ECONOMIC DEVELOPMENT AUTHORITY[261]

Adopted and Filed

Pursuant to the authority of Iowa Code section 15.106A, the Economic Development Authority hereby adopts amendments to Chapter 23, "Iowa Community Development Block Grant Program," Chapter 173, "Standard Definitions," and Chapter 174, "Wage, Benefit, and Investment Requirements," Iowa Administrative Code.

The amendments help align the community development block grant (CDBG) rules with planning and programming requirements of the U.S. Department of Housing and Urban Development (HUD). The amendments clarify Chapters 23, 173 and 174, update references, and consolidate all requirements for CDBG-funded programs into one chapter.

Notice of Intended Action was published in the Iowa Administrative Bulletin on March 4, 2015, as **ARC 1890C**. No public comment was received on these amendments. Item 10 has been revised since these amendments were published under Notice of Intended Action to add the term "the Economic Development Authority" and to include two additional rule references.

The Economic Development Authority Board approved these amendments on May 21, 2015.

After analysis and review of this rule making, no negative impact on jobs has been found. The Authority finds that these amendments to the state Community Development Block Grant Program will align the program more closely with federal requirements and make the program more flexible and usable for Iowa communities.

These amendments are intended to implement Iowa Code section 15.108(1)"a."

These amendments will become effective on July 29, 2015.

The following amendments are adopted.

ITEM 1. Amend rule 261—23.2(15) as follows:

261—23.2(15) Definitions. When used in this chapter, unless the context otherwise requires:

"Activity" means one or more specific activities, projects or programs assisted with CDBG funds. *"Adaptive reuse"* means conversion of an existing building or structure from nonresidential use to residential use.

<u>"Annual action plan</u>" means the annual plan required and approved by the U.S. Department of Housing and Urban Development that outlines the state's processes and procedures for distribution of CDBG funds. The annual action plan is an annual update to the state's CDBG consolidated plan. The federal requirements for an annual action plan can be found at http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/guidance/state_guidelines.pdf. The annual action plan can be found on the authority's CDBG Web site.

"Annual allocation" means the annual amount HUD allocates to the state of Iowa for CDBG activities.

"Authority" means the economic development authority created in Iowa Code section 15.105.

"Career link" means a program providing training and enhanced employment opportunities to the working poor and underemployed Iowans low- and moderate-income persons.

"CDBG" means community development block grant.

"Citizen participation plan" means the plan required and approved by the U.S. Department of Housing and Urban Development that describes the state's process for including citizen participation in development of its consolidated plan and annual action plan. The citizen participation plan is available on the authority's CDBG Web site.

<u>"Consolidated plan"</u> means the five-year plan required and approved by the U.S. Department of Housing and Urban Development that establishes goals and objectives for the state's CDBG program. The consolidated plan is available on the authority's CDBG Web site.

"EDSA" means economic development set-aside.

"HUD" means the U.S. Department of Housing and Urban Development.

"IDED" means the Iowa department of economic development.

"*LMI*" means low and moderate income. Households earning 80 percent or less of the area median income are LMI households.

"PFSA" means public facilities set-aside.

"*Program income*" means gross income a recipient receives that is directly generated by the use of CDBG funds, including funds generated by the use of program income.

"Program year" means the annual period beginning January 1 and ending December 31.

"Quality jobs program" means a job training program formerly funded with CDBG funds that is no longer operational.

"Recipient" means a local government entity awarded CDBG funds under any CDBG program.

<u>"Subrecipient</u>" means a public or nonprofit entity contracting with and receiving funds from a recipient to carry out CDBG project activities.

"Sustainable community activities" means activities to develop viable communities while preserving precious environment and resources.

"Working poor" means an employed person with an annual household income between 25 and 50 percent of the area median family income.

ITEM 2. Rescind rule 261—23.3(15) and adopt the following **new** rule in lieu thereof:

261—23.3(15) Annual action plan. The authority will prepare a CDBG annual action plan for submittal to and approval by HUD. The plan will provide a description of the activities and programs that will take place during the year to meet goals established in the consolidated plan.

