GEORGIA DEPARTMENT *of* COMMUNITY AFFAIRS

2027

CDBG Applicants' Manual

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INTRODUCTION

This Applicants' Manual represents one of the key elements by which the Department addresses its administrative responsibilities for the Community Development Block Grant (CDBG) Program. Every effort has been made to balance the need for sufficient information upon which to make rational decisions between competing proposals and to ensure compliance with Federal law with the desire to eliminate all unnecessary paperwork and reduce the administrative burden on local governments.

It is essential that applicants prepare application documents in accordance with the instructions contained herein and as outlined at the Applicants' Workshop / CDBG Summit sessions. Applications should be clear, thorough and sufficiently detailed to provide all information required. **This is the responsibility of the applicant whether the applicant prepares the application or whether the application is prepared by a representative, agent or designee**. The 2027 CDBG Annual Competition Application and forms can be accessed by using the following solicitation link: https://gn.ecivis.com/GO/gn_redir/T/c60t5im4lcb.

During the FFY 2027 program year, the Georgia CDBG program is divided into five separate components: (1) The Annual Competition, (2) The Immediate Threat and Danger Grant Program (IT&D), (3) The Employment Incentive Program (EIP), (4) The Redevelopment Fund, and (5) the Innovative Grant Program.

This Applicants' Manual addresses only the CDBG Annual Competition. Applicants' Manuals for the IT&D, EIP, Redevelopment Fund, and Innovative Grant Program can be downloaded from the Department of Community Affairs' (DCA's) web site at https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg.

Overview and History of Community Development Block Grant Program (CDBG)

The origins of the CDBG Program can be traced to our nation's recognition of widespread poverty in inner city areas, the urban disorders of the 1960s, and the deterioration of the urban infrastructure. During the 1960s, many programs were enacted by the federal government to address these problems through the creation of what are now called "categorical programs," each addressing a specific problem recognized by Congress. Programs such as the Urban Recreation and Parks Program, "slum and blight clearance" programs, and other categorical programs were enacted and funded. Each required a separate application by interested city or county governments.

During the first half of the 1970s, the federal government recognized that it would be more effective to enact broad "block grant" programs to replace many of the separate categorical programs. These new block grants allowed local governments wider latitude to design programs more in tune with their locally identified needs and priorities. During this period, Congress expanded appropriations for block grant programs and determined which communities would be entitled to receive these funds (as opposed to requiring separate applications from interested local governments).

The Community Development Block Grant (CDBG) was first enacted by Congress as Title I of the Housing and Community Development Act of 1974. The CDBG program replaced a number of federal categorical programs.

The primary objective of CDBG as stated in the Act, is "the development of viable communities through improvement of living conditions, housing and the expansion of economic opportunities in cities and counties, principally for persons of low- and moderate-income."

Initially only larger urban governments were entitled to receive CDBG funds. At the federal level, the U.S. Department of Housing and Urban Development (HUD) administered the program and enacted regulations to allow local governments to implement a broad range of eligible activities if they furthered the National Objectives of the Act.

During the 1970s, Congress expanded the range of local governments receiving CDBG funds to address problems faced by smaller cities and rural communities by providing funding to HUD to create a new competitive "Small Cities" Program. This program became known as the HUD administered "Small Cities CDBG Program for Non-Entitlement Cities." Eligible governments were those under 50,000 in population. It was called a "non-entitlement program" because communities interested in receiving funds made a competitive application to HUD rather than being entitled to receive direct funding as were the larger urban governments. Otherwise, HUD operated the Small Cities Program in a manner very similar to the larger Entitlement CDBG Program.

During the early 1980s, the federal government passed sweeping changes to "devolve" many federal programs by limiting federal agencies to oversight and rulemaking roles and allowing state governments a role in administering many formally exclusively federal programs. For example, state agencies responsible for environmental protection (such as the Georgia Department of Natural Resources, Environmental Protection Division) assumed many of the responsibilities of the U.S. Environmental Protection Agency (EPA).

In 1981, acting at the request of President Reagan, Congress amended the Housing and Community Development Act of 1974 and directed HUD to establish a new CDBG Program for Non-Entitlement local governments to be administered by state governments, replacing the HUD Small Cities Program. Under the changes implemented in 1981, while states were allowed to administer the non-entitlement program, HUD was given continued responsibility to directly administer the urban-entitlement program and regulate state administration of the non-entitlement CDBG program.

In enacting this new program, Congress clearly desired that state governments have the major responsibility for the design and management of the new CDBG Program for Non-Entitlement Communities. In this regard, the first federal regulation issued by HUD in 1982 for the new program was developed only after extensive consultation with state governments and it allowed states great flexibility in program design and management. To quote the regulation [24 CFR Part 570.480(c)], "the Secretary (of HUD) will give maximum feasible deference to the state's interpretation of the statutory requirements and the requirements of this regulation."

At the time of the new regulation, DCA was given the responsibility of design and management of the new CDBG Non-Entitlement Program. Utilizing an extensive consultation and advisory process with Georgia's non-entitlement local governments, DCA designed a competitive CDBG Program responsive to local needs and priorities. The consultation and advisory process continues through annual public input hearings and DCA "listening sessions" with affected local governments, their staff, Regional Commissions (RCs), and consultants.

Each year, the State of Georgia receives CDBG funds from the U.S. Department of Housing and Urban Development (HUD) for a variety of housing, public facility, and economic development programs which are included in the State's Annual Consolidated Plan. The CDBG Annual

Competition described by this Applicants' Manual describes the competitive rating and review process that will be used to distribute FFY 2027 Annual Competition CDBG funds.

Definitions

CDBG has a language all its own at times. This list of definitions is intended to assist applicants in understanding and using the terminology.

Affirmatively Furthering Fair Housing: The Housing and Community Development Act of 1974, as amended, is the dominant statute for the Community Development Block Grant (CDBG) program. It requires that each federal grantee certify to HUD's satisfaction that (1) the awarded grant will be carried out and administered according to the Fair Housing Act, and (2) the grantee will work diligently to affirmatively further fair housing, and (3) the grantee will maintain records to support the affirmatively furthering fair housing certification.

Area Benefit Projects: An activity, the benefits of which are available to all the residents in a particular area, where at least 70 percent of the residents are low- and moderate-income persons. Such an area need not have the same boundaries as census tracts or other officially recognized boundaries, but must be the entire area served by the activity. Units of general local government may, at the discretion of the state, use either HUD-provided data comparing census data with appropriate low- and moderate-income levels or survey data that is methodologically sound. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion. The website for the HUD-provided data is https://www.hudexchange.info/programs/acs-low-mod-summary-data/. Please also refer CPD Notice 24-04 Low-and Moderate Income Summary Updates for HUD's announcement of summary data based on the American Community Survey 2016-2020 5-year estimates.

Build America, Buy America (BABA): The Build America, Buy America Act, enacted as part of the Infrastructure Investment and Jobs Act on November 15, 2021, established a domestic content procurement preference for all Federal financial assistance obligated for infrastructure projects after May 14, 2022. The domestic content procurement preference requires that all iron, steel, manufactured products, and construction materials used in covered infrastructure projects are produced in the United States. HUD's *De Minimis* and Small Grants Waiver, effective November 23, 2022, for a period of five (5) years or such shorter time as HUD may announce via Notice, applies to contracts over $250,000. This waiver has been provided for your reference in Appendix W. Additionally, HUD maintains a comprehensive collection of currently effective and expired BABA waiver on the following website: https://www.hud.gov/hud-partners/baba.

Certified Assurance: The document that all CDBG local government applicants must sign (See DCA Form 10). It contains many "certifications" required by federal law and should be read and must be signed by the Chief Elected Official of the applicant. ***In addition, the signature must be authorized by a resolution of the governing body (i.e., city council, etc.) and submitted with the application.***

CDBG: The Community Development Block Grant Program as authorized by the Housing and Community Development Act of 1974. CDBG is divided into two general programs: 1) the "entitlement program" administered by HUD provides funding to metropolitan cities and urban counties; and 2) the State "non-entitlement" program for smaller local governments.

CFD: Community Finance Division of the Georgia Department of Community Affairs. The division

of DCA where the CDBG program is housed.

Child Occupied Facility: A building, or portion of a building, constructed prior to 1978, visited regularly by the same child, under 6 years of age, on at least two different days within any week (Sunday through Saturday period), provided that each day's visit lasts at least 3 hours and the combined weekly visits last at least 6 hours, and the combined annual visits last at least 60 hours.

CHIP: Community HOME Investment Program. Created by the National Affordable Housing Act of 1990, the Home Investment Partnerships (HOME) Program is the first federally funded block grant designed to address state and local affordable housing concerns. The CHIP program is administered by DCA's Housing Finance Division.

Conflict of Interest: Elected officials, government employees, and their families are generally prohibited from benefiting either financially or personally from CDBG funded activities. An example would be if a councilmember lived in the neighborhood receiving CDBG funded waterlines. See the Conflict of Interest and Certification sections of this manual for more information.

Consolidated Plan: Developed by local and state governments with input from citizens and community groups, the Consolidated Plan serves four functions: 1) it is a planning document for each state and community, built upon public participation and input; 2) it is the application for funds under HUD's formula grant programs (CDBG, HOME, ESG, and HOPWA); 3) it lays out local priorities; and 4) it lays out a 5-year strategy the jurisdiction will follow in implementing HUD programs. The FFY 2023-2027 Consolidated Plan is available on the DCA web site at: https://dca.georgia.gov/affordable-housing/housing-development/community-initiatives/hud-planning/hud-planningreporting.

Cooperating Agreement: This is the agreement needed for joint or regional CDBG applications (see DCA Form 11). It sets forth which applicant is considered the "lead applicant" responsible for all compliance considerations.

The Davis-Bacon Act of 1931: Statutory requirement that persons working on Federally-supported projects be paid minimum prevailing wage rates for particular crafts or labor classifications as prescribed by the Secretary of Labor. For purposes of the State Administered CDBG Program, all contracts are subject to the Act and must be monitored by DCA for compliance.

Environmental Impact Assessment: As required by the National Environmental Policy Act of 1969, and for purposes of the State CDBG Program, a document prepared by a recipient government which identifies and analyzes environmental impacts of a proposed project. CDBG projects started before completion of the assessment and requisite findings and public notices are NOT eligible for CDBG funding. The federal government requires DCA to monitor each individual project for compliance. (See National Environmental Policy Act.)

Equal Employment Opportunity (EEO): Term which refers to a variety of federally required activities to ensure non-discrimination in hiring, promoting, and managing employees. DCA is required to monitor each CDBG recipient's compliance with EEO requirements.

