

Fiscal Year 2016 Indian Community Development Block Grant (ICDBG) Program



NOFA Training

Today's Agenda

- **Purpose and Overview of ICDBG**
- **Eligible Applicants**
- **Submission of Applications**
- **Threshold & Rating Factors**

What's New in 2016

- **Eliminates or moves definitions**
- **More tables and bullets**
- **New threshold on untimely closeouts**
- **No points for unfunded applicants**
- **Modifies point values of some rating factors**
- **Eliminates 15 day grace period for reports due**

Available Funds

- **FY 2016 appropriation = \$60,000,000**

Competitive Grants - \$56,611,911

Imminent Threat - \$4,000,000

Authority

- Title I of the Housing & Community Development Act of 1974 (42 U.S.C. 5301 et seq)
- ICDBG regulations, 24 CFR part 1003 – found at <https://www.gpo.gov/fdsys/search/searchresults.action?st=24+CFR+1003>

Program Description

To develop viable Indian and Alaska Native communities by creating decent housing, suitable living environments & economic opportunities primarily for LMI (Low and Moderate Income) persons

Key ICDBG Definitions

- **Community Based Development Org.**
- **Low-and Moderate Income**
- **New Applicant**
- **Firm Commitment**
- **Standard Housing/Standard Conditions**

Types of Grants

- **Single Purpose Grants - for many community development purposes**
- **Imminent Threat Grants - awarded as needed - not by application deadline**

Imminent Threat Grants



Overview

- **No Area Office allocations**
- **Funds used to remove imminent threats to health or safety**
- **Must meet regulatory criteria**

Helpful Tips

- **NOFA does not list forms to be submitted for these grants**
- **Contact your Area ONAP first to see –**
 - **If HUD has funds**
 - **If activity qualifies**
 - **What to submit**

Criteria

- Threat not recurring
- Must be unique and unusual circumstance
- Must impact entire service area
- Project feasible and has reasonable chance of alleviating problem

Examples

- **Asbestos removal**
- **Replacement of failed water system**
- **Home repairs from floods**
- **Mold remediation – if not recurring**
- **Uranium in wells**

Show Me the Money



Area ONAP Allocations

- Funds allocated to six Area ONAP regions
- A regulatory formula (24 CFR 1003.101)
 1. \$1M to each region
 2. Each region's share of tribal population (40%), poverty (40%), and overcrowding (20%)

Area ONAP Allocations

Alaska	\$7,056,169
Eastern Woodlands	\$4,608,084
Northern Plains	\$8,551,891
Northwest	\$3,068,364
Southern Plains	\$13,444,256
Southwest	\$19,883,147

Grant Ceilings

- **Grant ceilings apply to entire application**
- **If applicant's request exceeds the ceiling per region, application not rated**

Ceilings By Regions

- **Alaska** \$600,000
- **Eastern Woodlands** \$600,000
- **Northern Plains** \$1,000,000
- **Northwest** \$500,000
- **Southern Plains** \$800,000
- **Southwest** \$605,000 - \$5.5 M

Housing Rehab Cost Limits

Alaska	\$75,000
Eastern Woodlands	\$35,000
Northern Plains	\$50,000
Northwest	\$50,000
Southern Plains	\$35,000
Southwest	\$65,000

Regulations and Requirements

- **If funded, must comply with regulations, guidelines and requirements of the ICDBG program and regulations referenced in ICDBG regulations**

Eligible Applicants

- Native American Tribal Governments (see BIA list at:
<http://www.indianaffairs.gov/cs/groups/xraca/documents/t ext/idc1-033010.pdf>)
- Tribal organizations determined by BIA or IHS

Period of Performance

- ***Competitive Grants*** - until September 15, 2023 to draw down all funds and complete project
- ***Imminent Threat Grants*** - 12 months from date funds are available to spend funds and complete project

