Community Development Block Grant

PUBLIC SERVICES PROGRAM GUIDELINES

April 2024

HOUSING & COMMUNITY DEVELOPMENT DIVISION
150 NORTH CAPITOL BOULEVARD
BOISE, ID 83702-5920
cityofboise.org/hcd
(208) 570-6830

IDAHO RELAY SERVICE
DIAL 7-1-1
TOLL-FREE NUMBERS
1-800-377-3529 ASCII
1-866-252-0684 SPANISH
1-888-791-3004 SPEECH TO SPEECH
1-800-377-3529 TTY

The City of Boise prohibits discrimination on the basis of race, color, national origin, religion, gender, sexual orientation, gender identity/expression, familial status, disability, or age.

EQUAL HOUSING OPPORTUNITY

This document can be provided in a format accessible to persons with disabilities and/or persons with limited English proficiency upon request.

Anyone who requires an auxiliary aid, service, or translation for effective communication may contact the HCD Division by phone at 208-570-6830 or by email at Housing@cityofboise.org. Individuals who are deaf, hard of hearing, or have speech disabilities may use the Idaho Relay Service for the Hearing Impaired to make a request for accommodation by calling 1-800-377-1363 (voice) or 1-800-377-3529 (TTY).

SPANISH

Los miembros de la comunidad pueden solicitar traducción, interpretación y/o ajustes razonables para garantizar que puedan participar plenamente en este proceso. Para realizar una solicitud, comuníquese con la División de Vivienda y Desarrollo Comunitario por correo electrónico: housing@cityofboise.org, teléfono: 208-570-6830, TTY: 1-800-377-3529, fax: 208-384-4195, o en persona en 150 N. Capitol Blvd (segundo piso).

KISWAHILI

Wana jamii wanaeza omba huduma za utafsiri au zingine za kuhakikisha kwamba wanaeza shiriki kwa ukamilifu kwenye mchakato huu. Tafadhali wasiliana na Idara ya Makao na Maedeleo ya Jamii kupitia barua pepe: housing@cityofboise.org, simu: 208-570-6830, kuduma ya Simu ya Viziwi (TTY): 1-800-377-3529, Faksi: 208-384-4195, au ujifikishe kwa 150 N. Capitol Blvd (ghorofa ya pili)

BOSNIAN

Članovi zajednice mogu zatražiti prevodjenje, tumačenje i/ili razuman smještaj kako bi osigurali da mogu u potpunosti sudjelovati u ovom procesu.

Za podnošenje zahtjeva obratite se Odjelu za stanovanje i razvoj zajednice putem emaila: housing@cityofboise.org, telefon: 208-570-6830, TTY: 1-800-377-3529, fax: 208-384-4195, ili osobno na 150 N. Capitol Blvd (2. kat).

ARABIC

للمشاركة و تقديم الطلبات من خلال تحديد موعد مقابلة شخصية او مقابلة عن طريق الهاتف وللاستفسارات او لطلب خدمات الترجمة ولتحديد المواعيد ، يرجى الاتصال بقسم الإسكان وتنمية المجتمع عبر البريد الإلكتروني:
فاكس: 208-384- ، TTY: 1-800-377-3529 هاتف: 208-570-6830 ، ، Housing@cityofboise.org
4195 ، أو 150 N. Capitol Blvd (الطابق الثاني).

FARSI

اعضای انجمن می توانند برای اینکه قادر به مشارکت کامل در این فرآیند باشند، درخواست ترجمه، تفسیر، و/ یا کمک هی معقول دیگر کنند. برای درخواست، لطفاً از طریق ایمیل با بخش مسکن و توسعه جامعه تماس بگیرید:

housing@cityofboise.org

تلفن: ۲۰۸-۵۷۰-۶۸۳۰

تلفن ناتوانان گفتاری و/ یا ناشنوا: ۱-۸۰۰-۳۷۷-۳۵۲۹

شماره فکس: ۲۰۸-۳۸۴-۴۱۹۵
یا به صورت حظوری به ادرس

150 N. Capitol Blvd (2nd floor) (طبقه دوم)

TABLE OF CONTENTS

This document summarizes the primary requirements of the City of Boise's (City) Public Services Program. Additional requirements applicable to any specific public service activity will be documented in a Subrecipient Agreement between the City and service provider agency (subrecipient). The term "activity" will be used throughout this document to refer to the program or service being proposed/implemented by an agency.

These Program Guidelines are not intended to address every circumstance or regulatory requirement for the CDBG Public Services Program. Omission of any federal, state, or local requirement or law does not relieve the subrecipient or the City from adhering to all applicable requirements. Revisions to these program guidelines may be implemented by the City in response to regulations, legal requirements, or any other changes deemed necessary at the City's sole and absolute discretion. Such revisions may occur without notice and are applicable to all pending and future applications. Applicants are responsible for complying with any changes.

