

Remember to





Office of Housing and Urban Improvement

OHUI Staff Introductions

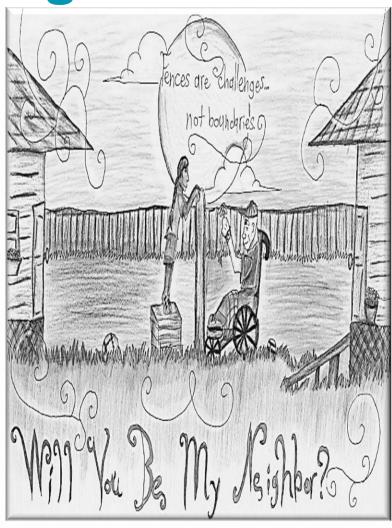
- Miriam Carrillo, OHUI Director
- Alexander Goldstein, Program Compliance Manager
- Vince Wooten, CD Specialist
- Muhammad Hashmi, Accountant
- Salvatore Reginello, Housing Inspector
- JoAnn Martin-Onesky, Housing Specialist
- Angela Bowen, Housing Specialist
- Maria Claudia Goncalves, CD Specialist Housing
- Winsome Baker, Office Assistant I

Applicant Introductions

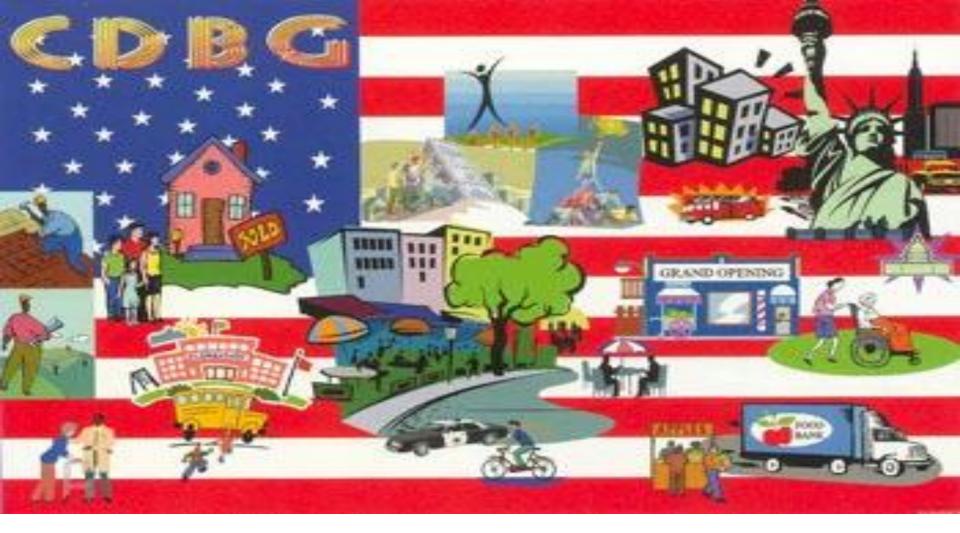
- Name
- Agency
- Your Agency and Services



Agenda



- NEW online application process
- CDBG program overview
- National objectives
- Eligible activities
- Other federal requirements
- Preparing a winning proposal
- Questions & Answers



CDBG Program Overview

What is a Community Development Block Grant?

Federal entitlement program under the Department of Housing and Urban Development (HUD) that provides annual grants on a formal basis to entitlement cities and counties to develop viable urban communities by:

- Providing decent housing
- Providing a suitable living environment
- Expanding economic opportunities

Principally for low-and moderate-income persons



Establishing Legislation

- Authorized under Title I of the Housing and Community Development Act of 1974
- Combined a number of existing community development programs into one funding source
- Provided for increased flexibility for local governments
- Regulations located at 24 CFR Part 570

City of Pompano Beach

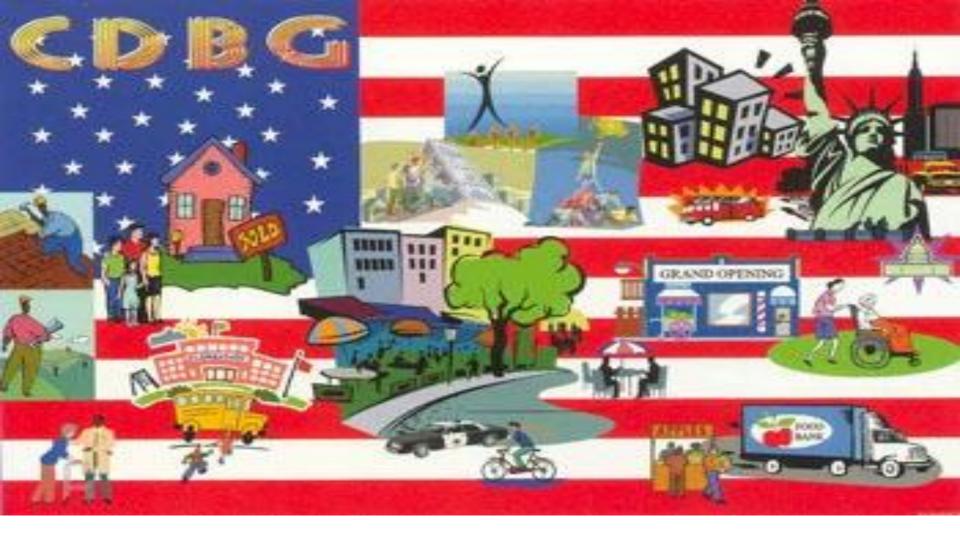
- Is an entitlement Community
 - The City of Pompano Beach expects to receive \$1,007,279 in CDBG for FY 2019-2020.
 - Approximately \$151,091 for public services
 - Approximately \$856,182 for other eligible activities including owner occupied rehabilitation administered by OHUI
- 2020-2021 Fiscal year starts October 1 and ends September 30



Consolidated Plan, Action Plan & CAPER

What does this mean to you?

- Funding from HUD is provided according to an adopted plan.
- Projects and activities must meet HUD National Objectives and goals/objectives established in the City's Consolidated Plan.
- Many strings attached.
- HUD Money=HUD Rules.



