

# PRESENTATION

## COMMUNITY DEVELOPMENT BLOCK GRANT- CORONAVIRUS (CDBG-CV)

### *CDBG-CV Entitlement Program Pre-Application Webinar*

*Presented by: Shaurita Jackson*

#### **Slide #0: INTRODUCTION SLIDE**

**Shaurita Jackson:** Good afternoon and welcome to the Community Development Block Grant-Coronavirus Entitlement Pre-Application Webinar. My name is Shaurita Jackson and I am the Community Program Manager for the Small Cities CDBG Program. We are so glad you decided to join us today and we look forward to sharing valuable information regarding the pre-application process for the coronavirus funding. Today, we have an outstanding team of individuals who will join me in the webinar. We have Kate Doyle, who is the Bureau Chief for the Bureau of Small Cities and Rural Communities. We have Ted Court, who is our Team Leader in the Small Cities CDBG Program. We also have Geoff Amison, who is our Environmental Review Manager, and last but certainly not least, we have Kathleen Weissenberger, who is our consultant for the CDBG-CV funding. For informational purposes, we will be recording the webinar presentation and the presentation will be available at a later date. Finally, if you have any questions during the Webinar, we ask that you please enter your questions by using the Teams Live Event Q&A chat and we will address the questions at the end of the presentation.

#### **Slide #1: AGENDA**

**Shaurita Jackson:** This afternoon, we will be discussing the CDBG-CV Entitlement Pre-Application requirements and process. Our agenda is outlined here. We will be covering: Overview of the CDBG-CV Entitlement Program, applicant eligibility, program requirements, eligible activities, duplication of benefits, citizen participation requirements, procurement, crosscutting requirements, how to submit a CDBG-CV pre-application, and after the formal presentation we will answer questions using the Teams Live Event Q&A Chat.

#### **Slide #2: OVERVIEW OF THE CDBG-CV ENTITLEMENT PROGRAM**

**Shaurita Jackson:** First, we will discuss some basics of the CDBG-CV Entitlement Program.

#### **Slide #3: PROGRAM OVERVIEW**

**Shaurita Jackson:** DEO receives an annual allocation of State Community Development Block Grant funding from HUD. The CARES Act, appropriated additional funding to states and entitlement grantees for specific COVID-related activities. DEO's CDBG-CV Entitlement Program is designed to help grantees respond to, prepare for, or prevent the coronavirus. Activities must be critical and primarily benefit low- and moderate-income residents. HUD allocated CDBG-CV funds in three rounds. The state of Florida's total allocation of CDBG-CV funds is just over \$285 million dollars. Of the \$2 billion dollars HUD allocated in round one funding, the state received \$16.7 million dollars in the State CDBG Program and Florida

Entitlements received a total of approximately \$75 million dollars. Of the \$1 billion dollars in round 2 funds, the state received \$63.1 million dollars to be distributed to both, non-entitlement local governments and CDBG entitlement grantees. Of the \$2 billion dollars in round 3 funds, HUD once again funded the States Small Cities Program and Entitlement Program, separately. The Small Cities program received an additional \$20.2 million dollars, and the Florida's entitlement communities received an additional \$110.6 million dollars. These funds are administered under the state CDBG program and allocated to entitlements.

#### **Slide #4: AVAILABLE PROGRAM FUNDING**

**Shaurita Jackson:** As I mentioned, in round 2, the state received \$63.1 million dollars to be distributed to both small cities and entitlements. This chart shows the breakout of funds for the entitlement program, small cities program and state administration and technical assistance.

#### **Slide #5: GRANT ALLOCATIONS AND METHODOLOGY**

**Shaurita Jackson:** DEO used a national consulting firm, Root Policy Research to determine the maximum funding available for entitlement jurisdictions individually and for Florida non-entitlement areas collectively. The following factors were used to determine those allocations. The first indicator in the formula is the Baseline needs of communities. This number was based on the HUD 2020 allocation formula and was given a 40% weighting. This indicator represents populations that are most vulnerable to housing and economic challenges in general.

#### **Slide #6: GRANT ALLOCATIONS AND METHODOLOGY**

**Shaurita Jackson:** The second indicator in the formula is the COVID economic impacts using unemployment insurance claims between March 7 and July 31. This was given a weight of 30%. Re-employment data is only available at the county level.

#### **Slide #7: GRANT ALLOCATIONS AND METHODOLOGY**

**Shaurita Jackson:** The link to the CDBG-CV Entitlement Program allocations is available at [www.Floridajobs.org/CDBG-CV](http://www.Floridajobs.org/CDBG-CV).