FY 2016 General Section

Found at

<http://portal.hud.gov/hudportal/documents/huddoc?id=2016nofa-gensec.pdf>

And with application download at

<http://www.grants.gov>

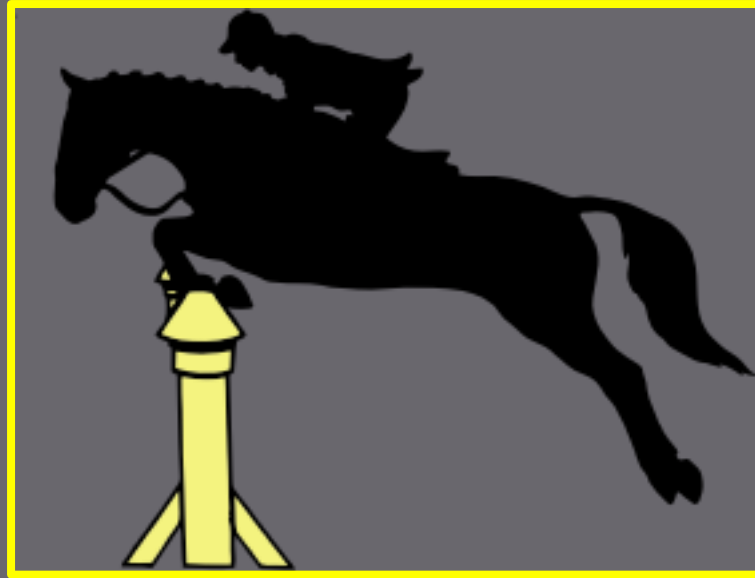
Five Steps to Apply

- Obtain a DUNS Number
- Register with the SAM
<https://www.sam.gov/portal/SAM/#1>
- Register in Grants.gov
- Grant approval to submit
- Check status

Grants.gov Information

- **Helpful information on website**
- **Click on “Applicants” to find**
 - **Applicant Tools and Tips**
 - **Applicant FAQs**
 - **User Guides, Organization Registration Guide, and educational videos**

Thresholds



Threshold Requirements

- **General Section**
- **Program-Related**
- **Project-Specific**

General Section Thresholds

- **Application submitted on time**
- **Civil rights matters resolved before application deadline**

Program Thresholds

- **Outstanding ICDBG Obligation – cannot have**
- **Civil Rights violations – cannot have**
- **Untimely ICDBG Closeouts – application not reviewed if certain grants not closed**

Project Thresholds

- **There are only two in 2016 for certain types of projects**
 - **New Housing Construction**
 - **Economic Development**

New Housing Threshold

- Developer must be a CBDO
- No other suitable housing in area AND
- No other sources can meet the need AND
- Rehab not economically feasible OR household is currently overcrowded, OR household to be assisted has no current residence

Documenting a CBDO (Option 1)

- **Socially oriented non-profit**
- **Board represents community**
- **Free to procure**
- **Not subject to reversion of assets**

Documenting a CBDO (Option 2)

- **Section 301(d) of Small Business Investment Act entities**
- **SBA approved entities**
- **HOME Community Housing Development Organization (CHDOs)**
- **Tribal-based community development non-profit**

Documenting a CBDO (Option 3)

- **Similar to Option 1 and 2**

Example:

- **Has all characteristics as 1 but cannot find board with 1/3 or less public officials**
- **TDHEs not automatically CBDOs**

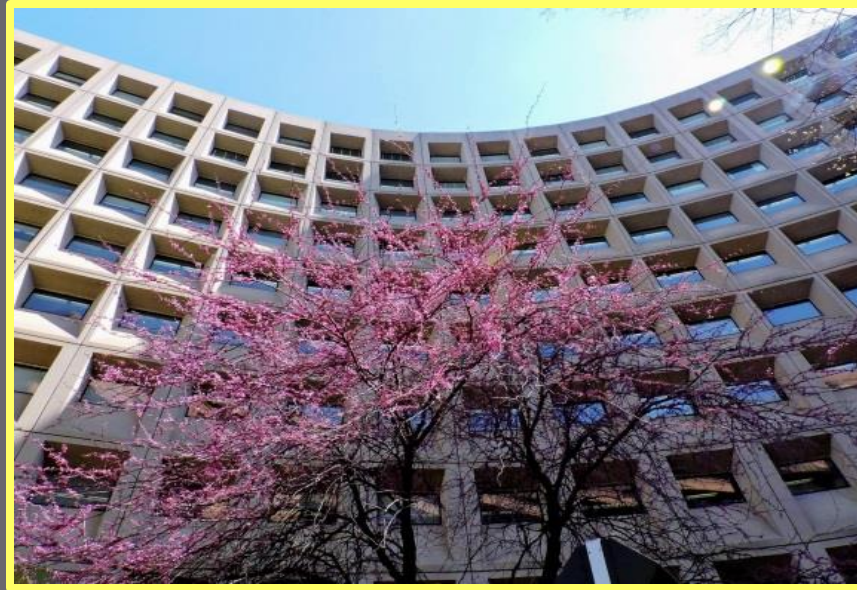
Economic Development Threshold

- **Financial analysis prepared by qualified party must demonstrate project is feasible and has a reasonable chance of success**
- **Show public benefit of ICDBG**
More requested = greater public benefit demonstrated

