

# NYS Community Development Block Grant (CDBG) Exit Conference Webinar



## Public Infrastructure, Public Facilities, and Economic Development

Good morning, everyone. Welcome to the CDBG exit conference webinar. My name is Julianne Clouthier, and I am an Economic Developer at the New York State Office of Community Renewal. Joining me today, is Economic Developer Ashley Lavigne. This webinar is intended to cover recent applicants to all unsuccessful non-housing applications. This includes applications submitted through the 2013 Consolidated Funding Application (CFA) funding round as well as the 2013 Community Renewal Fund (CRF) funding round, and open-round Economic Development.

# NYS CDBG Exit Conference Agenda

## Program Summary

- Overview of NYS CDBG program
- Eligible Activities
- Funding Limits

## Critical Application Sections

- National Objective Compliance
- Demonstration of Need
- Project Description
- Project Budget
- Supporting Documentation



## Application Process

- CFA sections and common errors



## Summary

- Scoring Criteria/Application Evaluation Criteria
- Helpful Hints

The presentation will include the following topics: Program Summary, Critical Application Sections, Application Process, and Summary.

The first section of discussion will be **Program Summary**, which will include an overview of the CDBG program including, Public Infrastructure, Public Facilities and Economic Development Programs and all eligible activities that a municipality may apply for, as well as funding limits for municipalities.

The second section of the discussion will be **Critical Application Sections**, which will include information on National Objective Compliance, Demonstration of Need, Project Description, Project Budget, and Supporting Documentation. These sections will include common deficiencies that are found in unsuccessful applications, as well as helpful hints that should be used to prepare an application.

The third section of discussion will be the **Application Process**, which will include a description of the various aspects of the CFA. Please keep in mind that while completing the application, if you have any application specific questions relating to your project, you should contact your community or economic developer for assistance.

The final section is a **Summary**, which will include Scoring Criteria/Application Evaluation Criteria and Helpful Hints.

## NYS CDBG Exit Conference Agenda

- Application tips will be provided throughout the entire presentation to address common deficiencies.
- Questions are welcome, but please hold until the end of the presentation.
- We will respond to questions at the end of the presentation.



Application tips will be provided throughout the entire presentation to address common deficiencies.

Questions are welcome, but please hold until the end of the presentation.

We will respond to questions at the end of the today's webinar.

## Overview of NYS CDBG Program

- Develop viable communities by providing decent housing and a suitable living environment principally for persons of low- and moderate-income.
- NYS must ensure that at least 70% of its CDBG grant funds are used for activities that benefit low- and moderate-income persons (at or below 80% of median) and meet one of the following National Objectives:
  - Benefit low- and moderate-income persons or families; or
  - Aid in the prevention or elimination of slums or blight; or
  - Meet an urgent community development need.



The objective of the CDBG program is to ensure that communities throughout the state are viable by providing decent housing and suitable living environments for low and moderate income persons, and at least 70% of New York State CDBG funds are used for activities benefiting low and moderate income persons (which means that they are at or below 80% of the area's median income) and meets one of the following National Objectives:

- Benefit low- and moderate-income persons or families; or
- Aid in the prevention or elimination of slums or blight; or
- Meet an urgent community development need.

## NYS CDBG Funding

- Annual Competitive Applications through Consolidated Funding Application (CFA)
- Applications submitted through the Community Renewal Fund (CRF)
- Open-round Economic Development funding (pending availability)
- For all application processes, the following applies:
  - Eligible applicants include non-entitlement cities, towns, and villages with populations under 50,000 and counties with an area population under 200,000. This link provides a listing of eligible communities: [www.nyshcr.org/Programs/NYS- CDBG/EligibleCommunities.htm](http://www.nyshcr.org/Programs/NYS-CDBG/EligibleCommunities.htm)
  - Applicants must comply with federal, state, and local citizen participation requirements.



The three avenues to pursue non-housing New York State CDBG funding opportunities include:

- Annual Competitive Applications through Consolidated Funding Application (CFA);
- Applications submitted through the Community Renewal Fund (CRF); and
- Open-round Economic Development funding (pending availability).

The CFA streamlines the grant application process for New York State's various economic development agencies. The Consolidated Funding Application (CFA) enables businesses and other entities to apply to multiple agency funding sources through a single, web-based application.

In 2013, the CFA announcement awarded \$13.2 million dollars in Community Renewal Funds to five of the Regional Economic Development Councils (REDC).

Open-round Economic Development funding is only available as resources permit. This process is initiated through a pre-submission form obtained from an OCR Economic Developer.

Eligible applicants include non-entitlement cities, towns, and villages with populations under 50,000 and counties with an area population under 200,000. For a complete listing of eligible communities, please visit the NYSHCR website or navigate to the link provided:

[www.nyshcr.org/Programs/NYS- CDBG/EligibleCommunities.htm](http://www.nyshcr.org/Programs/NYS-CDBG/EligibleCommunities.htm)

Applicants must also comply with federal, state, and local citizen participation requirements.

## Public Infrastructure Program Guidelines

- Must be able to demonstrate that project meets National Objective Criteria and at least 51% of the beneficiaries are low-and moderate income (LMA)
- NYS CDBG can fund up to 100% of project cost
  - NYS CDBG funds should be used to fill the budget gap
  - If other funds have been demonstrated to not be available
  - Other funds have been made available, but funds are not affordable
  - Other funds have been committed and will be available at the time of grant award



The Public Infrastructure Program Guidelines require that the applicant:

- Must be able to demonstrate that the proposed project meets National Objective Criteria by demonstrating that at least 51% of the beneficiaries are low-and moderate income (LMA)
- The New York State CDBG program can fund up to 100% of project cost, however:
  - New York State CDBG funds should be used to fill the budget gap
  - Other funds must have been proven to be unavailable
  - Other funds must have been made available, but those funds are not affordable
  - Other funds must have been committed and are anticipated to be available at the time of grant award

## Public Facilities Program Guidelines

- Must be able to demonstrate that project meets National Objective Criteria and at least 51% of the beneficiaries are low-and moderate income for the area, for example, community centers or health clinics
- Must be able to demonstrate that project meets National Objective Criteria and all the beneficiaries qualify as LMC, for example, senior centers
- NYS CDBG can fund up to 100% of project cost
  - NYS CDBG funds should be used to fill the budget gap
  - If other funds have been demonstrated to not be available
  - Other funds have been made available, but funds are not affordable
  - Other funds have been committed and will be available at the time of grant award



The Public Facilities Program Guidelines require that the applicant:

- Must be able to demonstrate that project meets National Objective Criteria and at least 51% of the beneficiaries are low-and moderate income for the area, for example, community centers or health clinics.
- Must be able to demonstrate that project meets National Objective Criteria and all the beneficiaries qualify as LMC, for example, senior centers. We will discuss LMA and LMC later in the presentation.
- Similar to Public infrastructure, The New York State CDBG program can fund up to 100% of project cost, however;
  - New York State CDBG funds should be used to fill the budget gap
  - Other funds have proven to be unavailable
  - Other funds have been made available, but those funds are not affordable
  - Other funds have been committed and are anticipated to be available at the time of grant award

## Economic Development and Small Business Program Guidelines

### Economic Development

- NYS CDBG funding up to **40%** of total project cost
- Project must result in creation/retention of at least one (1) permanent FTE job per **\$15,000** in CDBG investment
- CDBG funds intended for gap funding

### Small Business Assistance

- NYS CDBG funding up to **40%** of total project cost
- Project must result in creation/retention of at least one (1) permanent FTE job per **\$25,000** in CDBG investment
- Minimum 20% owner equity required
- CDBG funds intended for gap funding



The Economic Development Program Guidelines include the requirements of:

- NYS CDBG funding up to 40% of total project cost
- Project must result in creation/retention of at least one (1) permanent FTE job per \$15,000 in CDBG investment
- CDBG funds intended for gap funding

The Small Business Program Guidelines include the requirements of:

- NYS CDBG funding up to 40% of total project cost
- Project must result in creation/retention of at least one (1) permanent FTE job per \$25,000 in CDBG investment
- Minimum 20% owner equity required
- CDBG funds intended for gap funding

## Microenterprise Program Guidelines

- Minimum **50%** allocation must assist start-up microenterprise businesses
- NYS CDBG Microenterprise funds must be allocated as a **grant** to assisted businesses
- Individual grant assistance must range between **\$5,000** and **\$35,000\***
- Grants **not** to exceed 90% of total project cost to assisted businesses
- Minimum 10% owner equity contribution to individual projects
- Each microenterprise owner must complete approved entrepreneurial assistance or small business training program prior to receiving CDBG ME grant funds.