#### **Slide #8: CDBG-CV ENTITLEMENT PROGRAM TIMELINE**

**Shaurita Jackson:** DEO anticipates accepting pre-applications from Entitlements in the late Winter or 2021. This pre-application would identify the community need, the activities planned to be undertaken, and the tie to COVID-19. The first of two public hearings must be completed and documented, in the pre-application submission. DEO will then conduct a capacity review of the community's pre-application for national objective and eligible activity, as well as the tie to COVID and the applicants previous experience in CDBG and their capacity to carry out the proposed activity. DEO will provide necessary technical assistance to applicants to ensure projects or programs being proposed are viable. During this period, the entitlement will hold the second of two required public hearings. After any necessary technical assistance, the Entitlement will submit a final application, including more detailed information on the activity or activities to be carried out including final budgets, public hearing documentation, and environmental review documentation as applicable, as well as document the readiness of the project to proceed upon grant award or contract. DEO anticipates they will be accepting final applications in the late Spring or early Summer of 2021. DEO will review and approve

applications and execute contracts with local governments in the late summer or early fall of 2021.

### **Slide #9: CDBG-CV ENTITLEMENT PROGRAM TIMELINE**

**Shaurita Jackson:** This is the current anticipated timeline for the CDBG-CV Entitlement program. We have our pre-application cycle opening on February 1 and it will run through March 15<sup>th</sup>. So, the pre-application deadline will be 5 p.m. on March 15<sup>th</sup>, 2021. The final application cycle is anticipated for Spring/Summer of 2021 and of course, our award and contract negotiations are anticipated to occur in Summer/Fall of 2021. Please note that some of the dates may change depending upon the number of applications that we actually receive.

### **Slide #10: APPLICANT ELIGIBILITY**

**Shaurita Jackson:** So, how do you know if your Jurisdiction is eligible for funding?

### **Slide #11: WHO IS ELIGIBLE TO APPLY?**

**Shaurita Jackson:** A list of eligible entitlement communities is listed on DEO's CDBG Coronavirus relief webpage under CDBG-CV Entitlement Program Resources. A list of the entitlement allocations can be found on the same page under DEO Method of Distribution.

### **Slide #12: PROGRAM REQUIREMENTS**

**Shaurita Jackson:** Now let's talk a little bit about CDBG-CV funds and the required relationship to COVID-19.

### **Slide #13: RELATIONS TO COVID-19**

**Shaurita Jackson:** Per the CARES Act, and subsequent federal register notice, all CDBG-CV funds must be used for activities that respond to, prepare for, or prevent the coronavirus. These can be costs that are directly related to the virus such as rehabbing for social distancing, or vaccine distribution or testing, and etc. This could also be for things that are from indirect impacts from COVID. This would be activities like, rental assistance for people who have lost income due to the shutdowns or the companies that were impacted financially due to the shutdowns or social distancing, or even the added expense of cleaning or personal protective equipment. DEO will be reviewing all applications to ensure the activities proposed can be tied to the impacts of COVID-19.

### **Slide #14: NATIONAL OBJECTIVE**

**Shaurita Jackson:** National Objectives. The Housing and Community Development Act requires that all activities funded with CDBG funds must meet a national objective of the CDBG program. The primary national objective of the CDBG program is to benefit low-to-moderate income beneficiaries. This can be achieved in four ways-through area benefits, through limited clientele, through housing, and through jobs. In addition of meeting a national objective of the CDBG program, CDBG-CV projects and programs must also be designed to prevent, prepare for, or respond to the coronavirus pandemic. Therefore, DEO thinks it is unlikely that a fundable project will be utilizing the national objectives of slum and blight or LMI housing. If you believe you have a project that meets the criteria for CDBG-CV and intend to utilize one of these national objectives, please reach out to DEO immediately to ensure fundability of your project.

## **Slide #15: ELIGIBLE ACTIVITIES**

**Shaurita Jackson:** Now, let's talk about what kinds of activities are eligible.

## **Slide #16: CDBG-CV ACTIVITIES**

**Shaurita Jackson:** All eligible activities of the CDBG program available under section 105 of housing and community development act are available for use in the CDBG-CV program. However, all activities must be able to show how they are designed to prevent, prepare for, and respond to the coronavirus. Basic categories of eligible activities are listed on this slide. Eligible activities are acquisition, public improvements, public facilities, business assistance, microenterprise assistance, public services, planning, broadband planning, and public infrastructure. Ineligible activities can include: General government expenses, buildings for the general conduct of government, political activities, purchase of equipment with exceptions. Equipment of the provision of a public service activity, that is an exception. Operating and maintenance expenses with the exception of operating expenses related to a public service activity. New housing, DEO will not be funding the construction of permanent new housing with CDBG-CV funds. Income payments, emergency payments such as, rent or utilities may be paid for up to six consecutive months. The payments must go directly to the provider and they must be consecutive. As we mentioned before, DEO will be reviewing all proposed activities to ensure the tie to COVID-19.

## **Slide #17: SAMPLE ACTIVITIES**

**Shaurita Jackson:** DEO has not set a threshold for the number of projects or activities that the entitlement may apply for. However, the online pre-application form limits the entitlement to five separate activities. As an example, if a community wanted to acquire a building and rehab the facility for use as a vaccination site, DEO would consider this, one activity or project. Please contact DEO immediately if this might be an issue. DEO will consider the number of activities along with other criteria during the capacity review, prior to awarding funds. We strongly encourage entitlement communities to work with eligible local government communities within your jurisdiction when planning your projects. Additionally, if you decide to work with another entitlement community within your jurisdiction, you may do so and combine the allocations. Over the next slides, we will take a brief look at sample activities that a community may undertake.