Three National Objectives

National Objectives

Each eligible activity must meet one of three national objectives:

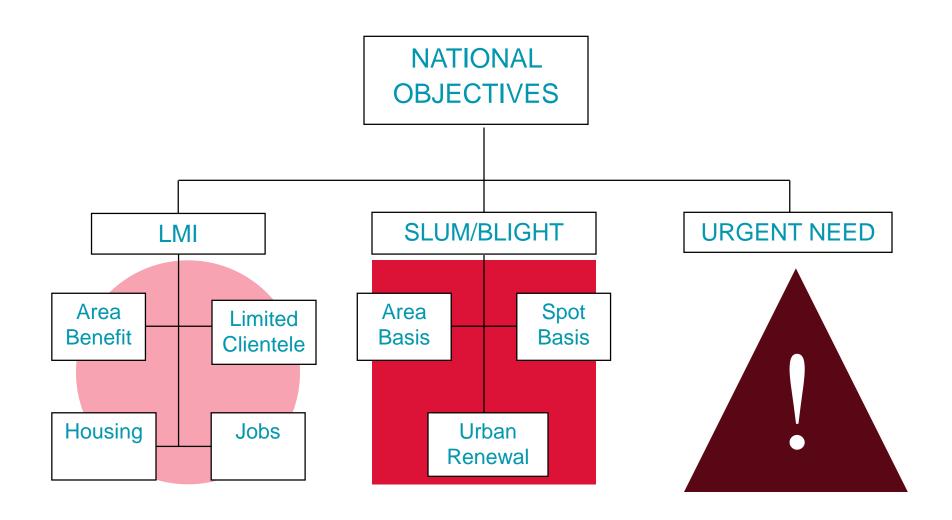
- Aid in the prevention of slum and blight
- Meet an Urgent Need
- Benefit low- and moderate- income persons

Regulations at 24 CFR part 570

https://www.hudexchange.info/resources/documents/CDBG_Guide_National_Objectives_Eligible_Activities.pdf

National Objectives

- Some activities qualify under more than one national objective
- Rule of thumb, choose the one that is easiest to document





Slum & Blight

- Slum & Blight objective is divided into two categories
 - Area Basis; addressing conditions in an entire area
 - Spot Basis; addressing conditions with a single structure or location
- Regulations located at 24 CFR §§570.208(b)



Aid in the Prevention of Slum and Blight

Typical activities designed to address blight on an area basis include these examples, when assistance is designed to address one or more of the specific conditions which originally qualified the area:

- Acquisition and clearance of blighted properties,
- Installation of a park or playground,
- Commercial revitalization through façade improvements, and
- Treatment of toxic materials on property to enable it to be redeveloped for a specific use



Urgent Need

- Used to address emergency situations
- To meet the urgent need test:
 - Existing conditions pose serious and immediate threat to the health/welfare of the community
 - Existing conditions are recent (18 months) or recently became urgent
 - Recipient cannot finance on its own
 - Other funding sources are not available



Urgent Need

Example:

A major catastrophe such as a flood or hurricane that threatens the community's residents with the spread of serious disease. The community's other resources may well be depleted and other Federal programs may not be sufficient to cover all the costs.



National Objective: LMI

- There are 4 ways an activity can satisfy the LMI national objective:
 - Area benefit
 - Limited clientele
 - Job creation or retention
 - Housing
- Regulations located at §570.208(a)(1-4)

Benefit to Low- and Moderate- Income Persons or Households

Area Benefit:

- Activity must benefit all residents in an area where at least 51% of the residents are Low- and/or Moderate income
- The service area must be clearly delineated by OHUI and must be primarily residential

Benefit to Low- and Moderate- Income Persons or Households

Examples:

- Water and Sewer lines
- Libraries, Neighborhood and Community Centers
- Parks, Street Improvements, and Sidewalks*
- * Primarily CDBG General Capital Improvement Projects

Ineligible Activities

- Maintenance and repair of public facilities
 - Exception: modification for ADA compliance
- Operating costs
 - Exception: costs related to CDBG public service activity
- Buildings for general conduct of government
 - Exception: modification for ADA compliance
- General government expenses i.e. trash pickup or equipment purchase
- Political activities



Limited Clientele

Clientele presumed by HUD to be principally low- to moderate- income persons



LMI Limited Clientele

- LMI Limited Clientele activities benefit special populations (senior citizens, homeless shelters, disabled adults)
- Activities must meet one of four requirements
 - Benefit to clientele who are presumed to be principally LMI
 - Requires information that demonstrates 51% of participants are LMI
 - Participation limited to LMI only
 - Nature and location indicate activity's clientele will primarily be LMI persons.



LMI Limited Clientele

Limited Clientele Groups Include:

- Abused children;
- Battered spouses;
- Severely disabled adults;
- Homeless persons;
- Illiterate adults;
- Migrant farm workers;
- Elderly persons;
- Persons living with AIDS; and
- Programs with eligibility requirements that limit the benefits of an activity to LMI persons.

Job Creation



Job Creation & Retention

Activities related to economic opportunity

- Typical activities: business loans, commercial rehabilitation, infrastructure to a business
- In order to meet this criteria, activities must create or retain permanent jobs.

AND

- 51% of the jobs created/retained must be available to or held by LMI persons
- Jobs are counted on full time equivalent (FTE) basis



Public Services





Eligibility Requirements

To utilize CDBG funds for a public service, the service must be either:

- A new service or
- A quantifiable increase in the level of an existing service

Public Services Cap

- Public Services funds are capped at 15% of the annual CDBG Allocation for the City of Pompano Beach estimated at \$1,007,279
 - Approximately \$151,091 this year for public services.
- Certain project/activities may be funded with other funds or be eligible under another area

Eligible Public Service Activities

Activities related to **public services** include but are not limited to:

- Services for child care, youth development and for seniors
- Health care, including substance abuse counseling and treatment
- Education and training programs
- Public safety and recreation services
- Fair Housing activities
- Services for homeless persons
- Programs for energy conservation

CDBG Eligible Activities

- Public Service Costs
 - Labor, supplies, and materials directly related to the provision of eligible services
 - CDBG may pay for operations and maintenance of facility where service occurs
 - Costs must be documented



Ineligible Public Service Activities

- Income Payments
- Political Activities
- Religious Activities
- Beneficiaries who do not meet income limits
- Beneficiaries who are not residents of Pompano Beach

LMI Housing

- Acquisition, rehabilitation, improvements to permanent residential structure
- Owner or renter occupied
- Purchase assistance



