CDBG Competitive Application PY 2023/2024 Frequently Asked Questions

Can you confirm that it is permissible to hold the second public hearing after the application deadline?

In accordance with 24 CFR Part 570.431, the City/Town must comply with citizens participation requirements in the preparation of the proposed and final application. In accordance with these requirements, a minimum of two public hearings must be held, for the purpose of obtaining citizens' views and formulating or responding to proposals and questions. Each public hearing must be conducted at a different stage of the CDBG program. Together, the hearings must address community development and housing needs, development of proposed activities and review of program performance. There must be reasonable notice of the hearings and the hearings must be held at times and accessible locations convenient to potential or actual beneficiaries, with reasonable accommodations including material in accessible formats for persons with disabilities. The applicant must specify in its plan how it will meet the requirement for hearings at times and locations convenient to potential or actual beneficiaries.

Regulations require citizens be given timely notice of local meetings and reasonable and timely access to local meetings, information, and records relating to the grantee's proposed and actual use of CDBG funds including, but not limited to:

- (i) The amount of CDBG funds expected to be made available for the coming year, including the grant and anticipated program income;
- (ii) The range of activities that may be undertaken with those funds;
- (iii) The estimated amount of those funds proposed to be used for activities that will benefit low- and moderate-income persons;
- (iv) The proposed CDBG activities likely to result in displacement and the applicant's plans, consistent with the policies developed under § 570.606(b), for minimizing displacement of persons as a result of its proposed activities; and
- (v) The types and levels of assistance the applicant plans to make available (or to require others to make available) to persons displaced by CDBG-funded activities, even if the applicant expects no displacement to occur;

The municipality may combine public hearings with other meetings/hearings conducted but must assure all content required in the application is adhered to. Note that the municipality's request may not be altered in any way after submittal of the application. Therefore, all public hearings have historically been held prior to submittal of the application.

Is a hearing required with the Planning Board to determine Comprehensive Plan consistency?

While each municipality may have its own policy to determine consistency with the Comprehensive plan, the state does not require a hearing to determine compliance with the Comprehensive plan.

According to the Application Handbook:

Threshold Requirements:

The Administrative Officer/Planner for the local Planning Board or Commission (or authorized official if no Administrative Officer/Planner exists) shall be responsible for providing citations demonstrating conformance with the Comprehensive Plan and if required, the State Guide Plan. The same official shall also be responsible for certifying that all proposed activities comply with municipal ordinances and regulations.

VII. Evaluation and Scoring

A. General Application Process

4. Activities must be submitted to the applicant's planning board or commission to determine compliance of proposed activities with local planning and development policy as set forth in the local Comprehensive Plan.

Can another community only assign a service activity to this municipality if the service is provided to the other community and this municipality administers the service in both communities?

The assignment would only be necessary if the focus is provision of services to that community's residents.

One of the organizations we're working with provides services in several communities. If the CDBG funds would only be used for services provided to this municipality residents (even though the organization serves other communities) then I don't think we could have the other community assign the service to us. But if funds are requested to provide this municipality and the other communities, and we agree to administer the services, then we could try that approach.

Both statements are correct, generally; if the services are only to be provided to (your municipality) residents, there would be no need to have another community agree to assign administrative duties to the municipality.

The organization receives some CDBG funding from Entitlement Communities to provide services in those communities. If the organization wanted to expand services in this municipality and the communities they're already serving, could we ask the other communities to assign the service to us even if they continue to use some of their CDBG funds for the service in their communities?

No; if another community assigns administrative responsibilities to this municipality, it would not be for the funds awarded to the municipality for the municipality residents, the services provided to the municipality residents would have to considered and demonstrated to be an expansion of the services provided prior to the municipality's involvement.

Which application do municipalities use with subrecipients?

Applications between municipalities and subrecipients are at the discretion of the municipality. Applications used for prior competitive cycles can be used again for the CDBG Competitive Application PY2023/2024.

Is this grant specifically based on LMI of 51% or above or will a project that benefits seniors/disabled with a lower LMI of 25.73 in the town qualify?

Please refer to 24cfr570.208(a)(2)(i) to determine if the activity benefits limited clientele.

Please refer to <u>24cfr570.208(a)(2)(i)(A)</u> to determine if benefit clientele may be presumed to be principally low and moderate income persons.

Is the cap for awards this round \$1 million? Can \$500,000 be awarded to two projects?

As explained on slide 8 of the Manager's Workshop Power Point:

- There are NO overall application dollar limits/caps
- There are, however, limits on the number of proposed activities
 - Public Facilities/Improvements-Up to 3 proposals

- Essential Services- up to 4 proposals (consolidated individual non-profit requests)
- Planning (1 proposal allowed)

Can multiple public facilities be combined into a single application?

When an individual public facility serves multiple communities, proposals in support of this facility should be applied for through a single, lead community.

If an agency operates multiple facilities but these facilities have independence from each other, separate applications must be submitted. This is necessary as compliance documentation (national objective, environmental, procurement) is distinct for each facility and must be tracked separately.

Where is the CDBG Competitive Application PY 2023/2024 application? It is not on the Community Development Block Grant homepage.