PROGRAM OVERVIEW

The City of Boise receives an annual allocation of Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD). CDBG is a flexible program that addresses a wide range of community development needs, with the mission of providing decent housing, a suitable living environment, and expanding economic opportunities, principally for low- and moderate-income persons. CDBG's flexibility empowers people and communities to design and implement strategies tailored to their own needs and priorities.

CONSOLIDATED PLAN AND ANNUAL ACTION PLAN

As a recipient of HUD funds, the City must create long-term and short-term plans that guide its priorities and investments. The Five-Year Consolidated Plan identifies broad goals and priorities for a five-year period, and Annual Action Plans summarize the actions, activities, and resources that will be used each year to meet those goals. Proposed public service activities must align with the priorities outlined in the City's current Consolidated Plan, which can be viewed at https://www.cityofboise.org/public-services.

PUBLIC SERVICES FUNDING

HUD allows a maximum of 15% of the City's annual CDBG allocation to be used to support non-profit organizations providing public services. The City has historically utilized the maximum 15% each year to support the high level of need in the community. The City grants CDBG funds to eligible organizations to be used over the period of one program year (PY), which runs from October 1 through September 30.

MEETING A NATIONAL OBJECTIVE

Every CDBG-assisted activity must meet one of three national objectives.

Benefit to Low- and Moderate-Income (LMI) Persons/Households

This is referred to as the "primary" national objective because the City must spend 70% of its annual allocation on activities that benefit people with low and moderate incomes. ***This is the national objective the majority of public services fall under.*** For the categories under this national objective, a minimum of 51% of clients served/residents benefited by the activity must be LMI, which is defined as individuals or households (depending on the activity) whose annual income does not exceed 80% of the area median income (AMI) as defined by HUD. Additional information on income is provided under the Beneficiary section. Please note that while this is the minimum requirement, the City prioritizes activities that overwhelmingly serve LMI clients (see Application Review section for more information).

There are four categories of activities that can be used to meet the LMI national objective:

- **Limited Clientele:** provides benefits to a specific group of LMI persons regardless of where they live, or to particular LMI persons within a specific area. ***This is the primary category for eligible Public Services.*** There are some client types that are generally presumed by HUD to be LMI. Presumed benefit clientele include persons in any one or a combination of the following categories: abused children, battered spouses, elderly persons (62 or over), 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. Additional information can be found at 24 CFR 570.208(a)(2)(i)(A).
- **Area Benefit:** provides benefits to all residents of a particular area with at least 51% LMI residents (as defined by HUD).
- **Housing:** undertaken for the purpose of providing or improving permanent residential structures to be occupied by at least 51% of LMI households.
- **Job Creation or Retention:** creates or retains permanent jobs, of which at least 51% are held by LMI persons.

Aid In the Prevention or Elimination of Slums or Blight

For an activity to meet this national objective, it must determine the extent of and physical conditions that contribute to blight, and meet specific criteria based on an area/site or an urban renewal area.

Meet a Need Having a Particular Urgency

This national objective is for activities that address/alleviate emergency conditions that pose a serious and immediate threat to the health or welfare of the community (typically a natural disaster) and is therefore rarely used.

PROGRAM ELIGIBILITY AND REQUIREMENTS

The City may impose requirements beyond those found in CDBG regulation. Any such requirements are included within these program guidelines.

ELIGIBLE ENTITIES

In order to receive CDBG funding for public services, an entity must:

- be a non-profit organization as designated by the IRS
- be in good standing with the State of Idaho
- have a Unique Entity Identifier (UEI) number and up-to-date registration with SAM.gov
- not be suspended, debarred, or otherwise precluded from receiving federal awards

Faith-based organizations may be eligible, as long as the proposed activity is available to residents regardless of religious belief or practice.

INELIGIBLE ENTITIES

The following entities are not eligible for CDBG public services funds:

- individuals
- for-profit businesses
- organizations that engage in any discriminatory practices on the basis of race, color, national origin, religion, gender, sexual orientation, gender identity/expression, familial status, or disability
- organizations that stipulate mandatory religious engagement or influence in the provision of their services
- organizations that are funders or pass-through entities
- organizations who are contracting services to a program for which they are not the primary service provider

ELIGIBLE ACTIVITIES

Eligible public services are activities that assist low- to moderate-income (at or below 80% AMI) individuals or households and meet a national objective. Regulations allow CDBG funds to be used on a wide range of activities, including, but not limited to:

- Case management
- Childcare
- Counseling
- Crime awareness/prevention, public safety
- Education programs
- Emergency housing support (e.g., short term rental assistance, security deposits, utility payments)
- Employment services (e.g., job training, literacy skills)
- Energy conservation
- Food bank/resources to address food insecurity
- Fair housing services (e.g., counseling on discrimination)
- Health services
- Housing counseling
- Housing information/education/referral services
- Legal services
- Mental health services
- Neighborhood cleanups
- Recreational services
- Screening for lead poisoning
- Substance abuse recovery/prevention/education programs
- Tenant/landlord counseling (e.g., prevent/settle disputes)
- Transportation services

Activities may target services for a defined group of low- to moderate-income persons, such as:

- Elderly (62+)
- Veterans
- Children (0-12)

- Youth (13-19)
- Refuges/resettled populations
- Homeless
- Individuals/households at risk of eviction/homelessness
- Individuals with disabilities
- Individuals with HIV/AIDS
- Victims of domestic violence
- Abused/neglected children
- Persons with addiction/substance abuse issues

Activities that target a specific group must be available to those clients regardless of where they live in Boise. For example, services being provided only to the residents of one senior living facility would not be eligible for public service funds.

