AGENDA

- HUD Allocation/Planning Process
- National Objectives and Eligibility
- Funding Requirements
- Cross-Cutting Federal Requirements
- Application Process
- Reimbursements
- Reporting
- Compliance/Monitoring
- Resources
HUD ALLOCATIONS

• U.S. Department of Housing and Urban Development (HUD) provides support for housing and community development activities

• City receives annual allocation for the Community Development Block Grant Program (CDBG)
  • Flexible program to address a range of community development needs

• 15% of the City’s annual allocation can be used for Public Services
  • Program Year 2023 (Oct 2023–Sept 2024):
    ▪ CDBG allocation – $1,390,584
    ▪ 15% Public Services cap – $208,587
PLANNING PROCESS

• Five-Year Consolidated Plan (Con Plan)
  • Broad goals and priorities
  • Data gathering/analysis
  • Guides how federal funding will be invested in our community

• Annual Action Plan (AAP)
  • Provides a summary of actions, activities, and resources planned for each year to address the priority needs and meet the goals identified in the Con Plan

• Community Outreach/Input
  • Helps identify and prioritize needs, goals, and funding investments for project categories
NATIONAL OBJECTIVES

CDBG

• Benefit low to moderate income persons (<80% AMI)
• Aid in the prevention/elimination of slums or blight
• Meet a need having a particular urgency

Public Services

• Limited Clientele
  • Services to specific group of LMI persons
  • 51% of clients served must be LMI
• Area Benefit
• Housing
• Job Creation/Retention
ELIGIBLE ENTITIES

Who Can Apply

• Nonprofit organization (IRS designation)
  • Faith-based organizations without any requirements around religious beliefs/practices
• Good standing with the State
• Unique Entity Identifier (UEI) + registration on SAM.gov
• Not suspended or barred from receiving federal funds

Who CANNOT Apply

• Individuals
• For-profit businesses
• Organizations that:
  • are funders/pass-through entities
  • Are not the primary service provider
  • Require religious engagement/influence
  • Engage in discriminatory practices
Eligible Activities

• Childcare
• Counseling/case mngt
• Education/recreation prog.
• Emergency housing support
• Food bank/resources
• Health/mental health services
• Substance abuse recovery
• + many more

Ineligible Activities

• Political activities
• Payments directly to indiv.
• Equipment, maintenance and repairs, facility operating costs
• Fundraising
• Government expenses/buildings
ELIGIBLE ACTIVITIES CONT.

Targeted Groups (examples)

- Elderly
- Veterans
- Children (0-12)
- Youth (13-19)
- Refugees
- Homeless/at risk of homelessness
- Individuals with disabilities
- Individuals with HIV/AIDS
- Victims of domestic violence

- Clients can live anywhere in Boise or in a specific neighborhood
- Services cannot be limited to tenants of one facility/building
  - Ex: only residents of one senior living facility
ELIGIBLE COSTS

Allowed Costs for CDBG Funds

• Salaries for staff assisting the CDBG-funded activity

• Client assistance (not paid directly to individuals)
  • Rent/utility payments
  • After-school program scholarships
  • Daycare scholarships
Eligible Beneficiaries

- Live in Boise’s area of impact
- 51% of clients served by activity must be ≤80% AMI
- Annual gross household income must be verified/documented
  - 24 CFR 5.603 and 5.609
  - HUD Income Calculator
- Income levels updated by HUD annually

CDBG Income Categories
Extremely low = ≤30% AMI
Low = 31% to 50% AMI
Moderate = 51% to 80% AMI
Non-LMI = ≥81% AMI
## 2023 Income Guidelines

Boise Median Income: $98,300 (household of 4)

<table>
<thead>
<tr>
<th>Number of People/Household</th>
<th>Moderate Income (80% of AMI)</th>
<th>Low Income (60% of AMI)</th>
<th>Very Low Income (50% of AMI)</th>
<th>Extremely Low Income (30% of AMI)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 person</td>
<td>$49,950</td>
<td>$37,440</td>
<td>$31,200</td>
<td>$18,750</td>
</tr>
<tr>
<td>2 person</td>
<td>$57,050</td>
<td>$42,780</td>
<td>$35,650</td>
<td>$21,400</td>
</tr>
<tr>
<td>3 person</td>
<td>$64,200</td>
<td>$48,120</td>
<td>$40,100</td>
<td>$24,100</td>
</tr>
<tr>
<td>4 person</td>
<td>$71,300</td>
<td>$53,460</td>
<td>$44,550</td>
<td>$26,750</td>
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</table>
FUNDING REQUIREMENTS

New Activity/Fund Request
- No prior funding rules
- Review current funding source

Continuing CDBG Funds
- Same or decreased level of funding
- Same level of service (dollar per client)

CDBG Funds Replace Govt
- City/state funds for activity in prior 12 months
- Increase in level of service
FEDERAL REQUIREMENTS

• Uniform administrative requirements at 2 CFR Part 200
• Section 504: nondiscrimination and accessibility laws for individuals with disabilities
• Title VI of Civil Rights Acts: Language access requirements for Limited English Proficient individuals
• Equal Opportunity: nondiscrimination requirements in employment
• Non-discrimination and Equal Access: prohibition of discrimination and equal access requirements regardless of gender identity
• Fair Housing: fair housing requirements for housing activities
• Environmental Review: conducted by City staff
**APPLICATION TIMELINE**

