



U.S. Department of Housing and Urban Development  
Community Planning and Development

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Special Attention of:  
All Regional Administrators  
All CPD Division Directors  
All CDBG Grantees

**Notice: CPD-23-02**  
**Issued: April 10, 2023**  
**Expires: April 10, 2024**  
Supersedes: CPD Notice 22-07

SUBJECT: Instructions for Urban County Qualification for Participation in the Community Development Block Grant (CDBG) Program for Fiscal Years (FYs) 2024-2026

### INTRODUCTION

This Notice establishes requirements, procedures, and deadlines to be followed in the urban county qualification process for FYs 2024-2026. Information concerning specific considerations and responsibilities for urban counties is also provided. HUD Field Offices and urban counties are expected to adhere to the deadlines in this Notice.

This Notice provides guidance for counties wishing to qualify or requalify for entitlement status as urban counties, as well as for existing urban counties that wish to include previously nonparticipating communities. **Please send copies of this Notice to all presently qualified urban counties, to each county that can qualify for the first time or requalify for FYs 2024-2026, and to each state administering the State CDBG program which includes a potentially eligible urban county. If HUD Field Offices are notified later than the date of this Notice of one or more new potential urban counties, each should be provided a copy of this Notice.** This Notice includes the following seven attachments, lettered A-G, that contain listings of:

- Attachment A, all currently qualified urban counties;
- Attachment B, counties that requalify this qualification period (2024-2026);
- Attachment C, counties scheduled to qualify or requalify in FY 2024 for FY 2025-2027;
- Attachment D, counties scheduled to qualify or requalify in FY 2025 for FY 2026-2028;
- Attachment E, currently qualified urban counties that can add nonparticipating units of government for the remaining one or two years of their qualification period;
- Attachment F, counties that may qualify as urban counties if metropolitan cities relinquish their status; and
- Attachment G, counties previously identified as eligible but that have not accepted urban county status.

Additions to Attachment B may be provided separately, should any counties be identified as potentially eligible for the first time in July 2023.

The schedule for qualifying urban counties is coordinated with qualifying HOME Investment Partnerships Program (HOME) consortia to be able to operate both the CDBG and HOME programs using the same urban county configurations. The CDBG urban county qualification process for the FY 2024-2026 qualification period will start in March 2023 and run through September 15, 2023. This will provide HUD sufficient time before the September 30th deadline for FY 2024 funding under the HOME Program to notify counties that they qualify as urban counties under the CDBG Program. This Notice emphasizes the importance of completing all the steps of the urban county qualification/ requalification process by mid-September to ensure that there is no detrimental effect on the HOME consortia qualification/requalification process. Urban county worksheets will be accessible via Community Planning and Development's (CPD) Grants Management Process (GMP) system. The CPD Systems Development and Evaluation Division will provide GMP system guidance for submitting urban county qualification data.

Section V.H., second paragraph, regarding Cooperation Agreements clearly delineates the fair housing and civil rights obligations to which urban counties and participating jurisdictions are subject. By this time, all existing urban counties should have incorporated the required language in their cooperation agreements regarding fair housing and civil rights obligations. Urban counties should review the language in their existing cooperation agreements regarding fair housing and civil rights obligations to determine whether they still need to revise their existing agreements. The use of automatically renewing cooperation agreements does not exempt existing urban counties from incorporating the required language in Section V.H. HUD will not accept any cooperation agreements or approve any urban county's qualification/requalification that does not incorporate this language.

Urban counties have the option of drafting a separate amendment to their existing agreements that includes these provisions rather than drafting a new cooperation agreement that contains the provisions. However, the separate amendment must still be executed by an official representative of each of the participating units of general local government and the urban county.

Jurisdictions that are qualifying as an urban county for the first time must submit all required documents outlined in Section IV. to the Entitlement Communities Division in HUD Headquarters in addition to their local HUD offices (see Section IV. for details). In addition, if new jurisdictions are seeking to qualify as urban counties because they contain metropolitan cities willing to relinquish their entitlement status, the Entitlement Communities Division in HUD Headquarters should be notified as soon as possible, but no later than two weeks after the jurisdictions notify the Field Office of their intent to qualify as an urban county (see Section VIII. for details).

A unit of general local government may not sell, trade, or otherwise transfer all or any portion of such funds to a metropolitan city, urban county, unit of general local government, or Indian tribe, or insular area that directly or indirectly receives CDBG funds in exchange for any other funds, credits, or non-Federal considerations, but must use such funds for activities eligible under Title I of the Housing and Community Development Act of 1974, as amended. This

requirement first arose as a result of discovering that units of general local government located within an urban county were trading CDBG funds for unrestricted local funds. Congress has prohibited this practice. Urban counties qualifying in 2023 for FYs 2024-2026 must incorporate this provision into cooperation agreements by revision or amendment. HUD will not accept any cooperation agreements or approve any urban county's qualification/requalification that does not incorporate this language.

Section F., Section VIII., Special Considerations addresses the implications of an incorporated unit of general local government dissolving and the effect it will have on the urban county qualification/requalification process.

Section G., Section VIII., Special Considerations addresses factors that arose during the 2017 qualification/requalification period regarding qualification of New York Towns as metropolitan cities.

The coronavirus pandemic has affected the urban county qualification and requalification processes, in that all required correspondence and documents must be transmitted electronically. To avoid delays, HUD encourages urban counties to begin the qualification and requalification processes upon release of this Notice to meet the deadlines in Section II., Qualification Schedule. Section II identifies correspondence that must be submitted in letter format on the appropriate letterhead rather than by email. Any properly executed letter (i.e., in letter format on the appropriate letterhead) may be transmitted as an attachment via email. If a properly executed letter is required, the Notice shall denote such requirement by indicating that the correspondence or notification must be "by letter." If not required, the Notice shall indicate that the correspondence or notification may be made "by letter or email."

Policy questions from Field Offices related to this Notice should be directed to Gloria Coates in the Entitlement Communities Division at (202) 402-2184 or [gloria.l.coates@hud.gov](mailto:gloria.l.coates@hud.gov). Data questions should be directed to Abubakari Zuberi in the Systems Development and Evaluation Division at (202) 708-0790 or [abubakari.d.zuberi@hud.gov](mailto:abubakari.d.zuberi@hud.gov). Requests for deadline extensions should be directed to Gloria Coates. These are not toll-free numbers. The TTY number for both divisions is (202) 708-2565.

The information collection requirements contained in this notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2506-0170, which expires January 31, 2025. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

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COMMUNITY DEVELOPMENT BLOCK GRANT  
URBAN COUNTY QUALIFICATION  
Fiscal Years 2024-2026

In accordance with 24 CFR § 570.307(a) of the Community Development Block Grant (CDBG) regulations, the information below explains the U.S. Department of Housing and Urban Development's (HUD) process for qualifying and requalifying urban counties for purposes of the CDBG program.

I. GENERAL REQUIREMENTS

A. Threshold

To be entitled to receive CDBG funds as an urban county, a county must qualify as an urban county under one of the following thresholds:

1. Have a total combined population of 200,000 or more (excluding metropolitan cities) from the unincorporated areas and participating incorporated areas;
2. Have a total combined population of at least 100,000 but fewer than 200,000 from the unincorporated areas and participating incorporated areas, provided that, in the aggregate, those areas include the majority of persons of low and moderate income that reside in the county (outside of any metropolitan cities). Under this provision, the county itself is still required to have a minimum population of 200,000 (excluding metropolitan cities) to be potentially eligible. However, the urban county does not have to include each unit of general local government located therein, provided that the number of persons in the areas where the county has essential powers and in units of general local government where it has signed cooperation agreements equals at least 100,000. In addition, those included areas must in the aggregate contain the preponderance of low- and moderate-income persons residing in the urban county (calculated by dividing the number of low- and moderate-income persons residing in the county by two and adding one). Metropolitan cities are not included in these calculations; or
3. Meet specific requirements of Sec. 102(a)(6)(C) or (D) of Title I of the Housing and Community Development Act of 1974, as amended (the Act).

HUD must conduct a review to determine that a prospective urban county possesses essential community development and housing assistance powers in any unincorporated areas that are not units of general local government (UGLGs). HUD must also review all the UGLGs within the county to determine those, if any, in which the county lacks such powers. The county must enter into cooperation agreements with any such units of local government that are to become part of the urban county. Such agreements would bind an UGLG to cooperate in the use of its powers in carrying out essential activities in accordance with the urban county's program. See Section IX. for additional information on Determinations of Essential Powers.

## B. Consolidated Plan Requirements

To receive an Entitlement Grant in FY 2024, an urban county must have an approved Consolidated Plan (pursuant to 24 CFR § 570.302 and Part 91). This includes urban counties newly qualifying during this qualification period; urban counties that continue to include the same communities previously included in the urban county; and those urban counties that are amending their urban county configurations to add communities that chose not to participate previously. Where an urban county enters into a joint agreement with a metropolitan city for CDBG purposes, a Consolidated Plan is submitted by the urban county to cover both governmental entities for the CDBG program.

Pursuant to 24 CFR part 91, submission of a jurisdiction's Consolidated Plan may occur no earlier than November 15, and no later than August 16, of the Program Year for which CDBG, HOME, Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA) funds are appropriated to cover the Federal fiscal period of October 1, 2023, through September 30, 2024. **An urban county's failure to submit its Consolidated Plan by August 16, 2024, will automatically result in a loss of CDBG funds for the 2024 program year (24 CFR § 570.304(c)(1)) and termination of its qualification as an urban county (24 CFR § 570.307(f)) unless Congress extends this deadline via statute.** The Consolidated Plan must meet all requirements of 24 CFR part 91, including all required certifications.

## C. Consolidated Plan Requirements Where the Urban County Is in a HOME Consortium

Where UGLGs form a consortium to receive HOME funding, the consortium's lead entity submits the Consolidated Plan for the entire geographic area encompassed by the consortium (24 CFR § 91.400). Therefore, if an urban county is a member of a HOME consortium, the consortium submits the Consolidated Plan, and the urban county, like all other CDBG entitlement grantees in the consortium, is only required to submit its own non-housing Community Development Plan (24 CFR § 91.215(f)), an Action Plan (24 CFR § 91.220) and the required Certifications (24 CFR § 91.225(a) and (b)) as part of the consortium's Consolidated Plan. If an urban county has a CDBG joint agreement with a metropolitan city and both jurisdictions wish to receive HOME funds, they must form a HOME consortium to become one entity for HOME purposes. [For additional information on the requirements for consortia agreements, see 24 CFR § 92.101 and the Notice of Procedures for Designation of Consortia as a Participating Jurisdiction for the HOME Program (CPD-13-002).] Although an urban county as a member of a HOME consortium is only required to submit its own non-housing Community Development Plan, Action Plan and required certifications, the program responsibilities as stated in Section VII. of this Notice are important regardless of whether the urban county is a member of a consortium. In this regard and considering the requirement to submit its own affirmatively furthering fair housing certification per 24 CFR 91.225, an urban county is encouraged to work with the lead entity for the consortium in developing and seeing to the submission of a Consolidated Plan that reflects fair housing strategies and actions.

