

Speaker 0 00:00:00 Welcome everyone to the second Preservation and Reinvestment Initiative for Community Enhancement Notice of Funding Opportunity aka the PRICE NOFO webinar. My name is Jennifer Day. I'm from the special issues team in the Office of Block Grant Assistance, and I will be your emcee for today's webinar. This is the second in a series of weekly webinars covering HUD's PRICE NOFO. These webinars are intended for potential PRICE applicants and provide participants with an overview of PRICE and the application requirements. Today's webinar will provide a high-level overview of the Community Development Block Grant Program known as CDBG for potential applicants that have not worked with CDBG in the past. For those of you representing entitlement communities and state governments, you will be familiar with this information. In addition to a brief overview of CDBG, the webinar will take a deeper look at some key regulations in the PRICE NOFO. Although we will cover a lot of information today, please read the NOFO for definitive detailed instructions and information. Since we have some new folks attending today, we'll be reviewing some of the same resources we discussed last week. This information will be familiar to those who attended the first webinar. Next slide please.

Speaker 0 00:01:22 Today's agenda includes a quick look at the PRICE NOFO landing page and a review of upcoming webinars, followed by opening comments from HUD Leadership, a short presentation on CDBG, and a more in-depth look at the PRICE NOFO regulations. We will leave time at the end for Q and A. I will cover a few general housekeeping rules before we get started. Today's webinar will be a hybrid session with both live and recorded materials. All participants will be muted, so we ask that you submit all questions using the chat feature so that our presenters may be able to see questions and respond. Next slide, please.

Speaker 0 00:02:04 HUD has created a dedicated webpage for the PRICE competition. The PRICE NOFO landing page can be found on HUD dot gov and contains a link to the Notice Of Funding Opportunity, NOFO related webinars, including previous webinars on manufactured housing, and copies of application package materials. We highly encourage you to check this page regularly for updates. There are quick links on the right-hand menu, which are highlighted by orange arrows on the slide. In particular, we want to highlight that there is a link to the FAQ document. We'll be updating the FAQ document regularly as we get questions requiring clarification from the NOFO. Next slide please.

Speaker 0 00:02:50 This webinar is the second of eight weekly webinars for PRICE. These webinars are geared towards potential applicants and we encourage those that are new to federal grants to attend all the webinars as possible. Recordings and materials will be posted after each webinar generally a week after the live webinar occurred. We are still finalizing materials from last week's webinar, and we will post them as soon as they're available. We also want to highlight that the HUD Exchange site also has a special page for the manufactured housing and the PRICE competition. In general, HUD grantees are the primary audience of the HUD Exchange site. However, once awards are made, PRICE grantees will be able to find technical assistance and resources to help manage their grants and implement their programs on HUD Exchange. The site also links to the technical assistance webinar series HUD held last year, which provides an overview of manufactured housing. We encourage you to check out this webinar series if you haven't done so. Next slide, please.

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Speaker 0 00:03:56 Now that we've discussed the landing page and webinar series, I want to introduce Deputy Assistant Secretary (DAS) Claudia Monterrosa for opening remarks. As Deputy Assistant Secretary for Grant Programs, Claudia Monterrosa oversees affordable housing and community development programs, including the Community Development Block Grant Program, the Home Investment Partnerships Program, the Housing Trust Fund, and the CDBG Disaster Recovery Fund. In addition to department wide energy and environmental policy, DAS Monterrosa brings decades of nonprofit and public sector experience incorporating social justice, grassroots organizing, and equity to her work at HUD. Previously, Ms. Monterrosa served as the Chief Housing Officer for the City of Los Angeles. In this capacity, she oversaw the implementation of measures HHH, \$1.2 billion for the development of permanent supportive housing, and successfully secured over \$1.6 billion for emergency rental assistance for COVID-impacted tenants. She served as the public policy and research director at the Los Angeles Housing and Community Investment Department, where she managed a team that secured more than \$800 million in new funding for affordable housing, energy efficiency programs, foreclosure prevention, and strategic planning and preservation initiatives.

Speaker 0 00:05:22 Ms. Monterrosa directly led efforts to secure the adoption and implementation of the city's inaugural eviction defense program, including \$10.5 million in funding for the first year, and subsequently securing an additional \$30 million to extend the program through 2024. In 2017, her efforts led to the creation of the city's first permanent local source of funding for affordable housing via the adoption of the affordable housing linkage fee. In that same year, she led the city's successful adoption of the assessment of the Fair Housing Plan under HUD's new Affirmatively Furthering Fair Housing Rule. DAS Monterrosa holds an MA in Urban Planning from the University of California Los Angeles, and a BA in Political Science and Latin American and Iberian studies from the University of California Santa Cruz. DAS Monterrosa welcome, please start the video.

