



Community Development Block Grant CDBG

August 23rd, 2022



Agenda

- CDBG Overview & Eligibility
- CDBG-CV
- 2022 MOD
- Website
- Process
- Applications
- Submission Tips
- Environmental Reviews & Release of Funds
- Davis Bacon: Conformance Requests, Weekly Payrolls & Interviews
- Guest Speaker
- Monthly Draw Requests & Monthly Progress Reports
- Mid Project Monitoring
- Closeout
- Five Year Compliance & Reporting
- Important Dates
- Questions



CDBG Overview & Eligibility

- What is CDBG?
 - Created by the Housing and Community Development Act of 1974
 - *HUD's longest-running formula grant program
 - National Objectives
 - Benefit Low- and Moderate-Income Persons
 - Defined as 80% AMI and below under CDBG
 - "Area Benefit" vs. "Direct Benefit"
 - Prevent or eliminate slum and blight conditions
 - Urgent Need
 - e.g. responses to natural disasters
- Who are eligible recipients?
 - Units of General Local Government (UGLG)
 - City/Town Government
 - County Government
 - *UGLG can sponsor a non-profit application
- What types of projects?
 - Housing Activities
 - Public Facilities and Infrastructure
 - Public Services (15% cap)
 - Other Real Property Improvements



CDBG-CV

- Follows all CDBG rules and regulations
- Meet at least One National Objective
 - LMI Benefit
 - Slum & Blight
 - Urgent Need
- Must also
 - Prevent, Prepare or Respond to Corona Virus
- No cap on corona virus block grant
- Short expenditure deadline August 31, 2023