However, if the urban county is the lead entity rather than simply a participant in the HOME consortium, the urban county must submit the housing and homeless needs assessment, market analysis, strategic plan, and Action Plan on behalf of the consortium. The urban county and other entitlement communities that are members of the consortium must separately submit the certifications required at 24 CFR 91.225(a) & (b).

#### D. Synchronization of Urban County and HOME Qualification Periods

CDBG urban counties and HOME consortia qualification periods are for three successive years. If a member urban county's CDBG three-year cycle is not the same as the HOME consortium's, the HOME consortium may elect a qualification period shorter than three years to get in sync with the urban county's CDBG three-year qualification cycle, as permitted in 24 CFR § 92.101(e). All consortium members must also have the same program year start date.

Urban counties have requested extensions until the middle to end of September to submit all required documents to the HUD Field Office because some of the governing bodies of units of government in urban counties do not meet during the summer months. When there are automatically renewing cooperation agreements, the urban county must submit a legal opinion from the county's counsel that the terms and provisions continue to be authorized under state and local law and that the agreement continues to provide full legal authority for the county. Copies of any executed amendments to automatically renewed cooperation agreements (if any) and, if locally required, governing body authorizations must also be submitted.

Although flexibility exists to permit extensions in unusual situations, Headquarters will not grant any extensions past mid-September. Urban counties must factor in instances such as the meeting schedules of elected bodies of units of general local government while completing the requalification process, perhaps by submitting the cooperation agreement for execution before the summer recess begins. There are urban counties that are also completing the qualification/requalification process for HOME consortia at the same time they are completing the urban county qualification/requalification process. The qualification/requalification process for HOME consortia must be completed by the statutory deadline of September 30 for a HOME consortium to receive a formula allocation under HOME. If the urban county qualification/requalification process has not been completed by September 30, the consortium will not receive a HOME grant. To prevent this, all required documents must be received by HUD Field Offices by mid-September. This will allow Field Counsel time to review the cooperation agreements or amendments for legal sufficiency.

## II. QUALIFICATION SCHEDULE

The following schedule will govern the procedures for urban county qualification for the three-year qualification cycle of FYs 2024-2026. Unless noted otherwise, deadlines may only be



extended by prior written authorization from Headquarters. Deadlines in paragraphs D., E., G., and I. may be extended by the Field Office as specified below. However, no extension may be granted by the Field Office if it would have the effect of extending a subsequent deadline that the Field Office is not authorized to extend.

- A. By May 5, 2023, the HUD Field Office shall notify counties that may seek to qualify or requalify as an urban county of HUD's Determination of Essential Powers (see Section IX) as certified by the Field Office Counsel (see Attachment B, Counties Scheduled to Qualify or Requalify in 2023 for the 2024-2026 Qualification Period).
- B. By May 5, 2023, counties must notify, by letter, split places of their options for exclusion from, or participation in, the urban county (see Attachment B and Section III., paragraph D, for an explanation of split places).
- C. By May 5, 2023, counties must notify, by letter, each included unit of general local government, where the county is authorized to undertake essential community development and housing assistance activities without the consent of the governing body of the locality, of its right to elect to be excluded from the urban county, and the date by which it must make such election by letter (see paragraph E., below). HUD recommends that included units of government be advised that failure to respond means that they will be considered part of the urban county for FYs 2024-2026. Included units of government must also be notified that they are not eligible to apply for grants under the State CDBG program while they are part of the urban county. Additionally, that, in becoming a part of the urban county, they automatically participate in the HOME and ESG programs if the urban county receives HOME and ESG funding, respectively. Moreover, while units of general local government may only receive a formula allocation under the HOME and ESG programs as part of the urban county, this does not preclude the urban county, or a unit of government participating with the urban county, from applying for HOME or ESG funds from the State, if the State allows.
- D. Section 854(c) of the AIDS Housing Opportunity Act was amended by the Housing Opportunity Through Modernization Act of 2016 (HOTMA) to preserve the continued eligibility of FY 2016 HOPWA formula grantees, including Wake County, North Carolina, which is the HOPWA grantee for the Raleigh, NC, Metropolitan Statistical Area. Wake County is the only urban county that receives a HOPWA formula award from HUD under this arrangement. HOTMA also amended section 854(c) to allow a HOPWA formula grantee to enter into an agreement with an eligible alternative grantee, including a unit of general local government (which includes a county), to receive and administer the HOPWA formula allocation in its place. More information is available in Notice CPD-17-12, available at: <https://www.hudexchange.info/resources/documents/Notice-CPD-17-12-Implementation-of-HOTMA-Changes-to-the-HOPWA-Program.pdf>

A county that is already qualified as an urban county for FY 2024 (see Attachment E, Counties Qualified through 2024 or 2025 that Contain Nonparticipating Communities) may

elect to notify, by letter, nonparticipating units of government that they now have an opportunity to join the urban county for the remainder of the urban county's qualification period (see paragraph H., below).

- E. By June 12, 2023, any county which has executed cooperation agreements with no specified end date is required to notify, by letter, affected participating units of government that the agreement will automatically be renewed unless the unit of government notifies the county by letter by July 7, 2023, (see paragraph F., below) of its intent to terminate the agreement at the end of the current qualification period (see Attachment B). A failure by a unit of government to respond by the July 7, 2023, deadline means that the unit of government is required to remain with the urban county for FYs 2024-2026. Any extension of this deadline must be authorized by letter or email by the Field Office. An extension of more than seven days requires the Field Office to notify the Entitlement Communities Division by email or telephone.
- F. By June 12, 2023, any included unit of general local government, where the county does not need the consent of its governing body to undertake essential community development and housing assistance activities, that elects to be excluded from an urban county must notify the county and its HUD Field Office, by letter, that it elects to be excluded. Potential new entitlement cities are identified by the Census Bureau on or around July 1. Any unit of general local government that met metropolitan city status for the first time in a requalifying urban county will be given additional time to decide whether it wants to be included or excluded since it will be notified of its status after the July 21 deadline (see Section VIII.E.). Any extension of this deadline must be authorized by letter or email by the Field Office. An extension of more than seven days requires the Field Office to notify the Entitlement Communities Division by email or telephone.
- G. By July 7, 2023, any unit of government that has entered into a cooperation agreement with no specified end date with the county and elects not to continue participating with the county during the FY 2024-2026 qualification period must notify the county and its HUD Field Office by letter that it is terminating the agreement at the end of the current period. The county may allow additional time provided any such extension does not interfere with the county's ability to meet the deadline in paragraph J, below.
- H. By July 7, 2023, any unit of general local government that meets "metropolitan city" status for the first time and wishes to defer such status and remain part of the county, or to accept such status and become a joint recipient with the urban county, must notify the county and the HUD Field Office by letter that it elects to defer its metropolitan city status or to accept its status and join with the urban county in a joint agreement. Any metropolitan city that had deferred its status previously or had accepted its status and entered into a joint agreement with the urban county and wishes to maintain the same relationship with the county for this next qualification period, must notify the county and the HUD Field Office by letter by this date. Any unit of general local government that meets metropolitan city status for the first time and is notified in early July by HUD thereof will have until August 18, 2023, to comply

with the requirements of this paragraph. A potential metropolitan city that chooses to accept its entitlement status but chooses not to enter into a joint agreement with the urban county, or a current metropolitan city that chooses not to maintain a joint agreement with the urban county, must also notify the urban county and the HUD Field Office by letter by July 28, 2023. Any extension of this deadline must be authorized by letter by the Field Office. An extension of more than seven days requires the Field Office to notify the Entitlement Communities Division by email or telephone.

- I. By July 14, 2023, any unit of general local government that is not currently participating in an urban county and chooses to participate for the remaining second or third year of the county's qualification period must notify the county and the HUD Field Office by letter that it elects to be included. The county may allow additional time provided any such extension does not interfere with the county's ability to meet the deadline in paragraph J, below.
- J. By July 28, 2023, HUD Field Offices must notify CPD's Systems Development and Evaluation Division via e-mail ([Abubakari.D.Zuberi@hud.gov](mailto:Abubakari.D.Zuberi@hud.gov)) whether cities that are already identified as potentially eligible metropolitan cities elect to defer or accept their status. For units of general local government that meet metropolitan city status for the first time and are notified in early July thereof (as discussed in paragraph H., above), they must elect to defer or accept their status by August 18, 2023. For units of general local government notified in early July of their status as potential new metropolitan cities, Field Offices have until September 8, 2023, to notify the Systems Development and Evaluation Division of their decisions.
- K. By August 4, 2023, any county seeking to qualify as an urban county (see Attachment B) or to include any previously nonparticipating units of general local government into its configuration (see Attachment E) must submit to the appropriate HUD Field Office all qualification documentation described in Section IV., Documents to be Submitted to HUD. Any extension of this deadline must be authorized by letter or email by the Field Office and should not interfere with the Field Office's ability to meet the deadline in paragraph N. The Entitlement Communities Division and Field Counsel must be notified by email or telephone if an extension of more than seven days is needed. For HOME program purposes, the urban county configurations are final as of September 30 of every year. The HOME deadline is statutory and cannot be extended.
- L. By August 25, 2023, Field Office Counsel should complete the reviews of all cooperation agreements and related authorizations and certify that each cooperation agreement meets the requirements of Section V, Cooperation Agreements. Any delay in completion of the review must not interfere with the Field Office's ability to meet the deadline in paragraph N. The Entitlement Communities Division should be notified by email or telephone of any delay in the Field Counsel's review. **Note: If a county is using a renewable agreement and has submitted a legal opinion that the terms and conditions of the agreement continue to be authorized (see Section IV., paragraph E.), review of such opinion by Field Office Counsel is optional. However, Field Counsel must review the agreement to ensure that**

**any new requirements implemented by statute or regulation are incorporated into the agreement or added by an amendment to the agreement.**

- M. During July, Headquarters will post the urban county worksheets for each qualifying and requalifying urban county (listed on Attachment B) on the CPD Grants Management Process (GMP) system. **All information on included units of government must be completed via GMP.** Specific instructions for completing these electronic worksheets will be provided by the CPD Systems Development and Evaluation Division at the time they are posted on GMP.
- N. By August 25, 2023, Field Offices shall update and complete the form electronically for each qualifying or requalifying county. The revised worksheet must be sent to the appropriate county for verification of data (via FAX, email, or regular mail). The Systems Development and Evaluation Division will have access to the completed worksheets in GMP. Field Offices shall also concurrently make available to the Systems Development and Evaluation Division (and each affected urban county) a memorandum that identifies any urban county already qualified for FY 2024 that is adding any new units of government, together with the names of the newly included units of government (see Attachment E). **THIS DEADLINE MAY NOT BE EXTENDED WITHOUT PRIOR WRITTEN AUTHORIZATION FROM THE ENTITLEMENT COMMUNITIES DIVISION.**
- O. By September 8, 2023 (or soon thereafter), Headquarters will complete its review of the urban county status worksheets and memoranda for those urban counties adding new units of government. The Field Offices will have access to the updated worksheets and, if necessary, an indication from Headquarters of any apparent discrepancies, problems, or questions – all noted in GMP. The Field Office is to verify the data in the GMP Final Report and notify the Systems Development and Evaluation Division within seven days if any problems exist. If there are no problems, Field Offices will notify, by letter, each county seeking to qualify as an urban county of its urban county status for FY 2024-2026 by September 22, 2023.