## **Slide #18: SAMPLE ACTIVITIES**

**Shaurita Jackson:** The activity we will look at are buildings and improvements including public facilities, which would be your acquisition, construction, re-construction or installation of public works. Facility or site, or other improvements. So, some examples may be, rehabbing a facility for testing, diagnoses, and treatment. Another one would be the reconstruction or expansion of sidewalks and roads to allow for social distancing. When we look at rehabilitation of buildings and improvements, we can look at rehabilitating a senior center or homeless shelter by replacing the HVAC system, and/or installing an air purification system as well as, the installation of wifi routers or extenders in affordable housing buildings for public LMI residents.

## **Slide #19: SAMPLE ACTIVITIES**

**Shaurita Jackson:** We also look at assistance to businesses including specific economic development assistance. So, it looks at grants to support new businesses or business expansion to create jobs that manufacture medical supplies to respond to infectious diseases, as well as, consider possibly technical assistance grants and other financial assistance, to establish, stabilize, and expand microenterprises that may provide other things such as, medical, food services, food delivery services, cleaning, and other services to support health and quarantine. Another one is public services where we look at possibly provision of assistance to primary low – and – moderate income persons. So, a couple examples are providing testing, diagnosis, or other services at a fixed mobile location or even considering delivering meals on wheels to quarantined individuals or individuals who need to maintain social distancing due to medical vulnerabilities.

### **Slide #20: SAMPLE ACTIVITIES**

**Shaurita Jackson:** Our final slide we're going to take a look at regarding sample activities are planning grants or planning only grants. These are where you can gather data and develop non-project specific emergency infectious disease response plans or planning activities in conjunction or in junction with another eligible activity and there is some examples listed on this slide.

### **Slide #21: DUPLICATION OF BENEFITS**

**Shaurita Jackson:** Now we're going to talk about Duplication of Benefits. Most of you are already familiar with this from your entitlement CV allocation.

### **Slide #22: DUPLICATION OF BENEFITS**

**Shaurita Jackson:** The CARES Act requires community planning and development to ensure that adequate procedures are in place to prevent any duplication of benefits, as required by the Roberti Stafford Disaster Relief and Emergency Assistance Act. A duplication of benefits occurs when a person, household, business, government, or other entities receive financial assistance from multiple sources for the same purpose and the total assistance received for that purpose is more than the total need for assistance. CDBG-CV funds can not be used to cover costs that have already been paid for or that will be paid for by another federal program, insurance, or other sources. If this occurs, the grantee will have to repay that amount to its CDBG-CV account. Before CDBG-CV assistance is provided, a grantee must verify that subrecipients, assisted individuals or families, businesses, and other entities, have not previously received or will not receive duplicative assistance from other sources. Two examples are requiring entities or beneficiaries to provide a self-certification, indicating that they have not received a duplicative benefit. Requiring entities or beneficiaries to fill out a questionnaire listing potentially duplicative assistance that they have already received or reasonably anticipate receiving.

### **Slide #23: DUPLICATION OF BENEFITS**

**Shaurita Jackson:** HUD has provided a list of federal sources that might result in a duplication of benefits. These are not the only possible sources of duplication. So, please be sure to fully vet your projects using your duplication of benefits worksheet, provided by DEO. Applicants must include a copy the duplication of benefits policies and procedures with the pre-application or final application to DEO. DEO will be re-capturing all funds that are determined to be a duplication.

## **Slide #24: DUPLICATION OF BENEFITS**

**Shaurita Jackson:** To alleviate issues, applicants must develop and maintain adequate procedures to prevent a Duplication of Benefits. Procedures must include persons or entities receiving CDBG-CV funds, must repay duplicative assistance and a method to assess whether CDBG-CV funds will duplicate financial assistance that is already received or likely to be received by acting reasonably. A copy of the Duplication of Benefits procedure must accompany the CDBG-CV application. If an entitlement has already developed a Duplication of Benefits form or checklist for use with CDBG-CV funds, please reach out to DEO for review and approval to use that form.

## **Slide #25: CITIZEN PARTICIPATION REQUIREMENTS 24 CFR 570.486**

**Shaurita Jackson:** It is important to note, that this is a program of the State CDBG program. All citizens participation requirements are listed in 24 CFR part 570 and policies for implementation are set by DEO. Citizen participation will be required in addition to anything the entitlement has done for its own CDBG-CV funds.

