Application Frequently Asked Questions

1. How do I tell if my community/organization is a registered user of eCivis?

The CDBG Team does not have access to registered users in eCivis. Please contact the GMS team \underline{here} .

2. Are infrastructure projects prioritized separately from service projects? Facility/improvement/infrastructure projects and essential/public service proposals are grouped separately and scored against each other.

3. Only the budget forms are on the Grants Management page. Where are the competitive activity forms?

Contact <u>Submit a User Support Ticket - Grants Management | Rhode Island</u> (ri.gov).

4. How can we use Program Income?

Communities are allowed to retain CDBG-generated program income "for the same purposes from which it was generated". The regulations, however, allow the States to define "same purposes" (For instance, we could say it can only be used for other rehabilitation... or we could say it can be used for other CDBG activities). In general, our policy is that communities can retain and use it for the same activity (to continue the CDBG rehabilitation program) without amendment. If the community wishes to use it on another activity, they must submit a detailed request to RI Department of Housing outlining the new use. It should be noted that CDBG PI must comply with all the same rules as the initial CDBG funds, including National Objective (income eligibility/etc.)

5. Does the public comment period for CDBG have to start the day of/day after the hearing or can the public comment period start the day of/day after it is advertised in the paper?

Below is the regulatory reference to the citizens participation/public hearing requirements. There is any specific requirement as to when the public comment period must occur, provided sufficient time is provided to the public to comment and for comments to be considered/responded to. Therefore, the community can start the comment period the day of/day after (or even before) the hearing.

§ 570.486 Local government requirements.

(a) Citizen participation requirements of a unit of general local government. Each unit of general local government shall meet the following requirements as required by the state at \S <u>91.115(e)</u> of this title.

(1) Provide for and encourage <u>citizen participation</u>, particularly by low and moderate <u>income</u> persons who reside in slum or blighted areas and areas in which <u>CDBG</u> <u>funds</u> are proposed to be used;

(2) Ensure that residents will be given reasonable and timely access to local meetings, consistent with accessibility and reasonable accommodation requirements in accordance with section 504 of the <u>Rehabilitation Act of 1973</u> and the regulations at <u>24 CFR part 8</u>, and the Americans with Disabilities <u>Act</u> and the regulations at <u>28 CFR parts <u>35</u> and <u>36</u>, as applicable, as well as information and records relating to the unit of local government's proposed and actual use of <u>CDBG funds</u>;</u>

(3) Furnish citizens information, including but not limited to:

(i) The amount of <u>CDBG funds</u> expected to be made available for the current fiscal year (including the grant and anticipated program income);

(ii) The range of activities that may be undertaken with the <u>CDBG funds;</u>

(iii) The estimated amount of the <u>CDBG funds</u> proposed to be used for activities that will meet the national objective of benefit to low and moderate <u>income</u> persons; and

(iv) The proposed CDBG activities likely to result in displacement and the unit of general local government's antidisplacement and relocation plans required under <u>§ 570.488</u>.

(4) Provide technical assistance to groups that are representative of persons of low- and moderate-income that request assistance in developing proposals (including proposed strategies and actions to affirmatively further fair housing) in accordance with the procedures developed by the State. Such assistance need not include providing funds to such groups;

(5) Provide for a minimum of two public hearings, each at a different stage of the program, for the purpose of obtaining residents' views and responding to proposals and questions. Together the hearings must cover community development and housing needs (including affirmatively furthering fair housing), development of proposed activities, and a review of program performance. The public hearings to cover community development and housing needs must be held before submission of an application to the State. There must be reasonable notice of the hearings and they must be held at times and accessible locations convenient to potential or actual beneficiaries, with accommodations for persons with disabilities. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate;

(6) Provide citizens with reasonable advance notice of, and opportunity to comment on, proposed activities in an application to the state and, for grants already made, activities which are proposed to be added, deleted or substantially changed from the unit of general local government's application to the state. Substantially changed means changes made in terms of purpose, scope, location or beneficiaries as defined by criteria established by the state.
(7) Provide citizens the address, phone number, and times for submitting complaints and grievances, and provide timely written answers to written complaints and grievances, within 15 working days where practicable.

6. The handbook states: "No community may apply for more than two public service activities, unless the community has an Assignment from another community." Workshop slideshow, slide 8, says: "Essential Services- Up to 4 proposals."

Can you clarify how many activities we can apply for?

According to the handbook, each community may apply for up to 2 public/essential service activities. Multiple communities may collaborate and share application caps – For example, two communities working together could apply for a cumulative total of 4 service activities (in a single or multiple applications).

7. How are the Low/Moderate income streets or neighborhoods that would qualify for CDBG funding and other grant opportunities identified?

Communities may use HUD's Low/Moderate Income Summary Data Tables to identify predominately LMI census tracts/block groups. Applicants are reminded they must identify the full service area for a proposed activity and assess/document the income characteristics of that entire area. Communities may also conduct surveys if the area's boundaries are not consistent with CT/BG areas.

https://www.hudexchange.info/programs/acs-low-mod-summary-data/acs-low-mod-summarydata-summarized-block-groups/

8. If an activity is regional and serves several communities what Congressional District should be used, should both districts be listed?

RI has 2 congressional districts 1 & 2. The applicant will detail the congressional district that the facility or service is located in.

