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

NOFA Training
Today’s Agenda

• Purpose and Overview of ICDBG
• Eligible Applicants
• Submission of Applications
• Threshold & Rating Factors
What’s New in 2016

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

• FY 2016 appropriation = $60,000,000

  Competitive Grants - $56,611,911

  Imminent Threat - $4,000,000
Authority

• Title I of the Housing & Community Development Act of 1974 (42 U.S.C. 5301 et seq)

Program Description

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

• Community Based Development Org.
• Low-and Moderate Income
• New Applicant
• Firm Commitment
• Standard Housing/Standard Conditions
Types of Grants

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

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

• NOFA does not list forms to be submitted for these grants

• Contact your Area ONAP first to see –
  – If HUD has funds
  – If activity qualifies
  – What to submit
Criteria

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

• Asbestos removal
• Replacement of failed water system
• Home repairs from floods
• Mold remediation – if not recurring
• Uranium in wells
Show Me the Money
Area ONAP Allocations

• Funds allocated to six Area ONAP regions

• A regulatory formula (24 CFR 1003.101)

  1. $1M to each region

  2. Each region’s share of tribal population (40%), poverty (40%), and overcrowding (20%)
<table>
<thead>
<tr>
<th>Area</th>
<th>ONAP Allocations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alaska</td>
<td>$7,056,169</td>
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<tr>
<td>Eastern Woodlands</td>
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<td>Southern Plains</td>
<td>$13,444,256</td>
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<tr>
<td>Southwest</td>
<td>$19,883,147</td>
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</tbody>
</table>
Grant Ceilings

• Grant ceilings apply to entire application

• If applicant’s request exceeds the ceiling per region, application not rated
Ceilings By Regions

- Alaska: $600,000
- Eastern Woodlands: $600,000
- Northern Plains: $1,000,000
- Northwest: $500,000
- Southern Plains: $800,000
- Southwest: $605,000 - $5.5 M
# Housing Rehab Cost Limits

<table>
<thead>
<tr>
<th>Region</th>
<th>Cost Limit</th>
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<tbody>
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<td>Alaska</td>
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<tr>
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<tr>
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<tr>
<td>Northwest</td>
<td>$50,000</td>
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<tr>
<td>Southern Plains</td>
<td>$35,000</td>
</tr>
<tr>
<td>Southwest</td>
<td>$65,000</td>
</tr>
</tbody>
</table>
Regulations and Requirements

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

• Native American Tribal Governments (see BIA list at:

• Tribal organizations determined by BIA or IHS
Period of Performance

• *Competitive Grants* - until September 15, 2023 to draw down all funds and complete project

• *Imminent Threat Grants* - 12 months from date funds are available to spend funds and complete project
FY 2016 General Section

Found at

And with application download at
http://www.grants.gov
Five Steps to Apply

• Obtain a DUNS Number
• Register with the SAM [https://www.sam.gov/portal/SAM/#1](https://www.sam.gov/portal/SAM/#1)
• Register in Grants.gov
• Grant approval to submit
• Check status
Grants.gov Information

• Helpful information on website

• Click on “Applicants” to find
  – Applicant Tools and Tips
  – Applicant FAQs
  – User Guides, Organization Registration Guide, and educational videos
Thresholds
Threshold Requirements

• General Section

• Program-Related

• Project-Specific
General Section Thresholds

• Application submitted on time

• Civil rights matters resolved before application deadline
Program Thresholds

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

• There are only two in 2016 for certain types of projects
  – New Housing Construction
  – Economic Development
New Housing Threshold

• Developer must be a CBDO

• No other suitable housing in area AND

• No other sources can meet the need AND

• Rehab not economically feasible OR household is currently overcrowded, OR household to be assisted has no current residence
Documenting a CBDO
(Option 1)

- Socially oriented non-profit
- Board represents community
- Free to procure
- Not subject to reversion of assets
Documenting a CBDO
(Option 2)

- Section 301(d) of Small Business Investment Act entities
- SBA approved entities
- HOME Community Housing Development Organization (CHDOs)
- Tribal-based community development non-profit
Documenting a CBDO (Option 3)

• Similar to Option 1 and 2

Example:
- Has all characteristics as 1 but cannot find board with 1/3 or less public officials

• TDHEs not automatically CBDOs
Economic Development Threshold

• Financial analysis prepared by qualified party must demonstrate project is feasible and has a reasonable chance of success

• Show public benefit of ICDBG
  More requested = greater public benefit demonstrated
Economic Development Threshold

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

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

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

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

• Must *STATE* that:
  – Applicant has adopted rehab policies
  – For HO units buyer payments are current
New Housing Requirement

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

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

• If project will support future housing or community development projects submit evidence that project will be completed within three years of grant award
Most Common Activities