23.3(1) The annual action plan will contain the following:

- *a.* Executive summary.
- *b.* Sources of federal and state funds.
- c. Statement of specific annual objectives.
- *d.* Outcome measures.
- e. Method of distribution of funds.
- *f.* Allocation priorities and geographic distribution.
- g. Annual affordable housing goals.
- *h.* Homeless and other special needs.
- *i.* Other actions to meet underserved community development needs.
- *j.* Citizen participation in development of the plan.
- *k.* Certifications required by 24 CFR 91.325 as revised December 5, 2011.
- *l.* Monitoring efforts to ensure compliance.

23.3(2) The authority will follow the state's citizen participation plan during the development of the annual action plan. A draft annual action plan will be available on the authority's CDBG Web site for 30 days for public review and comment. The authority will hold a public hearing during the comment period to collect public input on the plan prior to its submittal to HUD.

23.3(3) The annual action plan will be submitted to HUD by November 15 of each year or 60 days after HUD announces the annual allocation amount. Upon review and approval by HUD, the annual action plan will cover activities from January 1 to December 31 of the year following plan submittal to HUD.

23.3(4) The annual action plan will include the proposed CDBG program funding allocation, including the percentage of funds allocated for each of the CDBG programs and activities listed in rule 261-23.4(15).

ITEM 3. Rescind rule 261—23.4(15) and adopt the following **new** rule in lieu thereof:

261—23.4(15) Allocation of funds and eligible applicants.

23.4(1) *Allocation of funds.* Upon approval by HUD, the authority will annually allocate CDBG funds among programs or activities according to the annual action plan as follows:

a. Administration.

b. Technical assistance.

c. Housing fund.

d. Job creation, retention and employment enhancement fund. Job creation, retention and employment enhancement funds are awarded through three programs: the economic development set-aside (EDSA), the public facilities set-aside (PFSA), and career link.

e. Water and sewer fund.

f. Community facilities fund.

g. Opportunities and threats fund.

23.4(2) *Eligible applicants.* All incorporated cities and all counties in the state of Iowa, except those designated as entitlement areas by the U.S. Department of Housing and Urban Development, are eligible to apply for and receive funds under the CDBG program. Applicants shall not apply on behalf of eligible applicants other than themselves.

23.4(3) Application with subrecipients. Any eligible applicant may apply directly or on behalf of a subrecipient.

23.4(4) *Joint applications.* Any eligible applicant may apply individually or jointly with another eligible applicant or other eligible applicants.

23.4(5) *Reallocation.* Any reserved funds not used for their specified purpose within the program year shall be reallocated in amounts and to funds as approved by the director to ensure the availability of resources to those funds in which the greatest need is demonstrated to exist or to respond to community or business needs.

23.4(6) *Recaptured funds.* Recaptured funds shall be available for use through the water and sewer fund, the community facilities fund, the opportunities and threats fund, the housing fund, the downtown revitalization fund, and the economic development set-aside fund. As approved by the director, recaptured funds may be used to fund projects from the job creation, retention and employment enhancement fund in order to respond to an immediate business need if no funds are available through the economic development set-aside fund or public facilities set-aside fund. Recaptured funds remaining at the end of a program year shall be reallocated in amounts and to funds as approved by the director to ensure the availability of resources to those funds in which the greatest need is demonstrated to exist or to respond to a community or business need.

ITEM 4. Amend rule 261–23.5(15), introductory paragraph, as follows:

261—23.5(15) Common requirements for funding. Applications for funds under any of the CDBG programs program-allocated funds pursuant to rule 261—23.4(15) shall meet the following minimum criteria:

ITEM 5. Amend subrule 23.5(2) by lettering paragraphs "1" to "3" as "a" to "c."

ITEM 6. Amend subrule 23.5(8) as follows:

23.5(8) Negotiation of awards. IDED reserves the right to The authority may negotiate award amounts, terms and conditions prior to making any award under any program.

ITEM 7. Amend subrule 23.5(9) by lettering paragraphs "1" to "21" as "a" to "u."

ITEM 8. Amend rule 261—23.6(15), catchwords, as follows:

261—23.6(15) Requirements for the competitive program water and sewer and community facilities funds.

ITEM 9. Amend paragraph 23.6(1)"a" as follows:

a. An applicant shall be allowed to submit one application per year under the water and sewer fund and one application per year under the community facilities and services fund.