9. Is the Primary Performance place of address the main office address or each address that's being served?

The Primary Performance address is where the service or facility is located.

10. Letters of support were not required in the past, do applicants need to provide letters of support for all activities?

Letters of support are optional.

11. This municipality is applying for an Affordable Housing grant and our first hearing for PY 22 was held in May. We're planning on the second hearing on July 19 with the specific Competitive grant requests. Do we need to hold a second hearing specific to this grant request, saying the Town is applying for X dollars for this specific affordable housing project?

Applicants should consult regulation 24CFR 570.486 and the CDBG Application Handbook (Section IV) for detail on what content must be provided at each public hearing. Hearing notices should detail the content of the hearing. Applicants may coordinate public hearings.

12. This municipality received CDBG funds for an activity in the last round of competitive grants. It has become apparent that this activity will require more funds to complete. Can this municipality

apply for further funding during the PY22 competitive round to supplement this gap to complete this activity?

Yes, a municipality may apply for funding in consecutive years for an activity provided that the request does not exceed the maximum funding limits during any Program Year.

13. There's mention of a "community development certification form" that can be attached but we're not seeing one in the portal for use.

"Community Development Certification Form" was added to the Solicitation under "Files" tab.

14. Is there a separate administrative application?

No, once all of the grants are awarded, administration is calculated by the CDBG staff and added to the contract.

15. With respect to subrecipient applications, does the person entering the activity on behalf of the community sign the Grants Management System User Certifications and Assurances form? Does the CEO of the municipality sign the other General Certifications and Assurances form?

The Authorized Representative General Certifications and Assurances Form is to be completed by a person with legal authority to sign documents; for example, Mayor, Town manager, etc. The Grants Management System User Certifications and Assurances is to be completed by the person submitting the application. The GMS User is identified on the Authorized Representative General Certifications and Assurances Form.

16. Can two subrecipient agencies combine on a single public services grant request?

No, if two services are provided by one agency one agency, this can be a single activity. Different agencies in different locations cannot combine into single activity.

17. We were under the impression that we could apply for up to 4 public service activities after the workshop last month. Can a municipality apply for up to 4 public service activities?

Municipalities can only apply for 2 public service activities in a competitive cycle unless the community receives an assignment of public service activity from another community.

18. The application asks for a "Voluntary Acquisition Letter" if the project involves acquisition. The letter template, which is linked in the Word version of the application, is attached and does not appear applicable. The subrecipient has a purchase agreement with the owner. Is the "Voluntary Acquisition Letter" is still needed.

Communities are advised to attach all required URA notices.

19. In the competitive application (updated) under application submission there a place to insert an activity budget form. Once created there is a space to enter budget and goals. The question is would the city/town submit a complete budget with all activities in the profile and then set up individual budgets for each activity?

Select a file Activity Budget DDBC Competitive Application Budget Form* Select a file Complete the online budget section of the application and complete and upload the appropriate tab of the CDBG Competitive Application Budget Form. The Excel form enables you to provide detail on other sources of funds. Financial Feasibility: Explain the basis for cost estimates and sources of funding. Attach cost estimates, engineering studies, recent operating budgets, etc. to verify costs. Detail all other resources that have been sought and/or received in support of the proposed activity. Attach funding commitment/denial letters from other sources and list all proposed sources of funding and approximate dates funding will be available. Be sure to specify how the CDBG funds will be used. Financial Feasibility *							
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Budgets are entered per activity; each project has its own budget. Please refer to <u>RI Specific-How to Submit an Application Document</u>.

20. This community is seeking information to get a third project (public service activity) covered. What is the procedure for two communities to apply for a consolidated activity?

If two communities are planning on a consolidated activity, the community giving up their activity-cap (providing an activity allotment) must provide a formal communication (letter or form) stating this. The Recipient community includes the letter with their application and assumes administration of the activity.

21. How does a community best account for the number of beneficiaries for a project to eliminate accessibility barriers to the handicapped (e.g., handicapped ramp for a Town Hall)?

Here are two resources where census information can be found: <u>American Community Survey</u> <u>United States Census</u>

22. The "Current Funding Opportunities" page includes files for the Competitive Application. One file called "App and Profile Blank" requests some identical information as the Portal application and some information that is completely different. Does this form need to be completed? If so, there does not appear to be a specific place to upload it.

The "Application and Profile blank" form was provided for viewing purposes. The applicant does not need to fill this out and complete it.

The "Generic cdbg-competitive-application" form was provided as a reference for the applicant to use with their subrecipients. The applicant does not need to fill this out.

23. Tucked at the very bottom of the main application page is a section called Budget and Goals. Is the Goals section to be completed for both public facilities projects and programs by entering presumed beneficiaries? The instructions in "How to Submit an Application" suggest this information is only for programs: "Some programs may have Goals built into their applications" (page 15)

All activities, public facilities and services, require goals to be entered in the application. These goals will likely be the anticipated beneficiaries.

24. With the Excel budget forms – Since we are uploading a form for each application, should we delete sheets in the workbook that are not applicable to the proposed project/activity? Or, should we leave the form as-is. E.g. If the application is for a Public Service activity, should I delete the empty Public Facility and Planning sheets?

It is not necessary to delete sheets which are not applicable to the requested activity.