More information about eligible activities can be found at 24 CFR 570.201 – 570.207. The City makes final eligibility determinations.

INELIGIBLE ACTIVITIES

The following activities are not eligible for CDBG funds:

- any activity that does not meet a national objective
- political activities
- rental assistance or other income payments made directly to individuals
- equipment, maintenance and repairs, or facility operating costs
- solicitation of funds and/or any type of fundraising by an employee
- general government expenses, including operation and maintenance
- improvements to buildings or portions thereof used for the general conduct of government, except for removal of architectural barriers or historic preservation

ELIGIBLE COSTS

The City has determined that the following costs are eligible under its Public Services Program:

- Staff salaries for positions assisting with a CDBG activity
- Client assistance (not paid directly to individuals) such as rent/utility payments, after-school program scholarships, etc.

ACTIVITY FUNDING REQUIREMENTS

The CDBG program may fund a new or existing activity. Certain requirements may be triggered for existing activities depending upon prior funding source, amount of funding request, and proposed level of service for CDBG funds.

CDBG Funding for a New Activity

The CDBG program may fund a new activity, which is defined as a newly created activity that did not exist prior. An existing activity that was paused/discontinued and then reimplemented/reopened would not be considered a new activity unless it did not operate for five or more years.

Continued CDBG Funding for Public Service Activities

CDBG funds may continue to fund the same activity in subsequent years, but only at the ***same or decreased level of funding*** each year. The City also requires that a continuing activity maintain the **same level of service** (service ratio), at minimum, which is considered in the application scoring criteria. Service ratio is defined as dollar per client. If an agency does not maintain the same service ratio over the course of the program year, an explanation must be provided, which will be taken into consideration for future funding requests.

> Example: Agency X received $100,000 in CDBG funds from the City of Boise to provide case management services to 100 clients during the 2022 program year. The service ratio is $1,000 per client served ($100,000 / 100 = $1,000).
>
> If the agency applies for $100,000 for the same activity in the 2023 program year, it must continue to serve **at least** 100 clients ($100,000 / $1,000 = 100).
>
> If the agency applies for $80,000 for the same activity in the 2023 program year, it must serve **at least** 80 clients ($80,000 / $1,000 = 80).

An agency may request increased CDBG funding for the same activity only if there is a ***quantifiable increase in the level of existing service***, which may be defined as **one** of the following two options:

- **Adding an additional service component.** For example, an activity that provides meal service to the elderly expands to include job training to train people on meal preparation and cooking.
- **Increasing the ratio of clients served (service ratio).** The minimum service ratio required should be calculated by determining the equivalent service ratio for the new funding request and then increasing the number of clients to be served (by at least one):

  Step 1) $\frac{\text{amount of prior funds}}{\text{\# of clients served}}$ = prior service ratio ($ per client)

  Step 2) $\frac{\text{new CDBG fund request}}{\text{prior service ratio}}$ = equivalent service ratio for new funds

  Step 3) equivalent service ratio + 1 = minimum # clients required

  Example: Agency X received $100,000 in CDBG funds to provide case management services to 100 clients in the 2022 program year. The service ratio was $1,000 per client served ($100,000 / 100 = $1,000).

  If the agency applies for $120,000 in CDBG funds for the same activity in the 2023 program year, the activity must serve **at least** 121 clients ($120,000 / $1,000 = 120 + 1 or more)

CDBG Funding for an Activity Previously Funded by City/State Government

CDBG funds are not meant as replacement of municipal or state money to fund essential services typically offered/funded by a government entity. CDBG funds may be used to fund an activity previously funded by or on behalf of city/state government if **one** of the following criteria are met:

- City/State funds were not used to fund the activity in the preceding 12 months. This timeline shall mean the 12 months prior to the City's submission of the relevant Annual Action Plan to HUD. The City's plan is usually submitted in July for the upcoming program year starting October 1.
- City/State funds were used within the preceding 12-months (as defined above), but there is a ***quantifiable increase in the level of existing service*** above that which was provided by or on behalf of the local government. See definition of quantifiable increase and calculation instructions in the section above.

  Example: Agency X received $100,000 in general funds from the City of Boise to provide case management services to 100 clients during one year. The service ratio was $1,000 per client served ($100,000 / 100 = $1,000).

  If the agency applies for $100,000 in CDBG funds for the same activity, it must serve **at least** 101 clients during the program year to meet the minimum client requirement ($100,000 / $1,000 = 100 + 1 or more).