### Take Note:

- **Microenterprise:** five (5) or fewer employees, one (1) or more is the owner(s)
- **Start-up:** business in operations less than six (6) months
- **\*Maximum \$35,000 grant not intended to serve as target assistance request**
- Cost for business owner to attend training is an **eligible** CDBG expense



The Microenterprise Program Guidelines require that applicants follow these steps when designing a program:

- A Minimum 50% allocation must assist start-up microenterprise businesses
- New York State CDBG Microenterprise funds must be allocated as a grant to assisted businesses
- Individual grant assistance must range between \$5,000 and \$35,000\*
- Grants cannot exceed 90% of the total project cost to assisted businesses
- A Minimum of 10% owner equity contribution is required for individual projects
- Each microenterprise owner must complete approved entrepreneurial assistance or small business training program prior to receiving CDBG ME grant funds.

## Citizen Participation Requirements

- All applicants must issue a public notice and hold a public hearing before submitting an application.
- The notice for the hearing must specifically mention the municipality's intent to apply for NYS CDBG funds.
- Hearings must be held in a location accessible to persons with disabilities and/or provide reasonable accommodations to allow all interested parties to participate.
- Hearings must be held at a time most conducive to public participation.



As previously mentioned, applicants must meet federal, state, and local citizen participation requirements. This is a threshold review item, which means that the lack of a public hearing or an improper notice will deem the project ineligible. Citizen participation requirements include:

All applicants must issue a public notice and hold a public hearing before submitting an application.

The notice for the hearing must specifically mention the municipality's intent to apply for NYS CDBG funds.

Hearings must be held in a location accessible to persons with disabilities and/or provide reasonable accommodations to allow all interested parties to participate.

Hearings must be held at a time most conducive to public participation.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Citizen Participation issues:*

- Failure to hold a public hearing prior to submitting the application.
- The hearing was not held by the eligible applicant.
- The public notice does not specifically mention the NYS CDBG program.



A common deficient area of the application is the failure to hold a public hearing prior to submission of the application. It must be a public hearing, not a board meeting or a public meeting.

Another common deficiency is that the hearing is not held by the eligible applicant. For example, the hearing was held by a local non-profit organization or industrial development agency instead of the municipality.

A third issue with citizen participation is that the public notice does not specifically mention the NYS CDBG program.

# Application Tips

## Common Deficiencies in Unsuccessful Applications

### *Citizen Participation – Sample Public Hearing Notice*

**NOTICE OF PUBLIC HEARING**  
CITY OF ONEONTA  
2013 NYS COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

The City of Oneonta will hold a public hearing on the 2013 New York State Community Development Block Grant (Small Cities) Program. This public hearing will focus on possible projects. The hearing will be held as follows:

Date: April 16, 2013  
Time: 11:00 AM  
Place: City Hall Council Chambers, 258 Main Street

The 2013 NYS CDBG (Small Cities) Program provides grants to communities to undertake housing, public facility and economic development activities. Approximately \$6 million is available to the Oneonta Vantage Region. Communities can apply for single-purpose housing and public facility projects, as well as other projects. Economic development projects and small business development projects. Activities must meet HUD Section 3 requirements. Oneonta low and moderate income persons. The City of Oneonta encourages the use of MWBE and WBE businesses in their services, supplies and products. Applications for housing, economic development, public facilities and other projects must be submitted to the State by April 30, 2013. The City of Oneonta is an Equal Opportunity Employer.

Possible projects may include:  
Economic Development Small Business Grant  
Wider Park Restrooms Rehabilitation  
Alumni Housing Development & Neighborhood Revitalization  
Public Infrastructure Improvements

Please attend the public hearing and express your ideas regarding community development roads, parks, and possible projects. Written comments can be submitted to the City as follows:

Jeffrey A. Nagle  
Community Development Office  
City Hall  
258 Main Street  
Oneonta, New York 13820

Richard P. Miller Jr., Mayor

Gail Kaserman of Oneonta, NY, in said County, being duly sworn, deposes and says that she is the Collection Specialist for the newspaper called The Daily Star, printed and published in Oneonta NY aforesaid, and that the advertisement of which the annexed is a printed copy has been published in the said newspaper on the

16th

Date(s) of April 2013

Gail Kaserman

Sworn to before me the 16th Day of April 2013

GUSTO A. BALACIOTTI  
NOTARY PUBLIC  
GUSTO A. BALACIOTTI  
Notary Public, State of New York  
No. 012424201  
Qualified in Oneonta County  
Commission Expires February 23, 2014

This slide is an example of a proper public hearing notice.

New York State CDBG funding is clearly identified.

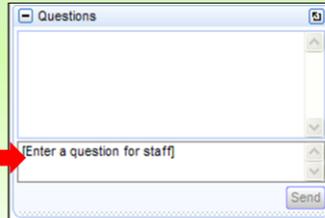
Date and time is presented

MWBE language is included

Since this is a real life example, we would like to point out that it is strongly recommended that the applicant also include language that addresses reasonable accommodations for citizens.

## Webinar Reminders

- Audio is available through your computer speakers or the telephone. If the sound quality through your speakers is inadequate, click on Telephone and call in to the conference line.
- Please press \*6 mute your line.
- A PDF of the presentation has been provided by email prior to the presentation.
- Use the Questions feature on your GotoWebinar toolbar to submit questions. We will respond to questions at the end of the presentation
- This webinar is intended for Community Development Block program (CDBG) Non-Entitlement Communities. This link provides a listing of eligible communities:



[www.nyshcr.org/Programs/NYS-CDBG/EligibleCommunities.htm](http://www.nyshcr.org/Programs/NYS-CDBG/EligibleCommunities.htm)

For anyone arriving late to the presentation, we wanted to provide the following webinar reminders.

We are conducting this group exit conference presentation to provide consistent and comprehensive guidance to all applicants. Please take the time to review your application and compare to the recommendations in today's presentation. After this presentation and your organization's review, if you still feel that you need specific guidance email us and we can schedule a time to discuss the application. Please note, each funding round is different due to the availability of funds. For this reason, we do not provide scores.

Audio is available through your computer speakers or the telephone.

If the sound quality through your speakers is inadequate, click on Telephone and call in to the conference line. Please dial in to the conference call using the phone number, access code and audio pin displayed in your GoToWebinar menu.

The presentation was provided to all registered participants prior the webinar

and will be made available to the OCR website with notes.

Use the Questions feature on your GotoWebinar toolbar to submit questions.