### III. QUALIFICATION ACTIONS TO BE TAKEN BY COUNTY

The following actions are to be taken by the urban county:

#### A. Cooperation Agreements/Amendments

Urban counties that must enter into cooperation agreements or amendments, as appropriate, with the units of general local government located in whole or in part within the county, must submit to HUD executed cooperation agreements, together with evidence of authorization by the governing bodies of both parties (county and UGLG) executed by the proper officials (see Section V., Cooperation Agreements, paragraph A.) in sufficient time to meet the deadline for submission indicated in the schedule in Section II. (cooperation agreements must meet the standards in Section V. of this Notice).

Where urban counties do not have the authority to carry out essential community development and housing activities without the consent of the unit(s) of general local government located therein, urban counties are required to have executed cooperation agreements with these units of government that elect to participate in the urban counties' CDBG programs.

B. Notification of Opportunity to Be Excluded

Units of general local government in which counties have authority to carry out essential community development and housing activities without the consent of the local governing body are automatically included in the urban county unless they elect to be excluded at the time of qualification or requalification. Any county that has such units of general local government must notify each such unit that it may elect to be excluded from the urban county. The unit of government must be notified:

1. That if it chooses to remain with the urban county, it is ineligible to apply for grants under the State CDBG program while it is part of the urban county;
2. That if it chooses to remain with the urban county, it is also a participant in the HOME program if the urban county receives HOME funding and may only receive a formula allocation under the HOME Program as a part of the urban county, although this does not preclude the urban county or a unit of government within the urban county from applying to the State for HOME funds, if the State allows;
3. That if it chooses to remain with the urban county, it is also a participant in the ESG program if the urban county receives ESG funding and may only receive a formula allocation under the ESG Program as a part of the urban county, although this does not preclude the urban county or a unit of government within the urban county from applying to the State for ESG funds, if the State allows;
4. That if it chooses to be excluded from the urban county, it must notify both the county and the HUD Field Office of its election to be excluded by the date specified in Section II., Qualification Schedule, paragraph E.; and
5. That such election to be excluded will be effective for the entire three-year period for which the urban county qualifies unless the excluded unit specifically elects to be included in a subsequent year for the remainder of the urban county's three-year qualification period.

C. Notification of Opportunity to Be Included

If a currently qualified urban county has one or more nonparticipating units of general local government (see Attachment E), the county may notify, by letter, any such unit of local government during the second or third year of the qualification period that the local

government has the opportunity to be included for the remaining period of urban county qualification. This written notification must include the deadline for such election and must state that the unit of general local government must notify the county and the HUD Field Office, by letter, of its official decision to be included. If cooperation agreements are necessary, the unit electing to be included in the county for the remainder of the qualification period must also execute, with the county, a cooperation agreement meeting the standards in Section V., Cooperation Agreements. The agreement must be received by the HUD Field Office by the date specified in Section II., Qualification Schedule, paragraph K.

D. Notification of Split Places

Counties seeking qualification as urban counties and having units of general local government with any population located only partly within the county must notify these units of their rights by the date provided in Section II., Qualification Schedule, paragraph B. Specifically, the county must provide the following notifications:

1. Where a split place is partly located within only one urban county, one of the following rules applies:
  - a. If it is a split place in which the county has essential powers, the entire area of the split place will be included in the urban county for the urban county qualification period unless the split place has opted out; or
  - b. If the split place can only be included in the county upon the execution of a cooperation agreement, the entire area of the split place will be included in the urban county for the urban county qualification period upon execution of such an agreement.
2. Where the split place is partially located within two or more urban counties, the split place may elect one of the following:
  - a. to be excluded from all urban counties;
  - b. to be entirely included in one urban county and excluded from all other such counties; or
  - c. to participate as a part of more than one of the urban counties in which it is partially located provided that a single portion of the split place cannot be included in more than one entitled urban county at a time, and all parts of the split place are included in one of the urban counties.

E. Notification of Opportunity to Terminate Agreement

Urban counties that have agreements that will be automatically renewed at the end of the current qualification period unless action is taken by the unit of government to terminate the agreement must, by the date provided in Section II., Qualification Schedule, paragraph E, notify such units that they can terminate the agreement and not participate during the 2024-2026 qualification period.

IV. DOCUMENTS TO BE SUBMITTED TO HUD

Any county seeking to qualify as an urban county for FY 2024-2026 or that wishes to exercise its option to include units of government that are not currently in the urban county's CDBG program must submit the following to the responsible HUD Field Office:

- A. A copy of the letter that notified applicable units of general local government (and a list of applicable units of government) of their right to decide to be excluded from the urban county along with a copy of letters submitted to the county from any such units of general local government requesting exclusion (see Section III., Qualification Actions to Be Taken by County, paragraph B.). This does not apply to an already qualified urban county adding communities.
- B. A copy of the letter from any unit of general local government joining an already qualified county that officially notifies the county of its election to be included (see Section III. paragraph C.).
- C. Where applicable, a copy of the letter from:
  - 1. Any city that may newly qualify as a metropolitan city but seeks to defer that status;
  - 2. Any city currently deferring metropolitan city status that seeks to continue to defer such status;
  - 3. Any city accepting metropolitan city status stating that it will enter into a joint agreement with the urban county and a letter from the county affirming its willingness to enter into a joint agreement with that city; or
  - 4. Any city accepting metropolitan city status that will cease participation in the urban county's CDBG program (See Section II., Qualification Schedule, paragraph G.).
- D. For a county that has cooperation agreements in effect that provide for automatic renewal, a copy of the letter sent by the county that notified affected units of government that the agreement will be renewed unless the county is notified by the unit of government to

terminate the agreement, and a copy of any such letter from any unit(s) of government requesting termination (see Section III., paragraph E.).

- E. Where applicable, copies of fully executed cooperation agreements, amended agreements, or stand-alone amendments between the county and its included units of general local government, including any cooperation agreements from applicable units of general local government covered under Section III., Qualification Actions to be Taken by County, paragraph C., and the opinions of county counsel and governing body authorizations required in Section V., Cooperation Agreements, paragraphs B. and C.

For a county that has cooperation agreements in effect that provide for automatic renewal of the urban county qualification period as provided under Section V., Cooperation Agreements, paragraph E., at the time of such automatic renewal, the documents to be submitted are: (1) a legal opinion from the county's counsel that the terms and provisions continue to be authorized under state and local law and that the agreement continues to provide full legal authority for the county; (2) copies of any executed amendments to automatically renewed cooperation agreements (if any); and, (3) if locally required, governing body authorizations.

- F. Any joint request(s) for inclusion of a metropolitan city as a part of the urban county as permitted by Section VIII., paragraph A., Metropolitan City/Urban County Joint Recipients, along with a copy of the required cooperation agreement(s). If either the urban county or the metropolitan city falls under the "exception criteria" at 24 CFR § 570.208(a)(1)(ii) for activities that benefit low- and moderate-income residents of an area, the urban county must notify, by letter, the metropolitan city of the potential effects of such joint agreements on such activities. See Section VIII., paragraph A., for further clarification.

All jurisdictions seeking to qualify as an urban county for the first time must ensure that all documents outlined in this Section that are submitted to the HUD Field Office are also submitted to the Entitlement Communities Division in HUD Headquarters for review. The original documents should be submitted to the HUD Field Office and the copies to HUD Headquarters.

## V. COOPERATION AGREEMENTS

All cooperation agreements must meet the following standards to be found acceptable:

- A. The governing body of the county and the governing body of the cooperating unit of general local government shall authorize the agreement and the chief executive officer of each unit of general local government shall execute the agreement.
- B. The agreement must contain, or be accompanied by, a legal opinion from the county's counsel that the terms and provisions of the agreement are fully authorized under State and local law and that the agreement provides full legal authority for the county. Where the



county does not have such authority, the legal opinion must state that the participating unit of general local government has the authority to undertake, or assist in undertaking, essential community renewal and lower income housing assistance activities. A mere certification by the county's counsel that the agreement is approved as to form is insufficient and unacceptable.

- C. The agreement must state that the agreement covers the CDBG Entitlement program and, where applicable, the HOME Investment Partnership (HOME) and Emergency Solutions Grants (ESG) Programs (i.e., where the urban county receives funding under the ESG program or receives funding under the HOME program as an urban county or as a member of a HOME consortium).
- D. The agreement must state that, by executing the CDBG cooperation agreement, the included unit of general local government understands that it:
  - 1. May not apply for grants from appropriations under the State CDBG Program for fiscal years during the period in which it participates in the urban county's CDBG program;
  - 2. May receive a formula allocation under the HOME Program only through the urban county. Thus, even if the urban county does not receive a HOME formula allocation, the participating unit of local government cannot form a HOME consortium with other local governments. (Note: This does not preclude the urban county or a unit of government participating with the urban county from applying to the State for HOME funds if the state allows. An existing renewable agreement need not be amended to add this Note. It is included here only for purposes of clarification.); and
  - 3. May receive a formula allocation under the ESG Program only through the urban county. (Note: This does not preclude the urban county or a unit of general local government participating with the urban county from applying to the State for ESG funds if the state allows. An existing renewable agreement need not be amended to add this Note. It is included here only for purposes of clarification.)
- E. The agreement must specify the three years covered by the urban county qualification period (e.g., Federal FYs 2024-2026), for which the urban county is to qualify to receive CDBG entitlement funding or, where applicable, specify the remaining one or two years of an existing urban county's qualification period. At the option of the county, the agreement may provide that it will automatically be renewed for participation in successive three-year qualification periods, unless the county or the participating unit of general local government provides written notice it elects not to participate in a new qualification period. A copy of that notice must be sent to the HUD Field Office.

Where such agreements are used, the agreement must state that, by the date specified in HUD's urban county qualification notice for the next qualification period, the urban county will notify the participating unit of general local government by letter of its right not to

participate. A copy of the county's notification to the jurisdiction must be sent to the HUD Field Office by the date specified in the urban county qualification schedule in Section II.