  If the agency applies for $80,000 in CDBG funds for the same activity, it must serve **at least** 81 clients during the program year to meet the minimum client requirement ($80,000 / $1,000 = 80 + 1 or more).

  If the agency applies for $120,000 in CDBG funds for the same activity, it must serve **at least** 121 clients during the program year to meet the minimum client requirement ($120,000 / $1,000 = 120 + 1 or more).

BENEFICIARIES

Clients served by an activity must reside within the City of Boise's area of impact. These eligible boundaries are the highlighted areas of the map found at https://city-of-boise.opendata.arcgis.com/datasets/boise::comprehensive-planning-areas/explore, which is searchable by address.

Income Eligibility and Verification

CDBG regulations require that 51% of the clients served by an activity must be at or below 80% AMI. Income is defined as the annual gross income of the client's household. Household income should be calculated per the definitions and regulations at 24 CFR 5.603 and 5.609 and by using the CPD Income Eligibility Calculator tool found on the HUD Exchange at https://www.hudexchange.info/incomecalculator/. The City requires subrecipients to verify and maintain documentation of the income for each client household, which will be required for reporting (see Reporting section).

The CDBG program defines the following income categories:

- Extremely low-income (at or below 30% AMI)
- Low-income (31% AMI to 50% AMI)
- Moderate-income (51% AMI to 80% AMI)
- Non-LMI (81% AMI and above)

Total household AMI percentage should be rounded up to the nearest whole number (e.g., a household at 50.2% AMI would be considered 51% AMI).

Area Median Income levels for Boise are published annually by HUD and updated on the City's website, which can be accessed at https://www.cityofboise.org/public-services/. The current income levels are also included as an attachment to the Subrecipient

Agreement and updates are emailed to subrecipients once HUD publishes the new guidelines (usually in June). The chart below is an **example** from the Income Guideline chart provided by the City. Please note that the names of income categories in the chart vary slightly from the CDBG program categories listed above, so be sure to look at the % of AMI to identify the correct category.

	Low Income (80% of AMI)	**(60% of AMI)**	**Very Low Income (50% of AMI)**	**Extremely Low Income (30% of AMI)**
Number of People/Household	**Annual Gross Income**	**Annual Gross Income**	**Annual Gross Income**	**Annual Gross Income**
1 person	$49,950	$37,440	$31,200	$18,750
2 persons	$57,050	$42,780	$35,650	$21,400
3 persons	$64,200	$48,120	$40,100	$24,100
4 persons	$71,300	$53,460	$44,550	$26,750
5 persons	$77,050	$57,780	$48,150	$28,900

Presumed Benefit Clients

If an activity ***exclusively*** serves presumed benefit clientele, the activity is *assumed* to meet the minimum income requirement above. Best efforts should still be made to collect and determine income. In the case that this is not possible, the subrecipient may report the appropriate income category for the client as defined below:

Abused children	Extremely low income
Battered spouses	Low income
Severely disabled adults	Low income
Homeless persons	Extremely low income
Illiterate adults	Low income
Persons living with AIDS	Low income
Migrant farm workers	Low income
Elderly persons	For center-based senior services, report as moderate income. For other services (not center-based), report as low income.

Demographics

Subrecipients are required to collect specific demographic and service information for each client. See Reporting section for all required information. Additional information and definitions for each required category are included in the Beneficiary Data Reporting Definitions found at https://www.cityofboise.org/public-services.

KEY FEDERAL REQUIREMENTS

CDBG activities are subject to a variety of "cross-cutting" federal requirements. Agencies must be aware of these requirements, which affect planning and ongoing implementation/operations.

Agency Capacity

Agencies who apply for CDBG funds must have the ability and capacity to carry out the activity in accordance with the uniform administrative requirements at 2 CFR Part 200.

Accessibility

Section 504 of the Rehabilitation Act of 1973 is a national law that protects qualified individuals from discrimination based on their disability. The nondiscrimination requirements of the law apply to entities and employers that receive financial assistance from any Federal department or agency. Section 504 forbids agencies and employers from excluding or denying individuals with disabilities an equal opportunity to receive program benefits, services, and employment. It defines the rights of individuals with disabilities to participate in, and have access to, program benefits and services. It is important that agencies and employers disclose their nondiscrimination policy and ensure members of the public, beneficiaries, and employees know how to access information and assistance.

Section 504 is implemented by 24 CFR Part 8 and utilizes the Uniform Federal Accessibility Standards (UFAS) for physical accessibility requirements for facilities/offices. For more information, see the City's Section 504 Guide and Self-Evaluation at https://www.cityofboise.org/public-services. The self-evaluation is required for all awarded subrecipients.

Language access is another important aspect of program accessibility. Title VI of the Civil Rights Act of 1964 requires that reasonable steps be taken to provide language assistance to ensure meaningful access to programs and activities for persons who are Limited English Proficient (LEP). A Language Access Policy is required for all awarded subrecipients.