We will respond to the most common questions at the end of the presentation.

This webinar is intended for Community Development Block program (CDBG) Non-Entitlement Communities. This link provides a listing of eligible communities:

[www.nyshcr.org/Programs/NYS- CDBG/EligibleCommunities.htm](http://www.nyshcr.org/Programs/NYS-CDBG/EligibleCommunities.htm)

All questions and answers will be made available on the OCR website by February 18, 2014.

## Public Infrastructure and Public Facilities Eligible Activities

### *Public Infrastructure*

- Public Water
- Public Sewer

### *Public Facilities*

- Day Care Facilities
- Community Centers
- Senior Centers
- Accessibility Improvements to Municipal Buildings (ADA Compliance)



Eligible public infrastructure activities include, but are not limited to, public water and public sewer projects.

Eligible public facilities activities include, but are not limited to, day care facility projects, community center projects, senior center projects, and accessibility improvements to municipal buildings.

## Economic Development, Small Business, and Microenterprise Eligible Activities

### *Economic Development and Small Business Assistance*

- Public Infrastructure projects in support of business attraction, expansion, and retention.
- Direct business assistance in support of business attraction, expansion, and retention. Use of funds may include, but are not limited to:
  - Working Capital, Machinery & Equipment, Acquisition of Real Property, Inventory, Employee Training Expenses, \*Construction, and \*Building Renovation.

### *Microenterprise Program*

- Establishment of a microenterprise program to provide assistance to businesses with 5 or fewer employees, including the owner.



**\*Construction and Building Renovation costs may be subject to Davis-Bacon wage requirements.**

Eligible economic development and small business activities include Public Infrastructure projects in support of business attraction, expansion, and retention, as well as direct business assistance in support of business attraction, expansion, and retention. Common uses of funds under this activity are:

- Working Capital
- Machinery & Equipment
- Acquisition of Real Property
- Inventory
- Employee Training Expenses
- \*Construction
- \*Building Renovation

An eligible microenterprise assistance activity is the development of a local microenterprise program to provide assistance to businesses with 5 or fewer employees, including the owner.

**\*As a reminder, if NYS CDBG funds are used for construction and**

**building renovation costs, the entire project may become subject to prevailing wages, as dictated by the Davis-Bacon Related Acts.**

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Ineligible Activities:*

- Projects that do not meet a National Objective;
- Buildings or portions thereof, which are used for the general conduct of government;
- General government expenses;
- Political activities; and
- Projects already in progress at time of application.

#### **Take Note:**

- Project activities **must not** commence prior to award date and release of funds.



Common ineligible activities are: projects that do not meet a National Objective (which will be discussed in more depth later in the presentation); projects which will use CDBG funds for buildings or portions thereof, which are used for the general conduct of government; projects that propose CDBG funding of general government expenses; projects that include political activities; and projects already in progress at the time of application.

As noted in the yellow box:

All project activities, regardless of funding source, **must not** commence prior to award date and release of funds.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Ineligible Activities:*

- The applicant has submitted an application for NYS CDBG funding assistance for the renovation of the roof on the Court building. The building, which is owned by the Town, houses the Town Office and Court. **[INELIGIBLE]**
- The applicant has submitted an application for NYS CDBG funding assistance for a handicap-accessible ramp to the Court building. The building, which is owned by the Town, houses the Town Office and Court. **[ELIGIBLE]**



The first example is an ineligible project because the building is used for the general conduct of government, and renovations are not solely designated to address accessibility issues.

The second example may potentially be an eligible public facilities project, since the renovations are limited to accessibility improvements. This is only provided to reference an eligible activity, and the applicant would need to submit appropriate documentation to substantiate the proposed activity.

## Public Infrastructure/Public Facilities Funding Limits

### Public Infrastructure

- Towns, Cities or Villages: \$600,000
- Counties: \$750,000

### Public Facilities

- Towns, Cities or Villages: \$400,000
- Counties: \$750,000

### Shared Municipal Infrastructure

- Infrastructure: \$900,000

**Program Year Funding Maximum: Equals the Program Year Funding Limits Listed Above**

---

**A maximum of 18% of the CDBG request can be used for Administration, Program Delivery, Engineering and Architecture.**



For Towns, Cities or Villages, the funding limits consist of \$600,000 for public infrastructure projects and \$400,000 for public facilities projects. For Counties, the funding limits consist of \$750,000 for public infrastructure projects and \$750,000 for public facilities projects. Municipalities that have a shared infrastructure project have a \$900,000 funding limit.

In addition to the individual application funding limits, each municipality has a program year maximum funding limit, which equals the per application maximum for each category.

In regards to soft costs, a maximum of 18% of the CDBG request can be used for Administration, Program Delivery, Engineering and Architecture.

## Economic Development, Small Business, and Microenterprise Funding Limits

### Economic Development

- Towns, Cities, Villages and Counties: \$100,000-\$750,000

### Small Business

- Towns, Cities or Villages, and Counties: \$25,000-\$100,000

### Microenterprise

- Towns, Cities or Villages, and Counties: \$0-\$200,000

**Program Year Funding Maximum** **\$750,000**

For Economic Development and Small Business projects, a maximum of \$16,000 of the CDBG request can be used for Program Delivery and Administration.

For Microenterprise Programs, a maximum of 25% of the CDBG request can be used for Program Delivery, Administration and Training.

- Of the 25%, a maximum of 5% can be used for Administration.



For Towns, Cities, Villages and Counties, the funding limits for traditional economic development projects consists of a minimum of \$100,000 and a maximum of \$750,000.

For Towns, Cities, Villages and Counties, the funding limits for small business projects consists of a minimum of \$25,000 and a maximum of \$100,000.

For Towns, Cities, Villages and Counties, the funding limits for microenterprise programs consists of no minimum award amount and a maximum award of \$200,000.

In addition to the individual application funding limits, each municipality has a program year funding maximum of \$750,000 for the Economic Development Program (ED, SB, and ME).

In regards to soft costs, for Economic Development and Small Business projects, a maximum of \$16,000 of the CDBG request can be used for Program Delivery and Administration.

For Microenterprise Programs, a maximum of 25% of the CDBG request can be used for Program Delivery, Administration and Training. Of the 25%, a maximum of 5% can be used for Administration.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Funding Limits:*

- The application requests more than the funding limit allows.
- The application requests funding for the same project through multiple CDBG applications e.g. Economic Development and Small Business.
- The application pushes the applicant above the maximum funding limit per program year.
- The application requests inconsistent amounts within the application.



With respect to funding limits, several common deficiencies in applications occur:

- The application requests more than the funding limit allows.
- The application requests funding for the same project through multiple CDBG applications e.g. Economic Development and Small Business.
- The application pushes the applicant above the maximum funding limit per program year.
- The application requests inconsistent amounts within the application.

## Critical Application Sections

- National Objective Compliance
- Documented Need
- Regulatory Compliance



These areas are critical sections of the application and will be discussed in more detail in the slides to follow.

The applicant must determine identify a National Objective. National Objectives will be explained in more detail in the upcoming slides.

The applicant must also provide a detailed explanation of why the community needs CDBG funds.

The applicant must also demonstrate understanding and compliance with all applicable program rules and regulations.

## National Objective Compliance

### *LMA: Low/Mod Area Benefit:*

- Identify the service area of the project.
- Two methods used to demonstrate compliance:
  - Census Data
  - Survey Data



NYS CDBG funded projects must demonstrate compliance with a National Objective. In order to document compliance, applicants must first identify the service area of their project. Activities that benefit an entire community are considered to have an area wide benefit and the service area is the entire community, excluding social service residences such as those operated by the NYS Office of Mental Retardation and Developmental Disabilities.