- F. Cooperation agreements with automatic renewal provisions must include a stipulation that requires each party to adopt any amendment to the agreement incorporating changes necessary to meet the requirements for cooperation agreements set forth in an Urban County Qualification Notice applicable for a subsequent three-year urban county qualification period, and to submit such amendment to HUD as provided in the urban county qualification notice (see Section IV., Documents to be Submitted to HUD, paragraph E.), and that such failure to comply will void the automatic renewal for such qualification period.
- G. The agreement must provide that it remains in effect until the CDBG (and, where applicable, HOME and ESG) funds and program income received (with respect to activities carried out during the three-year qualification period, and any successive qualification periods under agreements that provide for automatic renewals) are expended and the funded activities completed, and that the county and participating unit of general local government cannot terminate or withdraw from the cooperation agreement while it remains in effect.
- H. The agreement must expressly state that the county and the cooperating unit of general local government agree to cooperate to undertake, or assist in undertaking, community renewal and lower-income housing assistance activities. If the county does not have such powers, the agreement must expressly state that the cooperating unit of general local government agrees to "undertake, or assist in undertaking, community renewal and lower-income housing assistance activities." As an alternative to this wording, the cooperation agreement may reference State legislation authorizing such activities, but only with the approval of the specific alternative wording by HUD Field Counsel.

The agreement must contain an explicit provision obligating the county and the cooperating units of general local government to take all actions necessary to assure compliance with the urban county's certification under section 104(b) of Title I of the Housing and Community Development Act of 1974, that the grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964, and the implementing regulations at 24 CFR part 1, and the Fair Housing Act, and the implementing regulations at 24 CFR part 100, and will affirmatively further fair housing. See 24 CFR § 91.225(a) and Affirmatively Furthering Fair Housing Definitions and Certifications (86 FR 30779, June 10, 2021), to be codified at 24 CFR 5.151 and 5.152, available at

<https://www.federalregister.gov/documents/2021/06/10/2021-12114/restoring-affirmatively-furthering-fair-housing-definitions-and-certifications>. The provision must also include the obligation to comply with section 109 of Title I of the Housing and Community Development Act of 1974, and the implementing regulations at 24 CFR part 6, which incorporates Section 504 of the Rehabilitation Act of 1973, and the implementing regulations at 24 CFR part 8, Title II of the Americans with Disabilities Act, and the implementing regulations at 28 CFR part 35, the Age Discrimination Act of 1975, and the

implementing regulation at 24 CFR part 146, and Section 3 of the Housing and Urban Development Act of 1968. The provision must also include the obligation to comply with other applicable laws. The agreement shall also contain a provision prohibiting urban county funding for activities in, or in support of, any cooperating unit of general local government that does not affirmatively further fair housing within its own jurisdiction or that impedes the county's actions to comply with the county's fair housing certification. This provision is required because noncompliance by a unit of general local government included in an urban county may constitute noncompliance by the grantee (i.e., the urban county) that can, in turn, provide cause for funding sanctions or other remedial actions by the Department. The agreement must include the obligation to sign the assurances and certifications in the HUD 424-B.

Periodically, statutory, or regulatory changes may require urban counties to amend their agreements to add the new provision(s). Urban counties may draft a separate amendment to their existing agreements that includes the new provision(s) rather than drafting a new cooperation agreement that contains the new provisions. However, the separate amendment must be executed by an official representative of each of the participating units of general local government and the urban county.

- I. The agreement must expressly state that the cooperating unit of general local government 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 which is the subject of such non-violent civil rights demonstrations within jurisdictions.
- J. The agreement may not contain a provision for veto or other restriction that would allow any party to the agreement to obstruct the implementation of the approved Consolidated Plan during the period covered by the agreement. The county has final responsibility for selecting CDBG (and, where applicable, HOME and ESG) activities and submitting the Consolidated Plan to HUD. If the county is a member of a HOME consortium, however, the consortium submits the Plan developed by the county (see Section I., General Requirements, paragraph C.).
- K. The agreement must contain language specifying that, pursuant to 24 CFR § 570.501(b), the unit of local government is subject to the same requirements applicable to subrecipients, including the requirement of a written agreement as described in 24 CFR § 570.503 (see Section VIII., Special Considerations, paragraph B.).

- L. A county may also include in the cooperation agreement any provisions authorized by State and local laws that legally obligate the cooperating units to undertake the necessary actions, as determined by the county, to carry out a community development program and the approved Consolidated Plan and/or meet other requirements of the CDBG (and, where applicable, HOME and ESG) program and other applicable laws.
- M. The county must also include a provision in the cooperation agreement that a unit of general local government may not sell, trade, or otherwise transfer all or any portion of such funds to another such metropolitan city, urban county, unit of general local government, or Indian tribe, or insular area that directly or indirectly receives CDBG funds in exchange for any other funds, credits or non-Federal considerations, but must use such funds for activities eligible under Title I of the Act. Urban counties requalifying in 2023 for FYs 2024-2026 must incorporate this language into cooperation agreements by revision or amendment.

## VI. PERIOD OF QUALIFICATION

### A. General

Any county that qualifies as an urban county will be entitled to receive funds as an urban county for three consecutive fiscal years regardless of changes in its population or boundary or population changes in any communities contained within the urban county during that period, provided funds are appropriated by Congress and the county submits its annual Action Plan by August 16 of each year. However, during the period of qualification, no included unit of general local government may withdraw from the urban county unless the urban county does not receive a grant for any year during such period. The urban county's grant amount is calculated annually and will reflect the addition of any new units of general local government during the second and third years of the period of qualification.

Any unincorporated portion of the county that incorporates during the urban county qualification period will remain part of the urban county through the end of the three-year period.

Any unit of general local government that is part of an urban county will continue to be included in the urban county for that county's qualification period, even if it meets the criteria to be considered a "metropolitan city" during that period. Such an included unit of general local government cannot become eligible for a separate entitlement grant as a metropolitan city while participating as a part of an urban county (see Section VIII paragraph E).

### B. Retaining Urban County Classification

Any county classified as an urban county in FY 1999 may, at the option of the county, retain

its classification as an urban county.

Any county that became classified as an urban county in FY 2000 or later and was so classified for at least two years will retain its classification as an urban county, unless the urban county qualified under section 102(a)(6)(A) of Title I of the Housing and Community Development Act of 1974, as amended, and fails to requalify under that section due to the election of a currently participating non-entitlement community to opt out or not to renew a cooperation agreement (for reasons other than becoming an eligible metropolitan city).

## VII. URBAN COUNTY PROGRAM RESPONSIBILITIES

The county, as the CDBG grant recipient, either for the urban county or a joint recipient (see Section VIII, paragraph A., Metropolitan City/Urban County Joint Recipients) has full responsibility for the execution of the community development program, for following its Consolidated Plan, and for complying with laws and requirements applicable to the CDBG program. The county's responsibility must include these functions even where, as a matter of administrative convenience or State law, the county permits the participating units of general local government to carry out essential community development and housing assistance activities. The county will be held accountable for the accomplishment of the community development program, for following its Consolidated Plan, and for ensuring that actions necessary for such accomplishment are taken by cooperating units of general local government.

## VIII. SPECIAL CONSIDERATIONS

### A. Metropolitan City/Urban County Joint Recipients

Any urban county and any metropolitan city located in whole or in part within that county can ask HUD to approve the inclusion of the metropolitan city as a part of the urban county for purposes of planning and implementing a joint community development and housing assistance program. HUD will consider approving a joint request only if it is signed by the chief executive officers of both entities and is submitted at the time the county is seeking its qualification as an urban county. A joint request will be deemed approved unless HUD notifies the city and the county otherwise within 30 days following submission of the joint request and an executed cooperation agreement meeting the requirements specified under Section V., Cooperation Agreements. An urban county may be joined by more than one metropolitan city, but a metropolitan city located in more than one urban county may be a joint recipient with only one urban county at a time.

Upon urban county qualification and HUD approval of the joint request, the metropolitan city becomes a part of the urban county for purposes of program planning and implementation for the entire period of the urban county qualification and will be treated by HUD as any other unit of general local government that is a part of the urban county. When a metropolitan city joins an urban county in this manner, the grant amount is the sum of the

amounts authorized for the individual metropolitan city and urban county. The urban county becomes the grant recipient.

A metropolitan city in a joint agreement with the urban county is treated the same as any other unit of general local government that is part of the urban county for purposes of the CDBG program, but not for the HOME or ESG programs. If the metropolitan city does not qualify to receive a separate allocation of HOME funds, to be considered for HOME funding as part of the urban county, it may form a HOME consortium with the urban county. If the metropolitan city qualifies to receive a separate allocation of HOME funds, it has two options: (1) it may form a HOME consortium with the county, in which case it will be included as part of the county when the HOME funds for the county are calculated; or (2) the metropolitan city may administer its HOME program on its own. NOTE: The execution of a CDBG joint agreement between an urban county and metropolitan city does not in itself satisfy HOME requirements for a written consortia agreement. For additional information on the requirements for consortia agreements, see 24 CFR 92.101 and the Notice of Procedures for Designation of Consortia as a Participating Jurisdiction for the HOME Program (CPD-13-002).

The ESG program does provide for joint agreements among certain grantees; however, there are separate requirements that apply to those joint agreements. A metropolitan city and an urban county that each receive an allocation under ESG and are located within a geographic area that is covered by a single Continuum of Care (CoC) may jointly request the Secretary of Housing and Urban Development to permit the urban county or the metropolitan city, as agreed to by such county and city, to receive and administer their combined allocations under a single grant. For more information about joint agreements for the ESG program, contact Marlisa Grogan at 603-666-7510, Ext. 3049 or Marlisa.M.Grogan@hud.gov. The TTY number is 603-666-3805. These are not toll-free numbers.

Counties and metropolitan cities considering a joint request should be aware that significant effects could occur where either the urban county or the metropolitan city would otherwise fall under the exception rule criteria for activities that benefit low- and moderate-income residents on an area basis (see 24 CFR 570.208(a)(1)(ii)). Joint agreements result in a modification to an urban county's configuration, and a change in the mix of census block groups in an urban county is likely to change the relative ranking of specific block groups by quartile, thus affecting the minimum concentration of low- and moderate-income persons under the exception rule. HUD will make a rank-ordering computer run available to counties and metropolitan cities considering joint participation to assist them in determining the possible effects of inclusion and how such an agreement may impact their respective programs.

#### B. Subrecipient Agreements

The execution of cooperation agreements meeting the requirements of Section V., Cooperation Agreements, between an urban county and its participating units of local

government does not in itself satisfy the requirement for a written subrecipient agreement required by the regulations at 24 CFR 570.503. Where a participating unit of general local government carries out an eligible activity funded by the urban county, the urban county is responsible, prior to disbursing any CDBG funds for any such activity or project, for executing a written subrecipient agreement with the unit of government containing the minimum requirements found at 24 § CFR 570.503. The subrecipient agreement must remain in effect during any period that the unit of local government has control over CDBG funds, including program income.

C. Ineligibility for State CDBG Program

An urban county's included units of general local government are ineligible to apply for grants from appropriations under the State CDBG Program for fiscal years during the period in which the units of general local government are participating in the Entitlement CDBG program with the urban county.