LMI Direct Benefit

- Determination of LMI status is based on the Department of Housing and Urban Development Section 8 Annual Income (24 CFR Part 5) Limits
- LMI is 80% or less of Area Median Income:
 - 0-30% Extremely Low Income
 - 30-50% Very Low Income
 - 50-80% Low Income
- OHUI is required to report beneficiaries from all 3 categories to HUD



LMI Direct Benefit

- To qualify a Housing project using LMI Direct Benefit, structures must be occupied by LMI households
 - Income documentation required from homeowner/household
- Typical activities include homeowner rehab, rental acquisition/rehab, emergency home repair, homebuyer assistance

Eligible Income Levels

Income Level	% of AMI	Annual Household Income	Number of Persons in Household
Very Low	50% or Below	\$29,500	1 Person
		\$55,600	8 Persons
Low	80% or Below	\$47,150	1 Person
		\$88,950	8 Persons

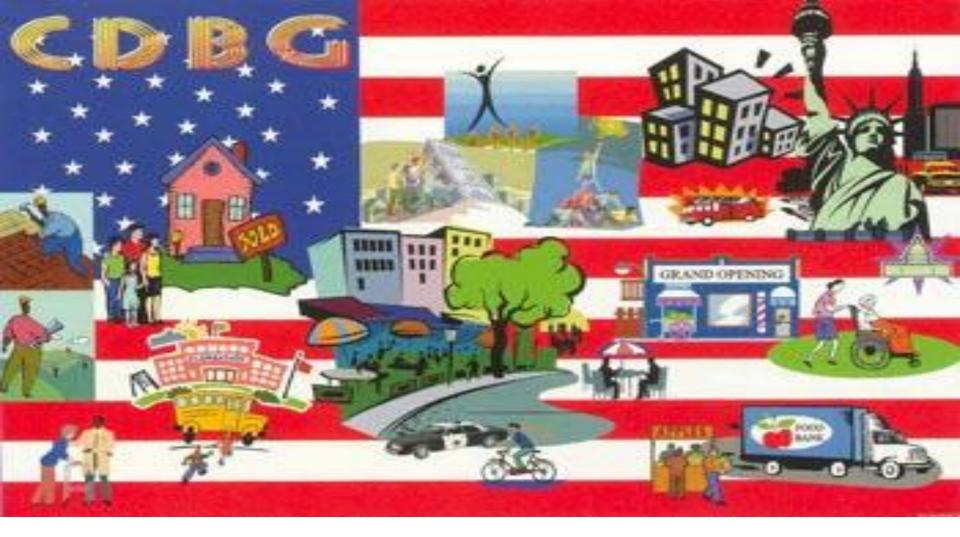
2019 Median Family Income (MFI) in Broward County is \$68,600

Data is subject to change

Sources and Resources:

U.S. Dept. of Housing and Urban Development

https://www.huduser.gov/portal/datasets/il/il2019/2019summary.odn



Additional Requirements

Other Eligibility Considerations

- Applicant's Capacity
 - Administrative/Staffing
 - Financial/Accounting
 - Program/Project Management
 - Grant Management Experience
 - Past Performance
 - Recordkeeping/Reporting
 - Commitment to Timeliness
 - On-going Commitment to Compliance





Timeliness

- HUD Requirements;
- Grantee Responsibilities;
- Subrecipient Responsibilities:
 - Spend all granted funds within 12 months
 - How can un-timeliness be prevented?



https://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12898.pdf



Things to Remember...

- CDBG funds are not your agency's money, it is HUD's money provided to the City.
- These funds can only be used on a reimbursement basis. No payments are made until after approved cost is incurred.
- Prior cost to grant award will not be reimbursed.
- The process you use to obtain service/product is as important as the service/product itself when it comes to determining what is a reimbursable expense.
- Never assume, you can always check before you act.



Important Do's and Don'ts

DO:

- Read the CON PLAN and understand community priorities.
- Read the HUD training manual "playing by the rules".
- Consider cost-benefit and cost effectiveness.
- Consider if your clients are willing to provide personal information for participation.



Important Do's and Don'ts

DO NOT

- Consider CDBG funding as sole source of funding for your project/program.
- Aggregate multiple programs on a single application.
- Underestimate your burdens and overhead cost.
- Exaggerate need or urgency.
- Assume funds will be available in subsequent years for multi-year projects.



Important Program Duties

- Fair Housing
- Section 3 employment
- Conflict of interest
- Record Keeping and Retention
- Financial Management
- Activity Close-Out (reporting beneficiary data)

What is Fair Housing?

The right to live anywhere you choose and that you can afford

 Based on the constitutional principles of equal access and due process



Discriminatory Practices

An individual or class of individuals in a specific protected class is treated differently than others when the result of that action denies equal access to a housing opportunity.



Requirements

- Analyze and eliminate discrimination
- Promote fair housing choice
- Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and/or national origin
- Promote housing that is accessible and usable by all persons, particularly persons with disabilities

Requirements

- Foster compliance with the nondiscrimination provisions of the Fair Housing Act.
- Make reasonable efforts to provide language assistance to ensure meaningful access for Limited English Proficiency (LEP) persons to the recipient's programs and activities.

Additional Protected Classes

Broward County

- Marital status
- Age
- Sexual orientation
- Gender expression
- Pregnancy
- Political affiliation



Fair Housing Suggestions

Be professional Employee training Reasonable standards Fair treatment Consistency Communication

More Suggestions

- Offer applications to every prospect
- Handle problems and complaints in a timely manner
- Periodically review policies and procedures to allow for changes in federal, state or local laws
- Use affirmative advertising
- Keep good records 4 years at least

Equal Opportunity: What is Section 3?

- Section 3 is a provision of the HUD Act of 1968
- Goal & Purpose:
 - to ensure that when employment or contracting opportunities are generated that these opportunities will be given to <u>low-income individuals</u> or <u>businesses</u> residing in the community where the project is located

When is Section 3 Triggered

- The grantee receives more than \$200,000 in grant funds, and invests any amount of these funds to carry out new construction or rehabilitation activity.
- The PJ/grantee or subrecipient that receives over \$200,000.
- A contractor/subcontractor of a project receives a contract for \$100,000 or more in grant assistance.