Activities that benefit a smaller or targeted group only benefit a designated area of a community. If you are trying to determine the low- and moderate-income (LMI) status of households in a neighborhood that will be benefiting from a CDBG activity, that neighborhood is the service area. Instead of a neighborhood, the service area may be a town, or a county, or it may be defined some other way.

The most recent Census data can be used to determine and provide evidence of compliance with the LMI Area Benefit National Objective.

If it is believed that the data does not accurately reflect the current economic condition of the area, the applicant may conduct an income survey. Income surveys may be conducted if:

- The proposed activity, such as a public infrastructure project, is located in a Census tract or block group and has less than 51% LMI persons based on the census data, and the applicant feels the census data is not accurate; or
- the activity is located in a census tract or block group and has at least 51% LMI persons, but does not serve the entire census tract or block group, or it only serves a portion of the census tract or block group; or
- the service area of the proposed activity is not contiguous with any census designated area for which data is provided.

For area benefit activities, such as public infrastructure projects, income survey data may be used to demonstrate that 51% of the area is LMI and to help demonstrate the need for the proposed activity.

Non-Random Income Surveys are conducted when an applicant wants to survey the entire service area, in areas with a relatively small population and information can be gathered from 100% of the population.

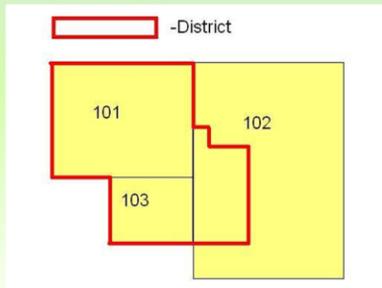
Random Income Surveys are conducted on a larger service area and participants are selected randomly, and the results are used to make estimates of the entire service area.

More information on these surveys, such as a required response rate, etc., can be found along with the application form.

## National Objective Compliance

### *Census Data*

- **Must** match proposed benefit area



### *Survey Data*

- Survey results must be summarized.
- Survey instrument should be adequate to demonstrate eligibility.
- Must include total population of the service area not just respondents.
- Must include Vacant, Seasonal and Institutional units:
  - Seasonal housing must be presumed to be non-LMI; and
  - If required response rate is not met, all non respondents and all vacant housing must be presumed to be non-LMI.

Census data must match the proposed benefit area exactly.

When submitting survey data with the application:

- The survey results must be summarized;
- The survey instrument should be adequate to demonstrate eligibility;
- Must include total population of the service area not just respondents;
- Must include Vacant, Seasonal and Institutional units:
  - Seasonal housing must be presumed to be non-LMI; and
  - If required response rate is not met, all non-respondents and all vacant housing must be presumed to be non-LMI.

## National Objective Compliance

### *LMC: Low/Mod Limited Clientele benefit*

- Presumed benefit – seniors, severely disabled, abused children
- Other service populations - require information on family size and income so that it is evident that at least 51% of the clientele are LMI (example: health center serving predominantly LMI clientele)



An LMI Limited Clientele activity is an activity that provides benefits to a specific group of persons rather than everyone in an area generally. It may benefit particular persons without regard to the area in which they reside or it may be an activity that provides benefits on an area basis, but only to a specific group of persons who reside in the area. In either case, at least 51% of the beneficiaries of the activity must be LMI persons.

Activities that would be expected to qualify under the LMI Limited Clientele subcategory include:

- Construction of a senior center;
- Public services for the homeless;
- Assistance to low/mod income persons developing a microenterprise,
- Meals on wheels for the elderly; and
- Construction of job training facilities for severely disabled adults.

For each activity, one of the following five types of documentation must be submitted:

- (1) Documentation showing that the activity is designed to be used exclusively by a segment of the population presumed by HUD to be L/M income persons, such as abused children: or
  
- (2) Documentation describing how the nature and the location of the activity establishes that it will be used predominantly by LMI persons; or
  
- (3) Data showing the size and annual income of the family of each person receiving the benefit; or
  
- (4) Data showing that barriers to mobility or accessibility have been removed and how the barrier removal was restricted to the extent feasible to one of the particular cases authorized under this subcategory; or
  
- (5) Documentation showing that the activity qualifies under the special conditions regarding job services where less than 51% of the persons benefiting are LMI persons.

## National Objective Compliance

### *LMJ: Low/Mod Job Creation and Retention*

- Economic development, small business, and microenterprise projects
- Permanent, full-time equivalent positions must be created or retained as a result of the project.
- Jobs must be made available to or taken by low-and moderate-income persons.



The final National Objective that will be covered in this presentation is the LMJ National Objective, which is the Low/Mod Job Creation and Retention National Objective.

This National Objective is only used for economic development, small business, and microenterprise projects.

Permanent, full-time equivalent positions must be created or retained as a result of the project.

Jobs must be made available to or taken by low-and moderate-income persons.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Failure to adequately demonstrate National Objective Compliance for Public Infrastructure and Public Facilities projects:*

- Incorrectly using Census Data instead of Survey Data
- Excluding a benefitting population from total count
- Excluding description of National Objective Compliance
- Survey results do not evidence that at least 51% of **persons** in the service area are low- and moderate-income.



A common deficiency in many applications is the failure to adequately demonstrate National Objective Compliance. National Objective compliance is a basic eligibility issue, and applications that do not successfully demonstrate National Objective compliance will be deemed ineligible.

The main issues that we find in public infrastructure and public facilities projects regarding National Objective compliance include:

- Using census data when the applicant should be using survey data, if the census data does not correctly identify the area benefiting from this project;
- Excluding a population that would be benefiting from this project from the total count; and
- Exclusion of the program description of what National Objective they program will comply with.
- Survey results do not evidence that at least 51% of **persons** in the service area are low- and moderate-income.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Failure to adequately demonstrate National Objective Compliance for Public Infrastructure and Public Facilities projects:*

- The Town is claiming LMA as National Objective Compliance, census data, included as supporting documentation included with the application indicates that the Town is 31.5% low-and moderate income (LMI). HUD census data indicates that the Town is 47.3% LMI. **[INELIGIBLE]**
- The Town is claiming LMA as National Objective Compliance, census data, included as supporting documentation included with the application indicates that the Town is 58.5% low-and moderate income (LMI). HUD census data indicates that the Town is 58.5% LMI. **[ELIGIBLE]**



The first example listed here is an ineligible project based on failure to meet a National Objective. The HUD data and the data presented by the applicant do not match and are below 51% LMI benefit.

The second example represents the description of a potentially eligible public infrastructure project. The data provided by the community matches the HUD data. This is only provided to reference an eligible activity, and the applicant would need to submit appropriate documentation to substantiate the proposed activity.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Failure to adequately demonstrate National Objective Compliance for Economic Development, Small Business, and Microenterprise projects:*

- A business/program that will create/retain permanent jobs has not been identified
- Proposed jobs require skills that preclude them from being considered made available to low- and moderate-income persons



The main issues that we find in economic development, small business, and microenterprise projects regarding National Objective compliance include:

- A business/program that will create/retain permanent jobs has not been identified
- Proposed jobs require skills that preclude them from being considered made available to low- and moderate-income persons

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Failure to adequately demonstrate National Objective Compliance for Economic Development, Small Business, and Microenterprise projects:*

- The proposed activity involves the redevelopment of the former ABC manufacturing site, which appears to be a brownfield site. The application describes “necessary public access improvements surrounding Main Avenue to promote future site development”. The application, submitted as an economic development project, does not identify a specific business or developer. **[INELIGIBLE]**
- The proposed activity involves the redevelopment of the former ABC manufacturing site, which appears to be a brownfield site. The application describes “necessary public sewer improvements surrounding Main Avenue to facilitate the start-up of Smith Manufacturing”. The application includes the creation of 15 permanent, full-time unskilled manufacturing jobs. **[ELIGIBLE]**



The first example listed here is an ineligible project based on failure to meet a National Objective, since no business was identified to create or retain jobs. Therefore, it is unclear whether a National Objective can be met.