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

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

Housing Rehabilitation

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

Land Acquisition

– In conjunction with Housing, Public Facilities & Improvements, Economic Development

– Land alone can be acquired for future housing development only
Eligible Activities

Homeownership Assistance

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

Public Facilities & Improvements

– Community Facilities

– Special Needs Facilities

– Infrastructure
Eligible Activities

Economic Development

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

Microenterprises

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

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

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

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

• 11:59:59 pm on June 14, 2016

• Confirmation of Submission

• Application Submission Validation check

• Application Validation & Rejection Notification
Submission Grace Period

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

• Narrative to five rating factors – and one page summary

• Applications for Assistance (SF-424)

• Disclosure Update (HUD-2880)

• Implementation Schedule (HUD 4125)
Submissions for All Projects

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

• Activities that benefit all residents of an area where at least 51% of residents are LMI persons

• Area must be primarily residential
Measuring LMI Benefit (Limited Clientele)

- Clientele presumed to be 51% LMI
- 51% of surveyed participants are LMI
- Participation limited to LMI
- Nature of activity/location indicates LMI benefit
Measuring LMI Benefit (Housing)

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

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

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

• Neighborhood level options (3 options)
  – Standard CDBG LMI data from the ACS, all people (1 option)
  – AIAN LMI households from the ACS (2 options)

• Applicant generated data per NOFA
Measuring LMI – More Info

• Website for data downloads – http://www.huduser.org/portal/icdbg/home.html
Applicant’s Own Data

• Data must meet this criteria
  – Be collected systematically
  – Be independently verifiable
  – Differentiate between reservation and BIA service area population where applicable
Applicant’s Own Data

• Must submit
  – Explanation of number of people benefitting from project and number of LMI
  – Sample copy of survey form
  – Explanation of methods used to collect data
  – Listing of incomes by household and size
Submissions for Certain Projects

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

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

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

• Applicants must score a minimum of 70 points to be funded
• Cut off for most Area ONAPs is much higher
• Points vary if current or new applicant
Factor 1 – Capacity

- Up to 30 points in total
- If funded this year, progress will be measured
- If funded in past years, lack of progress will = fewer points
SF 1 - Managerial, Technical & Administrative Capacity

• 15 points current grantees / 30 points new
• Possess or can obtain managerial, technical or administrative capacity to carry out proposed project
• Identify who will administer project
SF 1.a. Managerial & Technical Staff

- 8 points current or new
- Describe roles and responsibilities of project director and staff
- Experience of all key staff must be relevant, recent, and successful
SF 1.b. - Implementation Plan

- 3 points current grantees / 8 points new
- Identify specific tasks and timelines for completing project
- Two projects = two plans
- Full points if project can start within 180 days from award date
SF 1.c. - Financial Management

- 2 points for current grantees / 7 points for new
- Describe how financial management systems of applicant, CBDO and subrecipient meet regulatory requirements
- Seriousness/significance of open findings
- Current audit if required
SF 1.d.-
Procurement/Contract Mgmt

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

• 15 points for current grantees/new applicants not rated here

  – (a) Implementation/Expenditures (more points if faster spending) (4 pts.)

  – (b) Reports (2 pts.) – no 15 days grace period
SF 2 - Past Performance

- (c) Close-outs (3 pts.)
- (d) Audits (3 pts.)
- (e) Findings (3 pts.)
Rating Factor 2
Need/Extent of Problem

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

• Application should include information on need for the project and demonstrate that it meets an essential community development need and is critical to the viability of the community
SF 2 - Project Benefit

• Carefully review criteria for each type

• Calculation depends on type of project
SF 2.a.
Public Facilities and Improvements

• Up to 12 points
• Several options for determining need
  – CDBG data
  – ACS data
  – Your own information that meets the criteria in the NOFA
Public Facilities & Improvement Projects

- At least 85% LMI: 12 points
- At least 75% but < 85% LMI: 8 points
- At least 55% but < 75% LMI: 4 points
- Less than 55%: 0 points
SF 2.b. – Economic Development

- Beneficiaries are persons served, employed by project, jobs created or retained
- Submit census data or other data as explained on earlier slide
- Points given are identical to those on previous slide
SF 2.c.
Housing Construction and Rehab, Land Acquisition and Homeownership

Based on 2016 IHBG formula data

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<thead>
<tr>
<th>Range</th>
<th>Points</th>
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<td>$0 - $750</td>
<td>12 pts</td>
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<tr>
<td>$751 - $1,250</td>
<td>8 pts</td>
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<tr>
<td>$1,251 - $3,999</td>
<td>4 pts</td>
</tr>
<tr>
<td>$4,000+</td>
<td>0 pts</td>
</tr>
</tbody>
</table>
Rating Factor 3
Soundness of Approach