Documentation of Section 3 Resident

- A person seeking the training and employment preference provided by
- Section 3 bears the responsibility of providing evidence (if requested) that
- the person is eligible for the preference
- Acceptable documentation to determine eligibility as a Section 3 resident
- includes:
 - proof of residency in a public housing development;
 - evidence of participation in a HUD Youthbuild program operated in the metropolitan are (or non-metropolitan county) where the Section 3 covered assistance is spent;
 - evidence that the individual resides in the Section 3 area and is a low or very low-income person, as defined in Section 3(b) (2) of the U.S. Housing Act of 1937 (1937 Act)



Conflict of Interest 24 CFR § 570.611

- Conflicts of interest arise when officials or staff stand to benefit--either directly themselves or indirectly through business partners or relatives-from the awarding or contracting of grant funds.
- In general, conflicts of interest occur when one's private interest and public duties overlap, resulting in a real or perceived lack of independence or impartiality.

https://www.hudexchange.info/resources/documents/HUD-Integrity-Bulletin-Conflicts-of-Interest.pdf

Federal Conflict of Interest Law

The law at 24 CFR 570.611 is intended to protect the reputation of the CDBG program from even the appearance of providing special treatment or serving a special interest.

Common cituations include:

Common situations include.
☐ Elected officials voting on awarding of funds to organizations where a family member is on the staff or where the elected official is on the subrecipient's board;
☐ Executive directors of subrecipients entering into contracts with companies they are affiliated with through employment of, or ownership by, themselves or their relatives;
☐ Grantee officials or staff who have relatives who may benefit from a subrecipient's programmatic activities; and
 Failure to notify the U.S. Department of Housing and Urban Development (HUD) about conflicts of interest, or late and or incomplete requests for exceptions.

Persons Covered

Persons covered include any person who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of subrecipients that are receiving funds.

ALERT: Check State and local laws!



Procurement

In the procurement of supplies, equipment, construction, and services by recipients and by subrecipients, the conflict of interest provisions in 24 CFR 85.36 and 24 CFR 84.42, respectively, shall apply.

Key point – ALL other Conflicts of Interest are NON-PROCUREMENT

No persons who exercise or have exercised any functions or responsibilities with respect to CDBG activities assisted under this part, or who are in a position to participate in a decision-making process or gain inside information with regard to such activities, **may obtain a financial interest or** benefit from a CDBG-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

Record Keeping

Establish and Maintain:

- Administrative records
- Financial records, and
- Project/case files

Retain records for four years after annual project activities have been completed under the CDBG regulations

State of Florida requires 5 years

Program Monitoring

The primary mission of monitoring is to ensure that organizations are:

- In compliance with all regulations governing their administrative, financial, and programmatic operations; and
- Achieving their performance objectives within the schedule and budget, as outlined in the MOU or agreement.

Program Monitoring

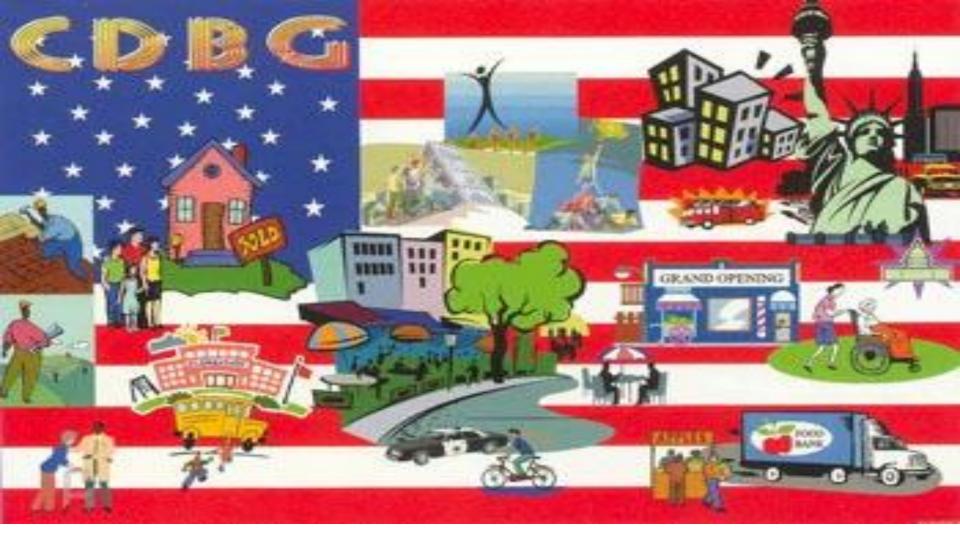
Provide access to all files & records to:

- OHUI
- HUD
- Comptroller General's Office of the US
- Other authorized governmental agencies

Florida Public Records Law Chapter 119: All records are public records

http://www.leg.state.fl.us/Statutes/index.cfm?App_mode=Display_Statute&URL= 0100-0199/0119/0119.html





Preparing A Winning Proposal

How Do We Participate?

Applications for:

- Housing
- Public Facilities and Public Improvements
- Public Service

Scoring of Applications Maximum of 110 points

Local Support/Leveraging 30 Points Maximum

Quality/Cost Effectiveness 30 Points Maximum

Experience/Community Support 20 Points Maximum

Prior Spending Experience
 20 Points Maximum

Bonus Points
 10 Points Maximum

Local Support/Leveraging 30 Points Maximum

Ability to leverage CDBG funds through matching funding sources from other agencies, grants, private funds or infusion of the organizations own funds evidenced.

Percentage of budget funded with CDBG:

- 100% 0 points
- 75% 99% 5 points
- 50% 74% 10 points
- 26% 49% 15 points
- 25% or less 30 points



Quality/Cost Effectiveness 30 Points Maximum

- Design of the program provides maximum benefit for clients to be served. Program or enhancements that do not duplicate an existing service/program/activity.
- Activities that provide a new or quantifiable increase in a general service program, transportation services, and substance abuse services, employment training, youth programs, the elderly, etc. (low/mod or limited clientele benefit)

Experience/Community Support 20 Points Maximum

Ability to manage the project if funded; areas to consider are staff capabilities, other available resources, organizations years of experience, leadership, management history and support letters from community.

Prior Spending Experience 20 Points Maximum

Expended 100% of funds awarded – 20 points
Expended 75% of funds awarded – 15 points
Expended funds in a timely manner – 10 points
Did not spend funds in time awarded – 0 points
First Time Applicant – No project in last fiscal year – 5 points

Bonus Points 10 Points Maximum

Uniqueness of project – are there other programs available to the community similar to this project?