ITEM 10. Strike "IDED" wherever it appears in subrule 23.6(3), introductory paragraph, paragraphs 23.6(3)"b," "f" and "g," paragraph 23.6(4)"b," subparagraph 23.6(4)"c"(9), paragraphs 23.6(4)"d" and "e," paragraph 23.7(1)"i," subrule 23.10(1), subparagraphs 23.10(2)"b"(7) and (9), subrules 23.14(1) to 23.14(3), 23.15(1), 23.15(5), 23.15(6), 23.15(11), and 23.15(12) and paragraph

23.16(3)"e" and insert "authority," "the authority" or "the Economic Development Authority" in lieu thereof as the context requires.

ITEM 11. Amend paragraph 23.6(3)"a" as follows:

a. Application forms shall be available upon request from IDED, Community Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309, or on the division's Web site at www.community.state.ia.us at iowagrants.gov.

ITEM 12. Amend paragraph 23.6(3)"c," introductory paragraph, as follows:

c. IDED The authority shall review applications and make funding decisions based on the following criteria described in the annual action plan. Review criteria typically include:

ITEM 13. Amend subrule 23.6(4), introductory paragraph, as follows:

23.6(4) Community facilities and services fund application procedure. Each year, $\frac{\text{IDED}}{\text{the}}$ the authority shall announce the availability of funds and instructions for applying for funds through direct mail, public notices, media releases, workshops or other means determined necessary by $\frac{\text{IDED}}{\text{the}}$ the authority.

ITEM 14. Amend paragraph **23.6(4)**"a" as follows:

a. Application forms shall be available upon request from IDED, Community Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309, or on the division's Web site at www.community.state.ia.us at iowagrants.gov.

ITEM 15. Amend paragraph 23.6(4)"c," introductory paragraph, as follows:

c. IDED The authority shall review applications and make funding decisions based on the following criteria described in the annual action plan. Review criteria typically include:

ITEM 16. Amend subrule 23.6(5) as follows:

23.6(5) *Contingent funding <u>Matching funds</u>.* IDED <u>The authority</u> may make awards contingent upon receipt of funding from other sources require matching funds as a contingency of an award as described in the annual action plan.

ITEM 17. Amend subrule 23.6(6) as follows:

23.6(6) Negotiation of awards. IDED reserves the right to The authority may negotiate award amounts and terms as described in the annual action plan.

ITEM 18. Amend paragraph **23.7(1)"a"** as follows:

a. Applicants shall apply only for direct loans or forgivable loans to make to private businesses for the creation of new jobs or the retention of existing jobs that would otherwise be lost. Eligible activities include infrastructure projects in direct support of economic development activities.

ITEM 19. Rescind paragraph 23.7(1)"c" and adopt the following <u>new</u> paragraph in lieu thereof:

c. For a project to be eligible for assistance, jobs created or retained shall meet the qualifying wage described in the annual action plan.

ITEM 20. Amend paragraph 23.7(1)"e" as follows:

e. Projects must maintain a minimum ratio of one permanent job created or retained for every \$10,000 \$20,000 in CDBG funds awarded.

ITEM 21. Rescind paragraph 23.7(1)"I."

ITEM 22. Amend subrule 23.7(2) as follows:

23.7(2) Application procedure. Application forms and instructions shall be available upon request from IDED, Business Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309; telephone (515)242-4819. An original and two copies of completed applications with required attachments shall be submitted to the same address <u>at iowagrants.gov</u>. IDED The authority shall accept EDSA applications at any time and shall review applications on a continuous basis. IDED The authority shall take action on submitted applications within 60 days of receipt. Action may include funding the application for all or part of the requested amount, denying the applicant's request for funding or requesting additional information from the applicant for consideration before a final decision is made.

ITEM 23. Amend subrule 23.7(3) as follows:

23.7(3) *Review criteria.* IDED The authority shall review applications and make funding decisions based on the following criteria described in the annual action plan. Review criteria typically include:

1. <u>a.</u> Impact of the project on the community.

2. b. Appropriateness of the jobs to be created or retained by the proposed project.

3. <u>c.</u> Appropriateness of the proposed wage and benefit package available to employees in jobs created or retained by the proposed project.

4. <u>d.</u> Degree to which EDSA funding would be leveraged by private investment.

5. e. Degree of demonstrated business need.

In evaluating applications, IDED shall give supplementary credit to applicants who have executed a good neighbor agreement with the business to be assisted.

IDED may conduct site evaluations of proposed projects.

