

Applicant Questions and DCA Responses 2017 CDBG-Mitigation Infrastructure Application

Date: December 21, 2020

Question: Is a survey necessary if the Census Tracts indicates that the area meets the low to moderate-income requirement?

Response: No. Per the CDBG-MIT Applicant Manual, Applicants are required to use the local survey method for activities that have small benefit areas. This method is also preferred for applicants proposing project activities for target areas with boundaries that are not contiguous with standard census geographic areas (place, census tracts, block groups, or blocks). CDBG regulations at 24 CFR 570.483(b)(1)(i) require that applicants conduct surveys that are methodologically sound to determine the percentage of LMI persons in the service area of a CDBG-funded activity.

Question: If two Census tracts are LMI and the other is not, can we average the Census tracts to meet the LMI requirements?

Response: Grantees may combine geographies to best represent service areas, typically by combining two or more block groups. When using multiple geographies in the determination of LMA compliance of a service area, grantees are reminded that percentages shall not be averaged across multiple geographies.

The proper calculation is as follows:

$$\text{LMI \%} = \frac{(\text{LMI Persons Geography A} + \text{LMI Persons Geography B} + \text{LMI Persons Geography C...})}{(\text{LMI Universe Geography A} + \text{LMI Universe Geography B} + \text{LMI Universe Geography C...})}$$

Example: A service area corresponds with two block groups. Block group 1 is 54.17% LMI with a population of 325 LMI persons of 600 total persons. Block group 2 is 50% LMI and has 1,500 LMI persons of 3,000 total persons. If 54.17% and 50.00% are averaged, which would be incorrect, the result is 52.09% LMI. However, the correct calculation per the formula above is 1,825 persons divided by 3,600 persons, resulting in 50.69% LMI [which HUD does not allow to be rounded up to 51%]. $50.69\% \text{ LMI} = (325 + 1,500) \div (600 + 3,000)$

Grantees should not define a single service area by compiling a mix of place and block group data. These geographic layers have overlapping areas. If a service area was constructed by mixing block group and place data, residents would likely be double counted. For information regarding averaging Census Tract data, please refer to CPD Notice 19-02.

Question: What determines whether a survey or Census Tract information is used to meet the LMI requirement?

Response: If a grantee is able to document and support that a service area coincides with one or more census boundaries, the grantee may use [HUD-provided LMI Summary Data](#) for particular census tracts to determine whether the project will primarily benefit low- and moderate-income individuals. Some words of caution if attempting to coincide a service area boundary with a census tract boundary:

- Ensure the service area is truly available to all the residents in the census tract; this may be difficult to support, particularly on location-specific urban projects (e.g. street improvement) or in rural areas where a public infrastructure project is not expansive enough to service the entire population in the larger census tracts; and
- As always, double check that the coinciding census tract and service area are primarily residential.

However, if a service area is not coterminous (i.e., does not coincide with a census boundary) or if the service area includes parts of multiple census tracts, the grantee may elect to perform a survey of an entire area. Please reference the following link: <https://www.icf.com/insights/disaster-management/decoding-low-moderate-income> for more information regarding determining LMI for area benefit.

Date: December 15, 2020

Question: Where can I find the “Guide to Acceptable Survey Methodology” referenced on page 17 of the CDBG-MIT Applicants Manual?

Answer: The guide is can be found on the HUD Exchange website using the following link: <https://www.hud.gov/sites/documents/14-13CPDN.PDF>

Date: October 8, 2020

Question: There were engineering efforts done before knowing of the CDBG-MIT grant. Can those engineering efforts (plans, environmental, permitting, etc.) be used to bid out the construction work once the grant is awarded? We do not have final [engineering] plans and will not for a while.

Answer: The plans developed previously can be used in the PER and/or bid documents. However, a complete PER is required to be submitted along with the application. The Applicants’ Manual lays out all PER requirements.

Question: The engineering/architectural firms selected for the public section of a particular project did not follow federal procurement, can we still use their work for the private section part of the Rocks that we intend to submit in the CDBG-MIT grant?

Answer: No, regardless of the source of funds DCA’s procurement process must be followed.

Date: October 6, 2020

Question: We understand that if a City submits a joint application with a County, it can still also submit a separate application from the County for a single activity project, however, we are not clear on the definition of single activity.

Answer: A single activity is defined as one activity i.e., stormwater drainage repair on Blue and Green Street. A multi-activity would be stormwater drainage repair on Blue and Green Street and a stormwater drainage repair on Henry Street.

