



CDBG PUBLIC SERVICES

PY2024 Pre-Application Workshop

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

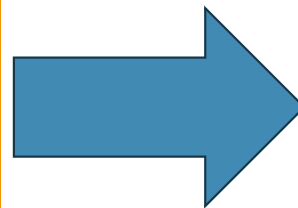
PLANNING PROCESS

- 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 ($\leq 80\%$ 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

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 $\leq 80\%$ 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 = $\leq 30\%$ AMI

Low = 31% to 50% AMI

Moderate = 51% to 80% AMI

Non-LMI = $\geq 81\%$ AMI

2023 INCOME GUIDELINES

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

	Moderate Income (80% of AMI)	Low Income (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 person	\$57,050	\$42,780	\$35,650	\$21,400
3 person	\$64,200	\$48,120	\$40,100	\$24,100
4 person	\$71,300	\$53,460	\$44,550	\$26,750

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

APRIL	MAY – JUNE	JULY - AUG	SEPTEMBER	OCTOBER
Application open	Application review and committee recommendations	Preliminary award letters	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 indiv. awardees	

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

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

QUARTERLY REPORTING CONT.

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

NARRATIVE REPORTING

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