ITEM 24. Amend subrule 23.8(2) as follows:

23.8(2) Application procedure. Application forms and instructions shall be available upon request from IDED, Business Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309; telephone (515)242-4819. An original and one copy of completed applications with required attachments shall be submitted to the same address at iowagrants.gov. IDED The authority shall accept PFSA applications at any time and shall review applications on a continuous basis. IDED The authority shall take action on submitted applications within 60 days of receipt. Action may include funding the application for all or part of the requested amount, denying the applicant's request for funding or requesting additional information from the applicant for consideration before a final decision is made.

ITEM 25. Amend subrule 23.8(3) as follows:

23.8(3) *Review criteria.* IDED The authority shall review applications and make funding decisions based on the following criteria described in the annual action plan. Review criteria typically include:

1. <u>a.</u> Impact of the project on the community.

2. b. Number of jobs created or retained per funds requested.

3. c. Degree to which PFSA funding would be leveraged by private investment.

4. d. Degree of demonstrated need for the assistance.

IDED may conduct site evaluations of proposed projects.

ITEM 26. Adopt the following **new** subrule 23.8(4):

23.8(4) *Transfer of PFSA to EDSA*. On or after July 29, 2015, funding for public facility infrastructure projects will be available under the EDSA program described in rule 261–23.7(15).

ITEM 27. Amend rule 261—23.9(15), introductory paragraph, as follows:

261—23.9(15) Requirements for the career link program. Projects funded through the career link program assist the unemployed and underemployed to obtain the training and skills services necessary to move into available higher-skill, higher-paying jobs.

ITEM 28. Amend subrule 23.9(1) as follows:

23.9(1) *Restrictions on applicants.*

a. Identified positions shall pay an average starting wage that meets or exceeds the lower of 100 percent of the average county wage or 100 percent of the average regional wage.

b. a. Applications for training projects shall include evidence of business participation in the curriculum design and evidence that a number of positions are available equal to or greater than the number of persons to be trained. Applications for employment-related transportation projects shall include evidence of local support for the project, including matching funds committed to the project.

e. b. The project length shall not exceed 24 months.

d. <u>c</u>. Applicants may use awarded funds <u>career link funds</u> for training, <u>apprenticeship programs</u>, <u>employment-related</u> transportation <u>and supportive services</u>, and child care costs. Up to 5 percent of funds may be used for administration.

e. Rescinded IAB 1/19/05, effective 2/23/05.

ITEM 29. Amend subrule 23.9(2) as follows:

23.9(2) Application procedure. Application forms and instructions shall be available upon request from IDED, Community Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309; telephone (515)242-4783. An original and five copies of completed applications shall be submitted to the same address at iowagrants.gov. IDED The authority shall accept career link applications at any time and shall review applications on a continuous basis until all program funds are obligated or the program is discontinued.

ITEM 30. Amend subrule 23.9(3) as follows:

23.9(3) *Review criteria.* **IDED** The authority shall review applications and make funding decisions based on the following criteria: described in the annual action plan.

a. Review criteria for training projects typically include:

1. (1) Quality of the jobs available and business participation.

2. (2) Merit of the proposed training plan.

3. (3) Degree to which career link funds are leveraged by other funding sources.

4. (4) Merit of the recruitment/job matching plan.

5. (5) Scope of project benefit relative to the amount of funds invested.

b. Review criteria for supportive services typically include:

(1) Degree to which career link funds are leveraged by other funding sources.

(2) Scope of project benefit relative to the amount of funds invested.

(3) Magnitude of need for the project.

(4) Local support for the project.

ITEM 31. Amend rule 261—23.10(15), introductory paragraph, as follows:

261—23.10(15) Requirements for the contingency opportunities and threats fund. The contingency opportunities and threats fund is reserved for communities experiencing a threat to public health, safety or welfare that necessitates immediate corrective action sooner than can be accomplished through normal community development block grant procedures, or for disaster recovery activities, or for communities developing a sustainable community demonstration project.

ITEM 32. Amend subrule 23.10(2), introductory paragraph, as follows:

23.10(2) Application review. Upon receipt of a request for contingency opportunities and threats funding, IDED the authority shall determine whether the project is eligible for funding and notify the applicant of its determination. A project shall be considered eligible if it meets the following The authority shall review applications and make funding decisions based on criteria described in the annual action plan. Review criteria typically include:

ITEM 33. Amend subrule 23.10(3) as follows:

23.10(3) Additional information. IDED reserves the right to The authority may request additional information on forms prescribed by IDED the authority prior to making a final funding decision. IDED reserves the right to The authority may negotiate final project award and design components.