## **Slide #26: LOCAL GOVERNMENT REQUIREMENTS**

**Shaurita Jackson:** For the CDBG-CV Entitlement Program, you will be considered a local unit of government in the state CDBG program and all applicable citizen participation requirements must be followed. The requirements are: to provide for and encourage citizen participation, particularly by low-and-moderate income persons who reside in slum or blighted areas and areas are proposed to be used, to ensure that citizens will be given reasonable and timely access to local meetings, information and records relating to the unit of local government's proposed and actual use of CDBG funds, to provide an opportunity to obtain resident views on COVID-related housing and community development needs, to furnish citizens information, including but not limited to: the amount of CDBG funds expected to be made available for the CDBG-CV Program; the range of activities that may be undertaken with the CDBG-CV funds; the estimated amount of the CDBG-CV funds proposed to be used for activities that will meet the national objective of benefit to low-and-moderate-income persons; and the proposed CDBG activities likely to result in displacement and the unit of general local government's anti-displacement and resolution plans required under section 570.488.

## **Slide #27: PUBLIC NOTICES AND HEARING**

**Shaurita Jackson:** Again, it's worth repeating that these funds are subject to the rules for the State CDBG program and DEO rules and policies must be followed unless the Entitlement has stricter standards for their CDBG-CV funds. All public notices must be advertised in the newspaper of general circulation and must be a minimum of five days prior to the hearing. It is suggested that other means of communicating with the public are also used such as, Facebook, Twitter and the applicant's webpage. Please ensure that your notices give enough information about the activities you are proposing to allow citizens the opportunity to understand if they are affected and respond.

## **Slide #28: VIRTUAL PUBLIC HEARING**

**Shaurita Jackson:** Let's discuss virtual public hearings. Virtual public hearings are certainly acceptable; however, we recommend considering the following, the meeting must allow all participants to ask questions in real time and allow a period for the questions to be answered. It is best to use virtual platforms that allow the option for conference calls. Some examples are listed on the slide such as, Google Hangouts, Zoom and Facebook Live or other virtual platforms. Consider call-in options that don't require internet connection and consult with your attorney prior to implementing virtual public hearings to ensure they meet all local requirements.

## **Slide #29: FIRST PUBLIC HEARING CONTENT**

**Shaurita Jackson:** The first public hearing, which must be completed prior to submission of the pre-application, is to provide the residents information on the available funding, discuss the types of activities that could be implemented, and to get resident input on the communities needs regarding, responding to, preparing for, or preventing the coronavirus. The second public hearing is to provide information on application, project or activities and collect comments on the project.

## **Slide #30: TIMING OF PUBLIC HEARINGS**

**Shaurita Jackson:** As I mentioned, you must conduct the first public hearing prior to submission of your pre-application and documentation will be required to be uploaded in the Qualtrics system.

## **Slide #31: PROCUREMENT 2 CFR 200.318-326**

**Shaurita Jackson:** CDBG-CV funds are subject to procurement requirements as outlines under 2 CFR 200 as well.

## **Slide #32: PROCUREMENT REQUIREMENTS**

**Shaurita Jackson:** All normal CDBG procurement regulations are in place for CDBG-CV funding. You will find additional information regarding procurement regulations using the following points of reference. 2 CFR 200.318 through 200.326 details various methods of procurement; 24 CFR part 75 section 3 will share information there as well; Florida Statute 287.055 for architects and engineers; and the Entitlement procurement policies if they are stricter than the federal requirements.

## **Slide #33: CONSULTANTS COMPETITIVE NEGOTIATION ACT**

**Shaurita Jackson:** The key takeaway for Florida Statute 287.055 is that you may not obtain a price prior to negotiations.

## **Slide #34: COST REASONABLENESS ESTIMATES**

**Shaurita Jackson:** All procurements in excess of the Federal, simplified acquisition threshold, which is currently, \$250,000, must have an independent cost estimate prior to receiving bids or proposals.

### **Slide #35: COST/PRICE ANALYSIS**

**Shaurita Jackson:** This slide gives examples for each procurement method and the price or cost analysis, contract type, solicitation method and examples of goods or services being procured. An independent cost estimate serves as a yardstick for evaluating the reasonableness of the contractors proposed costs or prices. An independent cost analysis consists of evaluating the separate elements, for example, labor or materials that make up a contractors total cost proposal to determine whether they are allowable, directly related to the requirement and reasonable. Price Analysis. Price Analysis is essentially Price Comparison. It is the evaluation of a proposed price, total or sum without analyzing any of the separate cost elements and cost analysis, is the evaluation of the separate elements, labor, materials, profits, etc. that make up a contractors total cost proposal or price to determine if they are allowable, directly related to the requirements and ultimately, reasonable. Cost analysis should apply to new contracts and contract modifications or change orders.

### **Slide #36: CROSSCUTTING REQUIREMENTS**

**Shaurita Jackson:** Now we're going to talk a little bit about Environmental Review. This is a very important topic because the required process for environmental reviews under this program will be different than what you normally do.

### **Slide #37: ENVIRONMENTAL REVIEW**

**Shaurita Jackson:** The CARES Act does not waive CDBG requirements for an environmental review per FR 6218-N-01. All CDBG-CV projects or programs must still meet the requirements for environmental review that are outlined in 24 CFR part 51, 24 CFR part 58, and State CDBG regulations at 24 CFR 570.604.