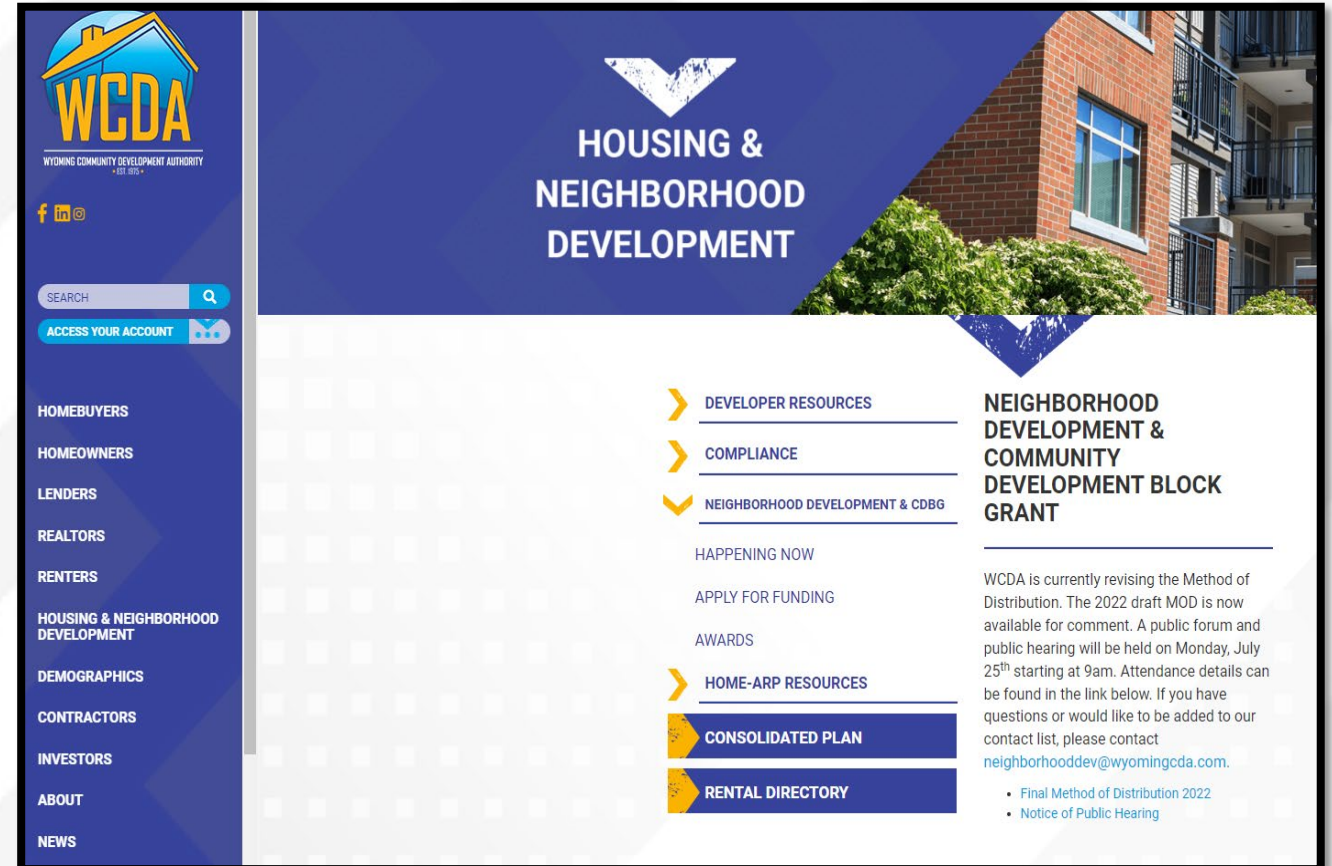
2022 Method of Distribution MOD

- Complete revision
- New scoring
 - Preference for housing type activities
- Higher cap on regular block grant
- No cap on corona virus block grant
- Limit two applications per applicant(UGLG)
- Urgent need during off cycle



Website

- Updates to the website
 - Links for interactive HUD maps
 - Forms will be available
 - LMI percentage for city and county





Process

- NOFA – Notice of Funding Availability
- Letter of Intent (Access for ProCorem sent after letter of intent received)
- Notice for 1st Public Hearing
- 1st Public Hearing (30 days after public notice)
- Submission of Application in ProCorem
- Site Visits
- Notice for 2nd Public Hearing
- 2nd Public Hearing (30 days after public notice)
- Recommendations for Funding to WCDA Board
- Notice of Award



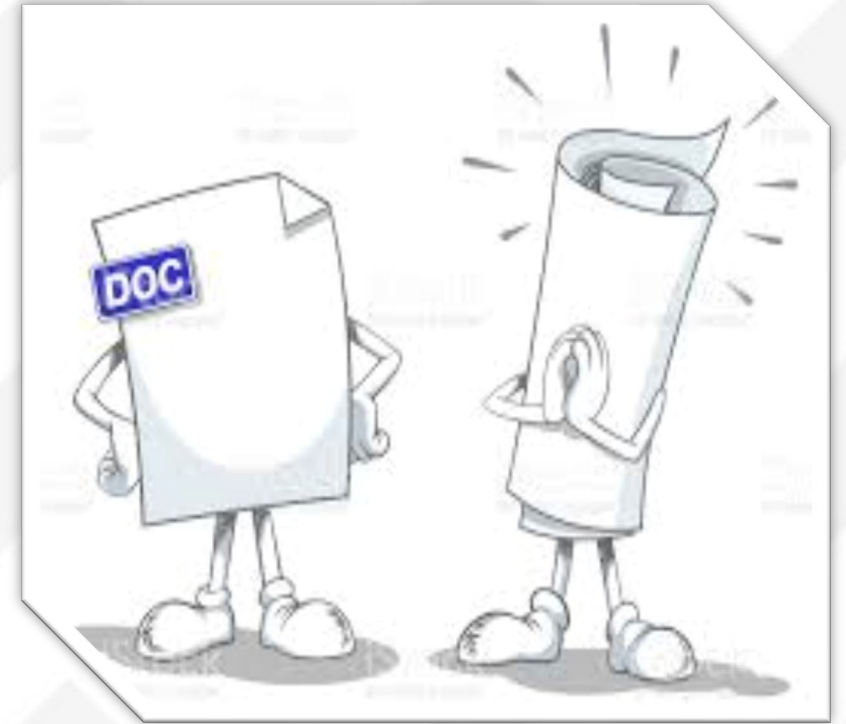
Applications

- Applications are going through a complete revision.
- Applications need to be submitted through ProCore™ following the application checklist.
- All Documents must be labeled appropriately.
- Please submit all PDF attachments in a searchable form
 - For example, type it in Word → File → “Save as Adobe PDF”



Submission Tips

- You are your project's biggest advocate!
- Clear narratives are key!
- Document why there is a need and what the benefit is?
- We should not have more questions than answers after application review.





Environmental Reviews & Release of Funds

- The Environmental Review Procedure will follow all guidelines set forth in 24 CFR Part 58. <https://www.ecfr.gov/current/title-24/subtitle-A/part-58>
- WCDA Staff will complete the Environmental Review and make recommendations during the process.
- Once the review has been completed, the authorized representative of the UGLG will certify completion.
- Depending on the activity type, the environmental review may at some point turn into an Environmental Assessment.
- An Environmental Assessment is an in-depth review of the subject and surrounding areas to ensure all environmental concerns or issues are addressed.
- The timeframe can vary depending on the activity, the concerns, and possible mitigation.