Speaker 1 00:06:20 I'm excited to talk to you about our newest grant competition and thank you so much for joining today's webinar to learn more about the Preservation and Reinvestment Initiative for Community Enhancement grant competition, also known as PRICE. PRICE is the first federal funding of its kind to support manufactured housing communities and residents across the country. This funding will help support efforts to maintain affordability, preserve and revitalize manufactured housing, and invest in the infrastructure and resiliency of manufactured housing communities. Manufactured housing has served as a key housing option to address gaps in our affordable housing supply and as a promising path to home ownership for millions of families of modest means. For too long manufactured housing has been unfairly stigmatized. Residents of manufactured housing units have been treated differently from owners of site-built homes and funding has been limited to preserve and revitalize manufactured housing communities. Here at HUD, we are excited to affirm our commitment to residents of manufactured housing homes and manufactured housing communities through this funding.

Speaker 1 00:07:40 Today, my colleagues will share more information on the Community Development Block Grant Program, and associated regulations that are key components and relevant for prospective applicants for the PRICE competition. I'm encouraging you all to attend the remaining six future webinars as well, which will help provide more details in understanding the various components and requirements of the PRICE competition, so you may successfully apply for

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this opportunity. And I do want to remind everyone that the application deadline for this competition is this June 5th at 11:59 PM Eastern Time, with emphasis on that Eastern time note there. So we look forward to awarding and implementing this funding as soon as we can in support of our country's efforts to reinvest and preserve this housing stock and increase our affordable housing supply; and building a much stronger, more equitable and resilient nation. Thank you all for joining today. We hope to see you in future webinars, and now I would like to hand it over to the next speaker. Thank you.

Speaker 0 00:09:06 Thank you, DAS Monterrosa. Next on the agenda, we have Doug Carlson from Cloudburst to provide an overview of CDBG. Next slide, please.

Speaker 2 00:09:16 Thanks, Jennifer. Hi everybody. I'm really glad to be here and thank you for joining us. As somebody who's worked on manufactured housing issues for most of my career, I'm really excited to be here and to talk and give you an overview of the Community Development Block Grant Program. If you're a fan of game shows, this will be a little bit of a lightning round for CDBG because the program is pretty involved in many ways, but we're going to talk about the framework for it because that's the framework also for PRICE. Next slide, please.

Speaker 2 00:09:50 So if you're not familiar with the Community Development Block Grant Program, it was legislated almost 50 years ago, but the primary objective of the block grant program is to enhance the housing infrastructure in communities to create suitable living environments that also create economic opportunities primarily or principally for people who are low and moderate income. And what do we mean by low and moderate income? Well, it's defined as 80% or less of the area median income for any given jurisdictional area. And that information and data is provided by HUD annually in terms of what 80% of the area median income is or not. And that is in one of the sections of the Housing and Community Development Act of 1974. So go to the next slide please.

Speaker 2 00:10:42 So, the regulatory framework and statutory framework for CDBG is the framework that is also used for PRICE. So, when it comes to the CDBG Program for entitlement jurisdictions in states, the framework is Title One of the Housing and Community Development Act of 1974. The Housing and Community Development Act will celebrate its 50th anniversary in August of this year. And the regulatory standards for the Community Development Block Grant program are in 24 CFR part 570. Those are the standards that apply for both entitlement jurisdictions and states. There's one subpart for states along with the Act and entitlement jurisdictions, use most of the rest of 24 CFR 570. For Indian CDBG statutes and regulations, we refer to 24 CFR part 1003. So, any potential tribal applicants, that would be the regulatory framework that would be used for potential tribal applicants. So, it's really important as we go through the session today to remember that as the CDBG framework applies to PRICE, you will want to refer to the PRICE Notice Of Funding Opportunity or NOFO for the waivers and the alternative requirements that are in the NOFO related to CDBG. That's very important because some things are different for the PRICE competition.

Speaker 2 00:12:11 So there are some basic components to the CDBG program for the activities, if you will, that are funded with CDBG funds, and those basic components are that each CDBG activity qualifies as being eligible under the framework of the law and the regulations that I just mentioned, that it meets one of three national objectives for the CDBG program that are also established in the law, but are also in the regulatory guidance and then those activities must also

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meet a number of other related CDBG and federal requirements.. We sometimes call those cross-cutting requirements related to the CDBG program. So, there's a number of things to keep in mind when you think about the framework for the program. Next slide, please.