D. Eligibility for a HOME Consortium

When included units of local government become part of an urban county for the CDBG Program, they are part of the urban county for the HOME Program and may receive HOME funds only as part of the urban county or from the State. Thus, even if the urban county does not receive a HOME formula allocation, the participating unit of local government cannot form a HOME consortium with other local governments. This does not preclude the urban county or a unit of government within an urban county from applying to the State for HOME funds if the State allows. However, a unit of local government that chooses to opt out of the urban county may become part of a HOME consortium by signing the HOME consortium agreement.

A unit of local government that is partially located in two counties with at least one of those counties being a member of a consortium may participate in the consortium. If the county is an urban county, the unit of local government may only participate as a member of the urban county.

E. Counties with Potential Metropolitan Cities

If a county includes a unit of general local government that believes its population meets the statutory threshold to enable it to receive CDBG entitlement funds as a metropolitan city directly, but the city and county have not yet received notification from HUD regarding metropolitan city eligibility, HUD has identified two options a county may use to address such situations:

1. The county and community can negotiate a schedule that will provide the community additional time to receive notification from HUD of its eligibility as a potential new metropolitan city and, if the community does not reach metropolitan city status (or

becomes eligible and elects to defer its status), execute a cooperation agreement and still meet the deadlines identified in this Notice; or

2. If a county believes delaying the execution of a cooperation agreement until HUD provides such notification will prohibit it from meeting the submission deadlines in this Notice, the county may want to include a clause in the agreement that provides that the agreement will be voided if the community is advised by HUD, prior to the completion of the requalification process for FYs 2024-2026, that it is eligible to become a metropolitan city and the community elects to take its entitlement status. If such a clause is used, it must state that if the agreement is not voided based on the community's eligibility as a metropolitan city prior to July 28, 2023 (or a later date if approved by letter or email by HUD), the community must remain a part of the county for the entire three-year period of the county's qualification.

Option 1 above is preferred. Option 2 is available if a county wishes to use it, although there is concern that a community may believe that the use of a clause that may void the agreement will enable it to opt out later in the three-year period of qualification if it reaches the population during that time to be a metropolitan city. Therefore, any such clause must be clear that it applies only for a limited period of time.

There are jurisdictions that may potentially qualify as urban counties for the first time because they contain one or more metropolitan cities that may consider relinquishing their status as entitlement grantees. If a county has a metropolitan city or cities that are willing to relinquish its/their status as entitlement grantee(s) and the county wants to begin the process of qualifying as an urban county, the Entitlement Communities Division in HUD Headquarters should be notified as soon as possible, but no later than two weeks after the county notifies the Field Office of its intent to qualify as an urban county. A list of these counties is provided as Attachment F.

#### F. Incorporated Unit of General Local Government Dissolution

A unit of general local government located in an urban county may unincorporate or dissolve or merge with another unit of general local government. Assuming the urban county possesses essential community development and housing assistance powers, the dissolved unit of general local government will automatically be considered as part of the urban county for CDBG program purposes. If the dissolved unit of government merges into another unit of general local government that already participates in the urban county, then the newly expanded unit of government will be a participant in the urban county's CDBG program. The cooperation agreement between the urban county and the expanded unit of general local government will need to be submitted to the Field Office for Field Counsel review.

The Bureau of Census' (Census) designation of a former incorporated unit of general local government as dissolved or a former unincorporated unit of general local



government as incorporated is important because Section 102(b) of the Housing and Community Development Act of 1974, as amended, requires the definitions in Section 102(a) such as city, metropolitan city, and urban county to be based on the most recent data compiled by Census. Therefore, Census must recognize the former incorporated unit of general local government as dissolved for it to be recognized by HUD as no longer being an incorporated unit of general local government.

If the urban county is requalifying this year or the following year, and the unit of general local government is recognized by Census as dissolved, the former unit of general local government will be considered a part of the unincorporated area of the urban county. In that instance, CDBG funds may be used to assist activities that will be located in the former unit of general local government, and its residents may benefit from CDBG-assisted activities.

If the urban county is requalifying this year, and the unit of general local government is not recognized as dissolved by Census (although dissolution has occurred), it will become part of the urban county, since the unit of government has legally ceased to exist.

#### G. Qualification of New York Towns as Metropolitan Cities

In the state of New York, there are towns that can qualify as metropolitan cities. These towns are required to secure the participation of all the incorporated villages located within their boundaries to attain metropolitan city status. As metropolitan cities, these towns may receive their own CDBG grants. New York towns requalify every three years.

There are eight New York towns (Greensburgh, Hempstead, North Hempstead, Oyster Bay, Clarkstown, Ramapo, Smithtown, and Southampton) that are located in existing urban counties and are eligible to be metropolitan cities but have not taken steps to qualify as metropolitan cities. They decided to participate in their respective urban counties' CDBG programs as participating units of general government. However, when the urban counties in which the towns are located requalify, these eight towns may decide to become metropolitan cities and administer their own CDBG programs. This means that the towns would have elected to leave the urban counties in which they were participating as units of general local government. If a New York town decides to become a metropolitan city and administer its own CDBG program, the following steps must be taken:

1. The New York town should decide before the urban county requalification process starts (usually March or April) whether it will accept its metropolitan city status. Past experience has demonstrated that units of general local government need plenty of time to complete all of the necessary processes, so HUD recommends that this decision-making process start in the year before the urban county's requalification year. The town must secure the participation of all the villages located within its boundaries by execution of a cooperation agreement with those villages. Depending

on local circumstances, it may take several months to notify every village by letter of its intent to become a separate entitlement community and to secure the participation of all the villages. The town cannot qualify as an entitlement grantee unless it secures the participation of all the villages. To illustrate, for example, hypothetical Blue County is requalifying in 2024 for 2025-2027. The town of Orange has been participating in the county's CDBG program but would like to become an entitlement grantee and administer its own CDBG program. It is advisable that the town make this decision during 2023 so it can begin to contact the villages and secure their participation in the town's CDBG program.

2. The urban county is required to notify all participating units of general local government by letter (typically, in April) that they may choose to opt out of participation in the urban county's CDBG program. The units of general local government must notify the urban counties by letter of their decisions by the due date (typically, in June) in Section II. of the urban county Qualification/ Requalification Notice. The New York town must respond to the urban county's correspondence by that date. If the town has an automatically renewing cooperation agreement with the urban county, it must notify the county (typically by mid-June) that it is terminating the cooperation agreement. The urban county must be notified by the established deadlines in this Notice so that it may complete the requalification process in a timely manner. Failure to meet the established deadlines may result in the New York town having to remain as part of the urban county for the next three-year qualification period. Furthermore, if a town notifies its respective urban county that it is leaving, and then does not sign up all the villages, then the town and any villages that have signed on to the town's decision to seek entitlement status may be excluded from the urban county but cannot receive separate metropolitan city funding because it did not qualify.

## IX. DETERMINATIONS OF ESSENTIAL POWERS

- A. For new urban counties, HUD Field Office Counsel must initially determine whether each county within its jurisdiction that is eligible to qualify as an urban county has powers to carry out essential community renewal and lower-income housing assistance activities. For requalifying urban counties, the Field Office Counsel may rely on its previous determination(s) unless there is evidence to the contrary. In assessing such evidence, Field Office counsel may consider information provided by the county and its included units of general local government as well as other relevant information obtained from independent sources.

For these purposes, the term essential community development and housing assistance activities means community renewal and lower-income housing assistance activities. Activities that may be accepted as essential community development and housing assistance activities might include but are not limited to (1) acquisition of property for disposition for private reuse, especially for low- and moderate-income housing; (2) direct rehabilitation of

or financial assistance to housing; (3) low rent housing activities; (4) disposition of land to private developers for appropriate redevelopment; and (5) condemnation of property for low-income housing.

In making the required determinations, Field Office Counsel must consider both the county's authority and, where applicable, the authority of its designated agency or agencies. Field Office Counsel shall make such determinations as identified below and concur in notifications to the county(ies) about these issues.

- B. For new and requalifying counties, the notification by the Field Office required under Section II., paragraph A., must include the following determinations:
1. Whether the county is authorized to undertake essential community development and housing assistance activities in its unincorporated areas, if any, which are not units of general local government.
  2. Which of the county's units of general local government the county is authorized to undertake essential community development and housing assistance activities without the consent of the governing body of the locality. The population of these units of local government will be counted towards qualification of the urban county unless they specifically elect to be excluded from the county for purposes of the CDBG program and so notify both the county and HUD by letter by July 14, 2023); and,
  3. Which of the county's units of general local government the county is either (a) not authorized to undertake essential community development and housing assistance activities or (b) may do so only with the consent of the governing body of the locality. The population of these units of local government will only be counted if they have signed cooperation agreements with the county that meet the standards set forth in Section V. of this Notice.

**ATTACHMENT A**

**ALL CURRENTLY QUALIFIED URBAN COUNTIES**

**NEW ENGLAND FIELD OFFICES**

MAINE CUMBERLAND COUNTY

**NEW YORK/NEW JERSEY FIELD OFFICES**

NEW JERSEY	ATLANTIC COUNTY
NEW JERSEY	BERGEN COUNTY
NEW JERSEY	BURLINGTON COUNTY
NEW JERSEY	CAMDEN COUNTY
NEW JERSEY	ESSEX COUNTY
NEW JERSEY	GLOUCESTER COUNTY
NEW JERSEY	HUDSON COUNTY
NEW JERSEY	MIDDLESEX COUNTY
NEW JERSEY	MONMOUTH COUNTY
NEW JERSEY	MORRIS COUNTY
NEW JERSEY	OCEAN COUNTY
NEW JERSEY	PASSAIC COUNTY
NEW JERSEY	SOMERSET COUNTY
NEW JERSEY	UNION COUNTY

NEW YORK	DUTCHESS COUNTY
NEW YORK	ERIE COUNTY
NEW YORK	MONROE COUNTY
NEW YORK	NASSAU COUNTY
NEW YORK	ONONDAGA COUNTY
NEW YORK	ORANGE COUNTY
NEW YORK	ROCKLAND COUNTY
NEW YORK	SUFFOLK COUNTY
NEW YORK	WESTCHESTER COUNTY

**MID-ATLANTIC FIELD OFFICES**

DELAWARE NEW CASTLE COUNTY

MARYLAND ANNE ARUNDEL COUNTY  
MARYLAND BALTIMORE COUNTY

MARYLAND  
MARYLAND  
MARYLAND  
MARYLAND

HARFORD COUNTY  
HOWARD COUNTY  
MONTGOMERY COUNTY  
PRINCE GEORGES COUNTY

PENNSYLVANIA  
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ALLEGHENY COUNTY  
BEAVER COUNTY  
BERKS COUNTY  
BUCKS COUNTY  
CHESTER COUNTY  
CUMBERLAND COUNTY  
DAUPHIN COUNTY  
DELAWARE COUNTY  
LANCASTER COUNTY  
LEHIGH COUNTY  
LUZERNE COUNTY  
MONTGOMERY COUNTY  
NORTHAMPTON COUNTY  
WASHINGTON COUNTY  
WESTMORELAND COUNTY  
YORK COUNTY