### **Slide #38: ENVIRONMENTAL REVIEW**

**Shaurita Jackson:** It is important to note that as these funds are distributed under the state CDBG program, all applicants or grantees must follow DEO processes for these crosscutting requirements. It is a particular note, that in the state CDBG program, our request for release of funds are submitted to DEO and DEO issues the authority to use grant funds.

### **Slide #39: ENVIRONMENTAL REVIEW RECORD SUBMISSION**

**Shaurita Jackson:** For projects that include only exempt and categorically excluded, not subject to activities, applicants should the appropriate forms along with supporting documentation to DEO with the pre-application. If a grantee anticipates using CDBG-CV for administration, Environmental Review Record, or etc., a certificate of exemption must be included in the pre-application for those activities regardless of the project level of review. For categorically excluded, subject to and environmental assessment projects, the grantee is encouraged to submit the environmental review record to DEO before final application, but it must be included with the final application, at the latest.

### **Slide #40: CHOICE LIMITING ACTIONS**

**Shaurita Jackson:** The first requirement to understand regarding the environmental review process, is the importance of avoiding choice limiting actions. The local government grantee and all other participants in a CDBG project including other public entities, non-profit agencies

or for-profit developers, or any of their consultants, can not commit HUD or non-HUD funds if an activity would have an inverse environmental impact, or limit the choice of reasonable alternatives. If the reviewer is aware that a subrecipient, developer or beneficiary is about to take action that would limit alternatives or choice limiting actions, the viewer must take appropriate action to defer those actions to ensure that NEPA and related laws are reviewed and followed before choice limiting decisions are made. Examples of choice limiting actions are, acquisition, leasing, rehabilitation or construction, and site improvements to include demolition and site clearance.

#### **Slide #41: CHOICE LIMITING ACTIONS**

**Shaurita Jackson:** Here are some more examples of choice limiting actions. So, we discussed acquisition of land and structures, demolition, construction bidding, new construction, rehabilitation, leasing and site improvements.

#### **Slide #42: LEVELS OF REVIEW**

**Shaurita Jackson:** Not everyone on the webinar is familiar with Environmental Reviews. We will be going over the basics today. There are four levels of Environmental Review; exempt, categorically excluded, environmental assessment and environmental impact statement. Categorically excluded has two subgroups; subject to and not subject to. Now, let's go into what each of those are.

#### **Slide #43: EXEMPT ACTIVITIES**

**Shaurita Jackson:** Starting now with the lowest level of review, exempt activities. Typically, exempt activities include administration of CDBG projects, environmental assessment or studies, planning or management, engineering or architectural design or inspections. Exempt activities are defined in section 58.34 of the HUD regulations. Even exempt activities require environmental review and documentation before proceeding. We will cover the review process after discussing all of the categories of review.

#### **Slide #44: EXEMPT ACTIVITIES**

**Shaurita Jackson:** Some examples of exempt activities are; General CV administration, planning only activities, design costs and public service activities.

#### **Slide #45: CATEGORICALLY EXCLUDED ACTIVITIES**

**Shaurita Jackson:** Under categorically excluded, there are two classes of activities. They are named "excluded" because they are excluded from certain NEPA requirements but not all Federal laws environmental requirements. These two categories are often shortened to excluded not subject to or excluded subject to or just subject to and not subject to or even just their acronyms, CENST and CEST.

#### **Slide #46: CATEGORICALLY EXCLUDED – "NOT SUBJECT TO"**

**Shaurita Jackson:** Some examples of CENST activities are; tenant-based rental assistance, supportive services to include, healthcare, housing, and placement, operating costs, economic development costs, some forms of homebuyer assistance, affordable housing pre-development costs, maintenance. Keep in mind that not all activities list in 24 CFR part 58, are eligible for

CDBG and particularly, CDBG-CV. Activities must still be eligible in the CDBG program and be related to COVID for CDBG-CV funds.

#### **Slide #47: CATEGORICALLY EXCLUDED – “SUBJECT TO”**

**Shaurita Jackson:** Examples of activities in this category are acquisition when there is no change in land use, removal within architectural barriers, and rehabilitation of buildings.

#### **Slide #48: ENVIRONMENTAL ASSESSMENT**

**Shaurita Jackson:** If an activity is not listed in part 58 under one of the other categories of review, the level of review required for your project would be, Environmental Assessment.

#### **Slide #49: ENVIRONMENTAL IMPACT STATEMENT**

**Shaurita Jackson:** Finally, Environmental Impact Statements is the highest level of review and is required when a project is determined to have a potentially significant impact on the environment. It is important to note that the size of the project alone does not determine significance; the nature of the impact does. The environmental impact analysis is not limited to the potential impact of the HUD assisted activity. It examines the sites and the surrounding area and must consider the impact of the entire scope of the area, potentially affected by the project's activity. You very rarely see Environmental Impact Statements for CDBG projects. Environmental Impact Statements are required for projects like a new airport, dams or train stations. These projects are seldom funded with the state's CDBG-CV funds.