Speaker 2 00:13:01 One of the key components of the CDBG program is meeting a national objective. This relates back to the primary objective of the program that it principally serve persons who are low and moderate income. So, it's very important to make sure that we understand the national framework objective for the CDBG program. All CDBG activities must meet one of three national objectives, and these are activities outside of planning and administration, which is also used for the program to run it. But the activities that are funded for the CDBG program have to meet one of three national objectives. The primary objective or the one that's used most often is low-mod benefit. In other words, benefit to persons who are 80% and below of area median income. As I described before, there are a number of different ways to maintain low-moderate income benefit.

Speaker 2 00:13:56 One is to qualify in areas low-moderate income. Another is to serve a limited clientele that is low-moderate income either by their incomes that are collected and used for data purposes or for certain persons who are presumed to be low and moderate income, such as people who are seniors, folks who are illiterate, people who have AIDS, and people who are disabled. There are some other persons who are presumed to be low and moderate income. There's also a housing low- and moderate-income objective so that it meets affordability standards. And then job creation national objective under low-mod for persons who are at or below 80% area median income. One of the other national objectives for the CDBG program is slum and blight. There's a couple of ways to meet the slum and blight national objective. That's to qualify an area as blighted. And the other one is to eliminate spot slum and blight in certain sections of communities. The third national objective is typically related to disaster scenarios or scenarios of immediate need because something happened in a community, and that's an urgent need. Those are for activities that fund problems of recent origin within the last 18 months and for which no local funding is available. Next slide please.

Speaker 2 00:15:19 So again, when we talk about the national objectives and the primary objective of the CDBG program to meet the low and moderate benefit requirement, it's important to note for all PRICE applicants that at least 70% of CDBG funds that are used for activities must be spent on activities that meet a low-mod national objective. So, the national objective that is highlighted, the vast majority, at least 70% of funding for CDBG activities has to meet this national objective. That goes back again to the primary objective for the program that it principally benefits low- and moderate-income persons. So, it's important to remember this as you think about applications for PRICE funding, that the vast majority of your funding has to be meet the low- and moderate-income objective when you carry out your activities. Next slide.

Speaker 2 00:16:17 So let's talk about eligibility. The one thing that is really good about the CDBG program is that there is a wide range of eligible activities that can be carried out and that makes it possible community-wide to really achieve a lot of goals with respect to the program. So, the eligibility categories for CDBG include acquisition and disposition of property, the provision of public services for low- and moderate-income persons, or limited presumed benefit limited clientele. As I described before, economic development -- job creation and retention, is another primary eligible activity of the CDBG program. Public facilities and improvements, CDBG funds are

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often used for those facilities improvements that can be public infrastructure or public buildings that provide services primarily to low- and moderate-income persons. CDBG of course can be used to support housing activities. We're going to talk a little bit more about what that means for manufactured housing and what it means for housing support overall with CDBG in a few moments, but it can certainly be used for that purpose. And then there's an administrative and planning set aside for CDBG that allows the recipients to run and manage the program administratively. Next slide.

Speaker 2 00:17:37 So when it comes to manufactured housing and manufactured housing communities, which is what the MHC stands for, there's a very wide range of things that can be done with CDBG funds. They can be related to preservation, the development of infrastructure or support of new housing, to go specifically towards manufactured housing development to deal with mitigation and resilience to areas that are potentially impacted by weather or disasters. There are housing support and services that can be provided with CDBG funds as public services. And then obviously there's planning and administrative activities. For PRICE the thing to really focus on and think about are some of those categories related to preservation and revitalization, repairing and reconstructing units, providing, acquiring and doing new units in one form or another, making sure that the fair housing and anti-displacement is followed. And then doing the types of infrastructure improvements that are necessary to support manufactured housing communities is also vital.

Speaker 2 00:18:41 It's vital for any housing activity, but particularly for manufactured housing, which tends to suffer from poor infrastructure. CDBG can be used for that. Again, you can talk about how we can do mitigation and resilience with respect to the CDBG funds, and then we can do the types of services that are necessary for the long modern income populations that typically occupy manufactured housing. That can include relocation assistance and things like eviction prevention and other things as part of CDBG public services. And then again, you will have resources available to you to actually plan and implement the program. So, the bottom line here is that there's a wide range of things that can be done with CDBG that supports manufactured housing in communities and has been supporting manufactured housing in communities for many, many years. But you have many options with respect to this particular program. Next slide.