Environmental Reviews & Release of Funds Continued

- Please submit with application, a full FIRM (Flood Insurance Rate Map) to verify no structures involved in a possible CDBG activity are NOT in a floodway, 100-year, or 500-year flood zone.
- Typically, CDBG funds may not be used for activity involving rehabilitation or acquisition of any structures located in a floodway, or zone.
- * Urgent Need may have exceptions to this policy.
- For example here is some of what we look at during an ER.
- Request for Release of Funds (RROF) may not be submitted prior to the ER being completed and possibly the Environmental Assessment.
- Depending on the results of the ER or EA, other public notice requirements may be necessary, prior to an RROF being sent to HUD.



Davis Bacon

Bids

- CDBG requires solicitation of bids for any work related to the project
- Include the contract attachments provided by WCDA
- Contract should be signed within 90 days from bid
- Submit all contracts to WCDA for review prior to signature
- Construction start within 90 days of contract signature date

Wage Determination

- The Davis Bacon wage determination requires:
 - schedule of work/job classifications
 - Minimum wage rates that must be paid for particular work
- WH1321 English and Spanish hung with Wage determination the day work begins

Conformance Requests

- Check the Sam site for current wage determinations
- If the wage is not list it must be done within 30 days of signed contract
- Missing deadlines can delay the project
- Use form 4230A



Davis Bacon Continued

Wages

- Compliance monitoring conducted throughout project
- No payroll deductions with out written permission of the employee
- Labor Standards provisions are legally binding.
- Failure to pay specified wages for job classification may result in:
 - Restitution
 - Liquidated damages
 - And/or recommendation for debarment

Payroll

- Certified payroll submitted weekly in a reasonable time
- Payroll needs to be on form WH347
 - No exceptions
- Weekly payroll uploaded to ProCorem
 - Due by end of business day the following Thursday
 - Ex: Pay week 10/11/21 – 10/15/21. Upload by 10/21/21
- Wet sign original to be mailed monthly
 - Due by end of business day first Thursday of following month
 - Ex: October due Thursday 11/4/2021

Site Interviews

- Required periodic interviews with workers on site:
 - Observe work being completed
 - Directly talk to the worker
 - Hours they work
 - Type of work & job title
 - Wage they receive



CDBG Guest Speaker

Doug Carlson TDA Consulting

Doug Carlson has more than 30 years of experience with grants management and compliance for programs and activities that finance, develop, and maintain affordable housing, revitalize urban and rural communities, create economic opportunities for low-income families, enhance disaster response and preparedness, and assist the homeless. Prior to joining TDA, Doug was the Community Planning and Development (CPD) Director for HUD's Portland Oregon Field Office, where he managed the CDBG, HOME, HOPWA, ESG, and CoC programs in two states. He provides training and technical assistance to assist communities with consolidated planning, economic revitalization, disaster response, housing finance and development, and homeless housing and services. Doug holds a Master in Public Administration degree from Harvard University, John F. Kennedy School of Government.



Monthly Progress Reports & Draw Requests

- Submit draw requests between the 10th of the each month
- Requests will be reviewed and any questions, concerns or clarification will be relayed by the 14th
- Checks will be processed on the 15th of the month and mailed.
- Monthly progress reports need to be submitted by the 10th of each month regardless of progress.
- Draw requests will not be processed if project is not in compliance or missing progress reports.



Mid Project Monitoring

- We will schedule a site visit at mid project completion
- Onsite Monitoring
 - Site Progress
 - Pictures
- Review Project File
 - Application
 - Agreement
 - Contracts
 - Progress Reports
 - Draw Requests
 - Correspondence
- Desk Audit
 - Review draw requests/financial documents
 - Review contracts
 - Review Progress reports



Project Closeout

- With the final draw request please include:
 - Final performance activity and beneficiary information.
 - Operation and or building certifications
 - Section 3 compliance
 - Audit compliance
- We will schedule a final walk through at project completion
- A single audit is required for any grant recipient that expends an aggregate total of \$750,000.00 or more in federal funding in the recipients fiscal year.
 - This is the responsibility of the recipient to complete and must cover the costs associated with. This is not an eligible CDBG expense.



5 year Compliance & Reporting

- Every Project will have a five year compliance period.
- Compliance starts at project closeout.
- Project must continue to meet national objective for compliance period.
- Yearly reporting of accomplishments and demographic information are required.



Important Dates

- Letter of intent
 - No later than 5 pm September 30, 2022
- Application and Documents Due
 - No later than 5 pm October 31, 2022
- Site visits
 - November 2022
- Awards
 - February 2023 board meeting



Additional Guidance

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