASIDE PROGRAM

A Community Housing Development Organization (CHDO) is a special type of non-profit housing designation under the HOME Investment Partnership Program created by The Cranston-Gonzalez 1990 National Affordable Housing Act (NAHA). Among the purposes of NAHA are to promote partnerships between states, units of general local government and non-profit organizations. NAHA also expands a non-profit organization's capacity to develop and manage decent and affordable housing.

The City of Cleveland develops guidelines for its certified CHDO program based on the Code of Federal Regulations Title 24- Housing and Urban Development, Part 92 – HOME Investment Partnership Program. Attaining state-certified status indicates that the organization has the capacity to sponsor a particular type of HOME-assisted housing. It also indicates that the organization is in touch with the community it is chartered to serve.

The City receives a yearly allocation of HOME funds from the U.S. Department of Housing and Urban Development (HUD). Fifteen percent of those funds must be "set-aside" to be awarded to CHDOs to develop housing. The City of Cleveland will distribute the set-aside funds through its Housing Trust Fund (HTF) Program in the form of gap financing for HTF developments. The terms and conditions of the distribution of all HOME funds can be found in the current City of Cleveland Consolidated Plan.

CHDO CERTIFICATION CONSIDERATIONS

- HOME program rules require that housing development organizations (even previously certified CHDOs) must be certified as a CHDO *each time* they apply for a HOME-funded housing development. Consequently, an organization can only be a CHDO if it is involved in a particular HOME-funded development project.
- The organization can only be a certified CHDO for the type of development project (example: multi-family rental) for which it can demonstrate the on-staff capacity. If prior development experience is in building and selling single-family homes, the applicant most likely will not be certified as a CHDO to develop rental housing.
- Pre-Proposal Evaluation:

The goal is for the City to issue a CHDO certification before your organization's submission of the HTF proposal. The certification is conditional upon a final application that is consistent with the information provided within this application.

In addition to confirming that your organization meets the federal CHDO definition, City of Cleveland will also focus on the following:

- The organization's demonstrated role in prior affordable housing developments
- Evidence that the developments proposed are of similar size, scope and complexity as prior developments
- The level of experience of your paid housing staff and whether it correlates to your role in the proposed development (owner, developer/co-developer, or both)
- The financial capacity of the organization

The City of Cleveland will confirm that, in a limited partnership (LP), the CHDO or its subsidiary will be the sole general partner. The City of Cleveland will also confirm that, in a limited liability

company (LLC), the CHDO or its subsidiary will be the sole managing member of the ownership entity. The City of Cleveland will determine if the organization has the capacity to carry out this responsibility.

Key submissions include a detailed housing staff experience narrative and the tables contained in the application. The narrative should be rich with examples of development experience, not just citations of the developments in which individual staff members have been involved. The tables should be filled in completely and accurately.

In order to help confirm CHDO certification at the earliest time in the HTF application process, a desirable submission at this pre-proposal stage is any Partnership or Operating Agreement(s), which, among other pertinent information, indicates that if the agreement permits the CHDO to be removed as general partner or sole managing member, the agreement must provide that the removal must be for cause and that the CHDO must be replaced with another City certified CHDO. City may review other documents to establish the organization's capacity.

- Once the HTF Proposal application is received and more details of the development and the development team become known, The City of Cleveland will confirm the organization's CHDO status. Provided that the information contained in this application and supporting documentation is not contradicted in the HTF Proposal(s) or Final Application(s), the CHDO status will remain the same.
- The HOME program has changed over the years, and developing housing as a CHDO has taken on increased obligations and commitments. Your familiarity with the current HOME regulations is important: <http://www.ecfr.gov/cgi-bin/text-idx?SID=72f5108e1bf34a8c309f1c05c1126c62&node=24:1.1.1.1.41&rgn=div5> CHDO specific regulations are in Subpart G.