Faith-Based Initiatives: A federal initiative to level the playing field for faith-based organizations when attempting to access federal grant funds. Faith-based organizations, although ineligible for direct CDBG assistance, may partner with local governments to assist low- and moderate-income persons using eligible CDBG activities. Please see further information at:

https://www.hudexchange.info/resources/hud-grantee-guide-working-with-faith-based-organizations-on-affordable-housing-development/.

Fair Housing Act: Legislation first enacted in 1968 and expanded by amendments in 1974 and 1988, which provides the Secretary of HUD with investigation and enforcement responsibilities for fair housing practices. It prohibits discrimination in housing and lending based on race, color, religion, sex, national origin, handicap, and familial status. DCA is required to monitor each CDBG recipient's compliance with applicable requirements.

Finding of No Significant Impact (FONSI): Pursuant to NEPA, a document presenting the findings of an Environmental Assessment stating that a proposed project will not result in an action which will significantly affect the quality of human life. See 24 CFR Part 58, Directive Number: 97-8.

GrAAM – DCA's Grant Application Administration & Management system, can be accessed at the following URL; https://portal.ecivis.com/#/login. CDBG applications can be accessed and submitted via the eCivis portal. The 2025 CDBG Annual Competition Application and forms can be accessed by using the following solicitation link: https://gn.ecivis.com/GO/gn_redir/T/c60t5im4lcb. Should you have any questions or concerns about this process, please contact DCA at: cdbg.biz@dca.ga.gov . For any technical assistance, please email all support requests to: support.eCivis@eunasolutions.com

HOME: Federal funds authorized pursuant to the Housing and Community Development Act that provides funds to local governments and states for new construction, rehabilitation, acquisition of standard housing, assistance to homebuyers, and tenant-based rental assistance.

Household: All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.

HUD: United States Department of Housing and Urban Development - the Federal agency responsible for oversight and regulation of CDBG funding to states.

Joint application: A joint application includes more than one local government as applicant. Joint applications are generally required when less than 51% of the beneficiaries are located within the jurisdiction of the applicant unit of local government. Exceptions may be considered on a case-by-case basis with DCA approval.

Last Resort Housing: One of the few ways that CDBG can be used for new housing construction. Used in CDBG when no existing relocation housing resources are available for displaced persons. See 49 CFR Part 24.404.

Limited English Proficiency (LEP): Limited English Proficiency means persons who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Note that for the purposes of gathering data for those with LEP, DCA used the U.S. Census definition as any individual who speaks a language at home other than English as their primary language, and who speaks or understands English "not well" or "not at all".

Limited Clientele: As the name implies, limited clientele are those people that benefit from specific services usually delivered at a particular location. For example, people that receive health services at a county health department are the "limited clientele" of that health department. HUD has determined that for purposes of meeting the CDBG national objective of benefiting low- and moderate-income persons, certain limited clientele can be assumed to be low- and moderate-income without detailed income records. This designation is limited to people qualified to attend facilities constructed with CDBG funds that serve abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," homeless persons, illiterate adults, persons living with AIDS, and migrant farm workers. Income records must be available for all other limited clientele beneficiaries, such as clients of Public Health facilities, Boys and Girls Clubs, etc., and those income records must demonstrate that at least 70 percent of the limited clientele are low-to moderate-income people.

Liquidated Damages: Liquidated damages refer to contract provisions requiring payment of a fixed sum, usually accruing on a daily basis, when certain contract time-related provisions are not met. In CDBG contracts, liquidated damages are assessed due to non-completion of a construction project in the time period specified in the contract in the absence of excusable delays. ***DCA encourages the use of liquidated damages in CDBG-funded construction contracts to encourage timely performance. Proceeds from liquidated damages are considered program income.***

Low- and Moderate-Income (also L/M income or LMI): At least 70 percent of the persons benefiting from CDBG projects, (with some exceptions) must be members of a family or household whose total gross family income is less than 80 percent of an area's median family income adjusted for family size. HUD publishes these limits on an annual basis and the most recent limits are available on the HUD web site at: https://www.hudexchange.info/resource/5334/cdbg-income-limits/. See also Appendix B.
Note that housing activities must benefit 100 percent low- and moderate-income persons.

Manufactured "Mobile" Home (MHU): A manufactured home (formerly known as a mobile home) is built to the Manufactured Home Construction and Safety Standards (HUD Code) and displays a red certification label on the exterior of each transportable section. Manufactured homes are built in the controlled environment of a manufacturing plant and are transported in one or more sections on a permanent chassis.

Method of Distribution (MOD): MOD is a description of the rating and ranking criteria for all CDBG Programs. Please refer to the section of this manual entitled Application Review Process. Section 104 of the Housing and Community Development Act of 1974, as amended, requires States to have a method of distribution for allocation of funds to units of general local government.

Modular Home: A housing unit constructed off-site in pieces (modules) using traditional building materials that meets or exceeds all applicable State and local building codes, then transported to the building site where the modules are joined to form a complete housing unit on a slab or foundation. A modular home is generally considered "real property".

National Objective: The Housing and Community Development Act of 1974, as amended, sets forth three general National Objectives. Every CDBG award must address at least one of the following objectives through the activities undertaken by the project: 1) benefiting low- and moderate-Income persons; 2) preventing or eliminating slums or blight; and 3) meeting urgent needs

National Environmental Policy Act (NEPA): NEPA mandates a framework and procedures that Federal agencies (including States and local governments that receive CDBG) must implement to consider all reasonably foreseeable environmental effects of their proposed actions and to involve the public in and inform the public about these environmental effects. Under the State CDBG Program, for ANY project where a local government fails to properly implement the NEPA procedures prior to undertaking a CDBG project, DCA is generally mandated to find that project "ineligible" for reimbursement with CDBG funds.

Office of Fair Housing and Equal Opportunity: The Office of Fair Housing and Equal Opportunity administers federal laws and establishes national policies that make sure all Americans have equal access to the housing of their choice. Particular activities carried out by the Office of Fair Housing and Equal Opportunity include implementing and enforcing the Fair Housing Act and other civil rights laws, including Title VI of the Civil Rights Act of 1964, Section 109 of the Housing and Community Development Act of 1974, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, the Age Discrimination Act of 1975, Title IX of the Education Amendments Act of 1972, and the Architectural Barriers Act of 1968.

Pre-Agreement Cost Approval (PACA): CDBG regulations and DCA policy allow potential applicants to request "pre-agreement cost approval" (PACA) from DCA that authorizes the potential applicant to commence project activities and maintain project timetables while applying for CDBG assistance. Upon DCA's issuance of pre-agreement cost approval, a project may move forward prior to submission of an application or award of funds while maintaining eligibility. See the section of this manual entitled Pre-Agreement Cost Approval (PACA) for further details.

Qualified Local Government (QLG): QLG means a county or municipality which: 1) has a comprehensive plan in conformity with required minimum standards and procedures (and Capital Improvement Element Updates consistent with the Development Impact Fee Compliance Requirements, where appropriate); 2) has established regulations consistent with its comprehensive plan and with the required minimum standards and procedures; and 3) has not failed to participate in DCA's mediation or other means of resolving conflicts in a manner which, in the judgment of DCA, reflects a good faith effort to resolve any conflict. Further, pursuant to O.C.G.A. §13-10-91(b)(7), governments that fail to provide the Georgia Department of Audits and Accounts (DOAA) with sufficient documentation of their participation in the federal government's "federal work authorization program" ("E-Verify) 13-10-91(b)(7) forfeit their "Qualified Local Government" (QLG) status. For further information and for the Qualified Local Government status of Georgia's cities and counties, see DCA's web site at: https://dca.georgia.gov/community-assistance/coordinated-planning/compliance.

Regional Commission (RC): Located in each of the 12 service regions across Georgia, these centers provide planning, grant writing and economic development assistance to local governments, usually under contract.

Regional Application: An application that includes applicants in *more than one county*, including city and county applicants. Regional applications apply to projects benefiting a multi-county region.

Section 104(d): Refers to Section 104(d) of the Housing and Community Development Act of 1974. See 24 CFR Part 42. Requires the replacement of demolished, vacant-occupiable, and occupied low- and moderate-income housing (one-for-one replacement) as well as a higher level of relocation assistance payments for displaced low- and moderate-income tenants.

Section 3: This provision of the 1976 HUD law that requires CDBG recipients to make a "good faith effort" to employ lower income residents of "project areas" and to direct business opportunities to such owners of businesses.

Section 8: Housing Assistance Payments Program, authorized by the Housing and Community Development Act of 1974.

Section 106: Section 106 of the National Historic Preservation Act that requires CDBG recipients and other federal programs to consider the possible effects of 'federal programs' on historic buildings and neighborhoods, including archeological resources. Regulations implementing Section 106 are issued by the Advisory Council on Historic Preservation, and, in Georgia, the Georgia Department of Community Affairs, Historic Preservation Division (DCA/HPD) is the designated State Historic Preservation Office (SHPO).

Section 504: A provision of the 1976 HUD law that requires facilities and programs receiving HUD assistance to be accessible to persons with a disability.

State Statutory/Regulatory Requirements: Also, generally, those local governments that have complied with all necessary requirements to maintain eligibility for state funding, including the Service Delivery Act (HB 489), the Local Government Audit Act, the DCA Local Government Finance Report requirements, the DCA Government Management Indicators Survey (GOMI) as required by O.C.G.A, 36-81-8, and the requirements of O.C.G.A 13-10 and O.C.G.A 50-36 (Georgia's Immigration Registration and Reporting Requirements). Additionally, local governments are required to follow requirements outlined in O.C.G.A. 35-1-17. Any local governing body of a law enforcement agency which fails to comply is not permitted to receive state funding or state-administered federal funding. For further information regarding the status of Georgia's cities and counties regarding the Service Delivery Act, the Government Management Indicators Survey, and the Report of Local Government Finance, see DCA's web site at: https://dca.georgia.gov/community-assistance/coordinated-planning/compliance.

Stick/Site Built Home: A housing unit built on-site using traditional building materials and methods that meet or exceed all applicable State and local building codes.

Target Housing: Any housing constructed prior to 1978, except housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing) or any zero-bedroom dwelling.

Tiered Environmental Review: CDBG environmental review procedure when specific sites (such as housing units) are not designated at the application stage.

Threshold: Basic requirements for participation in the Annual Competition. Failure to meet threshold will result in the application not being scored.

Uniform Relocation Act (URA): Also known as the Uniform Act, this is the short title of the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970. This law and its regulations issued by U.S. DOT (49 CFR Part 24) set requirements for how property, including easements, is acquired for federally assisted projects and sets forth minimum standards for assistance for persons and businesses displaced by federally assisted projects. See also "Barney Frank" amendments. DCA is required to monitor each CDBG recipient's compliance with applicable requirements.