Question: In addition to the joint application project with the County, the City would like to do a project that will build resiliency for homes that are vulnerable but may not qualify for HRRP assistance and also do repairs on a living facility that is a HUD subsidized non-profit residential apartment community for low-income seniors, couples and disabled people ages 62 and over. Would this be allowed in our single City application?

Answer: Unfortunately, the activities you suggested are not considered eligible under the Mitigation Infrastructure Program. However, please view the responses below. They are more appropriate for the 2017 Unmet Needs allocation.

Question: From the website, it looks as if 2017 Unmet Needs is the allocation under CDBG-DR that will fund our current HRRP program as well as the Affordable Multi-family Rental Program, the Buyout and/or Acquisition Program and the Hazard Mitigation Grant Program to help eligible cities with match for a FEMA grant and there is a separate DR allocation for CDBG-MIT, which we are preparing to apply for. Is that correct? And is there another unmet needs source of funds that we will also be able to apply for that is not listed here?

Answer: The available funding under the CDBG-DR program is as follows:

2017 Unmet Needs – The programs under this allocation are:

- Affordable Multifamily Rental
- Buyout and Acquisition
- Homeowner Rehabilitation and Reconstruction
- Hazard Mitigation Grant Assistance
- Infrastructure Program
- *Planning Program

2017 Mitigation – The programs under this allocation are:

- Infrastructure Program (Applications are available on DCA's website as of 8/31/20)
- *Planning Program

2018 (Unmet Needs) Hurricane Michael – The programs under this allocation are:

- Workforce Development
- Homeowner Rehabilitation and Reconstruction Program
- Small Business Economic Revitalization Program
- Infrastructure Program
- *Planning Program

*Note: DCA is developing the requirements for the Planning Program, details will be posted to DCA's website within the next few weeks).

The 2017 and 2018 Unmet Needs Infrastructure Programs are separate from the 2017 mitigation infrastructure funds and will have a different application process that will be posted to DCA's website as soon as it is available.

Question: Are we required to go through the procurement process if we want to use the consultants we already selected for HRRP for MIT as well?

Answer: Yes. They are completely separate allocations and different projects.

Date: September 30, 2020

Question: Did DCA record any scores and/or comments on the pre-applications that were submitted? If so, can the scores/comments on the pre-applications be provided to jurisdictions? Knowing where the pre-application stood would be helpful in the preparation of the final application.

Answer: The pre-applications were intended to guide the CDBG-MIT Action Plan submitted. They were not scored or commented on.

Date: September 29, 2020

Question: We are looking at the Regional Water Plan Seed Grant, which is state funded. We are interested in using the seed grant as leverage for the CDBG-MIT we can address a larger area and develop a more comprehensive Stormwater Master Plan with actionable items.

Answer: That sounds like a wonderful activity. However, it would not be eligible for leverage under the CDBG-MIT Infrastructure program. We do have a Planning Program with CDBG-MIT funds, would you be interested in meeting with Crystal and I to discuss the Planning Program funds?

Question: When do you anticipate executing agreements with local governments?

Answer: DCA will make CDBG-MIT funding awards on or around April 2021.

Date: September 25, 2020

Question: We received questions from respondents about what they should provide for the following items listed in the RFP:

- Cost schedules for general services, in addition to cost schedules for additional services.
- The firm must provide a professional services contract. (Note: The contract will be written as "direct costs plus a fixed fee, not to exceed a lump sum." If the architectural firm is contracted for the project, the contract must include additional clauses pertaining to federal regulations that will be supplied by the Grant Administrator Consultant). The firm should also include the percentage fee that it normally charges for design and construction supervision on this size project and a list of other services included under contract.

Answer: Ultimately it is up to the local government on how to reply to the respondent of the RFP. A potential item the local government could ask for on the first bullet is a list of fees associated with the services the respondent would provide if they were selected.

Regarding the second bullet, this seems like it may be a deliverable that the RFP respondent would provide if they were selected, maybe not as an item due at the time of proposal submission for the RFP. **Disclaimer, DCA has not reviewed the full RFP, these suggestions are merely based on the items listed in the bullet points above.**

Question: We are running into a time crunch with the Commissioners meeting and giving the vendor enough time to complete PAR. If we have to run again, I know we have to run the advertisement for 30 days, but does this start the day of publication in the newspaper or when we post it on our website and procurement registry? Also, what are other means of reasonable publication exposure?

Answer: RFP/Qs should be posted to a minimum of three (3) places. All of the advertisements should have the same deadline and should be posted 30 days before the deadline. The day of publication can count as Day 1. Publishing to the newspaper is not mandatory. In addition to sending direct solicitations to known providers (DR requires 5), many applicants choose to advertise RFPs via local the government website, GPR, and City Hall. Please ensure the Section 3 language is visible in each advertisement.