#### **Slide #50: CROSSCUTTING REQUIREMENTS**

**Shaurita Jackson:** Again, it is important to note that the CDBG-CV Entitlement Program is funded with State and Small Cities CDBG funds. All rules and requirements are determined by Federal Statute, regulations, and DEO policies. More information of DEO's procurement and financial management policies, procedures and forms, can be found on the DEO CDBG downloads for recipient's webpage.

#### **Slide #51: CROSSCUTTING REQUIREMENTS**

**Shaurita Jackson:** All normal CDBG procurement and labor standards and regulations are required and is noted in 24 CFR 570.603.

#### **Slide #52: CROSSCUTTING REQUIREMENTS**

**Shaurita Jackson:** Additionally, all normal CDBG Civil Rights and EEO requirements are listed in 24 CFR 570.487.

#### **Slide #52: CROSSCUTTING REQUIREMENTS**

**Shaurita Jackson:** CDBG-CV is subject to all requirements of the Uniform, Relocation, and Real Property Acquisitions Act, as well as section 104(D) of the Housing and Community Development Act. More information on DEO's URA policies, procedures and forms can be found on the DEO's downloads for recipient's webpage.

#### **Slide #53: HOW TO SUBMIT A CDBG-CV PRE-APPLICATION**

**Shaurita Jackson:** So, now that we've have gone over all the basic rules and requirements, let's talk about submitting the pre-application.

#### **Slide #54: PREPARING YOUR PRE-APPLICATION**

**Shaurita Jackson:** The first step in preparing your pre-application will be to identify the community's needs. This will be done by conducting research, evaluating current programs, and particularly by conducting the first required public hearing. The public hearing must be conducted prior to submission of the pre-application, be properly noticed and include the grantees four factor analysis and the language access plan, if applicable. More information on this requirement can be found in the program guidelines on the CDBG-CV webpage.

#### **Slide #55: PREPARING YOUR PRE-APPLICATION**

**Shaurita Jackson:** The next step would to identify any subrecipients. If subrecipients will be used in the CDBG-CV Entitlement program, documentation of the relationship and commitment should be obtained for submission with the pre-application. These partnerships may or may not be identified at this stage. Please include as much information about partnerships in the pre-application to expedite the DEO capacity review. You will also need to identify the key personnel for the project and grant administration. Will you use staff, or will you need to procure services? Documentation of prior experience will be uploaded with the pre-application.

#### **Slide #56: PREPARING YOUR PRE-APPLICATION**

**Shaurita Jackson:** Based on the national objective for your project, you may be required to determine if census data supports your service area or if an income survey will be required. You will need to determine if your beneficiaries are a presumed group, or already have documentation of 51% LMI based on other programs or if their in-take documents will be necessary. You will also need to develop your project budget. Final detail project budgets do not have to be finalized by the pre-application, but should be as detailed as possible and include all funds that will be requested.

#### **Slide #57: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** All applicants must submit a pre-application for DEO review prior to submitting the final application. Pre-applications will be reviewed for National Objective, Eligible Activities, Citizen Participation, Capacity of Jurisdiction. The Entitlement may submit one application that includes up to five activities. As we mentioned before, an activity for this purpose is considered a single program or project and not an IDIS activity. General Administration, design fees, acquisition and rehab of a facility for a vaccination site would be considered one activity.

#### **Slide #58: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** Pre-Applications will be submitted online via the Qualtrics system. A link to the pre-application registration will be available on the CDBG-CV webpage. Once you have registered, a personal, one-time link will be sent within two business days.

#### **Slide #59: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** Okay so, let's go through a few steps on how to submit the pre-application. First, you will be required to register to get the pre-application link and here is some of the information that we'll go through. The Applicant Name, the Application Preparer, Email Address, Phone Numbers, Contact Information, and Email for the Local Government.

#### **Slide #60: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** Once you receive the single use pre-application link, you can log into the Qualtrics system and enter your application. Throughout the pre-application, tips are provided below. Here is the welcome screen for the pre-application.

#### **Slide #61: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** The online application will automatically save as you go. Until you submit the application, you can return, using the same link; however, pages that have been completed cannot be returned to. DEO recommends completing your application in a word document and preparing all uploads before you begin entering in the system. Once you have submitted your application, you can not return to the application. If you have any questions or issues, you can contact DEO at 850-717-8405 or by email at [CDBG-CV@deo.myflorida.com](mailto:CDBG-CV@deo.myflorida.com)

#### **Slide #62: HOW TO SUBMIT A PRE-APPLICATION**

**Shaurita Jackson:** Applicants will need to choose a type or category of funding. If you are unsure of what category your project falls into, please contact DEO.