Speaker 2 00:19:39 So, like many federal programs, there are also examples of things that you cannot do with CDBG funds. And this is important to clarify because this is in the regulations for the program. CDBG cannot cover anything and everything, but it certainly has a wide range of things that it does that it can be used for. But there are some things that are ineligible under CDBG. One of them is buildings for the general conduct of government and general government expenses. Political activities and lobbying are ineligible under CDBG. income payments, with some exceptions, are ineligible under CDBG as is the purchase of equipment and operating and maintenance expenses. It's important again to look at the CDBG framework and the regulations for the program, which we'll reference later in the presentation to get a good idea of what is ineligible. One of the categories of ineligible activities is new housing construction and that with some exceptions, you can do it under regular CDBG, but it's really, really important to know that there are some exceptions in waivers that are specific to PRICE when it comes to new housing construction and its relationship back to the CDBG requirements.

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Speaker 2 00:20:51 So again, with respect to both the CDBG regulations, we encourage you to look at those and get familiar with them and some of the other materials, but also to make sure you read the PRICE NOFO so you understand those exceptions and waivers that are available. Next slide.

Speaker 2 00:21:09 So when it comes to eligibility, there was a new notice that came out. It was an update to a notice that was published in 2007 and that is CPD notice 23-10 that was published last year. And that's a notice related to the use of CDBG funds to support housing in one way or another. The new notice provides a much better technical understanding of the application of the CDBG regulations and statute related to housing activities. It provides more flexibility and a more complete category of types of activities that grantees can do to support housing, and it includes a lot of updated guidance on the CDBG uses for manufactured housing, how you do fair housing planning and special economic development and housing related to special economic development, and the use of ADUs or accessory dwelling units as part of a housing program. Next slide.

Speaker 2 00:22:07 Like many federal programs, again, CDBG also comes with a host of other cross-cutting or other types of federal regulations that need to be followed and applied to the use of the funds. One of the most important cross-cutting regulations is 2 CFR 200. That's the uniform administrative requirements for federal grant programs. It also includes cost principles and audit requirements for federal grant programs within 2 CFR 200. There is information on financial management requirements and internal controls. The standards for procurement that must be followed by CDBG grantees and sub-recipients, subrecipient monitoring and performance management are also included in the circular and the requirements for any pass-through entities that you provide money to as part of your CDBG activity delivery. This is one of the most key financial management standard guides that you have. In fact, it is the Guide for Federal Grant Programs so it's really important to become familiar with what's in 2 CFR 200. Next slide.

Speaker 2 00:23:10 There's a number of other federal regulations that generally apply to CDBG. This is not an exhaustive list. This is an "includes, but it's not limited to" list of other federal requirements, but these are some of the most important federal requirements. All CDBG activities must receive some form of environmental review. HUD is the Fair Housing Agency for the federal government, so Fair Housing Act and related laws apply. There are acquisition, relocation specific regulations related to that for CDBG. There are labor standards that apply to CDBG and the payment of federal Davis-Bacon related wages, lead-based paint, of course, that is also the agency that writes the regulations for lead-based paint abatement and removal. Section Three, which is a hiring initiative under CDBG and Section 504, which deals with accessibility. So those are other federal regulatory requirements that you want to become familiar with. Next slide.

Speaker 2 00:24:09 So, public participation is the hallmark or one of the cornerstones of the CDBG program, so it's really important to understand how this applies as well to PRICE. But under CDBG, the process for public participation wants to promote accessibility to residents and agencies and other parties to look at the plan of activities for CDBG funding and then to submit their comments back to the awardee of CDBG funds in terms of that actual activity. It's important for grantees to share their program related information for CDBG with persons that will be affected, particularly in the areas of development by planned activities or who may participate in the

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programs in one form or another. At the CDBG level, the grantees or recipients of CDBG funds must publish their citizen participation plan and hold public hearings and have public comment periods related to their plans and activities. There are streamlined CDBG requirements for PRICE, but it does incorporate many of the public participation elements of the CDBG program. And again, we encourage you to become familiar with some of those elements of the program. Next slide.

Speaker 2 00:25:20 There are lots of great resources on the HUD Exchange. If you're not familiar with the HUD Exchange, it would be a great idea to get an account established on the HUD Exchange and then take a look at some of these resources, which are linked in this presentation. There are online trainings for CDBG. For Basically CDBG, there are guides for the CDBG program including a guide to what a national objective is and how you meet them for basic eligible activities. Next slide, please. There are also other resources related to how you manage Subrecipients with the CDBG program and a curriculum for financial management. Remember I mentioned 2 CFR 200, which are the federal standards. There are financial management guidelines as well. The notice I already mentioned for supporting housing, and then the laws and regulations that we referenced are also linked on the HUD Exchange for the CDBG program. Jennifer, I'm going to hand it back to you.

Speaker 0 00:26:30 Thank you so much. Now we're going to go ahead and hand this over to Deputy Director Cory Schwartz, and he is the Deputy Director of the State and Small Cities Division in the Office of Block Grant Assistance. And he's going to give us a deeper dive into the PRICE NOFO regulations. Next slide, please.

