**State of Rhode Island  
PY’20/21 Community Development Block Grant (CDBG)**

**Affordable Housing - Application for Assistance**

Under federal program regulations, only municipalities are eligible CDBG applicants. Only applications with complete Municipal Application Cover Forms will be considered.

**Applicant: ­­­(­City/Town of)­­­­­­­­­­­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Project Name: ­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Total CDBG Funds Requested: $ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

**Citizen Participation:**

Ad Date(s):       Hearing Date(s):

I hereby certify that public hearing(s) duly advertised and convened on the above-listeddate(s) have been completed and that public comments made as the result of this process have been considered in the development of proposals contained in this CDBG application. The content of such hearing(s) included activity-specific information relative to this application in accordance with 24 CFR Part 570.486(a)(6).

I further certify that I am hereby authorized to file this application with the Office of Housing and Community Development, to provide any additional information or documents required by said Office, to make any assurances required in connection with this program, to execute an agreement with the State of Rhode Island and to otherwise act as the Representative of the Municipality in all matters relating to this application and any award which may be based upon this application.

Name:

Title:

Date:

**1. General Developer Information**

Organization/Developer: ­­­­­­­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Ownership entity if different from above: ­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

City/Town: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ State: \_\_\_\_\_\_\_ Zip Code: \_\_\_\_\_\_\_\_\_\_\_\_\_

Tax ID: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Agency DUNS # (required): \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Executive Director: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Telephone: E-mail Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Contact Person:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Telephone: ­­­­­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ E-mail Address: ­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Type of Organization:

Housing developer:  Organization is: non-profit  for-profit

Housing Authority:  Municipality:

Social Service Agency  Other: ­­­­­­­­­­­­­­­­­­­­­­\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**2. Project Location**

Project Name: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Street Address(es)**\*: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

City/Town: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Zip Code: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Plat: \_\_\_\_\_\_\_\_\_\_ Lot(s): \_\_\_\_\_\_\_\_\_\_\_ Census Tract: \_\_\_\_\_\_\_\_\_\_ Block Group: \_\_\_\_\_\_\_\_\_\_

***\*for scattered site developments attach a separate list of addresses.***

**3. Project Involves** *(check all that apply)*

Acquisition  ***if yes, submit a*** [***Voluntary Acquisition Letter***](https://www.hud.gov/sites/documents/1378X32CPDH.PDF)

New Construction  ***if yes, be certain to detail   
 “CDBG-eligibility” in Narrative***

Rehabilitation

Demolition

Relocation  ***if yes, submit a summary of your relocation plan***

Preservation  ***if yes, provide current and proposed information***

Environmental Remediation

Property is: Vacant Land

Existing building  Year built: \_\_\_\_\_\_\_\_ to be demolished?  Property/site is in a 100-year Flood Zone or has Wetlands Yes

***Submit a FEMA flood map for each address (see Application Checklist on pages 8-9). If there are floodplains or wetlands on the site, a HUD 8-Step Process must be conducted in accordance with 24 CFR Part 55 and included in the Environmental Review Record.***

**4. Occupancy and Relocation**

Number of current residential units in building: \_\_\_\_\_\_ Number of commercial spaces: \_\_\_\_\_\_

Is property occupied?  No  Yes

If yes, number of occupied units: \_\_\_\_\_\_\_ Number of operating businesses: \_\_\_\_\_\_\_

Number requiring permanent relocation: households: \_\_\_\_\_\_\_ businesses: \_\_\_\_\_\_\_

Number requiring temporary relocation\*: households: \_\_\_\_\_\_\_ businesses: \_\_\_\_\_\_\_

**5. Total Number of Proposed Residential Units**

Total Number of Units: \_\_\_\_\_\_\_\_ Number of Affordable Units: \_\_\_\_\_\_\_\_

Total building square footage (units and community/commercial): \_\_\_\_\_\_\_\_\_\_\_\_

Total commercial square footage:\_\_\_\_\_\_\_ Total community space square footage:\_\_\_\_\_\_\_\_\_

Total number of on-site parking spaces: \_\_\_\_\_\_\_\_

**This section is required for all proposals. Current (pre-rehab) information must be provided for units improved by Preservation projects. Use a separate sheet to provide post-rehab projections if unit information is expected to change.**

**Rental Proposals**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Rental Unit Summary** | | | | | | | | | | |
| **Number of Bedrooms: SRO, EFF, 1 through 5** | **Number of Baths** | **Unit Sq. Footage** | **Total Number of Units at This Size** | **Number of Units at \_\_\_\_ % AMI** | **Number of Units at \_\_\_\_ % AMI** | **Number of Units at \_\_\_\_ % AMI** | **Operating Subsidy (Yes or No)?** | **Proposed Tenant Paid Utilities (U/A)** | **Proposed Net Rent Per Unit Per Month** | **Proposed Gross Rent Per Unit Per Month** |
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| **Totals:** | | |  |  |  |  |  |  |  |  |