Equal Opportunity

Nondiscrimination is a requirement of employment and employment practices. Employment opportunities may not be denied on the basis of race, color, national origin, sex, age, religion, familial status, or disability. The Americans with Disabilities Act (ADA) modifies and expands the Section 504 Rehabilitation Act of 1973 to prohibit discrimination against "a qualified individual with a disability" in employment and public accommodations. The ADA requires that an individual with a physical or mental impairment who is otherwise qualified to perform the essential functions of a job, with or without reasonable accommodation, be afforded equal employment opportunity in all phases of employment.

Non-Discrimination and Equal Access

CDBG-funded activities must be conducted in a manner which will not cause discrimination on the basis of race, color, religion, sex, disability, familial status, or national origin. Segregated facilities, services, or benefits and different treatment are prohibited.

CDBG-funded agencies/activities are also required to have admissions and policies and procedures in place that ensure equal access to programs, facilities, benefits, services, and accommodations regardless of gender identity. Such policies should ensure that equal access is provided in accordance with the individual's gender identity, and must protect privacy, safety, and security of the individual.

Fair Housing

Agencies undertaking housing activities/projects must ensure fair housing rules are followed in the provision of housing services and assistance. Opportunities for purchase or rental, terms and conditions, advertising and marketing information, and availability of real estate services must not discriminate. Agency policies should include methods for informing the public and potential tenants about fair housing laws.

Environmental Review

Federally assisted projects are subject to a variety of environmental requirements. Submitting an application for CDBG funds triggers environmental review regulations as defined in 24 CFR Part 58. Public services typically fall under one of two classifications:

- *Exempt*: activities that will not have a physical impact or result in any physical changes
- *Categorically Excluded*: activities including but not limited to health care, housing services, permanent housing placement, short term payments for rent/mortgage/utility costs, and assistance in gaining access to local State and Federal government services

City staff are responsible for conducting the environmental review and must provide environmental clearance ***prior to*** execution of a Subrecipient Agreement and any release of funds by the City. Applicants that are not selected for an award of funds will receive a letter releasing them from the Environmental Review requirements triggered by an application for CDBG funds.

APPLICATION PROCESS

The public services application is open annually, usually in April. The funding opportunity is posted on the City's website, and email notification is sent to current and former subrecipients and applicants, as well as to community partners. The application and required documentation must be submitted in Neighborly (online software platform). An agency may request funds for more than one public service activity, but a separate application must be submitted for each.

Applicants must register for a Neighborly account in order to access the application. Agencies who have already created an account for a prior public services application may login to access the new application. To access Neighborly and view the Neighborly Subrecipient User Guide, go to https://www.cityofboise.org/public-services/.

Note: The email used to register a Neighborly account will be needed to sign in for future access to the application and all corresponding reimbursement requests, reporting, etc. A best practice recommendation is to use an organizational email address to prevent access issues with any changes in staff.

ANNUAL TIMELINE

APRIL	MAY – JUNE	JULY - AUGUST	SEPTEMBER	OCTOBER
Application open	Application review and committee recommendations	Preliminary award letters issued	Subrecipient Agreements executed	Beginning of Program Year (CDBG funds available)
Pre-Application Workshop hosted by City staff		Supporting documentation review/requests	Pre-Program Year Training with City staff and awardees	

REQUIRED INFORMATION/DOCUMENTS

Several documents are required as part of the application in order to assess the agency's ability and capacity to carry out the activity while adhering to CDBG regulations and City requirements. Additional documents are required for applicants who are selected for a grant award. The list below includes all documentation required prior to execution of a Subrecipient Agreement. A simplified Required Document Checklist for the application can be viewed and downloaded at https://www.cityofboise.org/public-services/, as well as all required City forms and templates referenced below.

Documents Required with Application

The following documents must be submitted with the application in Neighborly:

- **Articles of Incorporation & Bylaws** – Articles of incorporation are the primary law used to establish the general organization and governance for an organization to achieve existence. Articles (and any amendments) must be stamped/approved by the Idaho Secretary of State's office. Bylaws are used to detail how the entity is run and must be approved by the Board of Directors.
- **Nonprofit Determination** – a tax exemption determination letter issued by the IRS. A copy can be obtained or requested at IRS.gov by using their online tool found at https://www.irs.gov/charities-non-profits/eo-operational-requirements-obtaining-copies-of-exemption-determination-letter-from-irs
- **Certificate of Good Standing** with the State of Idaho – a letter/certificate of existence/filing issued by the Idaho Secretary of State's office, which includes the entity's "standing" (status). An up-to-date letter or online proof of current standing must be submitted. ***Note:*** A screenshot is accepted if it includes the agency's identifying information ***and*** standing.
- **Unique Entity Identifier (UEI)** and proof of up-to-date registration on SAM.gov – enables City staff to confirm the applicant agency is not barred from receiving federal funds. ***Note:*** A screenshot must be submitted that includes the agency's identifying information and registration status/date.
- **Liability Insurance Certificate** – should be current at time of application. Updated insurance may be requested during/at the end of the program year.
- **Organizational Chart** – outlines the hierarchal placement of positions within the agency.
- **List of Board of Directors** – must include name, contact information, occupation/affiliation, and identification of principal/executive officers.