Link to access the online application

https://portal.neighborlysoftware.com/copbfl/Parti

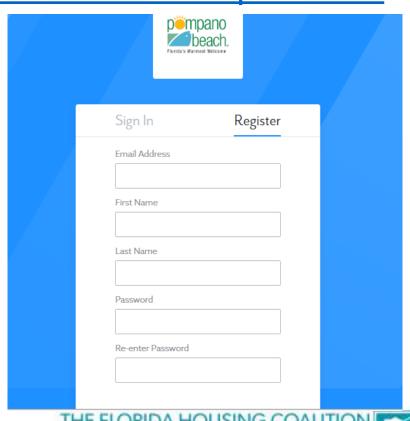
cipant/Login

Password Minimum of characters

1 capital letter

1 Number

1 symbol



THE FLORIDA HOUSING COALITION



On line application

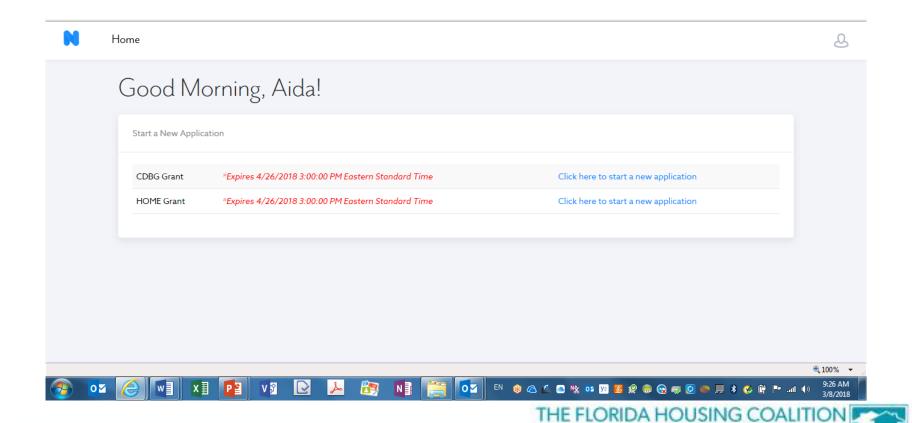
- You can submit more than 1 application under your user name and password, but you must complete and submit 1 application before you can open a new application.
- You can work on the application and save the data and go back to complete and submit the application at a later time.

Deadline

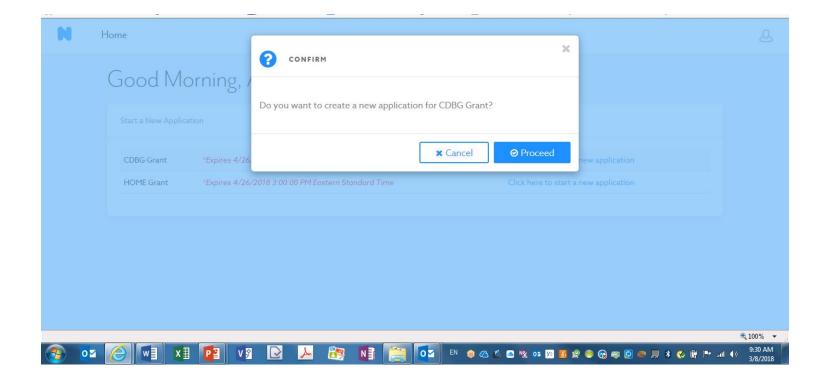
- All application must be submitted by 3:00 PM on -----, 2020.
- After 3:00 pm the application portal will be closed.



Welcome Screen

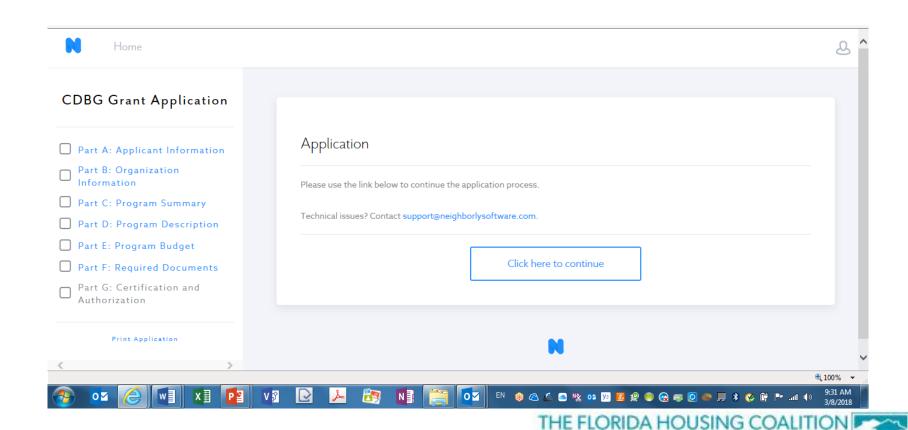


Click proceed to start application





The application has several parts



Technical issues?

 If you experience technical issues during the application process please e-mail:

support@neighborlysoftware.com

Part A: Applicant Information

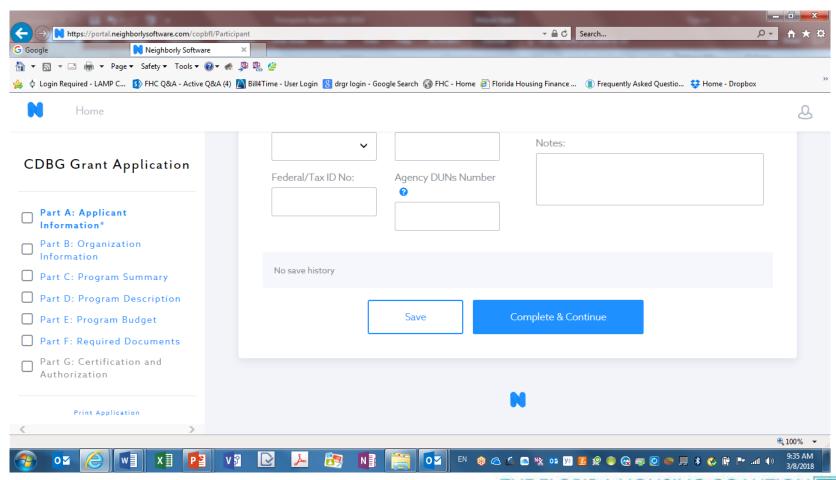
- Federal Identification Number
- Duns number
 - Free to Acquire
 - Call 1-866-705-5711 or go to:

http://fedgov.dnb.com/webform/displayHomePage.do

Part A

Home				٩
CDBG Grant Application				
Part A: Applicant	Part A: Applicant Information			
Information*	Please provide the following information			
Part B: Organization Information	A.1. AGENCY INFORMATION	A.2. CONTACT INFO	RMATION	
Part C: Program Summary	Official Agency Name ②	CEO Name	CEO Office Phone	
Part D: Program Description			Number	
Part E: Program Budget				
Part F: Required Documents	Main Administrative Address	CFO N	CFO Office Phone	
Part G: Certification and Authorization	Address Line 1	CFO Name	Number	
	Address Line 2			
Print Application	City V Zip Code	Contact Person		
			•	100%