Violence Against Women Act (VAWA): The Violence Against Women Act (VAWA) Reauthorization of 2022, effective October 1, 2022, includes a new requirement for U.S. Department of Housing and Urban Development (HUD) recipients to support an individual's right to seek law enforcement or emergency assistance. Community Development Block Grant (CDBG) recipients will have additional requirements to report non-compliant local laws and ordinances.

Voluntary Compliance Agreement (VCA): An agreement between HUD and a HUD grantee in order to address issues identified by HUD as part of its monitoring responsibilities and in order to resolve findings without the necessity of a formal evidentiary hearing or other judicial process.

Deadlines

All application submissions are required by 11:59 p.m. on the date specified.

Annual Competition Application	Received No Later than April 2, 2027
Completion of Professional Procurement	April 2, 2027
Completion of Tribal Consultation	April 2, 2027
Revitalization Area Strategy Application	Received No Later than April 2, 2027
Exceptions to the "Every Other Year" Rule	April 2, 2027
Applicants must have a current WaterFirst, PlanFirst, RAS, or GICH designation (active in the three-year program OR Certified Alumni) as of April 9, 2027	
Proposed CDBG Project must be included in Service Delivery Strategy	April 2, 2027
Timeliness Deadline	June 30, 2027
Deadline for Submission of Bonus Point Documentation	June 30, 2027
Deadline for Submission of Leverage Documentation	June 30, 2027
Submission of RLF Closeout for Bonus Points	June 30, 2027

State Reporting Compliance

Compliance will be evaluated at the time of application. If DCA identifies a curable deficiency in one of the following state reporting requirements, the applicant will have up to 60 calendar days from the date of DCA's written notice to resolve the deficiency:

- Local Government Audit Act compliance
- Qualified Local Government status and comprehensive planning compliance
- Service Delivery Strategy/HB 489 reporting compliance
- Report of Local Government Finances
- Government Management Indicators Survey

The 60-day cure period applies only to state reporting compliance. It does not extend the application deadline or cure substantive deficiencies involving application completeness, professional procurement, environmental review, project-specific SDS consistency, eligibility for an every-other-year exception, or RLF compliance.

Updates and Important Reminders

Applicants are responsible for understanding the contents of the entire manual. In this section, DCA has summarized important changes for FY 2027. Other more minor changes for FY

2027 may not be highlighted here. Also, read the forms and the instructions for the forms in their entirety. Additional important information may be included in these as well.

Deadlines: Please note that many of the deadlines for the Annual Competition have been revised. Submission of all documentation referenced in the Deadline Section must be received by DCA on the date specified.

Annual Competition applications are required to be complete at the time of submission by 11:59 p.m. on April 2, 2027, except that additional documentation may be submitted for bonus points or leverage until 11:59 p.m. on June 30, 2027. Leverage and bonus point documentation must be received via email to cdbg.biz@dca.ga.gov by the specific deadline. Those local government applicants that are not in compliance with deadline requirements will not be reviewed and will not be eligible to receive funding. DCA will perform a completeness check of all applications submitted and require the applicant to submit any missing or incomplete forms or certifications within five (5) business days of notification by DCA. No additional documentation may be submitted that could potentially alter scores including, but not limited to, photographs, maps, narrative, letters, tests, etc. Applicants must be in compliance with QLG/Comprehensive Planning requirements, the Local Government Finance Report requirements, the Government Management Indicators Survey requirements, and the Local Government Audit Act as of April 2, 2027. Any applicants not in compliance with the Local Government Audit Act, Service Delivery Act (HB 489), Qualified Local Government status, Government Management Indicator Survey (GOMI), or Report of Local Government Finance reporting by April 2, 2027, will have up to 60 calendar days after notification by DCA to cure any deficiencies.

Threshold Requirements: For the 2027 Annual Competition, threshold requirements include the following standards: 1) submission of a complete application; 2) compliance with all deadline requirements as noted in this manual; 3) meeting all requirements as specified by DCA for curing any application deficiencies; 4) completion of all professional procurement requirements; and 5) completion of the Tribal Consultation portion of the Environmental Review not later than April 2, 2027.

Increased maximum for rehabilitation of a Manufactured Housing Unit (MHU):
Due to rising costs associated with all types of construction, DCA is raising the limit for rehabilitation of an MHU from $10,000 to $20,000 (including owners financial participation). This provision is retroactive to all open CDBG awards, effective as of the publication date of this manual. Exceptions to this limit will be considered by DCA on a case-by-case basis. Please contact DCA for guidance on requesting an exception.

PDC Limits increased:
Please see the revised limits in the "Limitation on Administration and Professional Fees" Section of this manual.

Matching Requirement for Single Activity Housing Applications: Even though cash match is not required for single-activity housing grants, single-activity housing applicants (as well as Multi-Activity applicants) are required to document and submit evidence of commitment of financial participation from the homeowner as a threshold requirement. Amounts over and above homeowner participation amounts will be counted as leverage provided all requirements for leverage as outlined in the CDBG Applicants' Manual are met. Homeowner participation will not

be counted as leverage for single-activity housing applicants. For Multi-Activity housing applicants, the CDBG match requirements are applicable and homeowner participation may count toward cash match.

Community Development Needs Assessment: Pursuant to federal law, CDBG applicants must identify their community development and housing needs, including the needs of very low- and low-income persons, and the activities to be undertaken to meet such needs. The purpose of the community needs assessment or problem identification process is to have communities ascertain their most pressing problems and critical needs, **both on a community-wide basis and of the selected target area.**

A standard format for undertaking a Community Development Needs Assessment has been developed and is a required component of the application. The Community Development Needs Assessment will replace form DCA-3. The assessment must be consistent with the application. While the proposed project in the community's CDBG application does not have to be the highest priority community need, the rationale for the activity's selection must be present. The reasons for such, could include the availability of other, more appropriate local, state or federal resources, which would justify submitting a CDBG application for other than the top-ranked community need.

Points will be awarded by a review panel based on how well the applicant, compared to others, addresses the strategy factors.

Form DCA-8: DCA-8 must be prepared and submitted with a 2027 Annual Competition application, in addition to the budget worksheet. The purpose of this form is to allow applicants to describe, in detail, the resources available, or to be made available, for each activity. Applicants are encouraged to provide sufficient quantifiable data and to describe supporting efforts for the proposed program. Form DCA-8 should be backed-up by credible estimates of program cost prepared by individuals and agencies qualified to provide them.

Housing Applications and Service Delivery Strategy: Projects included in all housing and Multi-Activity applications must be included in the applicants' Service Delivery Strategy by the applicable deadline, April 2, 2027. Please see the information on Service Delivery Strategy below in this section on Updates and Important Reminders and in the Section on Eligibility Requirements and the Instructions for the DCA Forms.

Federal Flood Rick Management Standard: Projects under the HOME Investment Partnership, Community Development Block Grant (CDBG), Self-Help Homeownership Opportunity Program (SHOP), Section 8 Project-based Vouchers, and Office of Native American Programs (ONAP) and subject to the required related laws and authorities at 24 CFR 58.5 will be required to use to the new floodplain standards for all projects, effective June 24, 2024. This means the larger FFRMS floodplain will be required for projects subject to 24 CFR Part 55. Please consult the Environmental Compliance Section of this manual and the *CDBG Recipients' Manual* for additional information.

Low- and Moderate-Income Summary Data Updates: HUD has published CPD Notice 24-04, which provides guidance on the use of low- and moderate-income summary data (LMISD) based on the American Community Survey 2016-2020 5-year estimates (2020 ACS). These data will replace the prior LMISD based on the American Community Survey 2011-2015 5-year estimates (2015 ACS) for the purposes of demonstrating compliance with the CDBG National Objective of providing benefit to low- and moderate-income persons on an area basis ("Area Benefit" or LMA). Due to the transition policy for outlined in the notice, census qualifying projects are not permitted

to use data older than the current 2016-2020 low-to-moderate income survey data in the 2027 Annual Competition.

Bonus Points for Robust Citizens Participation Process: Required by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486(a)(6), a citizens participation plan is vitally important to the success of CDBG funded activities undertaken by local governments. Compliance reduces the number of legal challenges and citizen complaints against the local government recipient.

The goal of these bonus points is to incentivize communities who undertake a robust citizens participation process which provides citizens -- especially low- and moderate-income citizens of the community where CDBG-funded activities will take place -- an opportunity to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. These bonus points will be allocated using a scaled approach for efforts above and beyond the minimum Citizen Participation Requirements outlined in this manual. Bonus points will be awarded for demonstrated extra efforts providing an opportunity for citizens, especially LMI citizens, to participate in an advisory role in the planning, implementation, and assessment of the programs and projects funded through CDBG activities. Examples of "extra efforts" include various outreach and engagement efforts, such as utilizing the water bill, social media, ad flyers to announce public hearings, conducting public hearings well in advance of the application at convenient locations and at times convenient to working persons, and conducting more than one public hearing.

A maximum of ten (10) bonus points may be earned for projects displaying a robust citizen participation process.

Rating and Selection: The Rating and Selection System has undergone changes. Please review the changes located in this manual and request technical assistance from DCA when there are questions.

Bonus Points Based on Project Type: Each state administering the CDBG program is allowed the flexibility of determining its priorities from a range of eligible activities under Section 105(a) of the Housing and Community Development Act of 1974. A maximum of ten (10) points may be earned for projects in the categories of Housing / Neighborhood Stabilization and Water and/or Sewer. Multi-activity and Multi-infrastructure projects will be analyzed and the budget pro-rated to determine if the majority of the project (greater than 50%) qualifies for the bonus points.

Reduction of Points for Omissions and Inconsistencies: Points will be deducted for missing required components or concepts, not to exceed 25 points. Applicants will be provided an *Applicants' Manual* fully detailing application requirements.

Bonus Points for Regional Cooperation and Regional Impact: A maximum of 20 bonus points may be earned for projects displaying regional cooperation with regional impact. The proposed project must evidence a regional initiative through a revenue and cost sharing agreement or other intergovernmental agreement by multiple jurisdictions or two of more counties that results in regional impacts, benefits, or service delivery. Projects receiving regional cooperation bonus points are eligible to receive up to $2,000,000. DCA reserves the right to determine if a project meets the intent of regional cooperation. Successful regional applicants are not restricted from applying for the following year's CDBG Annual Competition, provided that all other eligibility criteria are met. Applicants are strongly encouraged to contact DCA to determine if a project meets this criterion.