VIRGINIA  
VIRGINIA  
VIRGINIA  
VIRGINIA  
VIRGINIA  
VIRGINIA

ARLINGTON COUNTY  
CHESTERFIELD COUNTY  
FAIRFAX COUNTY  
HENRICO COUNTY  
LOUDOUN COUNTY  
PRINCE WILLIAM COUNTY

**SOUTHEAST/CARIBBEAN FIELD OFFICES**

ALABAMA  
ALABAMA

JEFFERSON COUNTY  
MOBILE COUNTY

FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA

BREVARD COUNTY  
BROWARD COUNTY  
CLAY COUNTY  
COLLIER COUNTY  
ESCAMBIA COUNTY  
HILLSBOROUGH COUNTY  
JACKSONVILLE-DUVAL COUNTY

FLORIDA  
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NORTH CAROLINA  
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NORTH CAROLINA  
NORTH CAROLINA

SOUTH CAROLINA  
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SOUTH CAROLINA

TENNESSEE  
TENNESSEE

**MIDWEST FIELD OFFICES**

LAKE COUNTY  
LEE COUNTY  
MANATEE COUNTY  
MARION COUNTY  
MIAMI-DADE COUNTY  
ORANGE COUNTY  
OSCEOLA COUNTY  
PALM BEACH COUNTY  
PASCO COUNTY  
PINELLAS COUNTY  
POLK COUNTY  
SARASOTA COUNTY  
SEMINOLE COUNTY  
ST. JOHNS COUNTY  
VOLUSIA COUNTY

CHEROKEE COUNTY  
CLAYTON COUNTY  
COBB COUNTY  
DE KALB COUNTY  
FULTON COUNTY  
GWINNETT COUNTY  
HENRY COUNTY

CUMBERLAND COUNTY  
MECKLENBURG COUNTY  
UNION COUNTY  
WAKE COUNTY

BERKELEY COUNTY  
CHARLESTON COUNTY  
GREENVILLE COUNTY  
HORRY COUNTY  
LEXINGTON COUNTY  
RICHLAND COUNTY  
SPARTANBURG COUNTY

KNOX COUNTY  
SHELBY COUNTY

ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS

COOK COUNTY  
DU PAGE COUNTY  
KANE COUNTY  
LAKE COUNTY  
MADISON COUNTY  
MCHENRY COUNTY  
ST. CLAIR COUNTY  
WILL COUNTY

INDIANA  
INDIANA

HAMILTON COUNTY  
LAKE COUNTY

MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN

GENESEE COUNTY  
KENT COUNTY  
MACOMB COUNTY  
OAKLAND COUNTY  
WASHTENAW COUNTY  
WAYNE COUNTY

MINNESOTA  
MINNESOTA  
MINNESOTA  
MINNESOTA  
MINNESOTA  
MINNESOTA

ANOKA COUNTY  
DAKOTA COUNTY  
HENNEPIN COUNTY  
RAMSEY COUNTY  
ST. LOUIS COUNTY  
WASHINGTON COUNTY

OHIO  
OHIO  
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OHIO  
OHIO  
OHIO  
OHIO

BUTLER COUNTY  
CLERMONT COUNTY  
CUYAHOGA COUNTY  
FRANKLIN COUNTY  
HAMILTON COUNTY  
LAKE COUNTY  
MONTGOMERY COUNTY  
STARK COUNTY  
SUMMIT COUNTY  
WARREN COUNTY

WISCONSIN  
WISCONSIN  
WISCONSIN

DANE COUNTY  
MILWAUKEE COUNTY  
WAUKESHA COUNTY

**SOUTHWEST FIELD OFFICES**

LOUISIANA  
LOUISIANA

JEFFERSON PARISH  
ST. TAMMANY PARISH

OKLAHOMA

TULSA COUNTY

TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS

BEXAR COUNTY  
BRAZORIA COUNTY  
DALLAS COUNTY  
FORT BEND COUNTY  
HARRIS COUNTY  
HIDALGO COUNTY  
MONTGOMERY COUNTY  
TARRANT COUNTY  
TRAVIS COUNTY  
WILLIAMSON COUNTY

**GREAT PLAINS FIELD OFFICES**

KANSAS

JOHNSON COUNTY

MISSOURI  
MISSOURI  
MISSOURI

JEFFERSON COUNTY  
ST. LOUIS COUNTY  
ST. CHARLES COUNTY

**ROCKY MOUNTAIN FIELD OFFICES**

COLORADO  
COLORADO  
COLORADO  
COLORADO  
COLORADO

ADAMS COUNTY  
ARAPAHOE COUNTY  
EL PASO COUNTY  
JEFFERSON COUNTY  
WELD COUNTY

UTAH  
UTAH

SALT LAKE COUNTY  
UTAH COUNTY

**PACIFIC/HAWAII FIELD OFFICES**

ARIZONA

MARICOPA COUNTY







**ATTACHMENT B**

**COUNTIES SCHEDULED TO REQUALIFY IN 2023 FOR FYs 2024-2026**

**NEW YORK/NEW JERSEY FIELD OFFICES**

NEW JERSEY	BERGEN COUNTY
NEW JERSEY	BURLINGTON COUNTY
NEW JERSEY	CAMDEN COUNTY
NEW JERSEY	ESSEX COUNTY
NEW JERSEY	HUDSON COUNTY
NEW JERSEY	MIDDLESEX COUNTY
NEW JERSEY	MONMOUTH COUNTY
NEW JERSEY	MORRIS COUNTY
NEW JERSEY	UNION COUNTY

NEW YORK	ERIE COUNTY
NEW YORK	MONROE COUNTY
NEW YORK	NASSAU COUNTY
NEW YORK	ONONDAGA COUNTY
NEW YORK	ORANGE COUNTY
NEW YORK	ROCKLAND COUNTY
NEW YORK	SUFFOLK COUNTY

**MID-ATLANTIC FIELD OFFICES**

DELAWARE	NEW CASTLE COUNTY
MARYLAND	ANNE ARUNDEL COUNTY
MARYLAND	BALTIMORE COUNTY
MARYLAND	HARFORD COUNTY
MARYLAND	MONTGOMERY COUNTY
MARYLAND	PRINCE GEORGES COUNTY

PENNSYLVANIA	ALLEGHENY COUNTY
PENNSYLVANIA	BEAVER COUNTY
PENNSYLVANIA	BERKS COUNTY
PENNSYLVANIA	BUCKS COUNTY
PENNSYLVANIA	CHESTER COUNTY
PENNSYLVANIA	DELAWARE COUNTY

PENNSYLVANIA  
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PENNSYLVANIA  
PENNSYLVANIA  
PENNSYLVANIA

LANCASTER COUNTY  
LUZERNE COUNTY  
MONTGOMERY COUNTY  
WASHINGTON COUNTY  
WESTMORELAND COUNTY  
YORK COUNTY

VIRGINIA  
VIRGINIA

ARLINGTON COUNTY  
FAIRFAX COUNTY

**SOUTHEAST/CARIBBEAN FIELD OFFICES**

ALABAMA

JEFFERSON COUNTY

FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA  
FLORIDA

BROWARD COUNTY  
CLAY COUNTY  
ESCAMBIA COUNTY  
HILLSBOROUGH COUNTY  
LAKE COUNTY  
MIAMI-DADE COUNTY  
ORANGE COUNTY  
PALM BEACH COUNTY  
PINELLAS COUNTY  
POLK COUNTY  
VOLUSIA COUNTY

GEORGIA  
GEORGIA  
GEORGIA  
GEORGIA  
GEORGIA

CHEROKEE COUNTY  
COBB COUNTY  
DE KALB COUNTY  
FULTON COUNTY  
HENRY COUNTY

SOUTH CAROLINA  
SOUTH CAROLINA  
SOUTH CAROLINA  
SOUTH CAROLINA

BERKELEY COUNTY  
CHARLESTON COUNTY  
GREENVILLE COUNTY  
LEXINGTON COUNTY

TENNESSEE

KNOX COUNTY

**MIDWEST FIELD OFFICES**

ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
ILLINOIS  
MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN  
MICHIGAN

COOK COUNTY  
DU PAGE COUNTY  
LAKE COUNTY  
MADISON COUNTY  
ST. CLAIR COUNTY  
WILL COUNTY  
GENESEE COUNTY  
KENT COUNTY  
MACOMB COUNTY  
OAKLAND COUNTY  
WASHTENAW COUNTY  
WAYNE COUNTY

MINNESOTA

HENNEPIN COUNTY

OHIO  
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OHIO

CLERMONT COUNTY  
CUYAHOGA COUNTY  
FRANKLIN COUNTY  
HAMILTON COUNTY  
LAKE COUNTY  
MONTGOMERY COUNTY  
STARK COUNTY  
SUMMIT COUNTY  
WARREN COUNTY

WISCONSIN

MILWAUKEE COUNTY

**SOUTHWEST FIELD OFFICES**

LOUISIANA

JEFFERSON PARISH

TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS

DALLAS COUNTY  
HARRIS COUNTY  
HIDALGO COUNTY  
TARRANT COUNTY  
TRAVIS COUNTY

**GREAT PLAINS FIELD OFFICES**

MISSOURI

ST. LOUIS COUNTY

**ROCKY MOUNTAIN FIELD OFFICES**

COLORADO	EL PASO COUNTY
COLORADO	JEFFERSON COUNTY
COLORADO	WELD COUNTY
UTAH	SALT LAKE COUNTY

**PACIFIC/HAWAII FIELD OFFICES**

ARIZONA	MARICOPA COUNTY
CALIFORNIA	ALAMEDA COUNTY
CALIFORNIA	CONTRA COSTA COUNTY
CALIFORNIA	FRESNO COUNTY
CALIFORNIA	KERN COUNTY
CALIFORNIA	LOS ANGELES COUNTY
CALIFORNIA	MARIN COUNTY
CALIFORNIA	ORANGE COUNTY
CALIFORNIA	RIVERSIDE COUNTY
CALIFORNIA	SACRAMENTO COUNTY
CALIFORNIA	SAN BERNARDINO COUNTY
CALIFORNIA	SAN DIEGO COUNTY
CALIFORNIA	SAN JOAQUIN COUNTY
CALIFORNIA	SAN LUIS OBISPO COUNTY
CALIFORNIA	SAN MATEO COUNTY
CALIFORNIA	SANTA CLARA COUNTY
CALIFORNIA	SONOMA COUNTY
NEVADA	CLARK COUNTY

**NORTHWEST/ALASKA FIELD OFFICES**

OREGON	CLACKAMAS COUNTY
OREGON	MARION COUNTY
OREGON	WASHINGTON COUNTY
WASHINGTON	CLARK COUNTY
WASHINGTON	KING COUNTY
WASHINGTON	PIERCE COUNTY
WASHINGTON	SNOHOMISH COUNTY