Save or complete and continue

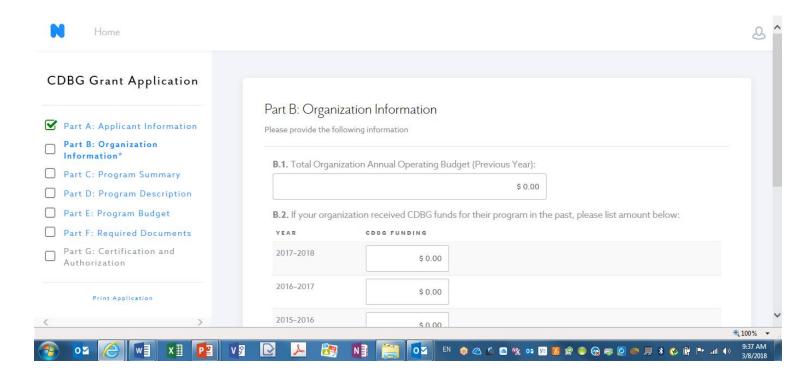




Part B: Organization Information

- Annual Budget
- Any CDBG Grants in prior three (3) years

Part B





Part C: Proposed Program Summary

Proposed Program Summary

- Program name
- Funds requested
- National Objective
- Program Category
- Proposed Output
 - (Number to serve)

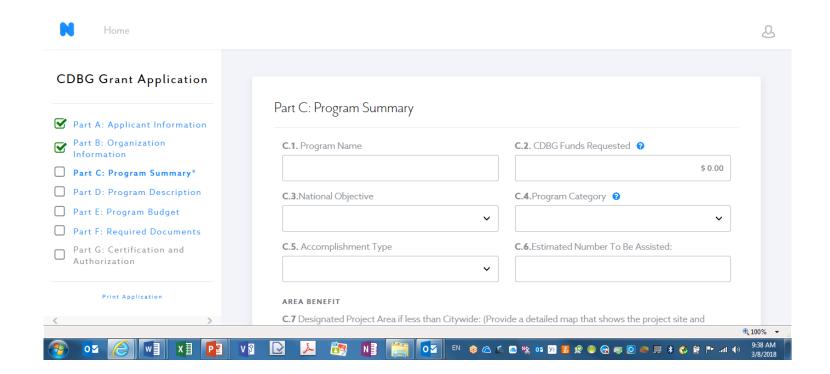
Part C: Proposed Program Summary

- Designated Project Area
 - Narrative Description
 - Area Benefit
 - Limited Clientele Benefit
 - Presumed
 - Low- and moderate- income served

Part C: Proposed Program Summary

- Estimate of Population Served
 - Use most current census data <u>www.census.gov</u> <u>www.shimberg.ufl.edu</u>
- Fair Housing & Equal Opportunity
 - Affirmative steps to ensure fair housing and equal opportunity
- Narrative Description

Part C



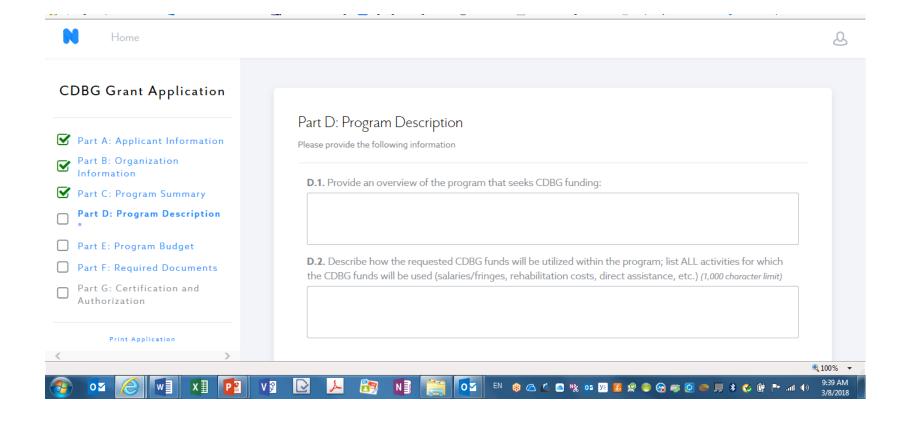
- Overview Narrative
 - WHO (persons served)
 - WHAT (specific activity)
 - WHEN (time frame to complete)
 - WHERE (location/address)

- Describe specifics of activities
 - Staffing
 - Costs
 - Direct Assistance
- Budget breakdown by activity
- Narrative-coordinating with others
- Time table (12 months)
 - Project award to project closeout

- Checklist of objectives
- Checklist of outcomes
- Narrative Primary objectives/outcomes
- Narrative Data to be collected

- Displacement
- Environmental hazards
- Economic development
- Revolving loan program