#### **Slide #63: PRE-APPLICATION SUBMISSION DOCUMENTS**

**Shaurita Jackson:** The following documents will be required as part of the pre-application submission. So here, we have listed the federal identification number, SAM.gov expiration date, the cage code which is at SAM.gov, your DUNS number. With public hearing documentation regarding four factor analysis, language access plan – if it is applicable, hearing notice with print large enough to review, the publisher's affidavit, the meeting minutes that are certified, sign-in attendance sheet.

#### **Slide #64: PRE-APPLICATION SUBMISSION DOCUMENTS**

**Shaurita Jackson:** We would also need letters of commitment, application documentation, Federal ID number and DUNS number, which we mentioned previously – your proposed budget template, key personnel with job descriptions and resumes as well as, HUD audit or monitoring findings – if applicable.

#### **Slide #65: PRE-APPLICATION SUBMISSION DOCUMENTS**

**Shaurita Jackson:** Additionally, we will request CDBG policies and procedures, financial management, procurement, section 3 compliance, labor standards, URA information, Recordkeeping, and last but not least, sub-recipient monitoring.

#### **Slide #66: QUESTIONS**

**Shaurita Jackson:** At this time, we will answer any questions that you may have. Please enter any questions that you may have in the chat, some of you may have already entered a few

questions as the presentation was going along, and we will answer all those questions at this time.

### **CDBG-CV Entitlement Program Webinar Q&A**

**Question #1: Do I understand correctly, that if every Entitlement Jurisdiction applies for the maximum allocation, the total request for funds will be \$58,748,222 for a total of 51,050,911 in available funds?**

**Kate Doyle:** The CARES Act CDBG-CV round 2 allocation methodology for Florida communities can be found on the DEO webpage. This formula considers the amount awarded to the state, the amount retained from the state for general administration and technical assistance, and funds that will be awarded to non-entitlement communities from the round 2 allocation.

**Question #2: Can you apply for this grant if you are currently using CDBG Housing funds? If the County applies, could you also assist city clients?**

**Kate Doyle:** The answer to the first part of that question is, all eligible Entitlement communities listed on the CDBG-CV Entitlement Program Eligible Communities List are eligible to apply. Current allocation of CDBG, CDBG-CV or other HUD funds don't affect this eligibility. So basically, non-entitlements who are eligible in the regular Small Cities CDBG program are not eligible for this program. For the second part of the question, we would need for you to contact us at DEO to further discuss this because there are different nuances to that but generally, if you're a local government jurisdiction that participates in an eligible entitlement community program, then you may be assisted with this county, grant, or allocation. But if the city itself is also an eligible entitlement under the program, you would need to make sure that you have coordination between the entities to ensure there is no Duplication of Benefits. Also, we are encouraging you that if you are an entitlement community, and you have another entitlement community, that you all can work together and if you want to combine your allocations, if need be.

**Question #3: Are the creation of jobs limited to jobs created to respond to COVID or can jobs be created in any field?**

**Kate Doyle:** HUD does recognize that there is a clear benefit that's derived from addressing economic disruptions due to coronavirus, the jobs themselves are not restricted to direct pandemic response.

**Question #4: It seems that rental assistance to Low-to-Moderate income households, would be an eligible activity under HUD guidelines, but that DEO is discouraging not funding this activity. Is that correct?**

**Kate Doyle:** Rental assistance is an eligible direct benefit activity and would be eligible under the LMI National Objective.

**Question #5: There appears to be a published Entitlement Allocation. Is this the maximum the City can apply for?**

**Kate Doyle:** Yes. What you need to do is go to the list that we have provided the link for, above in the Q&A chat and that will tell you the amount of your entitlement allocation and that would be the maximum that you could apply for. However, if it is after the application period, if not enough communities apply for their allocations and we have additional funds, then you could request for those funds. We will be redistributing those throughout the program if another entitlement community does not use their full allocation.

**Question #6: The City is an Entitlement and recently received two rounds of CDBG-CV funds. Would we need to apply for these funds?**

**Kate Doyle:** If I am understanding this correctly, as far as the two rounds of CDBG-CV funds that you received directly from HUD, that you would go through and do your action plan and get those funds directly from HUD. Whatever process you use with HUD, that is how you would get those two rounds of CDBG-CV funds, but for the funds that are going to be distributed through the state program, where we listed out the allocations for each entitlement community, yes, you would need to go through the pre-application and the application process.

**Question #7: To be clear, these aren't competitive dollars? These are funds the city can access if the application is approved?**

**Kate Doyle:** Yes. After we go through the pre-application process, we will be determining the capacity to administer the funds, as well as evaluating the activities for meeting National Objectives, the tie to COVID, making sure that you have the proper procedures in place. Once we have approved all of that, then yes, you would then be able to submit an application up to the amount that you have been allocated based on those activities that we have approved for you to conduct.

**Question #8: Did you say that the link to request a pre-application is available right now on the CDBG-CV site, or will it be available on February 1?**

**Kate Doyle:** No. It is not yet on the CDBG-CV site, it will be available on February 1 when the pre-application cycle opens and that will be at [www.Floridajobs.org/CDBG-CV](http://www.Floridajobs.org/CDBG-CV), and when you go to that page, there will be a link for the registration for the pre-application.