The second example represents the description of a potentially eligible project. The applicant has identified Smith Manufacturing as the proposed business to receive assistance. The applicant also states that 15 permanent full-time equivalent positions will be created which are designated as “unskilled.” By designating that the jobs are “unskilled,” this is an attempt to show that the jobs can be “made available to” to LMI persons, which is an eligible National Objective (LMJ). This is only provided to reference an eligible economic development activity, and the applicant would need to submit appropriate documentation to substantiate the proposed activity.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Failure to adequately demonstrate National Objective Compliance for Economic Development, Small Business, and Microenterprise projects:*

- The application indicates that the project will make jobs available to low- and moderate-income persons. The job creation and retention table in the application shows that 7 out of 10 jobs require associate's degrees and higher. **[INELIGIBLE]**
- The application indicates that the project will make jobs available to low- and moderate-income persons. The job creation and retention table in the application shows that 7 out of 10 jobs do not require education beyond high school or any experience. The application indicates that training will be provided. **[ELIGIBLE]**



The first example listed here is an ineligible economic development project based on failure to meet a National Objective, since the jobs are clearly requiring an Associates Degree or higher. As presented, it is unclear whether this project meets a National Objective, since requiring an advanced degree would preclude LMI persons from applying for these jobs.

The second example represents the description of a potentially eligible economic development project. The applicant states that seven out of the ten jobs do not require education beyond high school. The applicant further states that the company will provide on the job training. These criteria help to show that the project can meet a National Objective (LMJ), since over 51% of the jobs are “made available to” LMI persons. This is only provided to reference an eligible economic development activity, and the applicant would need to submit appropriate documentation to substantiate the proposed activity.

## Additional CDBG Resources

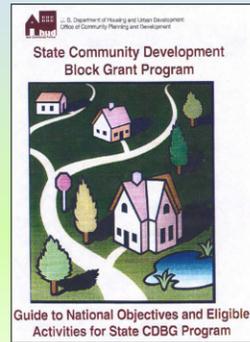
### For further information:

- Guide to National Objectives and Eligible Activities for State CDBG Programs

- “Basically CDBG” Course Training Manual

[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/comm\\_planning/communitydevelopment/training/basicallycdbg](http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/training/basicallycdbg)

<http://www.hud.gov/offices/cpd/communitydevelopment/library/stateguide/>



For further information on National Objectives Compliance, you can refer to the following Guide, “Guide to National Objectives and Eligible Activities for State CDBG Programs”. You can find this guide at the website indicated on this slide.

## Public Infrastructure & Public Facilities Demonstration of Need

### *Description of:*

- Existing conditions
- Need for services
- Area/Persons benefiting
- How Equivalent Dwelling Units (EDU) were calculated
- Operations and maintenance costs per EDU



### *Supporting Documentation:*

- Engineer/Architect reports
- Consent orders, other violations, or regulatory letters
- Funding for services



### **Public Infrastructure and Public Facilities Demonstration of Need**

Make sure you provide in full detail the Need of the area. This includes describing the community's existing community development needs, challenges and priorities and the process used to determine the needs and to set community development priorities. The applicant must indicate if there are there any serious public health, welfare or safety conditions as demonstrated by third party documentation, such as a consent order, engineering reports, test results, etc. You need to include these documents along with the application to demonstrate this. An example is a consent order from the NYS DEC related to a sewer district meeting requiring standard treatments, etc. Have conditions been viewed as critical enough to reach the funding level the municipality is applying for towards this program?

Also, have any community needs assessment surveys, comprehensive, strategic or community plans been conducted to identify the needs of the community, whether a community-wide or targeted area project best benefits the persons included in the project? Have these plans been adopted by the community, and have any plans or efforts been taken to address the goals of the community? For example, if the applicant is conducting an infrastructure survey, how many residential, commercial and institutions does the water and/or sewer system currently serve?

The applicant needs to verify how Equivalent Dwelling Units (EDU) have been calculated, including any operation and maintenance costs per EDU. The applicant needs to determine if the proposed improvements, without NYS CDBG assistance, increase annual user rates per EDU and if so, at what rate. All this needs to be documented in the application.

The applicant should submit proof that NYS CDBG funds are necessary to undertake the project and the community is unable to secure sufficient funding or assistance through other methods or resources including other funding.

## Economic Development Demonstration of Need

### *Description of:*

- Existing conditions
- Need for project
- Area/Persons benefiting
- Gap financing

### *Supporting Documentation:*

- Business plans
- Underwriting
- Financing denial or commitment letters



### **Economic Development Demonstration of Need**

As with public infrastructure and public facilities, make sure you provide in full detail the need of the area. This includes describing the community's existing community and economic development needs, challenges and priorities and the process used to determine the needs and to set community development priorities.

The applicant should also demonstrate the need for the project through a combination of narrative, business plan, and the community's underwriting.

If the project involves infrastructure, the applicant must indicate if there are there any serious public health, welfare or safety conditions as demonstrated by third party documentation, such as a consent order, engineering reports, test results, etc. You need to include these documents along with the application to demonstrate this.

The application should explain in detail how the project will benefit the community as a whole and how the job creation will impact individual persons within the community.

NYS CDBG funds are intended to be gap financing and should not be substituted for other non-federal funds. Therefore, the applicant should submit proof that NYS CDBG funds are necessary to undertake the project and that the business is unable to secure sufficient funding or assistance through other methods or resources. This documentation may include denial letters from other funding sources and any commitment letters to show how much funding has been committed to date.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Demonstration of Need*

- Data is presented without context.
- Need for CDBG funds is not detailed.
- Need for the specific activities was not explained.
- Failure to explain how the proposed plan aligns with community goals and the Community Strategic Plan.



Common deficiencies in the Demonstration of Need are:

- Data is presented without context.
- Need for CDBG funds is not detailed.
- Need for the specific activities was not explained.
- Failure to explain how the proposed plan aligns with community goals and the Community Strategic Plan.

Helpful tips:

Do not rely on data to speak for itself. Statistics should be presented with proper context to explain why NYS CDBG funds are necessary.

Tell us why your community needs NYS CDBG funds. Be specific – we need

to hear the whole story.

Explain what you expect to accomplish with CDBG funds.

Explain why the specific activities have been proposed, explain how the proposed grant meets the needs identified, and explain how the proposed plan aligns with community goals and the community Strategic Plan.

## Project Description

- Must be specific to the project and activities being proposed
- Should clearly demonstrate that the project will address the identified needs
- Detailed to provide a complete picture of the project
- Provide supporting documentation



### Project Description

These slides apply to all project types. The applicant needs to clearly describe the project and be specific to that project area. Provide a brief description of the current community in which the proposed activities will be undertaken, including a physical description, reason for selecting the area/project site.

You need to provide a complete picture of the project, explaining how and why the proposed project will address the needs of the area. As already said, you need to indicate the location, and what will be planned, designed and/or constructed, the issues/opportunities that will be addressed, and expected outcomes of the project.