ITEM 34. Amend subrule 23.10(4) as follows:

23.10(4) *Future allocations.* **IDED** reserves the right to <u>The authority may</u> reserve future funds anticipated from federal CDBG allocations to the contingency fund to offset current need for commitment of funds which may be met by amounts deferred from current awards.

ITEM 35. Amend rule 261—23.11(15) as follows:

261—23.11(15) Requirements for the housing fund program. Specific requirements for the housing fund are listed separately at 261—Chapter 25.

23.11(1) *Housing fund application procedure.* Each year, the authority shall announce the availability of funds and instructions for applying for funds through direct mail, public notices, media releases, workshops or other means determined necessary by the authority.

a. Application forms shall be available at iowagrants.gov.

b. Applications shall be submitted by the deadline established by the authority.

c. The authority shall review applications and make funding decisions based on criteria described in the annual action plan. Review criteria typically include:

(1) Level of need.

(2) Level of impact.

(3) Community involvement in other housing and community development activities.

(4) Project readiness.

(5) Local involvement in the project.

<u>*d.*</u> Applicants selected to receive awards shall be notified by letter from the authority director by the date(s) determined by the authority.

23.11(2) Applicability to housing fund on or after July 1, 2015. For CDBG housing fund program awards made on or after July 1, 2015, the administrative rules in this chapter will apply. For CDBG housing fund program awards made before July 1, 2015, the administrative rules in 261—Chapter 25 will apply for contract administration and project closeout purposes.

ITEM 36. Rescind and reserve rule 261–23.12(15).

ITEM 37. Amend subrule 23.14(2) by lettering paragraphs "1" to "4" as "a" to "d."

ITEM 38. Amend subrule 23.15(4) as follows:

23.15(4) *Program income.* If a recipient receives program income before the contract end date, it the program income must be expended before requesting additional funds are requested. If a recipient receives program income on or after the contract end date, the recipient may reuse the program income according to an IDED authority-approved reuse plan, or the recipient may return the program income to IDED the authority. If a recipient receives less than \$25,000 \$35,000 of program income cumulative of all CDBG grants in a program year, it the program income shall be considered miscellaneous revenue and may be used for any purpose.

ITEM 39. Amend subrule 23.15(7) as follows:

23.15(7) Contract amendments. Any substantive change to a funded CDBG project, including time extensions, budget revisions and significant alteration to proposed activities, shall be considered a contract amendment. The recipient shall request the amendment in writing. No amendment shall be valid until approved in writing by IDED the authority. IDED shall not approve the addition of a new activity unrelated to the original contract activities, unless all original activities shall also be completed per the contract. In such cases, IDED may allow up to \$10,000 of the original CDBG award to be used for a new activity. For projects funded under the economic development set aside, IDED shall not approve amendments involving the replacement of one activity with another.

ITEM 40. Amend subrule 23.15(8) as follows:

23.15(8) Contract closeout and audit. Upon completion of project activities and contract expiration, IDED the authority shall initiate closeout procedures. Contracts may be subject to audit before closeout of the contract can be completed. Recipients that expend \$500,000 or more of federal funds within one year must have these funds audited. The audit shall be performed in a manner consistent with the provisions set forth in the Single Audit Act, as revised in of 1996, and described in the CDBG management guide.

ITEM 41. Amend subrule 23.16(2) as follows:

23.16(2) Application procedure. Application forms and instructions shall be available upon request from IDED, Community Development Division, 200 East Grand Avenue, Des Moines, Iowa 50309, or on the division Web site at www.iowalifechanging.com/community <u>at iowagrants.gov</u>.

ITEM 42. Amend subrule 23.16(3), introductory paragraph, as follows:

23.16(3) *Review criteria.* IDED The authority shall review applications and make funding decisions based on the following criteria described in the annual action plan. Review criteria typically include:

ITEM 43. Adopt the following **new** subrule 23.16(4):

23.16(4) *Notification of award.* Applicants selected to receive awards shall be notified by letter from the authority director by the date(s) determined by the authority.

ITEM 44. Adopt the following **new** rule 261—23.17(15):

261—23.17(15) Section 108 Loan Guarantee Program. The authority will apply to HUD's Section 108 Loan Guarantee Program to establish a section 108 program to assist with economic and community development projects in Iowa.