Economic Development Threshold

- Grant will not reduce non-federal funds
- Not more than a reasonable rate of return on investment is provided
- Grant will be disbursed on pro-rata basis with other funds

HUD or Federal Requirements



HUD or Federal Requirements

- **Outstanding Delinquent Federal Debts**
- **Pre-Award Accounting System Survey**
- **Debarments and/or Suspensions**
- **False Statements**
- **Do Not Pay Website**

HUD or Federal Requirements

- **Code of Conduct**
- **Conflict of Interest of Consultants or Technical Experts Assisting HUD**
- **Prohibition Against Lobbying Activities**

ICDBG Program Requirements

- **Must comply with**
 - Indian preference as explained in regulation at 1003.510
 - Section 3 unless doing so conflicts with Indian preference
 - Fair Housing and civil rights laws applicable to tribes

Housing Rehab Requirement

- **Must *STATE* that :**
 - Applicant has adopted rehab policies
 - For HO units buyer payments are current

New Housing Requirement

- **Must state that you have current, in effect, tribal resolution adopting and identifying construction standards that meet requirements in Section I.A.3 of NOFA**

Public Services

- Limited to 15% of grant request
- Must be a new service or increase existing service
- Can not be a “stand alone” project
- Need not be related to other activities

Infrastructure Projects

- **If project will support future housing or community development projects submit evidence that project will be completed within three years of grant award**

Most Common Activities

- **Housing Rehabilitation**
- **Land Acquisition for New Housing**
- **Homeownership Assistance**
- **Public Facilities & Improvements**

Eligible Activities

- New Housing Construction:
may only be implemented through
a Community Based Development
Organization (CBDO)

Eligible Activities

Housing Rehabilitation

- Rental or homebuyer
- Publicly/privately owned
- Grants, loans, guarantees, interest supplements
- Multiple activity types
- Labor, materials, principal fixtures, security devices

Eligible Activities

Land Acquisition

- In conjunction with Housing, Public Facilities & Improvements, Economic Development
- Land alone can be acquired for future housing development only

Eligible Activities

Homeownership Assistance

- Only for LMI households
- Subsidize interest/principal
- Acquire guarantees from lenders
- Up to 50% of down-payment
- Pay reasonable closing costs
- Eligible activity vs. public service

Eligible Activities

Public Facilities & Improvements

- Community Facilities
- Special Needs Facilities
- Infrastructure

Eligible Activities

Economic Development

- Acquisition, construction, rehabilitation or installation of bldgs or equipment
- Assistance to non-profit and for profit organizations
- Special requirements for for-profits

Eligible Activities

Microenterprises

- Owner must be LMI and have five or fewer employees
- Funds used for grants, loans, TA, and general support
- No 15% public service cap

Other Eligible Activities

- Acquisition of Property – also housing units
- Clearance and Demolition
- Lead-based Paint Evaluation/Hazard Control
- Privately and Publicly Owned Commercial or Industrial Buildings
- Mold remediation

Eligibility of Government Facilities

- Depends where services are provided
- Police stations, jails, libraries = eligible
- Courthouses, local government offices and other government headquarters = not eligible

Ineligible Activities

- **Maintenance & Operations**
- **New housing construction, unless carried out by a CBDO**
- **Furnishings and personal property**
- **Construction tools/equipment**
- **Income payments**

Application and Submission Information



Submission Dates and Times

- 11:59:59 pm on June 14, 2016
- Confirmation of Submission
- Application Submission Validation check
- Application Validation & Rejection Notification

Submission Grace Period

- Applicants again have a 1-day grace period to resubmit applications
- Applies if application submitted before deadline and time and receive a rejection notice
- Does not apply to paper applications