TO APPLY FOR CHDO CERTIFICATION

The attached application is an example of the annual CHDO certification

- Some of the responses require the same document to substantiate multiple conditions. You only need to submit each document once. For ease and accuracy of the review, highlight and identify all of the relevant parts.
- Do not send illegible documents. Scanned documents must be readable.
- Do not send information that is not requested.
- When complete, email this application, saved as a Word document with the organization's name as part of the file name, and all accompanying documentation files, which should be clearly named to be easily identified in the review process. *Example: Articles of Incorporation.pdf.*
- Send the email to HousingDevelopment@clevelandohio.gov

PROCESS FOR APPROVING APPLICANT FOR CHDO CERTIFICATION FOR THE HOME PROGRAM

- The organization completes the application and returns it and all supporting documentation.
- The organization will be informed if it has met the requirements for CHDO certification.
- Applicants that cannot be certified because of missing or incomplete information will be given the opportunity to respond to the specific reasons why that the requirements were not met. They may submit any additional information to The City of Cleveland within one week of the notification to attempt to cure the deficiency. The City will notify the applicant of their CHDO status within three weeks of receipt of the additional information.

REFERENCES – CFR 24 §92.2 – DEFINITION OF A COMMUNITY HOUSING DEVELOPMENT ORGANIZATION

A Community Housing Development Organization (CHDO) is a private nonprofit organization that:

- (1) Is organized under State or local laws;
- (2) Has no part of its net earnings inuring to the benefit of any member, founder, contributor, or individual;
- (3) Is neither controlled by, nor under the direction of, individuals or entities seeking to derive profit or gain from the organization. A community housing development organization may be sponsored or created by a for-profit entity, but:
 - (i) The for-profit entity may not be an entity whose primary purpose is the development or management of housing, such as a builder, developer, or real estate management firm.
 - (ii) The for-profit entity may not have the right to appoint more than one-third of the membership of the organization's governing body. Board members appointed by the for-profit entity may not appoint the remaining two-thirds of the board members;
 - (iii) The community housing development organization must be free to contract for goods and services from vendors of its own choosing; and
 - (iv) The officers and employees of the for-profit entity may not be officers or employees of the community housing development organization.
- (4) Is tax exempt as follows:
 - (i) The private nonprofit organization has a tax exemption ruling from the Internal Revenue Service under section 501(c)(3) or (4) of the Internal Revenue Code of 1986 (26 CFR 1.501(c)(3)-1 or 1.501(c)(4)-1);
 - (ii) The private nonprofit organization is a subordinate organization that has been included in its 501(c)(3) or (4) central organization's group exemption letter by the Internal Revenue Service; or
 - (iii) The private nonprofit organization is wholly owned by the community housing development organization, as defined in this part, and is disregarded as an entity separate from its owner organization for Federal tax purposes.
- (5) Is not a governmental entity (including the participating jurisdiction, other jurisdiction, Indian Tribe, public housing authority, Indian housing authority, housing finance agency, or redevelopment authority) and is not controlled by a governmental entity. An organization that is created by a governmental entity may qualify as a community housing development organization; however, no more than one-third of the board members of the organization may be officials or employees of the participating jurisdiction or governmental entity that created the community housing development organization. Further, no governmental entity may have the right to appoint more than one-third of the organization's board members. The board members appointed by a governmental entity and the board members that are officials or employees of the participating jurisdiction or governmental entity that created the organization may not appoint any of the remaining two-thirds of the board members. The officers or employees of a governmental entity may not be officers or employees of a community housing development organization;
- (6) Has standards of financial accountability that conform to 2 CFR 200.302, 'Financial Management' and 2 CFR 200.303, 'Internal Controls;'
- (7) Has among its purposes the provision of decent housing that is affordable to low-income and moderate-income persons, as evidenced in its charter, articles of incorporation, resolutions or by-laws;
- (8) Maintains accountability to low-income community residents by:
 - (i) Maintaining at least one-third of its governing board's membership for residents of low-income neighborhoods, low-income beneficiaries of HUD programs, other low-income community residents, designees of low-income neighborhood organizations, or designees of nonprofit organizations in the community that address the housing or supportive service needs of low-income residents or residents of low-income neighborhoods, including homeless providers, Fair Housing Initiatives Program providers, Legal Aid, disability rights organizations, and victim service providers. For urban areas, "community" may be a neighborhood or neighborhoods, city, county, or metropolitan area; for rural areas, it may be a neighborhood or neighborhoods, town, village, county, or multi-county area (but not the entire State); and
 - (ii) Providing a formal process for low-income program beneficiaries to advise the organization in its decisions regarding the design, siting, development, and management of affordable housing;

(9) Has a demonstrated capacity for carrying out housing projects assisted with Federal funds, Low-Income Housing Credits (26 U.S.C. 42), Federal Home Loan Bank Affordable Housing Program (12 U.S.C. 1430) funds, or local and State affordable housing funds.