**Homeownership Proposals**

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
| **Homeownership Summary** | | | | | | | |
| **Number of Bedrooms: EFF, 1 through 5** | **Number of Baths** | **Unit Sq. Footage** | **Total Number of Units at This Size** | **Number of Units at \_\_\_\_ % AMI** | **Number of Units at \_\_\_\_ % AMI** | **Number of Units at \_\_\_\_ % AMI** | **Proposed Sales Price** |
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| **Totals:** | | |  |  |  |  |  |

**6. Homeownership with Rental Unit(s)**

Number of rental units: \_\_\_\_ Unit Sq. Footage: \_\_\_\_\_\_\_

**7. Site Control**. ***Attach evidence of site control. See Application Checklist on page 8-9.***

Applicant Owned

P & S Agreement

Option

RIH Land Bank  Purchased with RIH bridge loan? Yes  No

No Site Control

Explanation, if needed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Name of Current Owner: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Address: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Acquisition Cost: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Item** | **Already**  **Obtained** | **Not**  **Needed** | **In Process** | **Expected Date** |
| Zoning Approval |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Planning/Subdivision |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Final Comprehensive Permit |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Building Permits |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| DEM Wetlands |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| DEM Remediation |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| DEM Septic Approval |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| HUD Flood Zone |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| RI Historic Preservation & Heritage Commission |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Phase I Environmental |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_\_ |
| Phase II Environmental |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_ |
| Utility Availability |  |  |  | \_\_\_\_\_\_\_\_\_\_\_\_ |

**8. Project Status. *Attach evidence, if available. See Application Checklist on pages 8-9.***

**9. Project Schedule**

|  |  |
| --- | --- |
| **Benchmark** | **Expected Date** |
| Reservation of all funding acquired |  |
| Date of Closing |  |
| Acquisition of property |  |
| Completion of design/engineering |  |
| Request for Construction/Rehab Bids |  |
| Award of construction contract |  |
| Begin marketing of units |  |
| Start construction |  |
| Construction completion |  |
| Submission of occupant eligibility documentation |  |
| Full Occupancy |  |

**10. Project Details** (*check all that apply).*  ***Do not claim anything that cannot be substantiated.***

*Note – additional detail may be required in Attachments and/or application narrative.*

**Sustainable Design & Accessibility:**

Compact Development  Smart Growth / Walkability

Uses Existing Infrastructure  Public Water  Public Sewer

Brownfield Redevelopment  Historic Preservation

Preserves/Provides Open Space  Percentage of open space provided: \_\_\_\_\_\_

Preserves Agricultural Land  Neighborhood Revitalization

EPA Water Sense Appliances  Energy Star

Universal Design  Green Building

Handicapped Accessible Units  Number of ADA units: \_\_\_\_\_\_\_

**Geographic Diversity:**

Amount of housing stock in city/town considered affordable? \_\_\_\_\_\_%

Provides Transportation Options  within \_\_\_\_\_\_\_\_mile(s)

Access to Employment Centers/Jobs within \_\_\_\_\_\_\_\_mile(s)

Access to Community Services  within \_\_\_\_\_\_\_\_mile(s)

Access to Food and Retail Goods  within \_\_\_\_\_\_\_\_mile(s)

Access to Parks/Recreational Areas  within \_\_\_\_\_\_\_\_mile(s)

Access to High Performing Schools  Please Specify: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Duration of Affordability:** Affordability Period \_\_\_\_\_\_\_ years.

**11**. **Write a concise narrative description of your proposal which includes:**

**Special population(s) to be served: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_**

1. Detailed scope of work. (Preservation: Clearly specify units benefitting from proposed project.)
2. Describe the objectives and beneficiaries of proposal (including location and community impact) and explanation of how your project is consistent with the State Guide Plan, emphasizing Land Use 2025 and the Strategic Housing Plan and the Rhode Island Consolidated Plan.
3. Describe all previous affordable housing projects your organization has produced and identify

all key staff members, partners and development team (e.g., architects, engineers, consultants,

property manager).

**ATTACH AND TAB *IN EXACT ORDER* THE INFORMATION AND/OR**

**DOCUMENTS REQUESTED ON APPLICATION CHECKLIST**

**All applicants must sign the Agreement and Certification.**

**Agreement and Certification**

The undersigned specifically agrees that the funds requested by this application will be secured by a Mortgage and/or Deed Restriction on the property described herein and that The State of Rhode Island Office of Housing and Community Development, its agents, successors and assigns make no representations or warranties, express or implied, to the Applicant regarding the property, the condition of the property or the value of the property.