WASHINGTON

SPOKANE COUNTY

**ATTACHMENT C**

**COUNTIES SCHEDULED TO REQUALIFY IN 2024 FOR FYs 2025-2027**

<b>NEW ENGLAND FIELD OFFICES</b>	
MAINE	CUMBERLAND COUNTY
<b>NEW YORK/NEW JERSEY FIELD OFFICES</b>	
NEW JERSEY	ATLANTIC COUNTY
NEW YORK	DUTCHESS COUNTY
NEW YORK	WESTCHESTER COUNTY
<b>MID-ATLANTIC FIELD OFFICES</b>	
PENNSYLVANIA	LEHIGH COUNTY
PENNSYLVANIA	NORTHAMPTON COUNTY
VIRGINIA	CHESTERFIELD COUNTY
VIRGINIA	LOUDOUN COUNTY
VIRGINIA	PRINCE WILLIAM COUNTY
<b>SOUTHEAST/CARIBBEAN FIELD OFFICES</b>	
FLORIDA	BREVARD COUNTY
FLORIDA	COLLIER COUNTY
FLORIDA	JACKSONVILLE-DUVAL COUNTY
FLORIDA	OSCEOLA COUNTY
FLORIDA	PASCO COUNTY
FLORIDA	SEMINOLE COUNTY
FLORIDA	ST. JOHNS COUNTY
GEORGIA	CLAYTON COUNTY
GEORGIA	GWINNETT COUNTY
NORTH CAROLINA	CUMBERLAND COUNTY
NORTH CAROLINA	MECKLENBURG COUNTY
NORTH CAROLINA	UNION COUNTY
NORTH CAROLINA	WAKE COUNTY
SOUTH CAROLINA	SPARTANBURG COUNTY



TENNESSEE	SHELBY COUNTY
<b>MIDWEST FIELD OFFICES</b>	
ILLINOIS	KANE COUNTY
ILLINOIS	MCHENRY COUNTY
INDIANA	HAMILTON COUNTY
INDIANA	LAKE COUNTY
MINNESOTA	RAMSEY COUNTY
MINNESOTA	WASHINGTON COUNTY
<b>SOUTHWEST FIELD OFFICES</b>	
TEXAS	BEXAR COUNTY
TEXAS	BRAZORIA COUNTY
TEXAS	FORT BEND COUNTY
TEXAS	MONTGOMERY COUNTY
TEXAS	WILLIAMSON COUNTY
<b>GREAT PLAINS FIELD OFFICES</b>	
KANSAS	JOHNSON COUNTY
MISSOURI	JEFFERSON COUNTY
<b>ROCKY MOUNTAIN FIELD OFFICES</b>	
COLORADO	ADAMS COUNTY
COLORADO	ARAPAHOE COUNTY
<b>PACIFIC/HAWAII FIELD OFFICES</b>	
ARIZONA	PINAL COUNTY
CALIFORNIA	MONTEREY COUNTY
CALIFORNIA	SANTA BARBARA COUNTY
CALIFORNIA	VENTURA COUNTY

<b>NORTHWEST/ALASKA FIELD OFFICES</b>	
OREGON	MULTNOMAH COUNTY
WASHINGTON	THURSTON COUNTY

**ATTACHMENT D**

**COUNTIES SCHEDULED TO REQUALIFY IN 2025 FOR FYs 2026-2028**

**NEW YORK/NEW JERSEY FIELD OFFICES**

NEW JERSEY	GLOUCESTER COUNTY
NEW JERSEY	OCEAN COUNTY
NEW JERSEY	PASSAIC COUNTY
NEW JERSEY	SOMERSET COUNTY

**MID-ATLANTIC FIELD OFFICES**

MARYLAND	HOWARD COUNTY
PENNSYLVANIA	CUMBERLAND COUNTY
PENNSYLVANIA	DAUPHIN COUNTY
VIRGINIA	HENRICO COUNTY

**SOUTHEAST/CARIBBEAN FIELD OFFICES**

ALABAMA	MOBILE COUNTY
FLORIDA	LEE COUNTY
FLORIDA	MANATEE COUNTY
FLORIDA	MARION COUNTY
FLORIDA	SARASOTA COUNTY
SOUTH CAROLINA	HORRY COUNTY
SOUTH CAROLINA	RICHLAND COUNTY

**MIDWEST FIELD OFFICES**

MINNESOTA	ANOKA COUNTY
MINNESOTA	DAKOTA COUNTY
MINNESOTA	ST LOUIS COUNTY
OHIO	BUTLER COUNTY

WISCONSIN  
WISCONSIN

DANE COUNTY  
WAUKESHA COUNTY

**SOUTHWEST FIELD OFFICES**

LOUISIANA

ST. TAMMANY PARISH

OKLAHOMA

TULSA COUNTY

**GREAT PLAINS FIELD OFFICES**

MISSOURI

ST. CHARLES COUNTY

**ROCKY MOUNTAIN FIELD OFFICES**

UTAH

UTAH COUNTY

**PACIFIC/HAWAII FIELD OFFICES**

ARIZONA

PIMA COUNTY

CALIFORNIA

STANISLAUS COUNTY

**NORTHWEST/ALASKA FIELD OFFICES**

WASHINGTON

KITSAP COUNTY

**ATTACHMENT E**

**COUNTIES QUALIFIED THROUGH 2024 OR 2025 THAT CONTAIN  
NON-PARTICIPATING COMMUNITIES**

**NEW ENGLAND FIELD OFFICES**

CUMBERLAND COUNTY MAINE

**NEW YORK/NEW JERSEY FIELD OFFICES**

ATLANTIC COUNTY NEW JERSEY

WESTCHESTER COUNTY NEW YORK

**MID-ATLANTIC FIELD OFFICES**

DAUPHIN COUNTY PENNSYLVANIA

LEHIGH COUNTY PENNSYLVANIA

**SOUTHEAST/CARIBBEAN FIELD OFFICES**

MOBILE COUNTY ALABAMA

BREVARD COUNTY FLORIDA

COLLIER COUNTY FLORIDA

JACKSONVILLE-DUVAL COUNTY FLORIDA

MANATEE COUNTY FLORIDA

MARION COUNTY FLORIDA

PASCO COUNTY FLORIDA

SARASOTA COUNTY FLORIDA

ST. JOHNS COUNTY FLORIDA

CLAYTON COUNTY GEORGIA

GWINNETT COUNTY GEORGIA

MECKLENBURG COUNTY NORTH CAROLINA

UNION COUNTY NORTH CAROLINA

WAKE COUNTY NORTH CAROLINA

HORRY COUNTY SOUTH CAROLINA

RICHLAND COUNTY  
SPARTANBURG COUNTY

SOUTH CAROLINA  
SOUTH CAROLINA

**MIDWEST FIELD OFFICES**

KANE COUNTY  
MCHENRY COUNTY

ILLINOIS  
ILLINOIS

HAMILTON COUNTY

INDIANA

RAMSEY COUNTY  
ST. LOUIS COUNTY  
WASHINGTON COUNTY

MINNESOTA  
MINNESOTA  
MINNESOTA

BUTLER COUNTY

OHIO

DANE COUNTY  
WAUKESHA COUNTY

WISCONSIN  
WISCONSIN

**SOUTHWEST FIELD OFFICES**

TULSA COUNTY

OKLAHOMA

BEXAR COUNTY  
BRAZORIA COUNTY  
FORT BEND COUNTY  
MONTGOMERY COUNTY  
WILLIAMSON COUNTY

TEXAS  
TEXAS  
TEXAS  
TEXAS  
TEXAS

**GREAT PLAINS FIELD OFFICES**

JEFFERSON COUNTY  
ST. CHARLES COUNTY

MISSOURI  
MISSOURI

**ROCKY MOUNTAIN FIELD OFFICES**

ARAPAHOE COUNTY

COLORADO

UTAH COUNTY

UTAH

**PACIFIC/HAWAII FIELD OFFICES**

PIMA COUNTY  
PINAL COUNTY

ARIZONA  
ARIZONA

MONTEREY COUNTY  
SANTA BARBARA COUNTY

CALIFORNIA  
CALIFORNIA

**NORTHWEST/ALASKA FIELD OFFICES**

MULTNOMAH COUNTY

OREGON

KITSAP COUNTY  
THURSTON COUNTY

WASHINGTON  
WASHINGTON

ATTACHMENT F  
LIST OF COUNTIES THAT MAY QUALIFY AS URBAN COUNTIES  
IF METROPOLITAN CITIES RELINQUISH THEIR STATUS

<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>AL</b>	<b>Madison County</b>	<b>395,211</b>
AL	Huntsville city (pt.)	212,359
<b>AL</b>	<b>Montgomery County</b>	<b>227,434</b>
AL	Montgomery city	198,665
<b>AL</b>	<b>Tuscaloosa County</b>	<b>227,007</b>
AL	Tuscaloosa city	100,618
<b>AR</b>	<b>Benton County</b>	<b>293,692</b>
AR	Bentonville city	56,734
AR	Rogers city	71,112
AR	Springdale city (pt.)	12,106
<b>AR</b>	<b>Pulaski County</b>	<b>397,821</b>
AR	Jacksonville city	29,305
AR	Little Rock city	201,998
AR	North Little Rock city	64,162
<b>AR</b>	<b>Washington County</b>	<b>250,057</b>
AR	Fayetteville city	95,230
AR	Springdale city (pt.)	75,503
<b>AZ</b>	<b>Yavapai County</b>	<b>242,253</b>
AZ	Prescott city	46,833
<b>AZ</b>	<b>Yuma County</b>	<b>206,990</b>
AZ	Yuma city	97,093
<b>CA</b>	<b>Butte County</b>	<b>208,309</b>
CA	Chico city	102,338
CA	Paradise town	5,268
CA	Springdale city (pt.)	75,503
<b>CA</b>	<b>Merced County</b>	<b>286,461</b>
CA	Merced city	89,308
<b>CA</b>	<b>Placer County</b>	<b>412,300</b>
CA	Rocklin city	72,975
CA	Roseville city	151,901
<b>CA</b>	<b>Santa Cruz County</b>	<b>267,792</b>
CA	Santa Cruz city	61,950
CA	Watsonville city	52,067



<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>CA</b>	<b>Solano County</b>	<b>451,716</b>
CA	Fairfield city	119,705
CA	Vacaville city	103,078
CA	Vallejo city	124,886
<b>CA</b>	<b>Yolo County</b>	<b>216,986</b>
CA	Davis city	66,799
CA	West Sacramento city	53,637
CA	Woodland city	61,398
<b>CO</b>	<b>Boulder County</b>	<b>329,543</b>
CO	Boulder city	104,175
CO	Longmont city (pt.)	99,463
<b>CO</b>	<b>Larimer County</b>	<b>362,533</b>
CO	Fort Collins city	168,538
CO	Loveland city	77,194
<b>FL</b>	<b>Alachua County</b>	<b>279,238</b>
FL	Gainesville city	140,398
<b>FL</b>	<b>Leon County</b>	<b>292,817</b>
FL	Tallahassee city	197,102
<b>FL</b>	<b>Okaloosa County</b>	<b>213,255</b>
FL	Crestview city	27,820
FL	Fort Walton Beach city	20,879
<b>FL</b>	<b>St. Lucie County</b>	<b>343,579</b>
FL	Fort Pierce city	47,927
FL	Port St. Lucie city	217,523
<b>GA</b>	<b>Chatham County</b>	<b>296,329</b>
GA	Savannah city	147,088
<b>GA</b>	<b>Hall County</b>	<b>207,369</b>
GA	Gainesville city	43,417
<b>IA</b>	<b>Linn County</b>	<b>228,939</b>
IA	Cedar Rapids city	136,467
<b>ID</b>	<b>Ada County</b>	<b>511,931</b>
ID	Boise City city	237,446
ID	Meridian city	125,963
<b>ID</b>	<b>Canyon County</b>	<b>243,115</b>
ID	Caldwell city	63,629
ID	Nampa city	106,186
<b>IL</b>	<b>Champaign County</b>	<b>205,943</b>
IL	Champaign city	89,114
IL	Rantoul village	12,119
IL	Urbana city	38,681