Bonus Points for Workshop Attendees:
Applicants with local government staff attending the 2025 CDBG Summit, specifically the compliance and application development general sessions, will be eligible to receive 10 bonus points, with the submission of supporting documentation

Bonus Points for Georgia Initiative for Community Housing (GICH) Senior Year Communities:
The Georgia Initiative for Community Housing (GICH) Senior Year is a new, competitive program for GICH Certified Alumni Communities with a mission to holistically invest affordable housing funds into Georgia communities based on their strategic vision. The goal for the Georgia Department of Community Affairs (DCA) is to braid targeted investments in 1-2 targeted and competitively selected alumni communities. Those braided investments may include guaranteed awards or strong competitive advantage within Low Income Housing Tax Credit Program (LIHTC), CHIP, and CDBG. As an expansion of the GICH curriculum, participants will receive targeted technical assistance and education from DCA and other housing and community development experts on how to best implement their communities housing plans. Participants will also be eligible to receive select DCA funding resources that result in direct housing investments. Senior GICH communities will be eligible to receive up to 20 bonus points when submitting an application with a housing component (Neighborhood Revitalization or Multi-Activity).

Applications with Multi-County Impacts: Applications with multi-county impacts may be submitted by one jurisdiction provided the proposed project is located within the applicant jurisdiction's boundaries and does not require cooperation between two or more jurisdictions for project implementation, except when cooperation is limited to funding or other similar commitments that are under the direct control of each benefiting jurisdiction. For purposes of eligibility, applications that meet the requirements of this paragraph will be treated as single applications rather than joint or regional applications See also further information regarding Regional Applications in this manual under Special Requirements.

Procurement: All professional procurements must be completed prior to CDBG application preparation and submission. For example, prior to CDBG application submission, both grant application services and grant administration services should be solicited using the same Request for Proposal (RFP). This avoids the appearance of a conflict of interest that can be created when a grant writer in a later procurement process submits and receives an award for grant administration services. This approach is also applicable for engineering/architectural services. In other words, preliminary reports and design and construction services should all be procured upfront using the appropriate RFP or Request for Qualification (RFQ) process.

Local governments often rely on grant writers and engineers/architects to assist them in navigating complex federal and state requirements; however, having a grant writer or engineer/architect assist in the procurement process (e.g., developing an RFP or RFQ) can also create the appearance of a conflict of interest. DCA's procurement guidance regarding grant writing/grant administration published at https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration-0 can assist by making the process easier for local governments by providing step-by-step instructions. DCA will also assist local governments with the procurement process by providing technical assistance as needed. Please contact Brittney Hickom at Brittney.Hickom@dca.ga.gov or (470) 698-8166 with your procurement questions. Always consult the latest CDBG Recipients' Manual for DCA's procurement policies and procedures. These are contained in Chapter 3, Section 4 and

at: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc--annual-cdbg-competition-manuals--2.

DCA is also reminding local governments that DCA's procurement policies for professional services should be followed regardless of the source of payment for those services. In other words, even if local funds pay all or part of the cost of professional services related to a CDBG project, DCA's CDBG procurement policies should be followed.

Newly enacted requirements (effective April 28, 2019) based on the passage of House Bill 322, which amends, Code Section 36-80-27 and reads as follows: If a bid or proposal opportunity is extended by a county, municipal corporation, or local board of education for goods, and services, or both, valued at $100,000.00 or more, such bid or proposal opportunity shall be advertised by such respective local governmental entity in the Georgia Procurement Registry, as established in subsection (b) of Code Section 50-5-69, at no cost to the local governmental entity. Each advertisement shall include such details and specifications as will enable the public to know the extent and character of the bid opportunity. The Georgia Procurement Registry can be found at the following web site: https://doas.ga.gov/state-purchasing/georgia-procurement-registry-local-governments/gpr-overview.

See page 55 for additional information of professional procurement.

Buy America Preference (BAP): Under Sections 70912 and 70914, the BAP applies to the purchase of iron, steel, manufactured products, and construction materials for CDBG projects when funds are used for the construction, alteration, maintenance, or repair of infrastructure, as defined by the Build America, Buy America Act (BABA). For more information regarding specific considerations regarding the BAP to be made in the preparation of the CDBG application, please **see page 52 for additional information**.

Forms: The following forms are part of a complete CDBG application and must be prepared and submitted with the CDBG application. These are: 1) Civil Rights Compliance Certification—Prepare and submit; 2) Evidence of Compliance with System for Award Management (SAM)—See sample provided and submit; 3) Acknowledgement of Subrecipient Language Access Plan Requirement—Prepare and submit; and 4) Language Access Plan Threshold Certification—Prepare and submit. The Language Access Plan Threshold Certification form is designed to determine whether an applicant's pre-award public hearing must be advertised in English and another language (most often Spanish). Please review and prepare the form and submit with the application. If in completing the form, the applicant's jurisdiction includes a population of more than 5% LEP persons in a single language or 1,000 or more LEP persons in a single language, the pre-award public hearing must be published in the applicable language. ***See Appendix S for a copy of the pre-award public hearing notice in Spanish.***

Documentation of all pre-award public hearings (including in Spanish, if required) must be submitted with the application. This will include scanned public hearing tear sheets or an affidavit from the newspaper with a copy of the ad attached, which includes the date(s) of publication, will only be accepted. Failure to use the provided public notice template verbiage may result in disqualification of the application.

Service Delivery Strategy (O.C.G.A. §36-70-20): State law requires that all projects funded be consistent with the community's adopted Service Delivery Strategy (O.C.G.A. §36-70-20). The following components will be required for all applicants:

1. An approved SDS on file with DCA, in compliance with applicable state law; and
2. An approved SDS indicating that the applicant is an authorized provider of the service for which it is requesting CDBG funds (including housing).

It will not be necessary for an SDS to specifically identify that grant funds are a funding mechanism if other legal and appropriate funding sources are cited within the SDS document. Although it is prudent for a community's SDS to contemplate the use of grant funds to support service provision, that language will not be included in the evaluation for the 2027 CDBG competition.

The appropriate citation of the Strategy along with attachments and service area maps should be included in the application, along with a signed certification that the project is consistent with the Strategy. Maps should include the project area, or facility, in relation to the approved service area for that activity. Additionally, please include signed certification that the project is consistent with the locally adopted Comprehensive Plan and Service Delivery Strategy. ***If the project is not covered by the adopted Strategy by April 2, 2027, it will not be eligible for funding unless any deficiencies are cured within 60 days after notification by DCA. Note that certain types of applications are not routinely included in Service Delivery Strategies. These may include housing activities (such as would be typically offered through a CDBG housing or multi-activity application), Senior Centers, Boys and Girls Clubs and other types of services to limited clientele. In these cases, an update of the Service Delivery Strategy to include these services will be necessary. A sample update can be found in this manual in Appendix E.***

Guide to Acceptable Survey Methodology: The *Guide to Acceptable Survey Methodology* has been updated to prohibit the use of a "random" start for the initiation of a survey. A random number generator must be used when selecting the households to be surveyed. See Appendix C for further details.

Generally, a door-to-door survey is the preferred method. Units of general local government may, at the discretion of the state, use either HUD-provided data comparing census data with appropriate low- and moderate-income levels or survey data that is methodologically sound. All methods as outlined in HUD's CPD Notice 14-013 will be allowed for the FY2027 Annual Competition. It is imperative that proper documentation evidencing compliance with the notice be maintained and provided with the application. Failure to do so may result in disqualification from the competition. Please review the advantages and disadvantages of each survey method as outlined in the notice.

Concentration Map Requirement: DCA has long required concentration maps from the applicant jurisdiction that show concentrations of minorities, low- and moderate-income, and housing deficiencies. ***All applicants must create these maps using DCA's online tool or an approved equivalent, and keeping their concentrations in mind, should include on the Community Development Needs Assessment a narrative that indicates how and why the applicants' target areas were chosen. Target areas outside of an area of concentration must be justified by discussing why a target area inside of an area of concentration was not chosen. The project target area must be included, with target area boundaries drawn on the concentration maps.*** Please see this tool at: https://georgia-dca.maps.arcgis.com/apps/webappviewer/index.html?id=a547b61dac0545d29101ff902cbf8c3e. This will generate consistent maps from applicants that will allow each applicant to respond to its jurisdiction's concentrations.

Updated Section on Basic Compliance Rules for CDBG: The section on Basic Compliance Rules for CDBG has been updated to include further details on Civil Rights/Fair Housing Equal

Opportunity (FHEO). The section includes a listing of the Civil Rights Laws and Executive Orders that apply to the CDBG program as well as further details on the following topics: 1) Section 3; 2) Affirmatively Furthering Fair Housing; 3) Section 504; and 4) Limited English Proficiency (LEP). ***At the end of the section on Basic Compliance Rules will be information about how to address the Basic Compliance Rules in your CDBG application. Also note the updated Sample Public Hearing Notice.***

Appendix V: Appendix V entitled "Language Access Plan Template & Guidance" includes DCA's Local Subrecipient Language Access Plan Template, and Local Subrecipient Language Access Plan Guidance. The Template and Guidance include important information for jurisdictions where LEP populations exceed the threshold for additional language translation services for certain public notices. In order to view DCA's Language Access Plan, please go to the following link: https://dca.georgia.gov/fair-housing-policy-resources. DCA's Language Access Plan (LAP) may be used as a reference, but the Template and Guidance in Appendix V will be the primary documents needed in order for recipients of CDBG funds to meet their LAP obligations.

Revitalization Area Strategies (RAS): For the 2027 CDBG Annual Competition, RAS applications, annual updates, and renewals will be **due no later than April 2, 2027,** in order for RAS benefits to be applicable to the 2027 Annual Competition, including but not limited to the ability to apply for CDBG funds in RAS areas every year and bonus points. The RAS manual has been updated to provide for clarifications for needed documentation and a change in scoring points awarded under the "Local Redevelopment Tools" category. In addition, RAS will continue to allow surveys to be used to document the 20 percent poverty requirement for census block groups. See the RAS manual and Appendix C for further details.

Change in Eligibility for GICH Communities: For the 2027 CDBG Annual Competition, DCA will allow an exception to the "every other year" rule for communities that are "Certified Alumni" of the GICH program, as well as communities active in the three-year program. See Part I, Restrictions on Eligibility Part C.

Demographic Scoring: All applicants will be compared to each other to establish demographic scores using median household income as one of the three demographic factors. This method was established in FY2019 for establishing demographic scores.

Requirement to Consult with Native Americans: Note that the Tribal Consultation must be completed by April 2, 2027, and is a threshold requirement for the 2027 Annual Competition.

Timeliness Criteria for the 2027 Annual Competition Cycle: These criteria replace the 80/20 rule that has been used during previous competitions to evaluate progress on previously funded CDBG grants. DCA will review these criteria during the later stages of application review ***(June 30th for the 2027 Annual Competition cycle)*** to determine the eligibility of communities that have submitted a 2025 Annual Competition application and also have open CDBG grants.