Submissions for All Projects

- Narrative to five rating factors – and one page summary
- Applications for Assistance (SF-424)
- Disclosure Update (HUD-2880)
- Implementation Schedule (HUD 4125)

Submissions for All Projects

- **Budget - Cost Summary (HUD-4123)**
- **Citizen Participation Resolution**
- **Low and Moderate-Income (LMI) Benefit (housing projects rely on Housing Needs Table for points - posted with NOFA)**

Measuring LMI Benefit (Area Benefit)

- **Activities that benefit all residents of an area where at least 51% of residents are LMI persons**
- **Area must be primarily residential**

Measuring LMI Benefit (Limited Clientele)

- **Clientele presumed to be 51% LMI**
- **51% of surveyed participants are LMI**
- **Participation limited to LMI**
- **Nature of activity/location indicates LMI benefit**

Measuring LMI Benefit (Housing)

- **Residential structures provided/improved must be occupied by LMI persons**
 - **Single family structure - LMI occupancy**
 - **One unit of duplex - LMI occupancy**
 - **Structures w/3 or more units must have at least 51% LMI**

Measuring LMI (Job Creation/Retention)

- **Activities must create or retain permanent jobs and**
- **51% of jobs created/retained must be available to or held by LMI persons**

Measuring LMI Benefit

- **There are seven options**
 - **Primary Option – old way w/new data (1 option)**
 - **Standard ICDBG LMI data from the ACS, all people in tribal areas**
 - **Other tribal area options (2 options)**
 - **AIAN LMI data from the ACS, all HH alone or in-combo**

Measuring LMI Area Benefit

- **Neighborhood level options (3 options)**
 - **Standard CDBG LMI data from the ACS, all people (1 option)**
 - **AIAN LMI households from the ACS (2 options)**
- **Applicant generated data per NOFA**

Measuring LMI – More Info

- Website for data downloads – <http://www.huduser.org/portal/icdbg/home.html>

Applicant's Own Data

- **Data must meet this criteria**
 - **Be collected systematically**
 - **Be independently verifiable**
 - **Differentiate between reservation and BIA service area population where applicable**

Applicant's Own Data

- **Must submit**
 - Explanation of number of people benefitting from project and number of LMI
 - Sample copy of survey form
 - Explanation of methods used to collect data
 - Listing of incomes by household and size

Submissions for Certain Projects

- HUD-2993 (for paper applications)
- Resolution for Tribal Organization to Submit
- Statements on Housing Standards
- Resolution on Tribal Funds Committed
- Demographic Data

Submissions for Certain Projects

- Land Acquiring to Support New Housing Projects
- Health Care Facilities
- Correctional Facilities/Detention Centers
- Code of Conduct
- SF-LLL on Lobbying

Rating Factors



Rating Factors

1. Capacity of the Applicant
2. Need/Extent of the Problem
3. Soundness of Approach
4. Leveraging Resources
5. Comprehensiveness and Coordination

Useful Tips and Info

- **Applicants must score a minimum of 70 points to be funded**
- **Cut off for most Area ONAPs is much higher**
- **Points vary if current or new applicant**

Factor 1 – Capacity

- Up to 30 points in total
- If funded this year, progress will be measured
- If funded in past years, lack of progress will = fewer points

SF 1 - Managerial, Technical & Administrative Capacity

- **15 points current grantees / 30 points new**
- **Possess or can obtain managerial, technical or administrative capacity to carry out proposed project**
- **Identify who will administer project**

SF 1.a.

Managerial & Technical Staff

- **8 points current or new**
- **Describe roles and responsibilities of project director and staff**
- **Experience of all key staff must be relevant, recent, and successful**

SF 1.b. - Implementation Plan

- **3 points current grantees / 8 points new**
- **Identify specific tasks and timelines for completing project**
- **Two projects = two plans**
- **Full points if project can start within 180 days from award date**

SF 1.c. - Financial Management

- **2 points for current grantees / 7 points for new**
- **Describe how financial management systems of applicant, CBDO and subrecipient meet regulatory requirements**
- **Seriousness/significance of open findings**
- **Current audit if required**

SF 1.d.- Procurement/Contract Mgmt

- **2 points current grantees / 7 points new**
- **Describe how policies and procedures of applicant or organization meet regulatory requirements**
- **Findings related to procurement & contract management**
- **Current audit or letter from IPA**

SF 2 - Past Performance

- **15 points for current grantees/new applicants not rated here**
 - **(a) Implementation/Expenditures (more points if faster spending) (4 pts.)**
 - **(b) Reports (2 pts.) – no 15 days grace period**

SF 2 - Past Performance

- (c) Close-outs (3 pts.)
- (d) Audits (3 pts.)
- (e) Findings (3 pts.)