Speaker 3 00:26:53 Thanks, Jennifer. Thank you all. Thank you, Doug. I'm going to build off what Doug was talking about, with the basic CDBG requirements and reinforce some of those points, especially for those of you who are relatively or entirely unfamiliar with the CDBG program, as well as talk about some of the twists in the PRICE NOFO that the PRICE NOFO puts on our regular annual CDBG requirements. So I'm going to talk about the regulatory and statutory requirements for the PRICE competition. Some of those requirements apply during the application process and other of the requirements apply in the To our post award requirements. Compliance with those will shape how you construct your applications. So, it's important to become familiar with those requirements during the application process and in constructing your application. I won't discuss scoring criteria today.

Speaker 3 00:28:11 This is just on requirements surrounding application for and use of PRICE funding. Next slide, please. I see we're on the next slide. So, the PRICE competition seeks to pre preserve long-term housing affordability for residents of manufactured housing or manufactured housing communities, and to redevelop manufactured housing communities. As you may be aware, the PRICE competition has two pots of funding. There's \$200 million for the PRICE main competition, which is to assist in preserving and revitalizing manufactured housing and eligible manufactured housing communities. And there's a \$25 million pot of funding for the PRICE replacement pilot, which is specifically to assist in the redevelopment of manufactured housing communities as affordable replacement housing. We'll get into a little bit of that distinction in a couple of slides with eligible activities. Next slide, please.

Speaker 3 00:29:17 So these are the applicable requirements for the use of PRICE funds. The Consolidated Appropriations Act of 2023, also known as the 2023 budget, authorized HUD to

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provide funding for the PRICE competition which is of course what we're talking about today, and which contains, more specific requirements around the use of PRICE funding and of course, applying for PRICE funding as well. As Doug mentioned, the overarching statutory framework for the CDBG program is the Housing and Community Development Act of 1974. We're 50 this year and whose regulations are in 24 CFR Part 570, and for the ICDBG program at 24 CFR Part 1003. So, all of these laws and regulations apply to the use of funds. The NOFO is the first place to start in terms of what regulations, and requirements apply to PRICE funding. The NOFO, as you may have read through, contains numerous references to both acts as well as the regulations, in terms of what applies to the use of funding. Next slide, please.

Speaker 3 00:30:54 National Objectives. Each PRICE activity must meet a national objective under Section 101 of the Housing and Community Development Act. Doug talked about benefiting low- moderate income persons, preventing slums or blight, or meeting an urgent need. Just to reiterate, low-moderate income persons, those are persons at 80% of the area median income of the jurisdiction of the applicant or of the area in which the project is taking place. So please understand the median income of your project area. There are further regulations that apply, depending on the type of applicant. If you are a state applicant, regular national objective requirements 570.483 apply. If you are any other type of applicant, not including a tribal applicant. then please refer to 570.208 which has further information and details on meeting national objectives requirements. And if you are a tribal applicant, you can look into 24 CFR 1003.208 for requirements.

Speaker 3 00:32:13 I'll also note this is a good place to note that for a lot of the requirements, as I distinguished, between state and non-state and non-tribal applicants. If you are a non-state or non-tribal applicant, the requirements of the entitlement CDBG program generally apply to you. So, you may see points in the NOFO that say, local government or entitlement. Page 71 of the NOFO states that statutory and regulatory provisions governing the entitlement CDBG program shall apply to both entitlement and non-entitlement units of general local government and non-CDBG grantees.

Speaker 3 00:32:57 Next slide please. Affordability requirements. This is a little bit of a twist on the annual CDBG requirements. The PRICE NOFO applies the HOME affordability requirements to the use of PRICE funds. The HOME Investment Partnerships program, which is also administered by HUD, lays out different types of affordability restrictions based on whether its homeowner occupied housing or rental housing. These provisions are in 24 CFR Part 92, more specifically the sub-provisions 92.252 and 92.254. These affordability restrictions are minimum requirements that all PRICE recipients must meet. You'll see if you've reviewed the NOFO, there's a scoring criteria. It's actually preference points at the end of the scoring criteria in the NOFO that provides preference points if you go above and beyond those requirements. That is a separate opportunity to score preference points for the purpose of scoring.

Speaker 3 00:34:16 But the affordability restrictions, which are in the NOFO and the post award requirements apply again to all recipients of PRICE funding. In its PRICE Action plan, a grantee must define affordable rents and affordability standards that they're going to apply to the use PRICE funds for tribal applicants. Of the affordability standards that apply are those that are consistent

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with the Indian Housing Block Grant program, and that any affordability restrictions must be enforceable and imposed by vehicles such as use restrictions, covenants, or deed restrictions.