For example, if you are proposing to upgrade an aging infrastructure, exhibits, photographs, as well as a description of the current system and why it is failing are needed, as well as if there are any consent orders to have it fixed or replaced. Also, a description of improvements or ways to replace the system are described in a preliminary engineering report that the municipality should include along with the application. Identify any alternatives to the current project that are or are not desirable.

The applicant must provide documentation to support this, such as OCR's Activity Detail forms showing the number of households and persons benefiting from this project, as well as the level of income of each home and person benefiting. Also needed are SEQRA classification forms showing environmental requirements to be undertaken, work write-ups prepared by a professional as indicated earlier, any program guidelines that are in place, or an implementation plan allowing ready implementation of the program if awarded.

## Smart Growth Public Infrastructure Act

- Requires the New York Housing Trust Fund Corporation to ensure, to the greatest extent practicable, that public infrastructure projects meet relevant Smart Growth criteria prior to approving, undertaking and/or financing such projects.
- 10 Criteria are identified
- Criteria are listed in Application Kit



The Smart Growth Public Infrastructure Act went into effect in New York on September 29, 2010 and requires most state agencies and all state authorities, prior to approving or funding any public infrastructure project, to prepare and file a Smart Growth Impact Statement finding that the project is consistent with ten Smart Growth Criteria or justifying why it is not practicable to do so. The public infrastructure projects that are covered are defined very broadly as consisting of “transportation, sewer and waste water treatment, water, education, housing and other publicly supported infrastructure.” Unlike the State Environmental Quality Review Act, there are no exemptions for minor projects.

### **The 10 Smart Growth criteria include topics such as:**

- the use or improvement of existing infrastructure,
- development in areas that are already developed or in areas that are designated for concentrated infill development in local land use plans,
- mixed land uses and compact development,
- preservation of open space,
- improved public transport and reduced automobile dependency, and
- collaboration among state agencies and localities to promote inter-

municipal and regional planning

A full list of the ten criteria are listed in the application kit.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Project Description issues:*

- Applicant provides information that is unrelated to the proposed project.
- A detailed timeline for the project is not included in the project description.



Common deficiencies with respect to the project description include:

- Applicants sometimes provide a description of the complete history of the area, with information that does not directly relate to the current application.
- Applicants fail to discuss the timeline or demonstrate a thorough understanding of the need for the project and all accomplishments to be completed within the two-year contract deadline.

Helpful tips:

- Be detailed, but be careful to only include relevant data.
- Make sure that your timeline for the project is explicit, shows readiness to move forward immediately upon award, and demonstrates that the project can be completed within the contract deadline.

## Project Budget

- Budget must be clear and consistent throughout application.
- Must include all funding sources (committed & projected).
- Must identify sources and uses of activities and funding sources. This includes soft costs such as administration, program delivery, and engineering.
- If other grant sources are pending approval, explain what will happen with the project if the others applications are not funded.



### Project Budget

These slides pertain to all project types. We need to know what the budget is for the entire project, and include all project budgets for each activity included in the proposed project. We need a detailed breakout of costs associated with each activity to determine if the project is financially feasible, including costs associated with regulatory compliance. Have federal or state labor requirements been incorporated into the costs, where applicable. The applicant must supply details about available potential grants or whether failure to secure such funding would still leave a gap in financing.

For each source identified, indicate whether the source is formally committed or pending approval. If a source is identified as committed, the applicable commitment documentation must be attached where requested in the application.

Always provide documentation to support your information stated in the application. Make sure that estimates of the proposed project are put together by a professional engineer or architect, and that the most up to date prevailing wage rates were used when putting together these estimates.

If using force account labor, which is the part of the expense account of a municipality resulting from the employment of a labor force for construction, etc., there should be evidence of a commitment of these resources.

A cost benefit analysis needs to be performed to determine justification of the project and if it is feasible. You must compare the total expected cost of each option against the total expected benefits, to see whether the benefits outweigh the costs, and by how much.

If other grant sources are pending approval, explain what will happen with the project if the others applications are not funded.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Project Budget issues:*

- Inconsistent funding requests throughout the application
- Missing funding sources
- Required leverage not provided
- Insufficient funding for the project
- Funding commitments are not secured



The main deficiencies seen with the project budget section of the application are:

- Inconsistent funding requests throughout the application
- Missing funding sources
- Required leverage not provided
- Insufficient funding for the project
- Funding commitments are not secured

Helpful tips:

Budget narratives and budget tables should match throughout the entire application.

Do not leave out any funding sources.

Remember to include owner equity and other leverage when necessary.

Budgets should be well-planned, and 100 percent of the total project cost must be reflected in the budget.

All funding, with the exception of NYS CDBG, should be committed at time of application. This is to the greatest extent possible; we understand that with the CFA, communities are often applying to several funding sources in each round.

## Public Infrastructure and Public Facilities Supporting Documentation

### *Supporting documentation:*

- Engineer/architect estimates
- Ensure that prevailing wages were used when preparing estimates
- If force account labor, evidence of commitment of resources
- Cost benefit analysis



Supporting documentation for public facilities and public infrastructure projects includes, but is not limited to:

- Engineer/architect estimates
- Ensure that prevailing wages were used when preparing estimates
- If force account labor is to be used, provide evidence of commitment of resources
- Cost benefit analysis

## Economic Development Supporting Documentation

### *Supporting documentation:*

- A written commitment from the business that it will make at least 51% of the jobs on a FTE basis available to LMI persons as well as a commitment of the equity contribution proposed in the budget.
- Commitment Letter(s) from all other funding sources, including proposed terms.
- Third party cost estimates, including documentation of the cost of real property, acquisition, construction/rehabilitation, and/or equipment costs.
- Current business and personal financials.



Supporting documentation for economic development projects includes, but is not limited to:

- A written commitment from the business that it will make at least 51% of the jobs on a FTE basis available to LMI persons as well as a commitment of the equity contribution proposed in the budget.
- Commitment Letter(s) from all other funding sources, including proposed terms.
- Third party cost estimates, including documentation of the cost of real property, acquisition, construction/rehabilitation, and/or equipment costs.
- Current business and personal financials.

The full list of required supporting documentation can be found within the CFA Resource Guide annually or within the open-round Economic Development application.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Supporting documentation issues:*

- Failure to provide complete copies of all required supporting documentation.
- Forms not signed or not signed by the authorized signatory.
- Issues with the public hearing notice.



Common deficiencies with the supporting documentation are:

- Failure to provide complete copies of all required supporting documentation;
- Forms not signed or not signed by the authorized signatory; and
- Issues with the public hearing notice as described earlier in the presentation.

Helpful tips:

- Double check all uploads or attachments to the application before submitting the application. Certain missing attachments, such as the public hearing notice, can be a threshold eligibility issue.

## Administrative Capacity

- Demonstrate your understanding of program rules and regulations.
- Identify experienced staff who will be responsible for administration.



### Administrative Capacity

This information applies to all project types. The applicant must have the ability to administer a NYS CDBG project. Show us how ready your community is to administer the project. You should also demonstrate your understanding of the program rules and regulations. Please identify experienced staff who will be responsible for the administration of the grant. Detail your administrative procedures, and please be specific.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Administrative Capacity*

- Administrative capacity is not described, including staff roles and administrative procedures.
- Poor past performance administering NYS CDBG projects.
- Little or no demonstrated understanding of program rules and regulations.
- Project readiness is not evident.



One deficiency with respect to Administrative Capacity is that the applicant's capacity to administer the grant is not described, including staff roles and administrative procedures.