*I verify that the information in this application is true and correct. I understand that false statements herein are subject to the penalties of Rhode Island Law relating to unsworn falsification to authorities.*

Organization Name:

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Title: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Print or type name

Signature:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Date: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Application Checklist**

**Attach in this order (for all applications)**

Municipal Application Cover (signed and dated)

Application (signed and dated)

Narrative proposal description (Question 11)

Developer Board Resolution authorizing submission

***Tab 1: Financial***

Complete **all** Development Proforma pages/budgets

Evidence of funding reservation(s)

Draft replacement reserve agreement

***Tab 2: Development Team Capacity***

Resumes of all development staff

Architect and Contractor Qualifications (if selected)

Organization’s financial compilation or audit

***Tab 3: Project Status***

Property Deed and legal description of each property

Include Plat, Lot and zip codes for all addresses

Photographs of property

Evidence of site control

Evidence of zoning approval

FEMA Flood Map for each address

***Tab 4: Design & Construction***

Schematic Design and Specs

Detailed construction estimates (rehabilitation budget)

prepared by qualified professionals.

***Tab 5: Unit Marketing and Housing Demand***

Marketing Plan

Waitlist (if applicable)

Market Study/Analysis (if available)

Buyer/Tenant Selection Policy (if applicable)

***Tab 6: Geographic Diversity/Community***

Site location map (also show surrounding area)

***Tab 7: CDBG-Specific Attachments***

Completed Attachments (A through E)

and supporting documentation

***Additional tabs for the following:***

***Acquisition only:***

[Voluntary Acquisition Letter](https://www.hud.gov/sites/documents/1378X32CPDH.PDF) to Seller

Current appraisal

Current tax assessment

***Land Bank Properties only:***

Appraisal at time of Land Bank acquisition

Tax assessment at time of Land Bank acquisition

Itemized breakdown of carrying costs and fees

***Preservation only:***

Site map with building identifiers and unit numbers

***Relocation only:***

Relocation plan that includes household and

unit size and current gross rent, and copies of

GIN sent to tenants, if required.

***Refinance only (CDBG limited to rehabilitation costs):***

Contact OHCD for additional documentation requirements.

**ATTACHMENT A: CDBG ELIGIBILITY & NATIONAL OBJECTIVE**

The applicant must provide a detailed narrative explanation of how the project complies with CDBG requirements regarding Eligibility and National Objective found at 24 CFR Part 570.

**Eligibility:**

The community MUST detail the [HCDA Citation](https://www.hudexchange.info/onecpd/assets/File/CDBG-State-National-Objectives-Eligible-Activities-Appendix-A.pdf) and address every component of eligibility as necessary to be considered. Failure to adequately address this requirement will result in the denial of the proposal.

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Note: If project is “New Construction”, assure narrative explains how CDBG funds are eligible (since New Construction is generally ineligible under CDBG regulations). Please refer to notices/guidance linked to this application or contact OHCD staff for more information.

**National Objective:**

The community MUST detail how the project will demonstrate compliance with [CDBG national objective requirements](https://www.hudexchange.info/onecpd/assets/File/Basically-CDBG-State-Chapter-3-Nat-Obj.pdf). The specific regulatory citation(s) should be referenced in the narrative. Any forms/procedures used to document compliance should be attached.

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**ATTACHMENT B: CDBG NECESSARY AND REASONABLE**

ATTACH DOCUMENTATION DEMONSTRATING COMPLIANCE WITH HUD “NECESSARY & REASONABLE” REQUIREMENTS

CDBG funds may only be used in projects where individual line items, including acquisition, can all be shown to be “necessary and reasonable,” and consistent with industry norms. In order to document costs incurred are “necessary and reasonable” in accordance with federal regulations, the State is advising communities to do the following on each application:

For Rehabilitation - A pre-inspection and cost estimate should be developed prior to obtaining any bids on a proposed project. The bids received should be compared to the cost estimation with any significant variances explained in writing. The pre-inspection should comprehensively document the conditions of the structure and, whenever possible, collect photographic/other evidence supporting the necessity of the improvements.

For “New Construction” – A comparison of costs in the development budget to industry norms. Comparison of Total Development Costs to those typical of projects of similar size/scope. Comparison of total costs to price of comparable unit on market.

For Acquisition – A current appraisal by a qualified appraiser, with “as is” value. For land bank properties, an appraisal from the land bank purchase, as well as documented carrying costs (e.g. tax and insurance bills). A comparison of any fees and/or interest charges to industry norms.