- **Authorization for Board to Request Funds** – meeting minutes or other official action by the board of directors authorizing application submissions/request for CDBG funds.
- **Designation of Authorized Official** – a City form that must be completed/signed by the head of the board authorizing a representative for the organization (typically the executive director).
- **Program Policies and Procedures** – a document that outlines the processes and procedures for how the activity will be carried out.
- **ADA/Accessibility Policy** – a document describing how programs, services, and employment are provided in a way that is accessible to persons with disabilities. Applicants should review the City's Section 504 Guide and Self-Evaluation for more information (https://www.cityofboise.org/public-services).
- **Language Access Policy** – a policy that outlines the reasonable steps that will be taken to provide language assistance to ensure meaningful access to programs and activities for persons who are Limited English Proficient (LEP).
- **Program Pamphlets/Brochures/Flyers/Marketing Materials** – the public-facing materials used to promote/inform about the activity. These materials should include a nondiscrimination statement and how to access assistance for vision/hearing-impaired and LEP persons. See the City's Section 504 Guide and Self-Evaluation for more information.
- **Job Description(s)** – should be included for all staff position(s) directly involved in the CDBG-funded activity.
- **Sample Client Beneficiary Data Collection Form** – should capture all of the information required for beneficiaries (clients) of the CDBG-funded activity. See the Reporting section for required information.
- **Sample Timesheet** – required if CDBG funds will be used for salary reimbursements.
- **Financial Management System Description** – a document (City template) that outlines the agency's financial processes and software, responsible staff members, and overall capacity for managing federal funds.
- **Resumes for Primary Agency Staff** – must include Chief Administrator (Executive Director or Chief Executive Officer), Chief Fiscal Officer, and Accountant (whether inhouse or external contractor).
- **Financial Statement or Audit** – must submit the most recent annual financial statement or audit. An audit is required for agencies receiving a total of $750,000 or more of federal assistance (per 2 CFR 200).

Additional Documents Required for Applicants Selected for an Award

The following documents are required before execution of the Subrecipient Agreement:

- **Sect. 504 Self-Evaluation** (and Transition Plan if applicable) – must be completed in consultation with individuals/organizations representing individuals with disabilities. Some additional requirements apply to agencies with 15 or more employees. Applicants should review and complete the City's Section 504 Guide and Self-Evaluation template.
- **Hourly Billing Rate form** – must be completed for any staff salary to be reimbursed with CDBG funds using the City's form
- **Activity Budget** – an updated/current activity budget must be completed using a template provided by the City, which is included as an attachment to the Subrecipient Agreement. The activity budget includes the costs and funding

sources for the specific ***activity/program*** that the CDBG funds will contribute toward (not the entire organization).

- **Lobbying Certificate** – must be reviewed and signed using a template provided by the City, which is also included as an attachment to Subrecipient Agreement. Agencies are required to disclose any lobbying activities (more information included in the certification).

For new subrecipients who have not received funds from the City:

- W-9 (or if there has been a change to address of a continuing subrecipient)
- ACH form for direct deposit (or if there has been a change to account information of a continuing subrecipient)

ELIGIBILITY ANALYSIS

City staff complete an internal review of the proposed public services activity to ensure adherence to the following eligibility criteria: meets a National Objective, is an eligible activity type, is an eligible/allowed cost, and meets any service ratio or funding requirements for continuing/expanded activities.

APPLICATION REVIEW

The Public Services Committee is made up of individuals from community stakeholder organizations, such as public agencies, hospitals, and advocacy groups. Committee members are knowledgeable about community need and available resources/funding, and the organizations represented by the committee members are not eligible to apply for public services funds. Committee members are required to disclose any conflict of interest with applicants and are not assigned to review applications related to any conflict of interest.

Scoring Criteria

Individual committee members score applications and then meet to review scores and make funding recommendations. The City must approve final funding decisions.

Applications are reviewed on several categories:

- Description, detail, and clarity of the activity.
- Alignment with priority needs outlined in the City's Five-Year Consolidated Plan, Annual Action Plan, and other City strategies.
- Expected outcomes, including number of persons expected to be served and process to ensure at least 51% of beneficiaries are low/moderate-income. ***Note:*** Activities that overwhelmingly serve LMI clients are prioritized.
- Outreach/advertising for the activity, including efforts to reach minorities and Limited English Proficient populations.
- How the activity promotes sustainability and supports clients in achieving stability.
- Collaboration with other agencies, especially those providing similar services to prevent duplication of benefits.
- Experience, staffing/organizational structure, and ability to successfully carry out the activity.
- Prior monitoring/audit findings and how they were addressed.
- Financial health/stability, diversity of funding sources, operating reserves, and need to use reserves or seek out lending sources.
- Level of need/whether other agencies provide similar services.