- For Annual Competition applications funded in 2026, the following criteria should be met:
  - Must meet one of the exceptions to the "every other year" rule as outlined under *Restrictions on Eligibility for Competition* below.
  - All Special Conditions must be cleared.
  - DCA must have released funds.
  - For public facility, multi-activity, or economic development projects, all engineering design work must be finalized, complete and submitted to the cognizant agency for review.

- For housing or multi-activity projects, the local policies and procedures must have been submitted to DCA for review.

- For Annual Competition applications funded in 2025, the following criteria must be met:
  - Seventy-five percent of budgeted funds must be drawn down and spent.

- For Annual Competition applications funded in 2024 or earlier, the following criteria must be met:
  - One hundred percent of budgeted funds must be drawn down and spent.

Appendix N – DCA Notice to the Field: Clarifications for the Annual Competition and Ineligible Procurement Practices: Although not new for FY 2027 funds, applicants need to peruse the appendix, especially if preparing water or sewer applications. This appendix makes clear that applicants, especially water and sewer applicants or other applicants that are proposing activities that will generate operating revenue, must thoroughly discuss **financial alternatives** to CDBG funding. For example, applicants should discuss their ability/lack of ability to borrow funds for the project from other sources, the impact of borrowing funds on local government finances and *especially* on low- and moderate-income households. DCA currently uses the standard that water charges of **1.0% or greater** of median household income and sewer charges of **1.0% or greater** of median household income begin to demonstrate a significant local effort in meeting water/sewer infrastructure needs. Applicants should also bear in mind that local government participation in the Georgia Environmental Facilities Authority (GEFA) water and sewer rate survey is critical in allowing DCA to evaluate proposed financial alternatives. The results of recent GEFA surveys may be viewed at the following link: https://georgiawaterrates.org/dashboards. Applicants should include a copy of the dashboards for their local government, based on 5,000 gallons average monthly use. DCA review panels have access to this survey information.

Water and Sewer Hookups: HUD has made clear that water and sewer hookups on private property cannot be paid for with CDBG funds unless the household served is low- to moderate-income. Therefore, DCA requires adherence to the following policies regarding water and sewer hookups:

- In accordance with HUD requirements, DCA will not allow CDBG funds to be used on private property unless the household served is low- to moderate-income.
- For FY 2027 applications, applicants should discuss how water and sewer hookups, water and sewer service line replacements, and septic tank closures on non-low- to moderate-income private property will be paid for in order to increase the likelihood of a maximum score. **Note** that water and sewer laterals from the street to the private property line are eligible CDBG expenses regardless of income.
- For FY 2027 applications, applicants should indicate that all target area occupied households will be connected to the CDBG-proposed improvements (and all septic tanks properly closed, if applicable) in order to increase the likelihood of a maximum score.
- DCA will accept as documentation of low- and moderate-income status area surveys that are three years old or less. Specifically, surveys that are older than January 1, 2024, will not be accepted for the 2027 Annual Competition. Additionally, due to HUD's transition policy for American Community Survey 2016-2020 data, census qualifying projects are not permitted to use data older than the current 2016-2020 low-to-moderate income survey data in the 2027 Annual Competition.
- Applicants may decide whether to use their own funds to pay for non-low- and moderate-income hookups or to require property owners to pay for their non-low- and moderate-income hookups.

- **Note that if local funds are used to pay for non-low- and moderate-income hookups, these funds, if properly documented and committed, will be counted as match or leverage.** Local governments opting to pay for non-low- and moderate-income hookups may wish to check with their local attorney prior to proceeding.

A Note on CDBG Flexibility. CDBG has always been a flexible program allowing local governments to choose among a variety of activities in order to address local priorities and needs. DCA encourages the full use of this flexibility by allowing applicants to apply for the full range of eligible CDBG activities under the Annual Competition. This includes economic development projects. Although meeting the low- and moderate-income national objective has been the primary focus of most communities under the Annual Competition, applicants may also pursue the removal of slum and blight objective as well. The removal of slum and blight objective is best pursued through projects that deliver significant low- and moderate-income benefit. Note that regardless of the national objective or activities chosen by the applicant, the application must compete against other applications with similar activities and objectives.

Block Group ID. Applicants must provide the following geographic identifiers for the Target Area on DCA 1: Block Group ID (12-digit code including State Code, County Code, Census Tract and Block Group), Target Area Address (with city, and zip), and the Target Area Longitude and Latitude. Both the Block Group ID and Longitude and Latitude are available on the DCA Concentration Maps. This requirement has been added because HUD is now requiring this information in order to be able to show graphically where CDBG activities are taking place around the country. DCA requires Block Group ID information for all geographic areas included within the target area. See the directions for DCA-1 for further information. Applicants may look up addresses' census tract, block group, and block numbers at https://georgia-dca.maps.arcgis.com/home/index.html (then scroll down until you see the CDBG Applicant Concentration map) or for additional information also please see the following census web site: https://data.census.gov/cedsci/.

Engineering and Architectural Reports. Preliminary Engineering Reports (PERs) and Preliminary Architectural Reports (PARs) are often the heart of many CDBG applications. Please remember to carefully review the section of the manual entitled *Making Your Application More Competitive*. Note that many street and drainage PERs are not including preliminary hydrologic and hydraulic *calculations*. These calculations are critical for DCA's review of these projects. The calculations assist in determining the need for improvements and the appropriateness of the proposed solutions to those needs. ***Scores will be reduced if preliminary calculations are not provided.*** *Also, some PERs are not including maps that show existing and proposed infrastructure along with existing and proposed pipe sizes. These maps are critical to DCA's review of project proposals. Some Preliminary Architectural Reports (PARs) are not including existing floor plans with overall and room-by-room dimensions along with current use by room. Scores will be reduced if the information in this paragraph is not provided.* **Because the quality of Preliminary Engineering Reports and Preliminary Architectural Reports vary by applicant, DCA has provided detailed guidance concerning what should be included in these reports. See pages 72-75.**

Maps. All applicants, regardless of the type of application submitted, must submit a map (or maps) where the target area, or facility, is in relation to the jurisdiction's Service Delivery Strategy for that activity.

Procurement by Regional Commissions (RC). RCs that wish to subcontract directly with private consultants must use the appropriate procurement procedures outlined in this manual and

follow the requirements before entering subcontracts with private consultants. Alternately, the local government may contract separately with both an RC and a private consultant provided the procurement procedures in this manual are followed for the procurement of the private consultant.

Submission. DCA encourages applicants to contact staff for technical assistance in the preparation of their applications. DCA staff will do its best to respond in a timely manner to these requests. We encourage applicants to seek advice from various DCA staff resources as well as RCs, private grant consultants, and architectural and engineering firms.

Technical Assistance and Other DCA Rulings Regarding Application Preparation and consultants and engineers and architects when preparing applications. If a question is critical to the eligibility or competitiveness of an application and this manual does not clearly provide an answer to the question, please contact DCA in writing ***before*** the application deadline for a response.

For Questions About:	**Contact:**	**Phone:**
Departmental and Division Policy	Kimberly Carter, Deputy Commissioner for Community Development and Finance Reggie Taylor, Division Director Community Finance	404-679-0604 404-679-1722
CDBG Annual Competition Applications	Kathleen Vaughn, Director of Community Development	404-679-0594
	Pam Truitt, Manager of Compliance and Field Services	404-977-3326
Neighborhood Revitalization and Multi-Activity Applications	Glenn Misner, Director of NSP	404-357-3646
Revitalization Area Strategy (RAS) Applications	Glenn Misner, Director of NSP	404-357-3646

PART I: GENERAL INFORMATION

Eligible Program Applicants

- Units of general-purpose local government (cities or counties) that do not participate in HUD's CDBG Entitlement or Urban County program.

Ineligible Program Applicants

Note that the entities below receive their CDBG funding directly from HUD. Also note that the list below is based on the federal fiscal year 2024 funding for HUD. Because the federal fiscal year 2027 funding for HUD has not been established, this list is subject to revision.

- The cities of Albany, Atlanta, Brookhaven, Brunswick, Dalton, Gainesville, Hinesville, Marietta, Rome, Roswell, Sandy Springs=, Savannah, South Fulton, Valdosta, and Warner Robins.
- Cherokee County, Clayton County, Cobb County, DeKalb County, Fulton County, Gwinnett County, and Henry County,
- The consolidated governments of Athens/Clarke County, Augusta/Richmond County, Columbus/Muscogee County, and Macon/Bibb County.
- Any incorporated city within a HUD Entitlement Urban County that has chosen to participate with the Urban County through a Cooperating Agreement.

Eligibility Requirements

- Applications may be submitted individually by one unit of general-purpose local government, or jointly or regionally, by two (2) or more units of general-purpose local government.
- Only one single or multi-activity application per general-purpose local government, whether individually, jointly, or regionally submitted, shall be eligible for the Annual Competition per CDBG federal funding allocation.
- Only one single or multi-activity award under the Annual Competition per CDBG federal funding allocation may be received by any general-purpose local government, whether individually, jointly, or regionally submitted.

Under State statutes, applicants must comply with State planning and financial reporting laws. These laws include:

- The Georgia Planning Act (O.C.G.A. 45-12-200 et seq. and 50-8-1 et seq.),
- The Service Delivery Act (O.C.G.A. 36-70-20 et seq.),
- Government Management Indicators Survey (O.C.G.A. 36-81-8)
- DCA Local Government Finance Report requirements (O.C.G.A. 36-81-8), and
- Local Government Audit Act (O.C.G.A. 36-81-1 et seq.)

In certain instances of non-compliance, these laws prohibit the Department of Community Affairs from providing grant assistance. For information on a community's Qualified Local Government Status (QLG), i.e., the status of a community's compliance with the first four requirements listed above, please go to the following web site: https://dca.georgia.gov/community-

assistance/coordinated-planning/local-planning. For information on a community's compliance with the Local Government Audit Act, please contact Jacqueline E. Neubert at the Georgia Department of Audits at (404) 651-8938 or neubertj@audits.ga.gov or see the following link, https://www.audits2.ga.gov/local-government-compliance/.

Restrictions on Eligibility for Competition

The following restrictions may affect 2027 CDBG Annual Competition applications:

a) **Threshold Requirements:** For the 2027 Annual Competition, threshold requirements include the following standards: 1) submission of a complete application; 2) compliance with all deadline requirements as noted in this manual; 3) meeting all requirements as specified by DCA for curing any application deficiencies; 4) completion of all professional procurement requirements; and 5) completion of the Tribal Consultation portion of the Environmental Review not later than April 2, 2027.

b) All CDBG recipients are required to expend one hundred percent (100%) of all funds within thirty-six **(36) months from the date of the grant award** unless the project is extended by DCA. Additionally, substantial progress is expected within twelve (12) to eighteen (18) months. The Department of Community Affairs reserves the right to recapture all unobligated funds after the twenty-four-month period *and to restrict an applicant from submitting a CDBG application (or if submitted, DCA may not make an award) whenever an unacceptable level of funding under a current grant remains unspent or unobligated.* DCA will review previous grantee progress during the rating and ranking period. Please see DCA's timeliness criteria below. Consult with DCA prior to application submission if the applicant anticipates that DCA's timeliness criteria will not be met during the rating and ranking period.