Date: September 24, 2020

Question: What is the timeline for the expenditure of the funds by the sub-recipient?

Answer: There is a three-year expenditure timeline for CDBG-MIT funds.

Date: September 23, 2020

Question: Can the income limit chart on the LMI Survey be altered?

Answer: Yes. However, DCA should be able to distinctively distinguish whether the beneficiaries of the project are of moderate income, low income, very low income, etc. DCA is required to report beneficiaries to HUD this way. Below is an example of an income limit chart on a LMI Survey that captures all of the required data:

| # in Household | Combined Household Income | | | | |
|----------------|---------------------------|-------------------|-------------------|-------------------|--------------------|
| 1 | Less than \$11,500 | \$11,500-\$19,150 | \$19,151-\$22,980 | \$22,981-\$30,650 | More than \$30,650 |

Date: September 16, 2020

Question: Is a Memorandum of Understanding (MOU) required for joint applicants?

Answer: DCA does not require a MOU for a joint application. However, DCA provides a sample Cooperating Agreement (Form DCA-11). This agreement should designate the unit of government

that will serve as lead applicant. Additionally, we will need the Certified Assurances (Form DCA-10) for each jurisdiction.

Date: September 15, 2020

Question: Since each jurisdiction can submit one application, would a joint application count against our one eligible submission? In other words, can the County and City submit a joint application and a separate application for another project under the Mitigation Grant?

Answer: For MID areas, DCA will allow a joint application to be submitted and the city and/or the county will still be eligible to put in an individual application. However, it must be a single-activity application if they are also pursuing a joint application. For example, if Blue County and Red City enter into a joint application, the city and the county can each submit an individual single-activity application, as well.

Question: Would having the City be the lead applicant, in the joint application, give our submission additional points being that the City is in its entirety 31520 and the Most Impacted Area?

Answer: It is up to the local governments to determine who the lead-applicant will be. No jurisdiction will get additional points for activities benefitting MID Zip Codes, they will however potentially be granted funds from a different pot of money. If the activity serves residents within the MID Zip code it would be eligible for funding out of the \$10,791,150 that is allocated for the MID areas. The following details the allocations for CDBG-MIT funds:

\$10,791,150 – to be spend within MID Zip Codes

\$10,791,150 – to be spent within the 15-county Area

Date: September 14, 2020

Question: What is the procedure is to submit a CDBG-MIT Pre-Agreement Cost Approval (PACA)?

Answer: DCA will need a letter executed by the Chief Elected Official formally requesting Pre-Agreement Cost Approval (PACA). This letter should contain, at a minimum, the following:

- Explanation of need for the PACA; and
- Project specifics including costs for this activity; and
- Explanation of how the immediate roadway repairs relate to the overall CDBG-MIT activity for which jurisdiction is seeking assistance.

Date: September 11, 2020

Question: If a county uses county-owned land for an eligible mitigation project, could that land be considered leverage in the application? If, however, the county needs to acquire or lease real property for the project, can the cost of the land purchase or lease be included in the total project cost in the application?

Answer: It really depends on when the county acquired the land and if they did so with the intention of the activity, they are seeking CDBG-MIT assistance with. Additionally, CDBG-MIT funds can be used for the purpose of acquiring real property. However, leasing of real property would not be an eligible cost.

Date: September 9, 2020

Question: How do you provide descriptions for uploaded photos? Do you reference an attachment number in the application?

Answer: Each container in the application is labeled (Figure 1 – Figure 10). Applicants can provide a description by noting in the narrative, “Figure 1 illustrates the need for...”

Question: Should you create the Word narrative after you upload the photos, then paste the Word narrative into the DCA Form?

Answer: Yes. You will create the application in Word first labeling the images with Figure numbers. Then copy and paste all of the text in the text boxes provided and upload all pictures in the containers provided in PDF format.

Question: Is there a recording of the call available?

Answer: Yes. There is a recording of Webinar I and Webinar II available at the following link: <https://www.dca.ga.gov/community-economic-development/funding-programs/community-development-block-grant-disaster-3>

Date: July 29, 2020

Question: Are the pre-award expenses such as the procurement of a consultant and the consultant fees to write the grant be reimbursed after the grant is awarded?

Answer: CDBG-Mitigation Infrastructure funds may not be used to procure grant writer, architects/engineer consultation costs. The funds must be strictly used for grant administration.