Tips related to demonstrating administrative capacity are:

- Identify staff assigned to work on the proposed program, their specific roles, and any relevant training or experience that they have.
- Provide details related to the use of budgeted CDBG administrative funds.
- Identify additional sources of administrative funding for the program.
- Identify procedures in place to ensure timely implementation of the program.

Another deficiency is poor past performance administering NYS CDBG projects. Applicants should address any delinquency or timeliness issues as soon as possible to minimize the effect on the scoring of future applications.

A third deficiency is that the application shows little or no demonstrated understanding of program rules and regulations. Applicants should review the

application packet, OCR website, and Grant Administration Manual before preparing an application.

Project readiness is not evident in the application. This includes community interest, eligible projects, and funding commitments. The municipality needs to provide information showing that they are ready to implement a NYS CDBG project.

# Application Process

## Consolidated Funding Application (CFA)

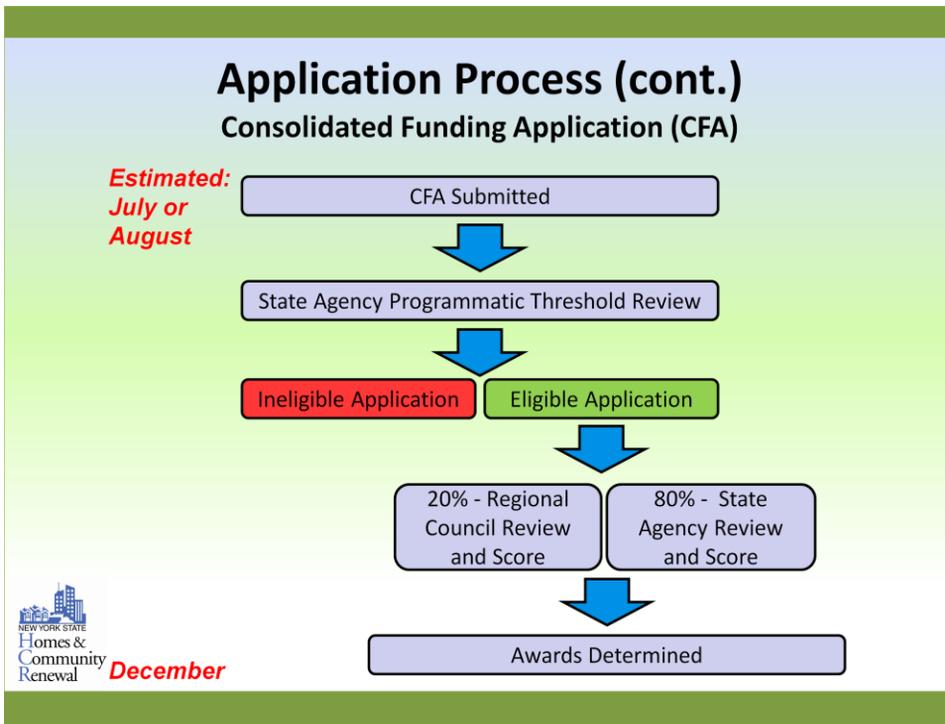
<http://regionalcouncils.ny.gov/>

Online application



Now that we've discussed the strengths and weaknesses of the specific components of the application, we will briefly discuss the application process for the Consolidated Funding Application and some potential issues you may encounter when applying.

The web site for the Regional Economic Development Councils is where you will find the announcement of available funds for 2014, as well as the schedule for any CFA workshops.



The timing of the 2014 CFA is unknown, but for reference, in 2013, the CFA Materials were released in early June and applications were due in August. In 2012, CFA materials were released in early May and applications were due in July.

# Application Process

## Consolidated Funding Application (CFA) Sections

### Threshold Questions

A series of Yes/No questions. Responses determine program eligibility. Applicant may not proceed to program specific questions if threshold criteria are not met.

### Attachments

Documents that you must upload to submit a complete application. These support the responses you have given to questions in the application.

### Basic Questions

Common to all applicants who are accessing the CFA. One set of Basic Questions per application.

### Standard Questions

Specific to the funding program that you are applying for, i.e. NY Main Street. If you apply for multiple programs with a single application, Standard Questions for each program will appear.



### Budget Table(s)

The primary sections of the CFA are threshold questions, attachments, basic questions, standard questions, and the budget table. Please keep in mind that updates and improvements are made each year for the CFA system, and each program application. Everything included in this presentation is based on 2013.

## Application Tips

### Common Deficiencies in Unsuccessful Applications

#### *Common Errors:*

- Examples include:
  - Applying for an economic development project through public infrastructure/public facilities application; or
  - Answering threshold questions incorrectly.



During the application process, a common error is to submit an application to the incorrect program. For example, applying for an economic development project through public infrastructure/public facilities application

This happens most often in the CFA application process, but does happen in other funding rounds as well.

Another common error is to answer the threshold questions incorrectly in the CFA. With this error, the applicant will not be allowed to attempt a CDBG application.

If you're unsure of which application you should be completing or have difficulty with the threshold questions, please contact an OCR Developer for assistance.

**Open FOR BUSINESS**

NYS Consolidated Funding Application

Home Help Print Log Out

Application Number 3343  
Project: hcr PPT  
[more](#)

### Select Project Category

**Welcome to the NYS Consolidated Funding Application.**

This is the first step of your application so please answer the following set of questions as accurately as possible.

Choose one or more categories below that best represent the *hcr PPT* project for which you wish to submit this application:

- Affordable Housing
- Community and Waterfront Revitalization
- Direct Assistance to Businesses
- Energy & Environmental Improvements
- Low Cost Financing
- Municipal/Public Infrastructure
- Parks, Recreation, Historic Preservation and Heritage Areas
- Sustainability Planning Assistance
- Transportation Infrastructure
- Workforce Development

**Proceed with Application**

The Public Infrastructure and Public Facilities application process is part of the CFA. This slide is an example of the application process that each municipality went through last year. When filling out this online application form, always make sure you are answering the questions as accurately as possible, as well as are selecting the correct categories that best represent public infrastructure and public facilities projects you are applying for.

**Open FOR BUSINESS**

NYS Consolidated Funding Application

Home Help Print Log Out

Application Number 3343  
Project: hcr PPT  
[more](#)

### Select Project Category

**Welcome to the NYS Consolidated Funding Application.**

This is the first step of your application so please answer the following set of questions as accurately as possible.

Choose one or more categories below that best represent the *hcr PPT* project for which you wish to submit this application:

- Affordable Housing
- Community and Waterfront Revitalization
- Direct Assistance to Businesses
- Energy & Environmental Improvements
- Low Cost Financing
- Municipal/Public Infrastructure
- Parks, Recreation, Historic Preservation and Heritage Areas
- Sustainability Planning Assistance
- Transportation Infrastructure
- Workforce Development

[Proceed with Application](#)

Economic Development projects are also considered through the Consolidated Funding Application. This slide is an example of the application process that each municipality went through last year, and the correct project category for economic development is selected with the red circle.

# Application Process

## CFA Threshold Questions

### Threshold Questions

A series of Yes/No questions. Responses determine program eligibility. Applicant may not proceed to program specific questions if threshold criteria are not met.

1. **Question Ref:** Q\_62  
**Question Type:** Threshold

Is the applicant an eligible New York State Non-entitlement municipality? Click [Help](#) for a list of eligible applicants.

#### HELP SECTION

Click [here](#) for a list of eligible NYS Community Development Block Grant (CDBG) applicants.