Speaker 3 00:35:03 Next slide, please. Eligible activities. Each proposed activity must be eligible pursuant to 105(a) of the Housing and Community Development Act. The NOFO lays out in the Eligible Activities section that any CDBG activity is eligible. For purposes of PRICE, the activity must not only be an eligible CDBG activity, but it must also meet, depending on which pot you are applying for, whether PRICE Main or PRICE replacement pilot, it must also meet that purpose. So, on page 26 of the NOFO, HUD lays out a number of potential eligible activities that are eligible to be carried out with PRICE funds. It's not exhaustive. You can apply for activities that are not on that list. You just have to make sure that one, it's an eligible activity under the HCDA under the regulations, or it is under the PRICE NOFO. There is a waiver for certain activities. As Doug mentioned, new housing construction. It must be an eligible activity, and it must either assist in preserving and revitalizing manufactured housing and manufactured housing communities, or assist in the redevelopment of manufactured housing communities as affordable replacement housing. Now, a number of the examples in that list may apply to both of those pots. But please be sure to note that, depending on which pot you're applying for, that the activity itself is eligible.

Speaker 3 00:37:02 Next slide, please. Consolidated Plan and Action Plan. Doug mentioned the use of the consolidated plan and annual action plan in the annual CDBG program. HUD is waiving those requirements for the PRICE application. And if you're an awardee, the PRICE action plan will exist outside of a CDBG grantee's or any Part 91 grantee's Consolidated Plan and Annual Action Plan. I will note that entitlement and state applicants to PRICE must certify that the use of PRICE funds is consistent with its strategic plan. So even though it's not part of the consolidated plan, the certifications in Appendix B for those applicants have a certification related to its consolidated plan. There's also a reference in Appendix B for multi-jurisdictional, entities (MJE). If one of the entities in an MJE is CDBG grantee, there is a reference to that entity's consolidated plan in the appendix. So, please, please look out for that particular certification, and I'll discuss a little bit more about other parts of the consolidated and annual action plan, including citizen participation in a couple of slides. Next slide.

Speaker 3 00:38:39 Timely expenditure. HUD is waiving normal requirements related to the annual CDBG Program, such as the one and a half times test for entitlement grantees and a 15-month announcement of awards for state CDBG grantees. Instead, all grantees must expend funds, within the period of performance of the grant, or September 30th, 2032, whichever is earlier. For PRICE grants, this period of performance is six years. So, six years from when the beginning date of the period of performance as the opportunity for awardees to expend funds, or September 30th, 2032, whichever is earlier. On that date, HUD will cancel all funds in a grantee's account. Please also note that grantees may not draw down funds in advance of need under Part 200.

Speaker 3 00:39:39 Although it's not in this list, and although we do not have interim expenditure requirements, HUD will review recipients' use of funds and pace of expenditure in monitoring to ensure that grantees are timely in expending funds in accordance with its PRICE Action Plan. Next slide, please. So, I'm going to get into the general overview of the kind of chronology of the grant process. After an applicant creates its application they will conduct the citizen participation or public participation process where it conducts at least one public hearing, and provides at least 15

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days for public comment. That period may end no less than three days before application submittal to allow applicants to incorporate public comment into its formal application that it submits to HUD.

Speaker 3 00:40:44 It will then submit its application to HUD, which includes not only the proposed use of funds, but also, all the certifications and all other requirements that are outlined in the NOFO. One note on that little box there about having a valid universal entity identifier from SAM dot gov, as well as registering on grants dot gov. The process to get a UEI and to register on grants dot gov is a multi-step process that can take up to four weeks. So, given the amount of time of the PRICE application period, HUD strongly encourages any potential applicant to start this process as soon as feasible to ensure that it has a UEI that registered in grants dot gov in time to submit an application before the end of the deadline outlined in the PRICE NOFO. It is very important to make sure that those pieces are in place. Otherwise, you will not be able to submit an application before the deadline. HUD will then review application in accordance with the PRICE NOFO and in accordance with the scoring criteria that it is established and select the highest scoring applications for award. If your application is selected for an award, HUD will send a letter to awardees outlining the next steps in the process. I'll also note here that all applicants can request a debrief related to their application. The process for requesting a debriefing is explained on page 67 of the NOFO.