Timeliness criteria for the 2027 Annual Competition cycle: DCA will review these criteria during the later stages of application review June 30th **for *the 2027 Annual Competition cycle)*** to determine the eligibility of communities that have submitted a 2027 Annual Competition application and also have open CDBG grants.

- For Annual Competition applications funded in 2026 the following criteria must be met:
  - Must meet one of the exceptions to the "every other year" rule as outlined under c) below.
  - All Special Conditions must be cleared.
  - DCA has released funds.
  - For public facility, multi-activity, or economic development projects, all engineering design work must be finalized, complete and submitted to the cognizant agency for review.
  - For housing or multi-activity projects, the local policies and procedures must have been submitted to DCA for review.

- For Annual Competition applications funded in 2025, the following criteria must be met:
  - Seventy-five percent of budgeted funds must be drawn down and spent.

- For Annual Competition applications funded in 2024 or earlier, the following criteria must be met:
  - One hundred percent of budgeted funds must be drawn down and spent.

RLF Compliance: If the local government submitting an Annual Competition CDBG application also has an open EIP/RDF Local Revolving Loan Fund, the RLF must be in compliance by April 2, 2027, for the application to be eligible for award. RLFs can be out of compliance in three different ways: 1) Their Semi-Annual report is not up to date, i.e., submitted within 30 days of the end of the reporting period; 2) The Fund has more cash on hand than the greater of a) $125,000 or b) 30% of total assets; 3) The Fund has not made a loan or grant within the past five years. The out of compliance RLFs must either be brought into compliance or closed by April 2, 2027, for the CDBG Annual Competition application to be eligible for funding.

c) Generally, units of government funded in the FFY 2026 Annual Competition (whether individually or jointly submitted, and including projects funded with funds other than FFY 2026 program year funds) may not apply for FFY 2027 CDBG funding. (See also the deadline, timeliness and threshold criteria above and in other sections of this manual.)

Exceptions: *This restriction does not apply to* local governments that propose CDBG projects ***within*** a current, approved Revitalization Area Strategy area (Application dated no later than April 2, 2027.) See the *Revitalization Area Strategy Manual, 2025 edition*, for further information.

This restriction does not apply to the Immediate Threat and Danger Program, the Employment Incentive Program, the CDBG Loan Guarantee Program, the Redevelopment Fund or the Innovative Grant Program.

This restriction does not apply to communities currently designated by the Georgia Environmental Finance Authority (GEFA) as a "Water First Community" as of April 2, 2027. Water First communities must propose water improvements as the primary purpose of the grant in order to apply annually. The current listing of designated Water First Communities may be found at GEFA's web site at https://gefa.georgia.gov/water-resources/waterfirst. Please also review this website for additional program information.

This restriction does not apply to any local government officially designated by DCA as a PlanFirst community. A PlanFirst community is defined as a county or city government that has a current "PlanFirst" designation with DCA as of April 2, 2027.

This restriction does not apply to any local government officially designated by DCA as a Georgia Initiative for Community Housing ("GICH") community, OR a GICH Community that is a GICH Certified Alumni. A GICH community is defined as any county or city government that is part DCA's three-year program of collaboration and technical assistance related to housing and community development OR a GICH Certified Alumni community as of April 2, 2027. The GICH exception applies only ***if*** the 2027 CDBG application involves a housing component.

d) Regional applicants meeting the requirements of this manual (see the Special Requirements section below) may apply annually.

e) Currently, there are no designated enterprise communities in the State of Georgia that are eligible to apply for CDBG funding on an annual basis.

f) Recipients of prior CDBG funding must resolve all outstanding CDBG-related audit and/or monitoring findings before submission of an application to DCA.

Threshold Requirements

For the 2027 Annual Competition, threshold requirements include the following standards: 1) submission of a complete application; 2) compliance with all deadline requirements as noted in this manual; 3) meeting all requirements as specified by DCA for curing any application deficiencies; 4) completion all professional procurement requirements (any sole source requests must be submitted to DCA prior to April 2, 2027); and 5) completion of the Tribal Consultation portion of the Environmental Review not later than April 2, 2027.

Special Requirements

Joint Applications

Joint applications are generally required when less than 51 percent of the beneficiaries are located within the jurisdiction of the applicant unit of general-purpose local government. Activities may serve beneficiaries outside the jurisdiction of the applicant, provided the unit of general-purpose local government has identified such a need as an overall community-wide housing and community development need and 51 percent or more of the beneficiaries are located within the applicant's jurisdiction. Exceptions may be made in writing by DCA on a case-by-case basis using guidance provided by law and regulation, the applicable local service delivery strategy, and written support for the exception from the county government. **Please consult with DCA for guidance concerning the need for joint applications. Requests for exceptions should be made to DCA as early as possible, but no later than April 2, 2027.**

Joint Applications must include:

- A copy of the Cooperating Agreement entered into by the cooperating units of government. This agreement should designate the unit of government that will serve as lead applicant. A sample cooperating agreement is included as Form DCA-11.

- Separate "Certified Assurances" (Form DCA-10) for each jurisdiction.

- Evidence of separate public hearings for each jurisdiction. A single public hearing, however, may serve the needs of each jurisdiction, provided that (a) each jurisdiction shares a central location and (b) the hearing is clearly publicized by both (or jointly publicized by each) jurisdictions. If a single hearing is proposed, please contact DCA for guidance. For further information, please refer to *Citizens Participation Requirements* further outlined in this manual.

Regional Applications

- Regional applications are intended to allow an applicant to address problems and apply for a project benefiting a multi-county region where multi-county cooperation and

agreements are required (e.g., purchase and sale agreements, management agreements, memorandums of understand, etc.). In order to encourage regional solutions, successful local applicants for regional projects (including all local applicants that are part of a regional application) will not be required to "sit out the next competition" and may apply the following year for a different or new project provided DCA timeliness criteria are met.

- Regional applications must meet the *Special Requirements for Joint Applications* outlined above. In addition, Regional applications should include a letter(s) from the appropriate Regional Commission (RC) certifying that the project is consistent with any local and regional plans that exist and has multi-county benefits. Please contact DCA prior to submission for guidance.

"What is the difference between Joint and Regional applications?"

Joint applications are usually required when less than 51% of the beneficiaries reside in the primary applicant's jurisdiction. Regional applications apply to projects benefiting a multi-county region.

Eligible CDBG Activities

National Objective—Low-and Moderate-Income Benefit

All CDBG funded activities must be eligible under the Housing and Community Development Act of 1974 and must meet a National Objective. See Appendix A for a copy of Section 105 of the Act which enumerates eligible activities and Appendix D for a copy of 24 CFR Part 570.483 which provides the criteria for meeting the HUD National Objectives.

Definition of Low- and Moderate- Income

***CDBG regulations specify the maximum income of program beneficiaries as summarized below*:**

- A low- and moderate-income (LMI income) person is defined as a member of a household having an income equal to or less than the Section 8 Housing Assistance Program low-income limit established by the U.S. Department of Housing and Urban Development (HUD).

- A household includes but is not limited to: a person who lives alone or intends to live alone, or two or more persons sharing residency whose income and resources are available to meet the household's needs and who are either related by blood, marriage, or operation of law, or who have a stable family relationship.

- The CDBG Income Limits (same as **Adjusted HOME Income Limits**, but not the same as Section 8 Income Limits) are available for each county and are based on 80 percent of the county's median income or 80 percent of the statewide non-metropolitan median income, whichever is greater, with adjustments for family size. They are published each spring and are distributed by HUD and DCA. Refer to Appendix B for the most recently calculated income limits. Also see HUD Exchange at https://www.hudexchange.info/resource/5334/cdbg-income-limits/.

- Family income is defined as follows: "the anticipated gross income from all sources (except those specifically excluded by HUD) received by all family members 18 years of age and older, including those who are temporarily absent from the unit.

Each CDBG activity must meet the following minimum threshold requirements for low- and moderate-income benefit:

✓ Housing Activities:	100% benefit to Low- and Moderate-Income Persons
✓ Public Facilities:	70% Benefit to Low- and Moderate-Income Persons
✓ Economic Development:	51% Benefit to Low- and Moderate-Income Persons

Instructions for determining low- and moderate-income benefit are located in Part IV of this manual (Instructions for Form DCA-6). Generally, a door-to-door survey is the preferred method. Units of general local government may, at the discretion of the state, use either HUD-provided data comparing census data with appropriate low- and moderate-income levels or survey data that is methodologically sound. All methods as outlined in HUD's CPD Notice 14-013 will be allowed for the FY2027 Annual Competition. It is imperative that proper documentation evidencing compliance with the notice be maintained and provided with the application. Failure to do so may result in disqualification from the competition.

Please review the advantages and disadvantages of each survey method as outlined in the notice. A sample low- and moderate-income survey is included in Appendix C. Applicants are reminded to include a complete description of the method used to determine benefit with Form DCA-6. Please refer to DCA's *Acceptable Survey Methodology* (Appendix C) publication for assistance in designing and implementing a sample survey.

In the case of buildings serving LMI persons, do not "double count" clients. DCA is interested in the total number of people using the facility -- not the number of visits to the facility. DCA counts the unduplicated number of beneficiaries over a year's time.

- Each activity listed in this section is eligible only to the extent to which it addresses the needs described on Form DCA-4 and benefits at least 70% (at least 51% for economic development and 100% for direct housing) low- and moderate-income persons. This determination must be satisfactorily demonstrated on Form DCA-6. Failure to adequately demonstrate low- and moderate-income benefit may lead to application denial.

Examples of eligible activities

***Examples of eligible activities include*:**

- **Supporting Fair Housing Activities** (See HUD Memorandums in Appendices M and N.)

- **Using CDBG Funds to Address the Challenge of Homelessness** (See HUD Memorandum in Appendix K.)

- **Acquisition of Real Property** in whole or in part by purchase, long term- lease, donation or otherwise by the applicant, another public agency, a nonprofit, and/or private individuals and for- profits- for the purpose of carrying out housing rehabilitation, economic development activities, public facilities, or other eligible activities.

- **Disposition** or costs incidental to disposing of property acquired with CDBG funds. Examples of eligible costs include appraisal, survey, marketing, legal, financial, transfer taxes, etc.