- Service ratio (dollar per client)
- How CDBG funds leverage non-Federal dollars
- Outcomes and compliance with prior City funding

Preliminary Award

Applicants selected for an award will receive a preliminary award letter that includes the intended amount to be awarded and the conditions that must be met prior to distribution of funds:

- The City must receive approval of the Annual Action Plan by HUD.
- An Environmental Review must be conducted by the City.
- The Mayor and City Council must approve the Subrecipient Agreement.

The letter is not notification of a final award of funds.

SUBRECIPIENT AGREEMENT

Once conditions of the preliminary award letter are met, the City and applicant enter into a Subrecipient Agreement for the period of one program year (October 1 – September 30). The Subrecipient Agreement lays out the terms and requirements of the CDBG program and the City, and the subrecipient is responsible for fully reviewing and adhering to these terms. The agreement also includes a detailed description of the activity and costs that will be reimbursed with CDBG funds, along with the reimbursement and reporting requirements/process, etc.

A Subrecipient Training is conducted by City staff to review the requirements and timelines for the program year, including reimbursements, reporting, compliance, monitoring, available resources, and general technical assistance/support.

REIMBURSEMENT PROCESS

CDBG funds are provided on a reimbursement basis. The subrecipient must submit reimbursement requests (draws) in Neighborly, along with supporting documentation showing that funds were spent on eligible costs as approved in the agreement. Draws are due the 15th of the month for the previous month. For example, the draw for October billing is due November 15th. The initial reimbursement cannot be submitted until the Subrecipient Agreement is executed and all required documents are received.

All draw packets must include the City's Request for Funds reimbursement cover sheet. This form must be signed and dated by the staff submitting the draw and the supervisor of the employee(s) if salary costs are being reimbursed (this may be the same person).

The required supporting documentation depends on the type of cost being reimbursed. One pdf file should be uploaded that combines all of the required documents.

All templates and forms referenced in this section are available at https://www.cityofboise.org/public-services/.

PERSONNEL SALARY

Reimbursement requests for personnel salary must include the following documentation:

- Request for Funds cover – It is important that the total request accurately reflects the percentage of eligible time identified on the timesheet.

- Monthly timesheet – must indicate the employee's name, job title, dates worked, total hours per day, and total monthly hours. Timesheets must clearly identify the hours to be billed to the CDBG program, as well as the funding source(s) for non-CDBG hours, and must be signed by both the employee and supervisor. Subrecipients should review the City's Sample Timesheet to ensure they are submitting all required information.

If any employee information (staff in the position, position description, and/or salary/billing rate) changes from the information submitted during the application process, updated forms and documents must be submitted to the City. Changes to staff must be submitted using the City's online Personnel Update form, and updated salary/billing rates must be submitted using the Hourly Billing Rate Calculation worksheet.

In the case of turnover or vacancy of staff being reimbursed with CDBG funds, portions of reimbursement may be adjusted or staff may be substituted with **prior City approval** and within the terms of the Subrecipient Agreement. In such a case, staff information must be updated using the City's online Personnel Update form.

CLIENT ASSISTANCE

Payments may never be made directly to a client. Supporting documentation must include:

- Detailed invoice
- Calculation/determination of assistance provided on behalf of clients, including method of tracking approved by the City

RENT ASSISTANCE

Rental assistance may include rent, rent arrears, utility payments, deposit, and other charges and fees as approved by the City and reflected in the Subrecipient Agreement. Assistance ***may not*** exceed three consecutive months, and payments may never be made directly to a client. Supporting documentation must include:

- Detailed invoice
- Rent ledger including specific charges and dates
- Copy of check(s) paid to the landlord
- Copy of the lease

Tracking rental assistance for clients from multiple sources of funding can be challenging. The City has created a rental assistance tracking template as a resource for subrecipients.

REPORTING

Reporting enables the City to measure and monitor the subrecipient's performance against the projected accomplishments included in the application and outlined in the Subrecipient Agreement. Subrecipients must report on unique individual clients (nonduplicated) assisted with CDBG funds (unless otherwise noted in the agreement), not all clients of the activity. If a client exits the program and re-enters/re-qualifies in the same program year, they may be counted again as a new client.

Note for race and ethnicity: Best efforts should be made to collect race and ethnicity data as self-identified by the client. In the case that this cannot be collected, categories may be estimated by observation or by using a number proportionate to Boise's population (demographic data for Boise is available at https://www.census.gov/quickfacts/fact/dashboard/boisecitycityidaho/).

QUARTERLY REPORTS

Client beneficiary data must be reported in Neighborly on a quarterly basis. Reports are due on the 15th of the month after every quarter (i.e. reporting for October – December is due on January 15th). Subrecipients should review the Beneficiary Data Reporting Definitions (available at https://www.cityofboise.org/public-services/) for additional information about each of the following required categories:

- Income category
- Race and ethnicity
- Disability status
- Elderly status
- Single-headed households by gender
- Service access type
- Homeless prevention data (only applicable to homeless prevention activities)
- Homeless assistance data (only applicable to homeless assistance activities)

Please note the following important reminders: The total number of clients reported in the income, race/ethnicity, and service access type sections must match. The combined reporting for all four quarters should match the annual totals reported. Subrecipients should take efforts to ensure accuracy of beneficiary tracking and reporting.