(i) To satisfy this requirement and demonstrate capacity as a developer of a HOME-assisted project, the nonprofit organization must have paid employees with housing development experience who will work directly on the HOME-assisted project. Where the paid employees of the organization do not demonstrate capacity to develop a HOME-assisted project alone, the experience of paid employees may be supplemented by board members or officers of the organization that are volunteers. If a nonprofit organization is demonstrating capacity using a volunteer board member's or officer's experience, the volunteer may not be compensated by or have their services donated by another organization. For its first year of funding as a community housing development organization, an organization may satisfy this requirement through a contract with a consultant who has housing development experience to train appropriate key, paid staff of the organization;

(ii) An organization that will own housing must demonstrate capacity to act as owner of a project and meet the requirements of § 92.300(a)(2);

(iii) An organization that will sponsor housing must demonstrate capacity as a developer or capacity to act as owner, as described in paragraphs (9)(i) and (ii) of this definition; and

(10) Has a history of serving the community within which housing to be assisted with HOME funds is to be located. In general, an organization must be able to show one year of serving the community before HOME funds are reserved for the organization. However, a newly created organization formed by local churches, service organizations or neighborhood organizations may meet this requirement by demonstrating that its parent organization has at least a year of serving the community.

SAMPLE APPLICATION FOR CHDO CERTIFICATION FOR THE HOME PROGRAM

Name of Organization	
Executive Director	
Executive Director email	
Address	
City, State, Zip Code	
County	
Phone	
Contact Person	
Title:	
Phone:	
Contact Email	
Name and Title of Person Completing this Application	
Is the person above an employee of the organization?	

CHECK THE SERVICES BELOW THAT ARE PROVIDED DIRECTLY BY THE ORGANIZATION:

- Accessibility Retrofitting
- Construction Management Services
- Credit Counseling
- Down Payment Assistance
- Employment Training
- Emergency/Transitional Housing Services
- Financial Literacy Training
- Food Pantry
- Foreclosure Counseling
- Grant Writing
- Historical Rehabilitation
- Homebuyer Education
- Housing Construction Company Owner/ Subsidiary
- HUD-Certified Housing Counseling Agency
- Legal Services
- Real Estate Development
- Rental Property Management
- Rental Property Owner
- Single Family Rehabilitation
- Tool Bank
- Transportation & Delivery Services
- Weatherization Services

Supportive Housing Special Needs Provider to:

- Abused Spouses and Their Children
- Elderly
- Homeless
- Elderly
- Individuals with Developmental Disabilities
- Individuals with Mental Disabilities
- Individuals with Physical Disabilities
- Migrant Farm Workers
- Persons with Alcohol or Other Drug Addictions
- Persons with HIV/AIDS

QUALIFICATIONS FOR CHDO CERTIFICATION

Check the boxes that apply and **submit the highlighted documentation with the application**. Highlight and label the pertinent sections of all documents that you are citing to fulfill these certification requirements.

“Governing Documents” refers to the organization’s bylaws, code of regulations or charter. These documents must all reflect the most current status of the organization, including its legal name and service areas, and any changes to these documents must have been approved by the board and incorporated into the text prior to submitting this application.

Legal Status

- L1. The organization is organized under state or local laws, as evidenced by the organization’s Articles of Incorporation.

- L2. The organization declares that no part of its net earnings benefit any member, founder, contributor or individual, as evidenced by a statement to that effect included in the Governing Documents.