Program Year 2024: October 1, 2024 – September 30, 2025

<table>
<thead>
<tr>
<th>APRIL</th>
<th>MAY - JUNE</th>
<th>JULY - AUG</th>
<th>SEPTEMBER</th>
<th>OCTOBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application open</td>
<td>Application review and committee recommendations</td>
<td>Preliminary award letters</td>
<td>Subrecipient Agreements executed</td>
<td>Beginning of program year (CDBG funds available)</td>
</tr>
<tr>
<td>Pre-Application Workshop hosted by City staff</td>
<td></td>
<td>Supporting documentation review/requests</td>
<td>Pre-Program Year Training with City staff and indiv. awardees</td>
<td></td>
</tr>
</tbody>
</table>
APPLICATION REQUIRED DOCUMENTS

- Articles of Incorporation & Bylaws
- Nonprofit determination
- Cert. of Good Standing
- UEI and proof of registration
- Liability insurance
- Organizational chart
- List of board of directors
- Authorization to request funds
- Designation of authorized official
- Policies and Procedures
- ADA/Accessibility Policy
- Language Access Policy
- Marketing materials
- Job descriptions + Resumes
- Beneficiary data collection
- Timesheet
- Financial Mngt System
- Financial Statement/Audit
APPLICATION REVIEW PROCESS

Eligibility Analysis
• City staff review each proposed activity to ensure it:
  • Meets a national objective
  • Is an eligible activity
  • Is an eligible cost
  • Meets fund requirements for continuing/expanded activities

Public Services Committee
• Individuals from community stakeholder organizations
  • Public agencies, hospitals, advocacy groups
  • Knowledgeable about community need and resources/funding
  • Not eligible to apply for public services funds
APPLICATION SCORING CRITERIA

• Detail/clarity of proposed activity and use of CDBG funds
• Alignment with City priorities, community need
• Expected outcomes and impact
  • Activities serving more than 51% LMI clients are prioritized
  • Level of service (service ratio)
  • Leveraging of CDBG funds
• Outreach/advertising efforts
• Sustainability/promotion of client stability
• Collaboration with other agencies
• Experience/ability to carry out activity
• Prior compliance and monitoring/audit findings
• Financial stability
AWARD OF FUNDS

• **Preliminary Award Letter** includes amount of award and conditions of commitment:
  - Release of funds by HUD
  - Mayor and Council approval
  - Environmental Review by City

• **Subrecipient Agreement**
  - Terms/requirements of CDBG program and public services
  - Activity description and allowed costs

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**Subrecipient Training**

- Timeline, process, forms, reimbursements, reporting, compliance
- Resources and support
**REQUIRED DOCUMENTS FOR Awardees**

**Applicants selected for award:**

- Section 504 Self-Evaluation
  - In consultation with individuals/organizations representing indiv. with disabilities
- Activity Budget
- Lobbying Certificate
- Hourly Billing Rate form

**New Subrecipients**

- W-9
- ACH form (direct deposit)
REIMBURSEMENTS

- CDBG funds provided on a reimbursement basis
- Draw requests due in Neighborly the 15th of the month for complete prior month
  - i.e., October billing is due November 15
- One pdf containing the City’s required cover sheet and supporting documents
  - **Personnel salaries**: detailed monthly timesheets
  - **Client assistance**: detailed invoice, calculation/tracking of assistance
  - **Rent assistance**: detailed invoice, rent ledger, copy of check(s) and lease
- Changes in staffing/pay rates must be reported/updated using City forms
QUARTERLY REPORTING

- Due in Neighborly by 15th of Jan, Apr, July, Oct
- Unique persons served (nonduplicated)
- Progress on goals
- Technical assistance needs
- Staffing and/or rate changes
- Updated documents

**Required Beneficiary Data**

- Income category
- Race and ethnicity
- Disability status
- Elderly status
- Single-headed household by gender
- Service access type
- Homeless prevention and/or assistance data
Race and Ethnicity

• Best efforts should be made to collect race and ethnicity as self-identified by the client.

• If it cannot be collected, categories may be estimated by observation or using a number proportionate to Boise’s population.

HUD’s Racial Categories

• White
• Black or African American
• Asian
• American Indian/Alaska Native
• Native Hawaiian/Other Pacific Islander
• Multiple/Other
Mid-Year Progress Report

- Reflects first 6 months of program year (Oct – Mar)
- Due April 15
- Progress toward outcomes, staffing/organization updates, challenges, technical assistance/resources needed

Final Report

- Reflects full program year (Oct – Sept)
- Due Oct 15
- Outcomes, lessons learned, organization updates, future plans, success stories
- Activity fund sources
  - Leveraging of CDBG funds reported to HUD
ONGOING COMPLIANCE

• City reviews progress throughout the program year
  • Number of clients served and any level of service requirements
  • Drawdown of CDBG funds

• City may request updated documents during the program year
  • Updated liability insurance
  • Updated UEI registration
  • Section 504 Self-Evaluation

• Technical Assistance
  • City provides support/resources as needed
MONITORING

• City staff monitor activities for compliance with CDBG and City requirements
• Risk Assessment: quantitative assessment at beginning of program year to help determine level of monitoring required
• Desk Review: thorough review of organizational materials, draws, reports, etc.
• Onsite visit: in-depth review of client files, financial processes, policies & procedures, etc.
PUBLIC SERVICES RESOURCES

- Public Services Program website
  https://www.cityofboise.org/public-services
  • Program overview and requirements
  • Public Services Program Guidelines
  • Application Required Document Checklist
  • City forms and templates
  • Links to income guidelines, the City’s HUD-required plans, Public Services Subrecipient File Checklist, guide to Subrecipient’s internal controls/administrative systems, etc.
Questions