- **Public Facilities and Improvements**, including the acquisition, construction, reconstruction, rehabilitation and/or installation of the same. This activity includes, but is not limited to, water and sewer facilities, flood and drainage improvements, parking, streets, curbs, gutters, sidewalks, parks and playgrounds. Other activities may include the development of shelters for homeless, elderly, mentally ill, abused and impaired persons. Public facility activities may also include the development of medical, community, senior and handicapped centers, or centers for literacy training.

- **Clearance** costs within a "targeted area" generally include the demolition and removal of structures and other items (mobile homes, dilapidated houses, junk cars, etc.) to appropriate sites.

- **Interim assistance** to a deteriorating "target area" may include activities which are low budget- and otherwise ineligible such as pothole, lighting, fencing, sidewalk, street repair, etc. Interim assistance may also include special refuse collection, trimming and removal of trees and overgrowth, etc. Assistance under this activity is generally associated with a redevelopment or revitalization project.

- **Relocation** or temporary relocation of families and individuals, businesses or other organizations. Relocation of persons or businesses that are displaced due to a federally funded project is required by Federal law and regulation (the Uniform Relocation and Real Properties Acquisition Act of 1970 (URA), and pursuant regulations). Temporary relocation for owner occupants who may be temporarily displaced by a rehabilitation or reconstruction project may be "optional" and subject to local policy approved by DCA based upon need. Temporary relocation of tenants is required under URA. *Temporary relocation activities associated with housing rehabilitation (including lead-based paint hazard control), or reconstruction should be budgeted within the appropriate activity line item (rehabilitation or reconstruction) on the budget worksheet. Only permanent relocation activities should be included in the relocation line items.*

- **Removal of Architectural Barrier** activity includes modifications to existing structures that are necessary to remove material and architectural barriers that restrict the mobility and accessibility of the elderly or handicapped to publicly or privately owned buildings, facilities or improvements.

- **Housing Rehabilitation** will utilize CDBG funds to finance the rehabilitation of public or private residential property, including the conversion of non-residential properties (in downtown commercial districts, etc.) for housing. **Rehabilitation of housing units built prior to 1978 must provide for compliance with lead-based paint hazard**

control regulations (24 CFR Part 35). NOTE FOR MHU's: DCA limits the amount allowable for the rehabilitation of MHU's and proposed costs should not exceed a total of $20,000 (including CDBG funds AND owner/other contributions) for MHU units.

- **Reconstruction** of housing provided that it is (a) owner-occupied-, and (b) the house proposed for reconstruction is "not feasible" for rehabilitation. The reconstructed unit must be built on the same parcel of land as the unit it replaces. Please consult DCA for detailed guidance if reconstruction is planned.

- **Homebuyer Assistance/Second Mortgage Assistance** can be used as a strategy to encourage homeownership. This tool can be used for assistance in providing help with principal reduction payment, down payment, second mortgage, loan closing and other related costs. In keeping with HUD policy "to improve the likelihood of continued affordability," homebuyer assistance requirements have been revised to support fixed rate loans. DCA requires (usually first mortgage) loans at a fixed rate of interest for a term that benefits the recipient of assistance—most often 30 years. Community Finance Division policy requires DCA review of adjustable and/or variable rate mortgages and other flexible mortgage financing plans, should a non-traditional loan be proposed. Please see the guidance memorandum entitled *Determining Affordability of First Mortgages on Loans with CHIP or CDBG Assistance* published April 12, 2004, and the guidance memorandum entitled *Use of Adjustable-Rate Mortgages, Variable Rate Mortgages or Other Flexible Mortgage Plans with CHIP or CDBG* published September 21, 2005. (See Appendix I.)

- **Code enforcement** related to the payment of salaries and overhead costs directly related to activities within a declining "target area."

- **Economic development** activities or assistance to "for profit entities," whether during the Annual Competition or through the Economic Development set-aside programs, generally take one of two forms:

  - ✓ direct loans to businesses/industry

  - ✓ public infrastructure in support of business/industry

- **Project related soft costs** including appraisal costs and costs related to reviews under the Programmatic Agreement or costs required for extraordinary environmental compliance.

- **Administrative costs** necessary to carry out a CDBG project. These costs include expenses for:

  - ✓ *General management, oversight and coordination.* This category refers to the direct costs of overall program management, coordination, monitoring and evaluation. It also includes similar costs associated with carrying out projects with multiple activities. (For example, salaries, related expenses and all other costs directly related to the overall management, oversight and coordination of a project with several activities, such as within a defined concentrated project area should be charged to this category).

- ✓ *Citizen participation.* Costs related to citizen participation in the planning, implementation and assessment of the program, including, but not limited to, the costs of providing program information to the public, providing technical assistance to citizens and citizen organizations, publishing notices, and holding hearings.

- ✓ *Reasonable costs of environmental studies* (including historic preservation clearances, project specific environmental assessments, and clearances for eligible activities) necessary to comply with Federal, State and local law, and other eligible administrative costs.

- ✓ *Translation services.* Please see DCA's Citizen's Participation and Language Access Plan requirements.

Administrative costs (generally not related to the design and construction services contract) may include archaeological studies, in-depth historic assessments, archival photographs, legal fees, title work, housing inspections, etc. **However, administrative costs generally do not include** direct costs and other professional services directly related to design and implementation of an engineering or architectural project. These costs should be budgeted as part of each appropriate engineering or architectural line item. Such costs may include the preparation of cost estimates, land surveys, easement plats, predesign meetings, preliminary construction drawings, permits and interagency approvals, construction drawings, pre-construction conferences, meetings with contractors/recipient staff, bid openings, contractor investigations, contract administration, inspections, training, & as- built- drawings, etc. Please consult DCA staff for budgetary guidance.

Ineligible Activities

Generally speaking, activities are ineligible if they do not meet HUD's National Objectives.

Examples of ineligible activities:

- ✓ Acquisition of furnishings, movable equipment, machinery, and land write-downs-.

- ✓ Operating and maintenance expenses.

- ✓ Construction or rehabilitation of buildings for the general conduct of government.

- ✓ Purchase of construction equipment.

- ✓ Cost of furnishings and personal property associated with new construction.

- ✓ Constructing new housing, creating a "secondary housing unit" (an in-law- suite, etc.) attached to a primary unit; installing luxury items such as upgraded appliances, spas, pools, etc.; the cost of non-built-in equipment and furnishings (stoves and refrigerators are exceptions); and labor costs for homeowners themselves to rehabilitate their own property.

- ✓ An exception to the new construction prohibition may be granted whenever: 1) No comparable local resources exist and the community can demonstrate eligibility

under *Last Resort* as defined under 49 CFR Part 24.404; or (2) a local government provides funding to a community-based housing development organization meeting the criteria outlined in HUD 24 CFR 570.204. DCA reserves the right to require additional market data and other development information prior to funding any new housing construction activities.

- ✓ Any form of direct grant assistance to a business or industry (for-profit entity) is ineligible.

Basic Compliance Rules for CDBG

This section of the CDBG Applicants' Manual describes some of the critical laws and regulations CDBG applicants must consider when planning a CDBG Project. Note that a complete list of applicable laws and regulations can be found in Appendix G.

It is the responsibility of the applicant's certifying official to ensure that the proposed program, activities, goals and timetables are in compliance with all applicable Federal and State laws, regulations and executive orders.

An important part of the application feasibility score is how well the proposal addresses compliance with applicable laws and regulations. Applicants should use the Description of Activity Form (DCA-5) to describe compliance actions to be undertaken by local government applicants and, if funded, grant recipients. ***Applications that fail to demonstrate compliance with applicable laws and regulations will lose points in the rating and selection process.*** If a CDBG grant is awarded, the Department of Community Affairs will provide local government representatives additional compliance training at the CDBG Summit.

Citizen Participation Requirements

The Housing and Community Development Act emphasizes efforts to involve citizens, especially low- and moderate-income citizens, in all aspects of the CDBG Program. Also, see DCA's Language Access Plan in Appendix V and the Manual's section on Basic Compliance Rules for CDBG for details regarding outreach to those with Limited English Proficiency. Also note the revised Sample Public Hearing Notice below.

As required by the Housing and Community Development Act, the Georgia Department of Community Affairs has adopted a written Citizen Participation Plan, available on the DCA website at https://dca.georgia.gov/affordable-housing/housing-development/community-initiatives/hud-planning/hud-planningreporting.

Applicants for and recipients of CDBG funds certify that they will follow this plan that requires that local units of government will provide for and encourage participation in the planning, implementation and assessment of their CDBG program.

In order to meet these goals, applicants must, at a minimum, meet the following requirements:

- ♦ Hold at least one (1) public hearing in the locality prior to submission of an application to DCA. The purpose of the hearing will be to obtain citizens' views and to respond to proposals and questions concerning previous CDBG funded projects (if any) and to obtain citizen participation in the development of new proposals including identification of community needs and proposed activities. The applicant must furnish information

including the estimated amount of funds proposed to be used for activities benefiting low- and moderate-income persons and its plan to minimize displacement and assist displaced persons.

- A notice advertising the public hearing must be published not less than five (5) calendar days prior to the date of the hearing in the non-legal section of a local newspaper of general circulation. (A sample public hearing notice is included on the next page and use of this formatting is strongly encouraged.) Local governments are encouraged to take other actions to provide adequate notice to potentially interested persons.

> A full five days must pass from the Public Notice publication date to the public hearing date. The first full day is the day after the Notice is published. For example: If the Notice is published on a Thursday the earliest the Hearing can be held is the following Wednesday. Another example: The hearing is scheduled for a Friday afternoon. Counting backward, day one (1) is Thursday and day five (5) is Sunday. The notice must be in a paper earlier than Sunday, i.e.: Saturday's paper or earlier.

- Please note that those applicants from jurisdictions where 1,000 or more residents of a language group with limited English proficiency reside or where more than 5% of residents are from a language group with limited English proficiency must advertise the pre-award public hearing in the applicable language, usually Spanish. To determine whether either of these thresholds are met, please refer to the most recent data release of American Community Survey Table S1601 (Language Spoken at Home) published in December of each year. ***Please source all data provided to DCA. Please also use these tables to fill out the Language Access Plan Threshold Certification. See Appendix S for a copy of the pre-award public hearing notice in Spanish.***

- The requirement of in-person public hearings has been reinstated. Virtual hearings are no longer authorized in lieu of in-person public hearings CDBG grants.

- A copy of the application as submitted to DCA must be available for public review and the public must be notified of its availability for review.

- Hearings must be held at times and locations convenient to potential or actual beneficiaries and with accommodations for the disabled. The needs of non-English speaking residents must be met for public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. Contact DCA for any required assistance.

- Applicant files must contain documentary evidence that the actions listed in this section have been taken, including copies of actual notices, agendas, and minutes of hearings.