- L3. The organization has a tax exemption ruling from the Internal Revenue Service (IRS) under Section 501(c) of the Internal Revenue Code of 1986, as evidenced by a 501(c)(3) or 501 (c)(4) Certificate from the IRS

- L4. The organization has among its purposes the provision of decent housing that is affordable to low-income and moderate-income persons, as evidenced by that statement to that effect included in the Governing Documents.

- L5. The organization has a clearly defined geographic service area articulated in the Governing Documents.

Capacity of the Organization

For HOME Program developments, the CHDO must conform to the HOME definition of “sponsor” (CFR 24 §92.300(a) (4)). Check the C1 box to acknowledge that your organization understands what it means to be a sponsor of the tax credit development for which you are being certified as a CHDO.

- C1 CFR 24 §92.300(a) (4) - Rental housing is “sponsored” by the community development housing organization if it is rental housing “owned”* or “owned and developed” by a subsidiary of a community housing development organization, a limited partnership of which the community housing development organization or its subsidiary is the MANAGING GENERAL PARTNER, or a limited liability company of which the community housing development organization or its subsidiary is the MANAGING MEMBER. The subsidiary of the community housing development organization may be a for-profit or nonprofit organization.

The subsidiary of the community housing development organization must be wholly owned by the community housing development organization. Submit a statement, signed by the authorized signer for the organization, that the subsidiary is wholly owned by the (potential) CHDO.

If the limited partnership or limited liability company agreement permits the community housing development organization to be removed as general partner or sole managing member, the agreement must provide that the removal must be for cause and that the community housing development organization must be replaced with another community housing development organization.

- C2. The applicant must document that the organization employs staff with the particular housing development experience appropriate for the HTC development and that the staff has the experience in producing the particular type of housing proposed. (Example: multi-family rental)

Staff must be paid by the organization. Volunteers, board members or staff “borrowed” or “donated” from other organizations do not fulfill this requirement. These qualifications can be acquired through a combination of education, training and experience.

Submit a narrative that explains in detail how each staff person involved in housing development (identify by name and title) demonstrates the necessary qualifications to carry out the ownership/development responsibilities of a sponsor organization. Detailed letters of recommendation from previous employers or colleagues, if that helps to illustrate the staff person’s experience, and resumes are helpful. They will be evaluated as a supplement to the more detailed information in the narrative and in Table 5a and Table 5b, below.

- C3. The organization conforms to the financial management and internal controls detailed in 2 CFR 200.302 - 303 as evidenced by a notarized statement by the president or chief financial officer of the organization or certification from a Certified Public Accountant or HUD-approved audit summary.

- C4. The organization has the financial capacity to serve in the role of sole general partner/managing member. This will be evidenced in part by the submission of the most recent audited financial statements for the organization. Also submit the most recent board-adopted Budget, along with approved meeting minutes documenting the budget approval and a letter from the equity syndicator, indicating that the organization has the capacity to provide required financial guarantees to the development. This may be submitted with this application for CHDO certification, but it is also required to be submitted with the HTC Application.

Serving the Service Area

- S1. The organization has a history of serving the service area(s) where HOME-assisted housing will be located, as evidenced by a statement that documents at least one year of experience in all service areas where HOME assisted housing is proposed. Those service areas must be articulated in the organization's governing documents. For newly created organizations formed by local churches or service and community organizations, a statement is required that documents that the parent organization has at least one year of experience in serving those areas. Completion of Table 2b – Serving the Service Area (below)
- S2. The organization has a board-adopted strategic development plan that specifically addresses plans for developing HOME-assisted housing in any or all of the service areas. The City will be evaluating that plan for goals that are **specific, attainable, measurable, realistic and timely**. Do not confuse this with a business plan. Submit a scanned copy of the strategic development plan, with the housing development sections highlighted. Submit board meeting minutes documenting that the plan was adopted.

Organizational Structure

- O1. The organization maintains **at least** one-third of its governing board's membership for residents of low-income neighborhoods, other low-income community residents or elected representatives of low-income neighborhood organizations, as evidenced by such a statement and highlighted in the Governing Documents.
- O2. The organization is not a governmental entity, including Participating Jurisdiction, other jurisdiction, Indian tribe, Public Housing Agency, Indian Housing Authority, Redevelopment Authority, Zoning or Planning Board or Commission.