• Up to 36 points
• Address quality/effectiveness of project to enhance community viability, meet identified needs, and sustain the project
Rating Factor 3
Soundness of Approach

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

• Up to 14 points
• Describe your project
• Describe how project will address identified need
• Describe how project will enhance community’s viability
SF 2 - Budget & Cost Estimates

• Up to 10 points
• Include cost breakdowns by line item (including planning & admin)
• Include cost estimates and describe qualifications of person(s) who prepared the estimate(s)
SF 3
Commitment to Sustain Activities

- Up to 12 points
- Demonstrate commitment to community’s viability
- Criteria varies by type of project
SF 3.a.
Public Facilities/Improvements

• Up to 12 points
• Provide statement that tribe or “entity other than tribe” has adopted/developed O&M Plan and commits funds for those responsibilities
SF 3.a.
Public Facilities/Improvements

- Must addresses maintenance, repairs, insurance, security & replacement reserves & include cost breakdown
- Buildings must show operating funds for services
- Service providers submit commitments for operating and space needs
SF 3.b.
(New Housing Construction, Housing Rehabilitation, Homeownership Assistance Projects)

• Up to 12 points
• Identify tribal and/or participant’s maintenance responsibilities
• Describe responsibilities and provide written commitment to undertake
SF 3.c. - Economic Development

• For up to 12 points describe:
  – How the project will operate
  – Why it is needed
  – How it will succeed
SF 3.d. Microenterprises

• For up to 12 pts describe how program will operate

• Include types of assistance offered and entities eligible for assistance

• Describe process for selecting applicants and analyzing business plans
SF 3.e.
Land Acquisition to Support New Housing

• Up to 12 pts
• Show that proposed site has:
  – Suitable soil conditions
  – Potable drinking water
  – Access to utilities, vehicular access, drainage, services, and no environmental problems and units built within two years of purchase
Rating Factor 4
Leveraging Resources

• Up to 8 points

• HUD will award points based on % of non-ICDBG funds relative to total project cost
# Leveraging Resources Points

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<tr>
<th>Non-ICDBG Resources to Total Project Costs</th>
<th>Points</th>
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<tr>
<td>25 percent or more</td>
<td>8</td>
</tr>
<tr>
<td>At least 18 percent but less than 25 percent</td>
<td>6</td>
</tr>
<tr>
<td>At least 11 percent but less than 18 percent</td>
<td>4</td>
</tr>
<tr>
<td>At least 4 percent but less than 11 percent</td>
<td>2</td>
</tr>
<tr>
<td>Less than 4 percent</td>
<td>0</td>
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</table>
Leveraging Resources

Allowable Non-ICDBG Resources

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

Disallowed Leverage

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

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

• Commitment must be received within 6 months
• Letter from contributing entity must:
  - Indicate why commitment cannot be made
  - Provide assurance project is eligible for $
  - Provide date when funding decision will be made
Factor 5
Comprehensiveness & Coordination

• Up to 10 points
• How project was developed with others in community and is consistent with any tribal strategic or comprehensive plans
SF 1 - Coordination

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

• Up to 8 points
• Outputs include
  – How many houses rehabilitated
  – How many jobs created
  – Square feet of public facility
  – How many homeownership units built/financed
SF 2 - Outputs & Outcomes

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

• In 2016, 2 bonus points for working in a Promise Zones or Preferred Sustainability Community
• Must submit forms signed by POC for each
• See V.D.3 of General Section
What HUD Does
Review and Selection Process

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

- At least 70% of funds must benefit LMI persons
- Threshold compliance
- Past Performance evaluated
- Rating - Minimum Points
Review & Selection Process (Con’t)

• Ranking
  – All types of projects ranked against all others

• Tiebreakers
  – Standardized across AONAPs
  – Projects selected that can be fully funded over those that cannot be
Technical Deficiencies

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

• No funding if no response or inadequate response

• HUD also does a delinquent Federal Debt and Name Check Review
Reasons for Rejection

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

• Pre-awards must be met
• Congressional Notification
• Awards announced in Sept
• Execute grant agreement – special conditions
Post Award Reporting Requirements

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

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

- Alaska: (907) 677-9860
- Eastern Woodlands: 1-800-735-3239
- Northern Plains: 1-888-814-2945
- Northwest: (206) 220-5270
Area ONAPs (Con’t)

• Southern Plains: (405) 609-8532
• Southwest (Phoenix): (602) 379-7200
• Southwest (Albuquerque): (505) 346-6923
Technical Assistance (TA)

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

• Contact your Area ONAP for specific locations and to register for NOFA training
• Online ICDBG training: http://www.hud.gov/offices/pih/ih/grants/icdbg.cfm
Examples of Funded Applications

• Can be found on HUD’s website at:


• Certain Area ONAPs have posted applications also