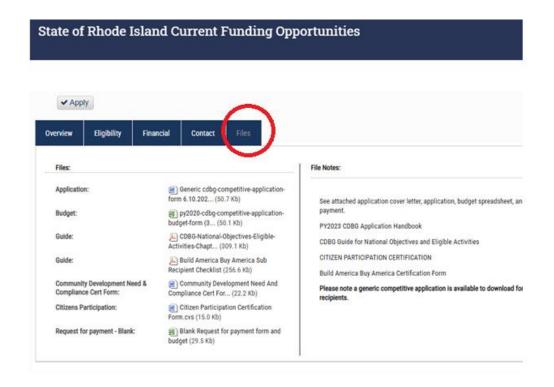
All open grant applications are located on the State's Grants Management System/eCivis Funding Opportunities page. A description of all open CDBG grant applications can be found on the Community Development Block Grant homepage with a link to the eCivis application portal located above. See screenshot below.



Sign up for the Weekly Email Digest to receive an up-to-date list of publicly available funding opportunities offered through State Agencies on the State Funding Opportunities page.

Where are additional forms used in the application process found?

Forms such as the competitive application, competitive application budget form, CDBG National Objectives Eligible Activities, Build America Buy America subrecipient checklist, Community Development Need and Compliance Cert, blank request for payment and Citizen Participation form can be found under the Files tab on each specific solicitation on the Funding Opportunity page. See screenshot below.



What is the final date that towns can submit the application for CDBG competitive funding to the state?

The State deadline for CDBG/Competitive (public facilities, improvements, essential services) applications is May 23, 2025. Applications for CDBG/Affordable Housing, CDBG/Residential Rehabilitation and CDBG/Economic Development are accepted on a rolling basis (See separate RFPs for additional detail).

Note that municipal applicants may set a separate schedule for the submittal of proposals from potential subrecipients, allowing them sufficient time to assemble and submit applications to the State.

How many public hearings are required per town?

In accordance with 24 CFR Part 570.431(b)(3), the community must hold a minimum of two public hearings, for the purpose of obtaining citizens' views and formulating or responding to proposals and questions. Each public hearing must be conducted at a different stage of the CDBG program. Together, the hearings must address community development and housing needs, development of proposed activities and review of program performance. There must be a reasonable notice of the hearings and the hearings must be held at times and accessible locations convenient to potential or actual beneficiaries, with reasonable accommodations including material in accessible formats for persons with disabilities. Typically, communities conduct two public hearings before submittal of an application to the State.

If a multi-town application is being submitted, will the project require approval from each town council, or just the lead town?

Every applicant must provide documentation of City/Town Council approval of its CDBG application. If a community is requesting an activity that serves a large area encompassing other municipalities, documentation showing support of the proposal from these other cities/towns is advisable, though specific City/Town Council approval from these other areas is not necessarily required.

If submitting a multi-town application, is the funding request limit \$500,000 for the project, or \$500,000 per town?

No <u>activity</u> may receive more than \$500,000 per program year. Note the current application cycle represents two program years (PY'23 & PY'24) so the limitation per activity is \$1M.

Should projects renovating public facilities be comprehensive?

We encourage applicants to complete a comprehensive capital needs assessment of any public facility to be rehabilitated. The cumulative investment can then be fully considered and requested, as appropriate. Submitting multiple smaller applications over several years as opposed to a single comprehensive application may be unnecessarily burdensome. Many administrative requirements associated with small activities are often substantially similar to larger activities which have comparably greater administrative budgets.

The municipality is looking to construct a community facility that would benefit *all* residents. Unfortunately, the community does not have a high enough LMI for eligibility. However, the community center *would* benefit a population of disabled individuals and senior citizens. Per *24cfr570.208(a)(2)(i)(A)* this project would benefit clientele that may be presumed to be principally low- and moderate-income persons. Is the town allowed to apply for this funding for a community center based on the benefit to these LMI residents?

24cfr570.208(a)(2)(i)(A) states:

To qualify under <u>paragraph (a)(2)</u> of this section, the activity must meet one of the following tests:

Benefit a clientele who are generally presumed to be principally low- and moderate-income persons. Activities that <u>exclusively</u> serve a group of persons in any one or a combination of the following categories may be presumed to benefit persons, 51 percent of whom are low- and moderate-income: abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers;

Unless the facility serves the presumed population *exclusively* it does not qualify under these criteria for national objectives.

This municipality is referring to the project as a "Senior Center". What criteria will be required to verify that the facility is being utilized "exclusively" by senior citizens?

During the application process, the municipality identifies goals for each project. The municipality will then collect and report demographic information about the project's realized beneficiaries. Information such as beneficiary income levels and race/ethnicity is collected and reported quarterly toward the stated goal. Detailed beneficiary records are reviewed during monitoring.

This municipality will be applying for CDBG funds for 2 projects. Should I submit 2 applications or submit 1?

Each project gets its own application. Once awarded, projects are reimbursed and reported on individually in eCivis. Information provided in the applications are directly connected to the payment requests and beneficiary reporting eCivis.