If the organization was *created* by a governmental entity, check here . Submit the Governing Documents which must reflect that the governmental entity may not appoint more than one-third of the membership of the organization's governing body. The documents must also show that no more than one-third of the board members are public officials or employees of governmental entity and that board members appointed by a governmental entity may not appoint the remaining two-thirds of the board members. The officers or employees of a governmental entity may not be officers or employees of a community housing development organization.

- O3. All board members have completed, signed and dated a self-certification form that attests to his or her status as a representative of the low-income community or as an elected or appointed official of the governmental entity that created the CHDO, if that applies. All board members must complete this document, whether or not they have completed it for a previous application. Submit the completed and signed electronic forms with this application.
- O4. The organization provides a formal process for low-income program beneficiaries to advise the organization in all of its decisions regarding the design, siting, development and management of all HOME-assisted or HOME-eligible affordable housing developments. This

formal process (the plan itself, not the outcomes) appears in and highlighted in the Governing Documents.

This plan must fully demonstrate that low-income residents actively participate in the above activities. A plan that does not demonstrate this will cause the organization to be rejected for CHDO status. The plan must include effective outreach to all of the community. This formal process is not satisfied merely by having the required low-income person representation on the board.

- O5. The organization is neither controlled by, nor under the direction of, individuals or entities seeking to derive profit or gain from the organization. If the organization was sponsored or created by a for-profit entity, check here and submit the Governing Documents which reflect the following about the for-profit entity:
- It does not have, as its primary purpose, the development or management of housing, such as a builder, developer or real estate management firm.
 - It may not appoint more than one-third of the membership of the organization's governing body. Board members appointed by the for-profit entity may not appoint the remaining two-thirds of the board members.
 - The CHDO created must be free to contract for goods and services from vendors of its own choosing.
 - The officers and employees of the for-profit entity may not be officers or employees of the community housing development organization.

Continue To Tables, Below

TABLE 1 – PROPOSED DEVELOPMENT(S)

Briefly describe the development for each proposal the organization plans to submit under the annual QAP

DEVELOPMENT NAME	CITY, COUNTY	DESCRIBE THE DEVELOPMENT TEAM	APPLICANT'S ROLE	POPULATION	# of Units	NEW CONSTRUCTION or REHAB	TYPE OF CONSTRUCTION

TABLE 2A – THE SERVICE AREA

List all of the service areas that are *specifically referenced* in the Governing Documents AND in which the organization is proposing HOME-assisted development under the annual Qualified Allocation Plan.

SERVICE AREA NAME (AS IT IS DESCRIBED IN THE GOVERNING DOCUMENTS)	THIS SERVICE AREA IS A (choose one) Use Dropdown Menu	IN WHICH COUNTY IS THIS SERVICE AREA LOCATED?	IF THIS SERVICE AREA IS A NEIGHBORHOOD, WHAT ARE THE NORTH, SOUTH, EAST and WEST BOUNDARIES THAT DEFINE IT?
	Choose an item.		
	Choose an item.		
	Choose an item.		
	Choose an item.		

TABLE 2B – SERVING THE SERVICE AREA

This table below will be used to establish that the service areas listed above are eligible for CHDO certification. To be eligible, the organization must be able to show at least one year of serving the housing/service/cultural needs of the people who live in the listed service areas.

The organization must demonstrate that it holds an integral, on-going, and relevant position in its Service Areas and that it engages with the residents and businesses in its Service Areas to enhance the quality of life for the people who live there. The organization must document its history of serving the community by describing the affordable housing development which it provided, and/or by describing its non-housing services that have had lasting benefits for the community, such as, but not limited to, counseling, food relief, or childcare facilities.

This information should demonstrate to the City of Cleveland reviewer that the organization served this area for at least a year; owned, developed or sponsored affordable housing in the service area or plans to do so in the next three years (as referenced in the strategic development plan); and is an integral and on-going part of the community.

Make sure to include relevant details, including dates, but be concise.