23.17(1) *Eligible applicants.*

a. All incorporated cities and all counties in the state of Iowa, except those designated as entitlement areas by HUD, are eligible to apply for and receive funds under this program.

b. Projects must meet a national objective as described in subrule 23.5(2).

c. The minimum loan amount for a project will be \$500,000. The maximum loan amount for a project will be \$10 million.

d. Applications must provide evidence of adequate private equity and ability to repay loan funds.

e. Applicants must certify to meet all applicable federal requirements including those requirements in subrule 23.5(9).

23.17(2) *Eligible activities.* Projects under the program will fall into at least one of the following categories:

a. Economic development resulting in substantial private investment and job creation/retention.

b. Adaptive reuse of vacant or underutilized commercial or industrial buildings for residential purposes.

c. Conversion of buildings to provide upper-story residential units.

d. Rehabilitation of vacant single-family residential units or demolition of blighted, unoccupiable, vacant single-family residential units.

23.17(3) Application procedure. Application forms and instructions shall be available at <u>iowagrants.gov</u>. The authority shall accept section 108 applications at any time and shall review applications on a continuous basis as long as funding is available.

23.17(4) *Review criteria and funding decision.* The authority shall review applications based on criteria described in the annual action plan. All final funding decisions will be made by HUD.

- ITEM 45. Rescind and reserve paragraph 173.1(1)"a."
- ITEM 46. Rescind and reserve paragraph 174.3(5)"c."
- ITEM 47. Rescind and reserve subrule 174.5(3).
- ITEM 48. Rescind and reserve subrule 174.6(5).
- ITEM 49. Amend rule 261—174.8(15) as follows:

261—174.8(15) Benefit requirements—prior to July 1, 2009. This rule regarding benefit requirements applies to awards made on or before June 30, 2009. This rule shall apply to the prior programs and funding sources until such time as the contracts for these prior programs are closed by the department.

Program	Benefit Requirement	Deductible Requirements	Is a monetary equivalent to benefits allowed?	Benefits Counted Toward Monetary Equivalent
ΕZ	80% medical and dental coverage, single coverage only OR the monetary equivalent	\$750 maximum for single coverage/ \$1500 maximum for family coverage	Yes	-Medical coverage (family portion) -Dental coverage (family portion) -Pension/401(k) (company's average contribution) -Profit-sharing plan -Life insurance -Short-/long-term disability insurance -Vision insurance -Child care
HQJC	No benefit requirement (If, however, the company does not provide 80% medical and dental coverage for a single employee, the award will be reduced by 10%.)	\$750 maximum for single coverage/ \$1500 maximum for family coverage	No (Providing 80% medical and dental coverage for a single employee is one of eight qualifying criteria the company may use to qualify for the program. Monetary equivalent of other benefits is not considered.)	Not applicable
EDSA	80% medical and dental for single employees OR 50% medical and dental for family coverage OR the monetary equivalent	\$750 maximum for single coverage/ \$1500 maximum for family coverage	¥es	-Medical coverage (family portion) -Dental coverage (family portion) -Pension/401(k) (company's average contribution) -Profit-sharing plan -Life insurance -Short-/long-term disability insurance -Vision insurance -Vision insurance -Child care -Other documented benefits offered to all employees (i.e., uniforms, tuition reimbursement, etc.)
СЕВА	80% medical and dental for single employees OR 50% medical and dental for family coverage OR the monetary equivalent	\$750 maximum for single coverage/ \$1500 maximum for family coverage	Yes	 -Medical coverage (family portion) -Dental coverage (family portion) -Pension/401(k) (company's average contribution) -Profit-sharing plan -Life insurance -Short-/long-term disability insurance -Vision insurance -Child care -Other documented benefits offered to all employees (i.e., uniforms, tuition reimbursement, etc.)

Program	Benefit Requirement	Deductible Requirements	Is a monetary equivalent to benefits allowed?	Benefits Counted Toward Monetary Equivalent
VAAPFAP	Not applicable	Not applicable	Not applicable	Not applicable
PIAP	Not applicable	Not applicable	Not applicable	Not applicable
EVA	Not applicable	Not applicable	Not applicable	Not applicable
TSBFAP	Not applicable	Not applicable	Not applicable	Not applicable

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