Speaker 3 00:42:25 Next slide, please. These are the certifications that I mentioned. These are in Appendix B of the NOFO, and it varies depending on applicant type. Please ensure that you are using the correct appendix. Depending on what type of applicant you are, and that you submit that as part of your application process. All applicants must complete the lobbying certification in accordance with the waivers and alternative requirements. The normal requirements for certifications in the annual program 91.225 and 91.325 are waived. Next slide, please. So, waivers, so this is the language from the Appropriations Act. The secretary may waive or specify alternative requirements for any provision of any statute or regulation that the secretary administers in connection with the use of amounts made available under this heading, except for requirements related to fair housing, non-discrimination, labor standards, and the environment upon a finding that such waiver or alternative requirement is necessary to facilitate the use of such amounts.

Speaker 3 00:43:39 That is a very long sentence. For those of you that don't read budgets, that may be very strange. For those of us that are a little familiar with the Appropriations Act, we are used to those long sentences. What does that mean? It means that HUD, in administering PRICE funds, can waive statutory and regulatory requirements that are normally applied to CDBG, which is really just what we were talking about. The vehicle of all these waivers and alternative requirements is the PRICE NOFO. So, as we're going through and we're talking about particular waivers and requirements, that is the authority that HUD is exercising under the Appropriations Act, to set program rules for use of PRICE funds. What that also means is that applicants can also request additional waivers and alternative requirements beyond what is has already been provided in the PRICE NOFO to carry out proposed activities. Details on requesting a waiver are in the NOFO Appendix A. Just because an applicant requests a waiver, it is not a guarantee that HUD will grant that waiver. But you can apply based on the process in Appendix A. Next slide, please.

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Speaker 3 00:45:14 So, this continues our kind of chronological grant process and getting into the grant administration. So, for those applicants that receive an award, after you've submitted the application and after it's been chosen, HUD will provide an offer of award and detailed next steps. Only the proposed use of funds that are described in the application will be obligated by HUD. Again, on that note on waivers, please submit anticipated waiver requests with your application for HUD to consider. For those applicants that receive awards, your application, or at least components of your application, will become what we call the PRICE Action Plan. So, again, this is different than a CDBG grantee annual Action Plan. It's a separate PRICE action plan that will exist.

Speaker 3 00:46:22 DRGR is the Disaster Recovery Grant Reporting System. Although it's called Disaster Recovery, HUD uses this application for a number of different grants, including PRICE grants. We've now gone from applicant to awardees or grantees. Grantees will put certain components of its PRICE application into DRGR, including activities, project projected expenditures and anticipated outcomes. And that becomes the PRICE Action plan. Grantees must also publish the PRICE application and the PRICE Action Plan on its official website in an accessible format to ensure access for persons with disabilities. HUD will use DRGR to review grantees' activities and use of funds, as well as its consistency with its application and the PRICE Action Plan. Next slide.

Speaker 3 00:47:40 This continues with what I was mentioning about how HUD will use DRGR. There is an annual performance report that is due after the end of each fiscal year. Grantees are also required to provide financial expenditure data on a quarterly basis called QPR. HUD will use this, as you can see, to provide reports to Congress and the public, to monitor PRICE grantees' use of funds consistent with their PRICE Action Plan, determine compliance, meeting requirements, and analyze risk as well, for monitoring.

Speaker 3 00:48:24 Note here that there are slightly different APR requirements for tribal applicants and for non-tribal applicants. There are some particular requirements in the NOFO related to tribal applicants, and submissions of annual performance reports. Next slide, citizen participation. So, the standard citizen participation requirements for the annual CDBG program are waived, some of the requirements for the PRICE NOFO are similar, and some of them are different. I'll get into what the particulars are in the next few slides. Tribal applicants have the option of following the requirements that I'm going to talk about in the next two slides or they can follow the public participation requirements in the ICDBG regulations at 1003.604. I want to note here that the public citizen participation process or public participation process is a base requirement to be considered for an award.

Speaker 3 00:49:45 It is distinct from the rating criteria, which has a rating criteria or criterion for stakeholder engagement. That rating criteria builds off what is required. However, fulfilling these public participation requirements, that base level, does not ensure any particular point total for purposes of scoring your actual application. So, similar to those affordability restrictions that I talked about at the top of my presentation, there is the required component, and then there is the questions that are used for HUD to score. So be sure that you're looking at both and not assuming that meeting the baseline means that you qualify for points in that subsection. Next slide, please.

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Speaker 3 00:50:40 So, these are the streamlined citizen participation requirements. One public hearing at the applicant's level of government as applicable to solicit public comments. The hearing must be in person, but can also provide a virtual option, reiterating that you must provide reasonable notice, at least 15 days and opportunity for public comment. The PRICE application must be made available to the public in its entirety for public comment. So, in its entirety, that means not just the proposed use of funds and what is going to be scored by HUD, but all of the requirements, all of the attachments, and narratives that are required in the NOFO is considered part of the PRICE application and must be made available to the public for comment.