SERVICE AREA	LIST ACTIVITIES THAT DEMONSTRATE THAT THE ORGANIZATION HAS PROVIDED AT LEAST ONE YEAR OF SERVICE IN THIS SERVICE AREA. INCLUDE DATES DURING WHICH THE SERVICE WAS PROVIDED. INCLUDE NUMBER OF PEOPLE SERVED.	LIST HOUSING DEVELOPMENT YOU PROPOSE TO UNDERTAKE IN THAT SERVICE AREA UNDER THE 2026 QAP

TABLE 3 – INVOLVING THE COMMUNITY

For the past 12 months, what were the actual results of your organization’s community outreach efforts? To structure the response, reference the particulars of the Formal Process (as described in your Governing Documents) for low-income program beneficiaries to advise the organization in all of its decisions regarding the design, siting, development, and management of all HOME-assisted and all other affordable housing developments. If you did not have a formal process in place for the last 12 months because you were not a certified CHDO, focus on the ways in which you engaged the residents in the service area in the past 12 months and the results of that outreach. Respond in the text box below.

TABLE 5A – HOUSING DEVELOPMENT STAFF EXPERIENCE

List all employees involved in housing development. This includes specialists, as well as all administrative staff who are in any way involved in housing development. List, but do not limit to, the Executive Director, Director of Finance, Director of Housing Development, Director of Operations and Human Resources. Do not leave any column items blank.

Employee's Name	Title	Primary Responsibility as it Relates to Housing Development	Hours worked per week in housing development	Total Hours worked per week	Date Hired
PART I: ALL HOUSING DEVELOPMENT STAFF (as described above) – As of 5/30/2026					
	Executive Director				
	Director of Finance				
	Director of Housing Development				
	Director of Operations				
	Director of Human Resources				

TABLE 5B – HOUSING DEVELOPMENT STAFF EXPERTISE

Name the employees listed above who perform the specific housing development tasks listed in this table. If you contract for a particular function, please note that. Do not leave any spaces blank.

Submit electronic copies of **official** payroll registers of all staff members who are named in this table. The records need to include hours worked as well as rate of pay, and cover the six month period before this application. **Make sure that Social Security and Employer Identification numbers are redacted from the official records**

Planning/Site Selection	
Land/Building Acquisition	
Development Team Selection	
Negotiation of Partnership Agreements	
Design	
Work Write-up for Rehab	
Financing Arrangements	
Contractor Selection	
Construction Management	
Construction Close-out	
Marketing/Lease-up of Rental Units	
Ongoing Project Compliance	

All board members must complete a new form with this certification. This form is just for example.

SELF-CERTIFICATION FORM FOR CHDO BOARD MEMBERS

Name:
Address:
City/State/Zip:
Email Address:
Organization's Name:

Check the ONE box that defines your status on the CHDO Board of Trustees

- A public official associated with, or an employee of, a public entity associated with the CHDO.**
The above can only be checked if this CHDO is a Participating Jurisdiction, a Public Housing Authority, a county or village, OHP, or a public entity. This box cannot also qualify as a low-income representative, even if she or he is also a low-income representative.
- Member of a Low-Income Household**
I am a member of a household whose household size for 2025 is less than 80% of the area median income in the census tract in which I live. (See instructions)
- Resident of Low Income Community (fill in information in the parentheses below)**
I reside in census tract number _____ in _____, where the households in that census tract had incomes less than 80% of the county area median income.
- Elected Representative of Organization of Low Income (fill in information in the parentheses below) (See instructions)**
I am elected by the membership of an organization whose membership is open to all residents of a **DEFINED COMMUNITY**. This organization directly serves the community in which it is located. Examples include neighborhood watch group, food pantry, faith-based community outreach organization, community garden club or book club. In the community served, more than 50% of the households have incomes less than 80% of the county area median income. I serve on the CHDO Board primarily as a representative of that group.

The group's name is (_____)

The primary focus of the group is (_____)

The census tracts served by the group are (_____)

I have evaluated Census Tract (_____) for low income eligibility
- I am not an elected or appointed public official, and I am not a representative of the low-income community as defined above.**

Signature of Board Member _____