Part D

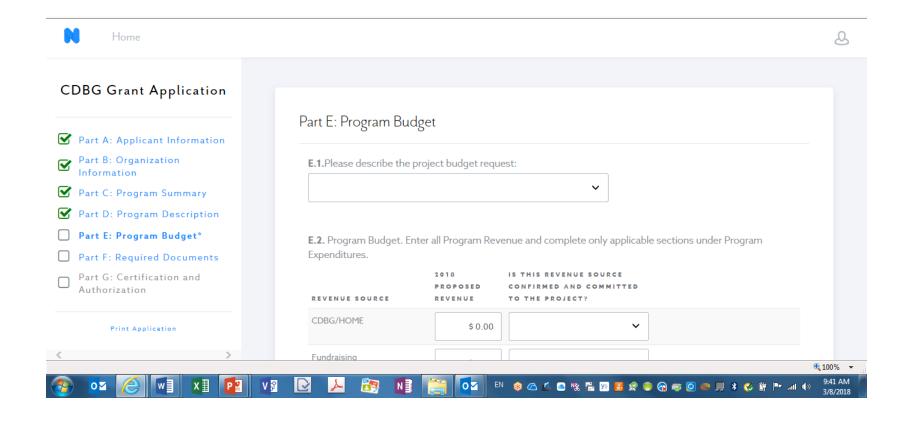




Part E: Project Budget

- Revenue sources
- Direct project costs
- Other costs

Part E

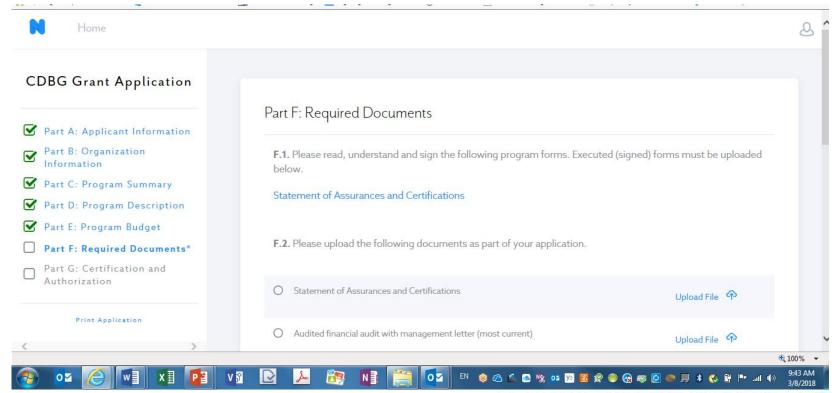




Part F: Attachments

- Audited Financial
- Articles of Incorporations & Bylaws
- List of Board
- Current Certification of Good Standing with Secretary of State
- Conflict of Interest Forms
- Organizational Mission Statement
- Scope of work
- Most current Annual Report
- Most current organizational budget
- IRS 501 c 3 determination letter

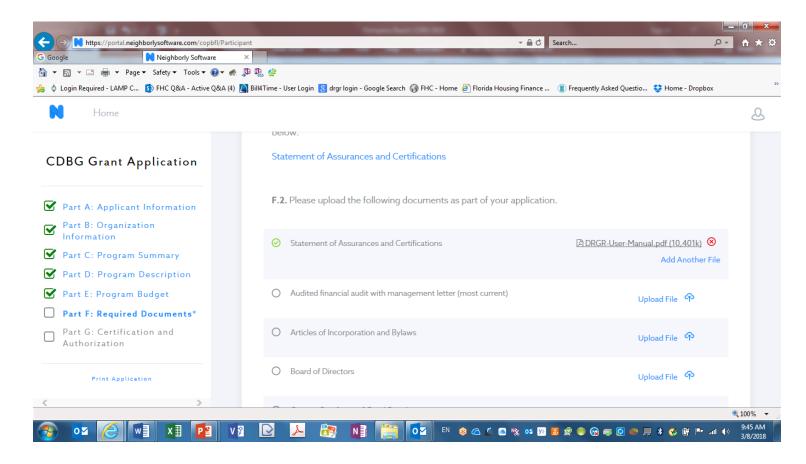
Part F







Upload multiple documents



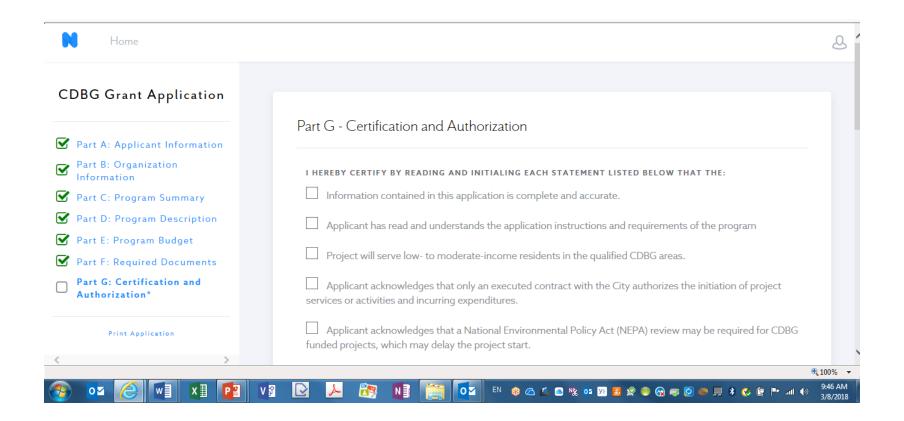


Part G: Certification & Authorization

Review and respond to list

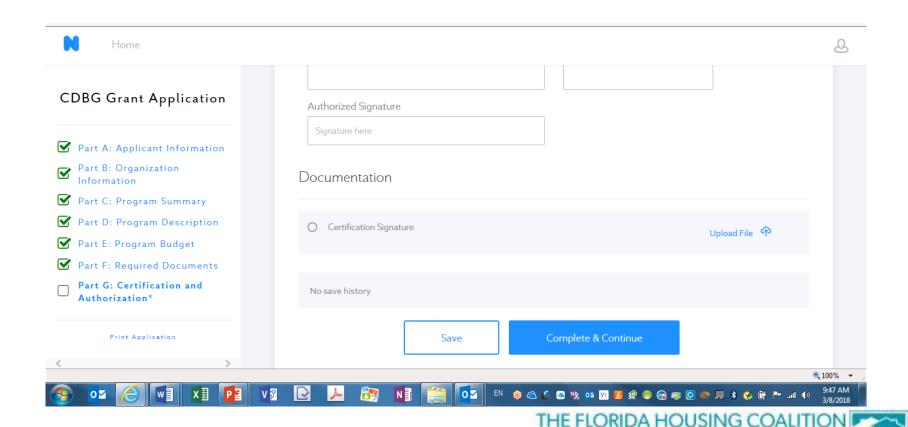
Check each box which applies to your organization