Rating Factor 2

Need/Extent of Problem

- Total of 16 points
- Subfactor 1 - Need and Viability (4 pts)
- Subfactor 2 - Project Benefit (12 pts)

SF 1 - Need & Viability

- **Application should include information on need for the project and demonstrate that it meets an essential community development need and is critical to the viability of the community**

SF 2 - Project Benefit

- **Carefully review criteria for each type**
- **Calculation depends on type of project**

SF 2.a.

Public Facilities and Improvements

- Up to 12 points
- Several options for determining need
 - CDBG data
 - ACS data
 - Your own information that meets the criteria in the NOFA

Public Facilities & Improvement Projects

At least 85% LMI	12 points
At least 75% but < 85% LMI	8 points
At least 55% but < 75% LMI	4 points
Less than 55%	0 points

SF 2.b. – Economic Development

- **Beneficiaries are persons served, employed by project, jobs created or retained**
- **Submit census data or other data as explained on earlier slide**
- **Points given are identical to those on previous slide**

SF 2.c.

Housing Construction and Rehab, Land Acquisition and Homeownership

Based on 2016 IHBG formula data

\$0- \$750	12 pts
\$751 - \$1,250	8 pts
\$1,251 - \$3,999	4 pts
\$4,000+	0 pts

Rating Factor 3

Soundness of Approach

- Up to 36 points
- Address quality/effectiveness of project to enhance community viability, meet identified needs, and sustain the project

Rating Factor 3

Soundness of Approach

- 1. Description & Rationale for Proposed Project (14 pts)**
- 2. Budget & Cost Estimates (10 pts)**
- 3. Commitment to Sustain Activities (12 pts)**

SF 1

Description and Rationale for Project

- Up to 14 points
- Describe your project
- Describe how project will address identified need
- Describe how project will enhance community's viability

SF 2 - Budget & Cost Estimates

- **Up to 10 points**
- **Include cost breakdowns by line item (including planning & admin)**
- **Include cost estimates and describe qualifications of person(s) who prepared the estimate(s)**

SF 3

Commitment to Sustain Activities

- **Up to 12 points**
- **Demonstrate commitment to community's viability**
- **Criteria varies by type of project**

SF 3.a.

Public Facilities/Improvements

- **Up to 12 points**
- **Provide statement that tribe or “entity other than tribe” has adopted/developed O&M Plan and commits funds for those responsibilities**

SF 3.a.

Public Facilities/Improvements

- **Must address maintenance, repairs, insurance, security & replacement reserves & include cost breakdown**
- **Buildings must show operating funds for services**
- **Service providers submit commitments for operating and space needs**

SF 3.b.
**(New Housing Construction, Housing
Rehabilitation, Homeownership Assistance
Projects)**

- **Up to 12 points**
- **Identify tribal and/or participant's maintenance responsibilities**
- **Describe responsibilities and provide written commitment to undertake**

SF 3.c. - Economic Development

- For up to 12 points describe:
 - How the project will operate
 - Why it is needed
 - How it will succeed

SF 3.d. Microenterprises

- For up to 12 pts describe how program will operate
- Include types of assistance offered and entities eligible for assistance
- Describe process for selecting applicants and analyzing business plans

SF 3.e.