For Preservation – CDBG funds may generally only be used for rehabilitation expenses. However, all project costs must be documented as “necessary and reasonable” to meet federal underwriting requirements.

Additional Narrative (if necessary):

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**ATTACHMENT C: Developer Financial Capacity Self-Assessment**

Applicant shall provide: 1) Audited financials for last 2 fiscal years

2) REO schedule (if rental development proposal)

Financial Stability

Yes No

□ □ Does the current balance sheet and budget indicate sufficient funds to support essential operations of the organization during development through completion (occupancy or sale)?

**□ □** Is there any aspect of the organization’s financial condition that would indicate any adverse conditions that might materially impair the organization’s ability to successfully meet their obligations during the construction completion and stabilization of the project?

Liquidity

Yes No

**□ □** Are there sufficient liquid assets available to cover current expenses?

**□ □** Does the organization have access to lines of credit?

**□ □** Does the organization have (or have access to) adequate resources available for pre-development expenses (if applicable)

Financial Management

Yes No

**□ □** Does the organization conduct an annual audit? Is the most recent audit current?

**□ □** Were there any findings in the last two years? Were the findings resolved?

**□ □** Does the organization have a conflict of interest policy governing employees and development activities, particularly in procurement of contract services and the award of housing units for occupancy?

**□ □** Does the organization maintain adequate insurance – liability, fidelity bond, workers comp, property hazard and project?

Portfolio Financial Condition (applicable for Rental Development proposals)

Yes No

**□ □** Are properties within the organization’s portfolio in stable physical and financial condition?

**□ □** If there are any significant problems within developments, has the organization be proactive in addressing them?

**ATTACHMENT D: Development/Management Team Capacity Worksheet**

1. List all projects applicant organization has completed (project is in operation; development file is closed) in the last ten years using the CDBG program (or similar program). If necessary, include additional pages.

None

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Project Name** | **City** | **Number of Units** | **Rental/HO** | **AMI Target** | **Special Needs (Y/N)** | **Total**  **Development Cost** |
|  |  |  |  |  |  |  |
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1. List all housing projects currently under development, including those utilizing CDBG funds. Note: If the development file has not yet been closed, than the project is considered still under development.

None

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Project Name** | **City** | **No. of Units** | **Rental/**  **HO,**  **AMI Target** | **LIHTC (Y/N)** | **Major Funding Sources** | **Est.**  **Complete**  **Date** |
|  |  |  |  |  |  |  |
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1. For the proposed project, list below the names of agency staff members or the third-party firm assigned to each task. Please include resumes for each individual listed. Property management team is required for rental proposals only.

|  |  |  |
| --- | --- | --- |
| **Position Name** | **Staff Person Name or**  **Contracted Firm Name** | **Years of Experience** |
| Executive Director |  |  |
| Development Staff |  |  |
| Development Staff |  |  |
| Development Consultant |  |  |
| Architect |  |  |
| Engineer |  |  |
| Construction Manager |  |  |
| Property Manager |  |  |
| Compliance Manager |  |  |
| Other |  |  |
| Other |  |  |
| Other |  |  |

1. Describe applicant’s experience leading construction development of projects of similar (or larger) size and scope.
   1. If applicant’s experience is limited, discuss whether you will partner with an appropriate party to mitigate this concern.
2. If applicant has applied for multiple projects in the same funding round, explain how the development team has the capacity to administratively and financially support all projects simultaneously.

If applicant is requesting CDBG funding for a homeownership proposal, then the following questions should be answered as it relates to completed Homeownership Developments with prior CDBG funding

1. Are any completed homeownership units still unsold? (more than 9 months post completion)

If applicant is requesting CDBG funding for a rental proposal, then the following questions should be answered as it relates to completed Rental Developments with prior CDBG funding

1. Have there been significant compliance issues in the past year in the applicant’s rental developments?
2. Have issues been resolved as of the time of application to CDBG funding?
3. What was the nature of the significant compliance issue (s)?
4. Does the property management company provide timely responses to reporting requirements or requests for follow-up documentation or clarification requests?
5. If there have been issue with property management response time or lack of response, has the applicant been responsive in seeking a resolution upon notification of the deficiency? Has the applicant implemented policies to improve responsiveness/response time?

*Additional questions for the Administrative Agent to consider:*

1. *Has the applicant failed to follow through with representations made at the time of application on previously funded CDBG projects where points were awarded that resulted in the project being funded, and had that element not been included they would not have received funding?*
2. *Has the applicant failed to meet important development/construction deadlines on previously funded CDBG projects? Why?*