<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>IL</b>	<b>Winnebago County</b>	<b>283,119</b>
IL	Rockford city (pt.)	147,711
<b>IN</b>	<b>Allen County</b>	<b>388,608</b>
IN	Fort Wayne city	265,974
<b>IN</b>	<b>Elkhart County</b>	<b>206,921</b>
IN	Elkhart city	53,949
IN	Goshen city	34,756
<b>IN</b>	<b>St. Joseph County</b>	<b>272,212</b>
IN	Mishawaka city	51,074
IN	South Bend city	103,353
<b>KS</b>	<b>Sedgwick County</b>	<b>523,828</b>
KS	Wichita city	395,699
<b>LA</b>	<b>Caddo Parish</b>	<b>233,092</b>
LA	Shreveport city (pt.)	181,146
<b>LA</b>	<b>Calcasieu Parish</b>	<b>205,282</b>
LA	Lake Charles city	81,097
<b>ME</b>	<b>York County</b>	<b>214,591</b>
ME	Biddeford city	22,569
<b>MI</b>	<b>Ingham County</b>	<b>284,034</b>
MI	East Lansing city (pt.)	44,417
MI	Lansing city (pt.)	107,653
<b>MI</b>	<b>Kalamazoo County</b>	<b>261,108</b>
MI	Kalamazoo city	73,257
MI	Portage city	48,844
<b>MO</b>	<b>Clay County</b>	<b>255,518</b>
MO	Kansas City city (pt.)	139,432
<b>MO</b>	<b>Greene County</b>	<b>300,865</b>
MO	Springfield city (pt.)	169,722
<b>MO</b>	<b>Jackson County</b>	<b>716,862</b>
MO	Blue Springs city	59,430
MO	Independence city (pt.)	122,088
MO	Kansas City city (pt.)	314,956
MO	Lee's Summit city (pt.)	100,061
<b>MS</b>	<b>Harrison County</b>	<b>209,396</b>
MS	Biloxi city	49,241
MS	Gulfport city	72,105
<b>MS</b>	<b>Hinds County</b>	<b>222,679</b>
MS	Jackson city (pt.)	149,387
<b>NC</b>	<b>Buncombe County</b>	<b>271,534</b>
NC	Asheville city	94,067

<b>State</b>	<b>Name</b>	<b>POP21</b>
NC	<b>Cabarrus County</b>	<b>231,278</b>
NC	Concord city	107,697
NC	Kannapolis city (pt.)	43,875
NC	<b>Durham County</b>	<b>326,126</b>
NC	Chapel Hill town (pt.)	2,847
NC	Durham city (pt.)	285,115
NC	Raleigh city (pt.)	1,540
NC	<b>Forsyth County</b>	<b>385,523</b>
NC	High Point city (pt.)	80
NC	Winston-Salem city	250,320
NC	<b>Gaston County</b>	<b>230,856</b>
NC	Gastonia city	81,161
NC	<b>Guilford County</b>	<b>542,410</b>
NC	Burlington city (pt.)	1,892
NC	Greensboro city	298,263
NC	High Point city (pt.)	107,265
NC	<b>New Hanover County</b>	<b>229,018</b>
NC	Wilmington city	117,643
NC	<b>Onslow County</b>	<b>206,160</b>
NC	Jacksonville city	72,876
NE	<b>Douglas County</b>	<b>585,008</b>
NE	Omaha city	487,300
NE	<b>Lancaster County</b>	<b>324,514</b>
NE	Lincoln city	292,657
NM	<b>Bernalillo County</b>	<b>674,393</b>
NM	Albuquerque city	562,599
NM	Rio Rancho city (pt.)	5
NM	<b>Doña Ana County</b>	<b>221,508</b>
NM	Las Cruces city	112,914
NV	<b>Washoe County</b>	<b>493,392</b>
NV	Reno city	268,851
NV	Sparks city	109,796
NY	<b>Niagara County</b>	<b>211,653</b>
NY	Niagara Falls city	48,360
NY	<b>Oneida County</b>	<b>230,274</b>
NY	Rome city	31,974
NY	Utica city	64,501
OH	<b>Lorain County</b>	<b>315,595</b>
OH	Elyria city	52,816
OH	Lorain city	65,430

<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>OH</b>	<b>Lucas County</b>	<b>429,191</b>
OH	Toledo city	268,508
<b>OH</b>	<b>Mahoning County</b>	<b>226,762</b>
OH	Alliance city (pt.)	46
OH	Youngstown city (pt.)	60,268
<b>OH</b>	<b>Trumbull County</b>	<b>201,335</b>
OH	Warren city	39,020
OH	Youngstown city (pt.)	2
<b>OK</b>	<b>Cleveland County</b>	<b>297,597</b>
OK	Moore city	63,462
OK	Norman city	128,097
OK	Oklahoma City city (pt.)	78,976
<b>OK</b>	<b>Oklahoma County</b>	<b>798,575</b>
OK	Edmond city	95,341
OK	Midwest City city	58,145
OK	Oklahoma City city (pt.)	527,861
<b>OR</b>	<b>Deschutes County</b>	<b>204,801</b>
OR	Bend city	102,059
OR	Redmond city	35,582
<b>OR</b>	<b>Jackson County</b>	<b>223,734</b>
OR	Ashland city	21,607
OR	Medford city	86,367
<b>OR</b>	<b>Lane County</b>	<b>383,189</b>
OR	Eugene city	175,096
OR	Springfield city	62,256
<b>PA</b>	<b>Erie County</b>	<b>269,011</b>
PA	Erie city	93,999
<b>PA</b>	<b>Lackawanna County</b>	<b>215,663</b>
PA	Scranton city	75,874
<b>SC</b>	<b>Anderson County</b>	<b>206,908</b>
SC	Anderson city	29,284
<b>TN</b>	<b>Hamilton County</b>	<b>369,135</b>
TN	Chattanooga city	182,113
<b>TN</b>	<b>Montgomery County</b>	<b>227,900</b>
TN	Clarksville city	170,957
<b>TN</b>	<b>Rutherford County</b>	<b>352,182</b>
TN	Murfreesboro city	157,519
<b>TN</b>	<b>Williamson County</b>	<b>255,735</b>
TN	Franklin city	85,469

<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>TX</b>	<b>Bell County</b>	<b>379,617</b>
TX	Killeen city	156,261
TX	Temple city	85,416
<b>TX</b>	<b>Brazos County</b>	<b>237,032</b>
TX	Bryan city	86,866
TX	College Station city	120,019
<b>TX</b>	<b>Cameron County</b>	<b>423,029</b>
TX	Brownsville city	187,831
TX	Harlingen city	71,925
TX	San Benito city	24,780
<b>TX</b>	<b>El Paso County</b>	<b>867,947</b>
TX	El Paso city	678,415
<b>TX</b>	<b>Galveston County</b>	<b>355,062</b>
TX	Galveston city	53,219
TX	League City city (pt.)	113,073
TX	Texas City city (pt.)	54,247
<b>TX</b>	<b>Hays County</b>	<b>255,397</b>
TX	Austin city (pt.)	975
TX	San Marcos city (pt.)	68,577
<b>TX</b>	<b>Jefferson County</b>	<b>253,704</b>
TX	Beaumont city	112,556
TX	Port Arthur city (pt.)	55,645
<b>TX</b>	<b>Lubbock County</b>	<b>314,451</b>
TX	Lubbock city	260,993
<b>TX</b>	<b>McLennan County</b>	<b>263,115</b>
TX	Waco city	139,594
<b>TX</b>	<b>Nueces County</b>	<b>353,079</b>
TX	Corpus Christi city (pt.)	317,773
<b>TX</b>	<b>Smith County</b>	<b>237,186</b>
TX	Tyler city	107,192
<b>TX</b>	<b>Webb County</b>	<b>267,945</b>
TX	Laredo city	256,153
<b>UT</b>	<b>Weber County</b>	<b>267,066</b>
UT	Ogden city	86,798
<b>WA</b>	<b>Benton County</b>	<b>210,025</b>
WA	Kennewick city	84,488
WA	Richland city	61,929
<b>WA</b>	<b>Whatcom County</b>	<b>228,831</b>
WA	Bellingham city	92,289
<b>WA</b>	<b>Yakima County</b>	<b>256,035</b>
WA	Yakima city	96,578

<b>State</b>	<b>Name</b>	<b>POP21</b>
<b>WI</b>	<b>Brown County</b>	<b>269,591</b>
WI	Green Bay city	107,015

ATTACHMENT G

COUNTIES PREVIOUSLY IDENTIFIED AS ELIGIBLE BUT  
HAVE NOT ACCEPTED URBAN COUNTY STATUS

**NEW ENGLAND FIELD OFFICES**

NEW HAMPSHIRE

HILLSBOROUGH COUNTY  
ROCKINGHAM COUNTY

**NEW YORK/NEW JERSEY OFFICES**

NEW YORK

SARATOGA COUNTY

**MID-ATLANTIC FIELD OFFICES**

DELAWARE

SUSSEX COUNTY

MARYLAND

FREDERICK COUNTY

**SOUTHEAST/CARIBBEAN FIELD OFFICES**

ALABAMA

SHELBY COUNTY

FLORIDA

HERNANDO COUNTY

GEORGIA

FORSYTH COUNTY

TENNESSEE

SUMNER COUNTY

**MIDWEST FIELD OFFICES**

MICHIGAN

OTTAWA COUNTY

OHIO

DELAWARE COUNTY

**SOUTHWEST FIELD OFFICES**

TEXAS

COLLIN COUNTY  
DENTON COUNTY  
ELLIS COUNTY

**GREAT PLAINS FIELD OFFICES**

IOWA

POLK COUNTY

**ROCKY MOUNTAIN FIELD OFFICES**

UTAH

DAVIS COUNTY

**PACIFIC/HAWAII FIELD OFFICES**

ARIZONA

MOHAVE COUNTY\*

CALIFORNIA

TULARE COUNTY

\*Mohave County may only qualify as an urban county if the cities of Kingman and Lake Havasu both decide not to accept their entitlement status.