Land Acquisition to Support New Housing

- **Up to 12 pts**
- **Show that proposed site has:**
 - **Suitable soil conditions**
 - **Potable drinking water**
 - **Access to utilities, vehicular access, drainage, services, and no environmental problems and units built within two years of purchase**

Rating Factor 4

Leveraging Resources

- Up to 8 points
- HUD will award points based on % of non-ICDBG funds relative to total project cost

Leveraging Resources Points

Non-ICDBG Resources to Total Project Costs	Points
25 percent or more	8
At least 18 percent but less than 25 percent	6
At least 11 percent but less than 18 percent	4
At least 4 percent but less than 11 percent	2
Less than 4 percent	0

Leveraging Resources

Allowable Non-ICDBG Resources

- Tribal trust or other funds
- Private & public loans/guarantees
- IHBG funds & other grants
- Donated goods/services
- Land needed for project
- Direct admin costs

Leveraging Resources

Disallowed Leverage

- Indirect admin costs
- Operations & maintenance costs for project
- Value of existing facility if expansion is proposed

Leveraging Resources

- **Submit information with application**
- **Written statement identifying & committing tribal funds**
- **Approved IHP on file with resources committed or written commitment for future IHBG funds**
- **Letter of commitment from non-tribal entity**
- **Comparable costs for goods, services & land**

Leveraging Resources

- **Commitment must be received within 6 months**
- **Letter from contributing entity must:**
 - **Indicate why commitment cannot be made**
 - **Provide assurance project is eligible for \$**
 - **Provide date when funding decision will be made**

Factor 5

Comprehensiveness & Coordination

- **Up to 10 points**
- **How project was developed with others in community and is consistent with any tribal strategic or comprehensive plans**

SF 1 - Coordination

- Up to 2 pts
- How you coordinated with those not providing funds but who share your goals
- Describe how community was involved in development of project per CP

SF 2 - Outputs & Outcomes

- Up to 8 points
- Outputs include
 - How many houses rehabilitated
 - How many jobs created
 - Square feet of public facility
 - How many homeownership units built/financed

SF 2 - Outputs & Outcomes

- Outcomes include:
 - Reduction in families in substandard housing
 - Increased income resulting from employment
 - Increased quality of life due to public facility
 - Increased economic self sufficiency of beneficiaries

Bonus Points

- In 2016, 2 bonus points for working in a Promise Zones or Preferred Sustainability Community
- Must submit forms signed by POC for each
- See V.D.3 of General Section

What HUD Does



Review and Selection Process

- Application received by deadline and per requirements
- Applicant is eligible
- Proposed project is eligible
- Application contains all required components

Review & Selection Process

- **At least 70% of funds must benefit LMI persons**
- **Threshold compliance**
- **Past Performance evaluated**
- **Rating - Minimum Points**

Review & Selection Process (Con't)

- **Ranking**
 - All types of projects ranked against all others
- **Tiebreakers**
 - Standardized across AONAPs
 - Projects selected that can be fully funded over those that cannot be

Technical Deficiencies

- Errors/oversights that would not alter rating if corrected
- Only successful applicants asked & required to correct
- Respond by deadline mandated
- No funding if no response

Pre-Award Requirements

- **No funding if no response or inadequate response**
- **HUD also does a delinquent Federal Debt and Name Check Review**

Reasons for Rejection

- Failure to submit all required documents
- Failure to address all parts of thresholds/requirements
- Not enough points in Factor 1
- Not enough points overall
- Not enough money to fund all applications

Anticipated Award Dates

- **Pre-awards must be met**
- **Congressional Notification**
- **Awards announced in Sept**
- **Execute grant agreement – special conditions**

Post Award Reporting Requirements

- Quarterly Federal Financial Reports (SF-425)
- Annual Status & Evaluation Report
- Close-Out Report

General Questions

- Area ONAP
- Electronic Submission – call 800-518-4726 or support@grants.gov

Area ONAPs

- **Alaska: (907) 677-9860**
- **Eastern Woodlands:
1-800-735-3239**
- **Northern Plains: 1-888-814-2945**
- **Northwest: (206) 220-5270**

Area ONAPs (Con't)

- **Southern Plains: (405) 609-8532**
- **Southwest (Phoenix):
(602) 379-7200**
- **Southwest (Albuquerque):
(505) 346-6923**

Technical Assistance (TA)

- HUD Reform Act (Section 103)
- TA only until NOFA publication
- TA includes general guidance about NOFA terms and regulations

Area ONAP NOFA Training

- Contact your Area ONAP for specific locations and to register for NOFA training
- Online ICDBG training:
<http://www.hud.gov/offices/pih/ih/grants/icdbg.cfm>

Examples of Funded Applications

- Can be found on HUD's website at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/foia/highscore

- Certain Area ONAPs have posted applications also