Speaker 3 00:51:35 Again, the public comment period must end no less than three calendar days before application submittal to ensure that the applicant can incorporate public comment into its formal submission to HUD. Please ensure that the public has equal access to information, including persons with disabilities and limited English proficiency, and that in-person public hearing must be in a facility accessible to persons with disabilities. Next slide. I see we're getting close on time, so I'm going to want to get all this content to you. So, I'm going to touch briefly on these slides. It's going to go a little fast, but please bear with me as best as possible. Substantial amendments are indicated in the NOFO the process to substantially amend your PRICE application or PRICE action plan, which could incur going back through the citizen participation process as outlined in the HUD NOFO. Next slide, please.

Speaker 3 00:52:55 Grantee must update its citizen participation plan to reflect the requirements of the PRICE NOFO. So, if you are a CDBG grantee, please be aware of that and also particularly that last bullet. The application and the grant award information must be available to the community on the grantee's own page or relevant agency's page. Next slide. Grant admin and general admin cap. Grantees must ensure the use of funds are spent appropriately regardless of whether it or another entity is carrying out funds. Whether it's a subrecipient or contractor. Admin caps. All recipients of PRICE funding may use a percentage of the PRICE award for general admin costs and technical assistance. This information is in the post award requirements. It's 10% of the award for state CDBG grantees and non-CDBG grantees and 20% of the award for planning general admin and technical assistance for tribal applicants. Next slide, please.

Speaker 3 00:54:14 Going back to citizen participation post award requirements, I mentioned that application materials must be available on the grantees website and that grantees must provide a written response to every public complaint. Next slide, please. There are a couple of waivers and alternative requirements that are particular to states. Those will be familiar to those states that have administered CDBG-CV or CDBG-RHP, no MOD is required. You may carry out activities directly through your own employees, through sub-recipients or contractors in entitlement areas without contribution from the entitlement. Please review the post award requirements. There are a number of waivers and alternative requirements that accommodate that use of funding rather than distribution through an MOD under the annual program. Next slide. Record keeping. All grantees must maintain records sufficient for HUD to be able to review and ensure compliance with all requirements. Please refer to the regulations for those particular requirements depending on the type of applicant that you are. There are also particular records that need to be kept for purposes of fair housing and equal opportunity requirements. Next slide.

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Speaker 3 00:55:40 Program Income for PRICE. Program income is income generated from the use of PRICE funds. Program income can be used for eligible activities consistent with the PRICE action plan. It can also be used for certain activities that are generally ineligible, including operating and maintenance expenses for certain PRICE funded activities. Please review the NOFO for more information. Next slide. Environmental requirements. Environmental requirements are found at 24 CFR Part 50 or 58. This is very important. Environmental review and request for release of funds must be done before the applicant spends funds in furtherance of the project. The responsible entity which conducts the environmental review varies depending on the type of applicant. Next slide.

Speaker 3 00:56:42 This language from the NOFO about environmental requirements. It is especially important to note that a grantee cannot spend funds, that includes PRICE funds and non-PRICE and non-HUD funding for certain activities until an environmental review has been completed. It is especially important to ensure that you are aware of the activities you're carrying out and that an environmental review has been completed before all applicable activities. Next slide. Reimbursement of expenses. You can incur expenses after the publication date of the NOFO, but before a grant agreement is executed. There are provisions there depending on the type of applicant. Please note that reimbursing yourself for expenses does not absolve that initial expenditure of complying with all requirements. So just because you're reimbursing yourself for requirements before you enter into a grant agreement, that initial expenditure must comply with all PRICE and other CDBG requirements. Next slide.

Speaker 3 00:57:57 Procurement. This is the application of existing procurement requirements. Depending on the nature type of applicant you are, states have a little bit more leeway than entitlement and other non-HUD, non-CBG grantee applicants, which are required to comply with uniform administrative requirements under 2 CFR. Next slide. HUD can also undertake corrective and remedial actions. Those are found in subpart I for states and subpart O for non-state and non-tribal applicants. Next slide. Questions and answers. I'm going to throw this back to Jennifer. I know we're right at time.

Speaker 0 00:58:43 Yes, we are. So, thank you Cory. We appreciate that. We have reached the end of our hour and we will not be able to do live Q and A. However, we are capturing all of the questions from the chat and we'll be working to address your questions. Please check the FAQs and attend future webinars. Next slide, please. On that note, we will have another webinar next week, Wednesday, March 20th at 3:00 PM Eastern, that will provide a walkthrough of the NOFO for tribal applicants. The link to that webinar is posted to the PRICE webpage, and we hope to see you next week and that you all have a great day. Thank you.

Speaker 5 00:59:25 Thank you. And you may now disconnect.