**Question #9: We are a Florida Municipality, interested in creating a CDBG-CV small business grant program. Is there a contact at DEO who we may work with directly to ensure that our program plan is in accordance with the requirements and regulations of CDBG-CV funding?**

**Kate Doyle:** Yes, we do have program staff that are able to provide you with technical assistance and we can assist you with that. So please, just reach out to us, and Pam has put in our Live Event Q&A, the email address inbox that you can send your request and we will set up an appointment with you to have a call with one of our program staff. That is CDBG-CV@deo.myflorida.com or you can call us at 850-717-8405, with any questions.

**Question #10: What is the pre-application deadline?**

**Kate Doyle:** The pre-application deadline right now, we do not have one. It is going to be a rolling pre-application. You can submit those, as soon you complete it. However, once we start opening up the final application, then we will probably have an end-date where we will end the application. So, you will have to go through the pre-application and application process but don't have a specific deadline on the pre-application, once we open the final application, we will have a deadline for the pre-application.

**Question #11: Can we get a copy of the slides?**

**Kate Doyle:** Yes. We are going to be emailing the slides to everyone who has participated in this webinar today, and we will also be posting them, but it may be next week by the time we send you the slides. We have also recorded the presentation and once we are able to transcribe the presentation, we will get that loaded up online.

**Question #12: Are we able to submit for public service funds in the pre-application, then do an application to do subrecipients to extend those funds and use those in the final application.**

**Kate Doyle:** I'm not sure exactly about the question. I think it is asking if public service funds are an eligible activity. Yes, they are. We would want to make sure that you have a subrecipient in place. We would be evaluating your subrecipient in the pre-application phase.

**Ted Court:** We are talking about a specific project and I think when we are looking at the pre-application, they do ask the local government to identify any subrecipients. It was our assumption that Entitlements are an ongoing operation from year-to-year and they are very familiar with preferred service providers within the community that they would rely upon to help them with their project. I think the only thing they are asking for in the pre-application is to identify those parties and letter support so we can determine that you have these potential subrecipients in place. You may have something in your pre-application, there may be minor changes in whom a subrecipient might be when you submit your final application, but in general I think they are requiring that you identify them.

**Question #13: Is this webinar being recorded and how can we access the recording?**

**Kate Doyle:** Yes, we are recording it. However, to be ADA compliant with posting it on our website, we need to transcribe the presentation, and then sometime next week, we will be posting a link on our website, [www.floridajobs.org/CDBG-CV](http://www.floridajobs.org/CDBG-CV).

**Question #14: We are a small town with three employees at City Hall, including the Town Manager. Do you know, or can you make any recommendations on any agencies that can assist with Grant writing?**

**Kate Doyle:** I'm not sure that we can specifically make any recommendations, but there are consultants that are available and administrative costs reimbursable if you procure a consultant service to assist you in your grant administration.

**Ted Court:** Local governments are allowed to contract with a local Regional Planning Council, also. They do not actually have to go through the procurement. If you're looking for an entity, or a Consultant firm or something like that, Kate is right, we cannot recommend a consultant directly but you can do a solicitation or advertisement in a local newspaper for an experienced consultant to help you develop an application. You would want to advertise in a local newspaper

in accordance with our program requirements. If you only get one response or proposer, you can request DEO's approval of the procurement. We would have to confirm compliance with the program requirements. If you got two or more, and you complied with program requirements, then you could select one of the two.

**Kate Doyle:** Correct, just make sure that you are following the procurement policies unless you are working with a Regional Planning Council and if you have any questions, please feel free to reach out to us.

**Ted Court:** It is a small town with three employees, that sounds like a Small Cities or a community that is participating in an Entitlement program. If you are participating in an Entitlement program, you may want to contact the Entitlement entity and request assistance from them because they will be the ones to make the determination of how those funds are used.

**Kate Doyle:** Yes, right now we are on the CDBG-CV Entitlement Program Webinar but we held a Small Cities Webinar yesterday, which we will also be posting on our website if you missed it, so that you can go back and listen to it. That is a competitive application cycle. So basically, if you look at the eligible communities, look through those lists and if you see that you are an eligible Small Cities community, then you need to make sure that you are applying through your pre-application process, through our small cities program. If you are a small community and you're reviewing the Entitlement communities and you do not see your community listed, then either look on the Small Cities list to see if you're eligible. If not, then contact the Entitlement community that your jurisdiction is located within, for example, the county that you're located in may be an Entitlement community and if they are the Entitlement program, then they will be the eligible applicant. You would not be an eligible applicant, that would be an Entitlement community.

## **Slide #67: CONTACT**

**Shaurita Jackson:** Thank you for participating in our webinar today. As we mentioned, the webinar slides will be provided on the CDBG-CV website. We have also updated the FAQ and other CDBG source materials as they become available. If you have questions, please don't hesitate to reach out to CDBG program staff at the number and email listed on this slide. Thank you again and enjoy the rest of your day.