The threshold questions are designed to determine whether or not a project and applicant is eligible for a program. Please answer these Yes/No questions accurately and honestly. If an incorrect answer is selected, then the inaccurate responses will lead to a later determination that the application is ineligible.

The threshold questions must be answered to move on to the other sections. Then, once you're in the other sections you can complete the application at your own pace and in any order that you want.

# Application Process

## CFA Attachments

The CFA will require a series of attachments, and allow for several optional attachments. Each attachment field will allow an applicant to upload a single PDF single document.

- Certification Form.
- Certification of Business Form.
- Community Development Grant/Loan Portfolio.
- CDBG Program Income Report.
- Proposed Project Financing and Lien Structure Form.
- Job Creation and Retention Table.
- Exhibit 2-3A Certificate of SEQRA Classification.
- Commitment Letter(s) from all other funding sources, including proposed terms.
- Third party cost estimates, including documentation of the cost of real property, acquisition, construction/rehabilitation, and/or equipment costs.
- Compliance with Citizen Participation requirements:
- Copy of public hearing notice to demonstrate compliance with Citizen Participation requirements.



This list contains a few of the attachments required for the 2013 NYS CDBG CFA for Economic Development. There may be changes for 2014, but each of these will probably be included.

# Application Process

## CFA Basic Questions

### Basic Questions

- Common to all applicants who are accessing the CFA.
- Only one set of Basic Questions per application.

### **BASIC**

#### **General Project Information**

Q\_546 Legal Name of Applicant



The CFA system is designed to allow an applicant to submit a single application for multiple funding sources. A single CFA, however, should be for a single project - not a series of projects with different funding sources.

There will be only one set of basic questions in a CFA. If you are struggling to limit your responses in the basic questions, that may be an indicator that it is not a single project and should not be a single CFA.

# Application Process

## CFA Standard Questions

### Standard Questions

Specific to the funding program that you are applying for, e.g. NYS CDBG Economic Development. If you apply for multiple programs with a single application, Standard Questions for each program will appear.

77. **Question Ref:** Q\_242

**Question Type:** Standard Question

Provide a detailed description of the business/activity seeking funding including all appropriate quantifiable information and any unique aspects.

HELP SECTION



Once you have completed the Basic questions, you will see the program specific, or Standard questions.

There is only a single heading for each of these sections- so be sure to watch for it. If you are applying for multiple funding sources, it is extremely important to answer the questions specifically focusing on the program identified. For NYS CDBG, if you are requesting additional sources, that should be identified as part of your total project – be careful not bury the NYS CDBG-specific responses in narrative about other projects and programs.

# Application Process

## CFA Standard Questions – Help Sections

Question Ref: Q\_241  
Question Type: Standard Question

Provide a brief description of the community's economic development needs including a discussion of economic trends and the community's plan to address the needs identified. (Refer to the Help section for a detailed list of information required to answer the question completely.)

### HELP SECTION

The description should include the following:

- A description of existing industry in the community (i.e. warehousing, manufacturing, agriculture);
- Demographic information including median family income and percentage of persons in poverty;
- A description of the labor force needs, including a discussion of the unemployment rate in the community and region, and the skills available or lacking in the labor market;
- The most recent calendar year's county-wide unemployment data as provided by the New York State Department of Labor. Provide data for yearly and monthly averages;
- A description of disinvestment in the community, as evidenced by recent business closures over the last five years;
- An explanation of how the proposed project supports designated Empowerment Zones, Enterprise Communities, NYS Excelsior Program and NYS Empire Zones;
- Description of the proposed project's relationship to other community development activities underway or planned;
- Description of any municipal strategic or comprehensive redevelopment plans; long-range strategy or community needs assessment survey that the project supports and how the project addresses the needs identified in the plan(s), strategy or community needs assessment. Explain why the proposed project is the best approach to addressing the need identified. Provide the date the plan(s) was adopted and the term of the plan. Do not submit plans, strategies or surveys with your application;
- Explain how the project will support or complement other public works, housing, economic development, main street revitalization or other community goals, particularly those that benefit (direct or indirect) LMI persons.



[Show Help](#)

Most standard questions will have a “Show Help” link visible to the right of the question. **It is extremely important** to click on these and review the Help Section guidance. As you can see – the Help section contains detailed discussion points and prompts to assist an applicant in developing a response.

## Are YOU Prepared to Apply for a CDBG Grant?



This is a chart that represents the process of making a decision on what your needs are, based on input from the community and strategic plans, etc.

Once you have a project in place, outreach is conducted to see who is eligible and interested in participating in the program.

You need to determine if you have any other funding sources to use towards the project.

You need to determine if there is a certain targeted area that would benefit most from this project, or if it would be an area-wide project.

You also need to determine who would be included in the administration of the grant if awarded on the municipality level.

Once all the steps indicated above are in place, the municipality submits an application to the OCR. If the application is not funded, the Chief Elected Official of the municipality should write a written request for consultation

pertaining to the application.

## Scoring Criteria/Application Evaluation Overview

- CFA Applications are competitively scored and ranked against each other, while CRF and open-round applications are analyzed independently.
- However, all funding determinations are based on the following factors:
  - Quality of application
  - Appropriateness of activity
  - CDBG and administrative performance history, if any
  - Severity of need
  - Extent to which activity resolves identified need
  - Capacity to complete activities in a timely & effective manner
  - Public benefit
  - Project feasibility & schedule
  - Leveraging and availability of other resources
  - Reasonableness of project costs, incl, program delivery & administration
  - Extent to which activity complements other federal, state, & local programs
  - Public support



CFA Applications are competitively scored and ranked against each other, while CRF and open-round applications are analyzed independently.

However, all applications are evaluated with the same factors in mind. This is an overview of what we look at in each application, and this presentation was prepared with this overview in mind.

## Helpful Hints

- Read the application packet
- Use the submission checklist
- Provide detailed maps
- Document Citizen participation
- Provide only related information
- Carefully proofread
- Follow the application outline
- Answer all questions
- Complete forms in their entirety
- Select the correct application type



The application preparer must read the application packet to understand the requirements. The application preparer should review the application packet before preparing the application and after it has been prepared to ensure that nothing has been missed.

In addition, the application preparer should:

- Use the submission checklist
- Provide detailed maps
- Document Citizen participation
- Provide only related information
- Carefully proofread

- Follow the application outline
- Answer all questions
- Complete forms in their entirety
- Select the correct application type

## Additional Program Requirements- Certification

- Identify and remediate environmental hazards (Lead!)
- Minority and Women-Owned Businesses (MWBE)  
<http://www.nylovesmwbe.ny.gov/>
- Title VI of the Civil Rights Act of 1964, As amended (42 U.S.C. 2000d et seq.)
- The Fair Housing Act (42 U.S.C. 3601-3620)
- Equal Opportunity in Housing (Executive Order 11063, as amended by Executive Order 12259)
- Age Discrimination Act of 1975, As Amended (42 U.S.C. 6101)
- Affirmative Marketing
- Americans With Disabilities Act (42 U.S.C. 12131; 47 U.S.C. 155, 201, 218, 225)
- Section 3 of the Housing and Urban Development Act of 1968
- Davis Bacon Related Acts



Here are some additional program requirements you should read and become familiarized with. They are very important when submitting an application.

## Questions?

If you have any further questions following the conclusion of this webinar, submit your questions to [ocrinfo@nyshcr.org](mailto:ocrinfo@nyshcr.org) or contact the Office of Community Renewal at 518-474-2057

Please visit the OCR website at: <http://www.nyshcr.org/Programs/NYS-CDBG/>