NARRATIVE REPORTS

Narrative reports are required in Neighborly halfway through the program year and at the end of the year.

Mid-Year Progress Report

The mid-year progress report reflects the first 6 months of the program year (October – March) and is due April 15th. This report helps to track subrecipient progress toward accomplishments, identify any major organizational/staffing changes, flag any challenges with the activity, collect updated documents as applicable, and respond to requests for technical assistance or resources needed for activities to be more successful over the second half of the program year.

Final Report

The final report reflects the ***full*** program year (October – September) and is due October 15th. This report captures total accomplishments for the year, outreach efforts, challenges encountered, collaboration, staff/organization updates, future plans for the activity, and success stories. The City also asks for feedback and suggestions for improvements to the Public Services Program.

The Final Report also requires subrecipients to report ***all*** fund sources for ***the activity*** (not organization) for the program year, including City of Boise funds (CDBG and non-CDBG). Completeness and accuracy of this information is important for the City's required reporting of leveraging of CDBG funds to HUD.

COMPLIANCE AND MONITORING

ONGOING COMPLIANCE

Subrecipients are required to comply with all CDBG regulations and City requirements throughout the program year. City staff may request updated documents during the year or as part of monitoring, including things like liability insurance, personnel forms, UEI registration status, and Section 504 Self-Evaluation/Transition Plan.

Technical Assistance (TA) by City staff is available throughout the program year. There are opportunities to submit questions and comments in Neighborly as part of reporting, or subrecipients may reach out directly to City staff (contacts are provided at the start of each program year). Staff also meet periodically during the year to assess subrecipient progress and any challenges or ongoing issues with activity implementation, reimbursements, reporting, etc. in order to address concerns or provide support.

Any requirements around level of service (service ratio) will be assessed at the end of the program year. Lack of compliance will be considered in future applications and may result in further action. For example, if CDBG requirements around increased level of service are not met, the City may deny reimbursement or require repayment of funds to the extent necessary to bring the activity into compliance.

Following completion of the program year and once the subrecipient has met all requirements (including submission of final documentation), the City issues a letter that officially closes out the activity.

RECORDKEEPING

It is important that subrecipients have an effective and secure records management system in place. The Subrecipient Agreement outlines primary records to be maintained, and specific requirements can be found at 24 CFR 570.506. Records should be retained for **five years** from the date of closeout by the City. Subrecipients may continue to access their Neighborly account, which retains all documents submitted with the application and throughout the program year. The application and reports may also be downloaded from Neighborly.

Physical records must be kept in a secure location behind two separate locking mechanisms, with access limited to members of management. Electronic records must be maintained locally and have a backup stored in the cloud or on a secure device.

MONITORING

The City is responsible for ensuring that its federal resources are being used responsibly and appropriately. The City will monitor all activities for compliance with CDBG and City requirements. The Compliance Team may review client files, activity and organization information, and may request further documentation as part of reviews. Subrecipients must comply with all monitoring requests.

The full monitoring process is described in detail in the City's Monitoring Policies and Procedures.

Risk Assessment

City staff conduct a quantitative risk assessment of all activities either at the time they are awarded or at the beginning of each program year, if awarded in a prior program year. Risk assessments are tailored for each category of activity and contain objective factors that help determine the level of risk associated with each activity undertaken by the City or its subrecipients.

Each assessment is scored on program-specific criteria and then sorted into High, Middle, and Low Risk categories, with the top third of scores ranked High Risk, the middle third ranked Medium, and the bottom third ranked Low. These scores are used in conjunction with past monitoring events to determine whether an activity will be subject to an onsite monitoring or a desk review. In general, a high-risk activity will be subject to an onsite review annually, a medium-risk activity will be monitored onsite every two years, and a low-risk activity once every three years, though this schedule may be adjusted as needed. All activities are subject to either an annual desk-monitoring or an onsite monitoring.

Desk Review

Desk monitoring involves the thorough review of various documents and reports submitted by subrecipients as well as the completion of program specific checklists for each activity. These reports and checklists cover a wide spectrum of critical information and include annual narratives and financial reports, draw requests, beneficiary reports, and organizational documents such as Section 504 Self-Evaluations/Transition Plans and agency policies and procedures. This review helps the City monitor the activity's progress towards accomplishing the goals laid out in the agreement and helps inform potential areas for technical assistance.

Onsite Visit

Onsite monitoring visits are essential for thorough assessment of federally funded activities and programs. Onsite visits follow a structured agenda and use monitoring forms tailored for each type of activity to ensure consistency and a comprehensive evaluation. Monitoring visits are not just about compliance; they are an opportunity for capacity-building, knowledge sharing, and mutual learning. This collaboration enhances program effectiveness and community impact.