Part G

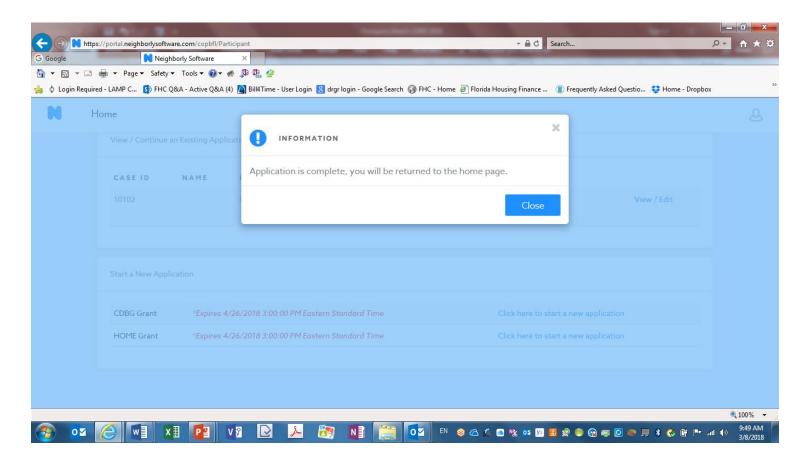




Print, sign and upload page

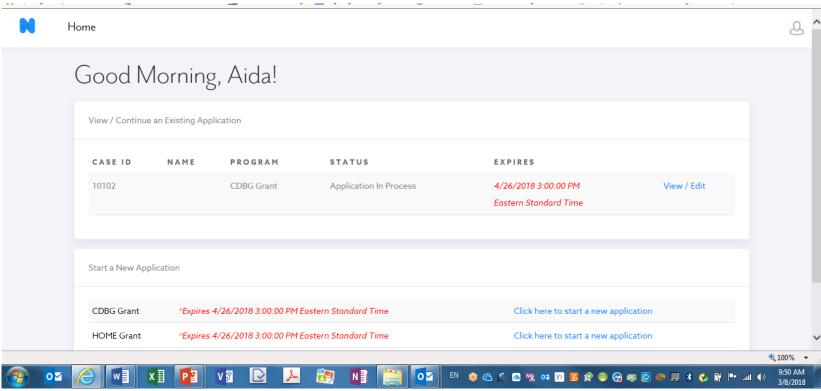


Complete Application





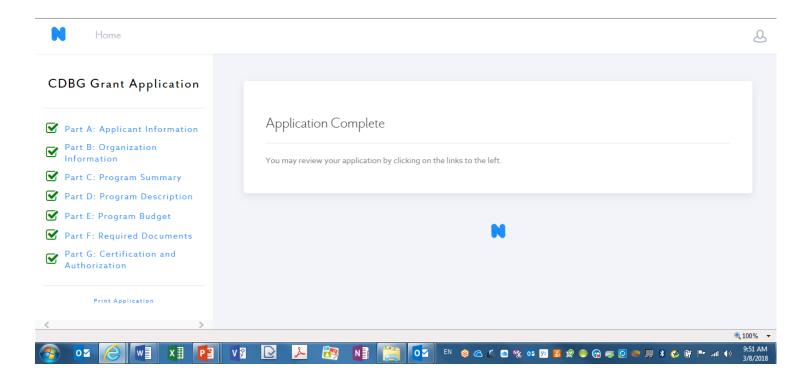
You can view and edit or start a new application



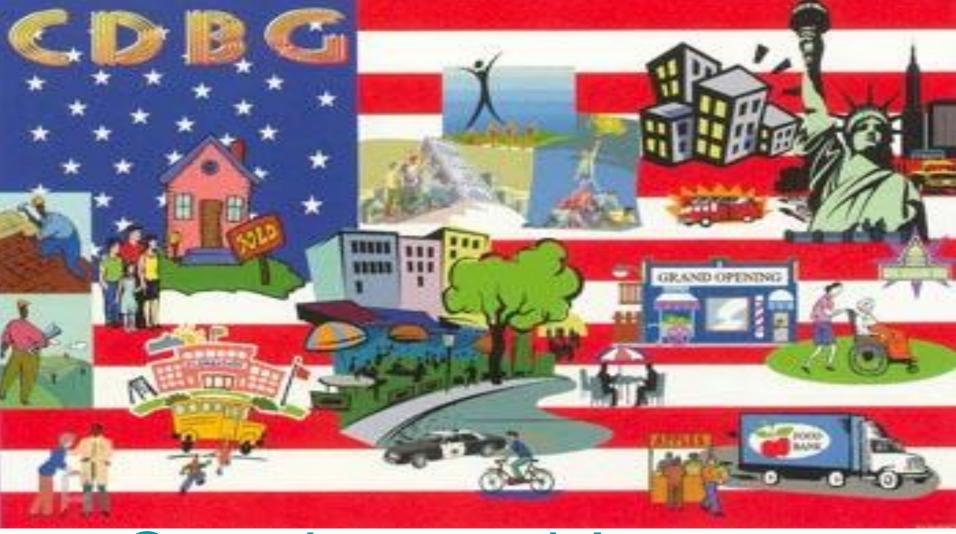




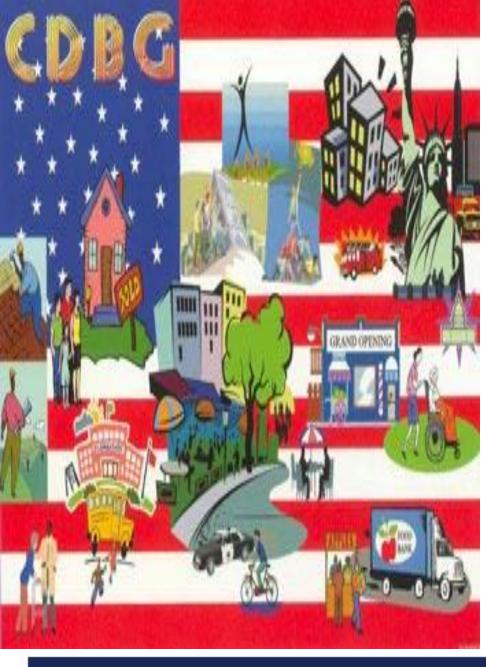
Review Complete Application







Questions and Answers



For Follow-Up

Contact Miriam Carrillo, Director (954) 786-4656

Miriam.Carrillo@copbfl.com

Alexander Goldstein, Program Compliance Manager

(954) 786-4641

Alexander.goldstein@copbfl.com