- Applicants and recipients must provide technical assistance to groups representative of persons of low- and moderate-income that request such assistance in developing proposals, *with the level and type of assistance to be determined by the local unit of government.*

- Citizens must be provided with reasonable and timely access to local meetings, information and records relating to the local government's proposed and actual use of

CDBG funds as required by HUD regulations, state law, or DCA policy.

- **This section should not be construed to restrict the responsibility or authority of the local government for the development and execution of its community development program.**

- The applicant must certify in the Certified Assurances component of the application (Form DCA-10) that the requirements above have been met.

> ***Note***: *Georgia Law requires that "all state, county and municipal records, except those which by order of a court of this state or by law are prohibited from being open to inspection by the general public, shall be open for a personal inspection of any citizen of this state at a reasonable time and place, and those in charge of such records shall not refuse this privilege to any citizen" (50-18-70, O.C.G.A.). This means that past and current records on the use of CDBG funds are required to be open for public inspection.*

Sample Public Hearing Notice

The (City or County) of (name of City or County) is considering applying to the Georgia Department of Community Affairs for a Community Development Block Grant of up to $(amount of funds). These funds must be used to primarily benefit low- and moderate-income persons.

The activities for which these funds may be used are in the areas of housing, public facilities, and economic development. More specific details regarding eligible activities, plans to assist displaced persons (if any), the estimated amount of funds proposed to be used for activities to benefit low- and moderate-income persons, and the rating system will be provided at a public hearing which will be held at (place/address) on (date), at (time).

The purpose of this hearing will be to obtain citizen input into the development of the application and to review progress on the previous CDBG grant (if applicable). The (City or County) of (name of City or County) is committed to providing all persons with equal access to its services, programs, activities, education and employment regardless of race, color, national origin, religion, sex, familial status, disability or age. Persons with special needs relating to handicapped accessibility or foreign language shall contact (name/phone) prior to (date). This person can be located at (complete address) between the hours of (hours am - pm), Monday through Friday, except holidays. Persons with hearing disabilities can contact us at our TDD number (AC + number). [Applicants who do not have a TDD phone may consider using the Georgia Relay Service, at (TDD) 1-800-255-0056 or (Voice) 1-800-255-0135.]

Equal Housing Opportunity

The applicant must maintain detailed minutes of this hearing, a "tear sheet" or affidavit pertaining to the public notice and documentation as to whether meeting "special needs" was required and, if applicable, addressed. This documentation must be submitted with the application by the submission deadline of April 2, 2027.

Residential Anti-displacement and Relocation Assistance Plan

A unit of general local government receiving funds from the State must certify to the State that it has in effect and is following a residential anti-displacement and relocation assistance plan, and that it will minimize displacement of persons as a result of assisted activities. Relocation activities are subject to The Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (46 U.S.C. 4601) and regulations at 49 CFR, Part 24. Additionally, Section 104(D) of the Housing and Community Development Act, as amended has two major requirements (see 24 CFR Part 42): (1) the one-for-one replacement of certain housing units demolished or converted to non-low-/moderate income status as a direct result of a CDBG project, and (2) the expanded relocation assistance benefit payment for certain displaced occupants. This requirement will affect certain program design strategies of any applicant proposing housing demolition and/or relocation activities.

Acquisition of Property for Public Facility Projects

The Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, and as implemented by DOT regulations 49 CFR Part 24, applies whenever a local government recipient of CDBG needs to acquire property, such as land for a building, easements, Right-of-Way (ROW) for public infrastructure such as water or sewer lines, street paving, or drainage improvements.

The basic requirements are:

- The property owner must be offered the Fair Market Value (FMV) of the property based on an appraisal;
- Prior to the purchase offer, owners must be provided with information concerning their rights under the law; and
- Donations are possible but only after the owner has been informed of the government's obligation to pay FMV and executes a waiver.

URA procedures must be followed for CDBG projects even if the local government recipient is using other federal funds, its own non-federal funds, or other non-federal funds to pay for the property.

Applicants should address the status of any property needed for the project using Form DCA-5.

Note on Eminent Domain

The State of Georgia in 2006 passed legislation (HB 1313) restricting the use of eminent domain by the political subdivisions of the state. Please note these restrictions when planning your CDBG project. For further information, please review HB 1313. This legislation amended portions of Titles 8, 22, 23, and 36.

Environmental Compliance

There are many federal and state environmental protection laws and regulations to consider when planning and implementing CDBG funded projects. It is important to note that compliance is often required for all funding sources, public and private, and for all components of the entire project. By planning at the application and predevelopment stages, CDBG recipients can avoid future compliance complications and time delays.

Form DCA-9 captures some of the important environmental compliance information needed to complete the environmental review required by NEPA.

National Environmental Policies Act of 1969 (NEPA) and HUD regulations implementing NEPA titled "Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities" (24 CFR Part 58).

All CDBG projects must take certain actions to comply with this regulation before committing funds for acquisition or construction. This generally includes the completion of an environmental impact assessment, documenting actions taken to comply with other environmental laws (such as those listed in the Appendix G and described below), and public notices.

The assessment is a written document which evaluates both the negative and positive environmental effects of a project. It looks at the human, social and natural environment. At the planning stage, CDBG applicants should consider potentially negative environmental effects and propose solutions which minimize or mitigate these effects.

Endangered Species Act (ESA): As a reminder, the U.S. Fish and Wildlife Service published a final 4(d) rule on January 14, 2016, that established prohibitions against the purposeful and incidental take of the Northern Long-Eared Bat (NLEB) as part of the Endangered Species Act. See Appendix U for more information.

Environmental Review Requirement: The environmental review of multi-family housing with five or more dwelling units (including leasing) or the development of non-residential property (buildings such as Head Start Centers, Senior Centers, etc.) must include, as part of the environmental assessment, an evaluation of previous uses of the site or other evidence of contamination on or near the site to ensure that the occupants of proposed sites are not adversely affected by hazardous materials, contamination, toxic chemicals and gases, and radioactive substances. Typically, this would be a "Phase One Environmental Assessment" conducted in accordance with American Society for Testing and Materials (ASTM) E1527-05 Standard. Grantees shall use current techniques by qualified professionals to undertake any investigations determined necessary [24CFR Part 58.5 (i)(2)(ii)]. The Environmental Professional must be a:

- Professional Engineer or Geologist with 3 years of relevant fulltime experience; or
- Licensed or certified to perform All Appropriate Inquiries (AAI) and three years of relevant fulltime experience; or
- Engineering of Science Baccalaureate degree or higher and three years of fulltime relevant experience; or
- The equivalent of 10 years relevant experience.

Requirement to Consult with Native Americans: On June 15, 2012, HUD published a Notice the states that CDBG Recipients "must consult with tribes to determine whether a project may

adversely affect historic properties of religious and cultural significance, and if so, how the adverse effect could be avoided, minimized or mitigated." This is applicable to projects on and off tribal lands and to many of Georgia's CDBG Recipients. The HUD Notice (CPD-12-006) and the HUD Assessment Tool describe in detail the required protocol. Note that the revised Request for Release of Funds and Certification (form HUD 7015.15) includes a certification that this protocol was followed. Please use the Tribal Directory Assessment Tool (TDAT) for current information on tribal contacts. The tool is available at https://egis.hud.gov/tdat/. Print the results of the search for your local Environmental Review Record (ERR) to document the search and the tribes listed at the time the search was conducted. In contacting tribes, please keep in mind that the initiative must come from the Grantee and can be made by mail or e-mail. Additionally, the letters being mailed, MUST be signed by the Local Elected Official. See Appendix P for a copy of CPD Notice 12-006.

A copy of the Notice and revised RROF/Certification can be found via the following web links:

The HUD Notice (CPD-12-006) may be acquired through the following web-link:

https://www.hud.gov/sites/documents/12-06cpdn.doc

The revised Request for Release of Funds and Certification (form HUD 7015.15) may be acquired through the following web-link:

https://www.hud.gov/sites/dfiles/OCHCO/documents/7015.15.pdf

Additional tools for compliance can be found at the HUD Environmental Assessment Tool at the following web site:

https://www.hudexchange.info/programs/environmental-review/

Floodplain Protection

HUD has issued regulations (24 CFR Part 55) intended to minimize floodplain development. As part of the overall environmental review process, CDBG recipients will have to document compliance with this regulation. At the application stage, refer to FEMA floodplain maps to determine if any component of your planned project takes place in the floodplain. For further information on FEMA floodplain maps, please see FEMA's web site at www.fema.gov.

Also, a series of Public Notices is required prior to any floodplain disturbing actions. Please see Appendix J for samples of the required notices. These notices are not required prior to submission of an application unless the applicant is undertaking the environmental review early in order to earn bonus points or has requested a PACA that requires completion of an environmental review. In addition, HUD requires any community using CDBG funds for any activity affecting a FEMA mapped floodplain to be a participating jurisdiction with the federal flood insurance program and to have FEMA approved local floodplain development restrictions. Any CDBG funded activity affecting the floodplain must also be in compliance with these local ordinances.

Wetland Protection

Similar to floodplain development restrictions, the Army Corp of Engineers (ACE) under the authority of Section 404 of the Clean Water Act has authority over "jurisdictional wetlands" and restricts their development. In addition, a Section 404 ACE permit may be required for projects disturbing a wetland. Also, a series of Public Notices is required prior to any wetland disturbing actions. Please see Appendix J for samples of the required notices. These notices are not

required prior to submission of an application unless the applicant is undertaking the environmental review early in order to earn bonus points or has requested a PACA that requires completion of an environmental review. For further information on Section 404 permitting requirements, please see Appendix J. This appendix also contains information concerning the recognition of wetlands and an ACE form to request a determination of ACE jurisdiction over properties applicable to the proposed project. More information can be obtained at Georgia's ACE district office web site at www.sas.usace.army.mil/.

Federal Flood Risk Management Standard (FFRMS)

HUD published its final rule Floodplain Management and Protection of Wetlands; Minimum Property Standards for Flood Hazard Exposure; Building to the Federal Flood Risk Management Standard on April 23, 2024. This final rule implements the Federal Flood Risk Management Standard (FFRMS), required by E.O. 13690 *Establishing a Federal Flood Risk Management Standard and a Process fir Further Soliciting and Considering Stakeholder Input*. This rule expands the floodplain of concern from the 100-year floodplain to a newly defined "FFRMS floodplain." The FFRMS floodplain is an expanded area both horizontally and vertically from the 100-year floodplain that is based on future flood risk. The rule requires that newly constructed or substantially improved structures within this newly defined floodplain be elevated or floodproofed to this higher FFRMS floodplain elevation for protection.

Specifically, this rule establishes a preference for (but does not yet require) use of a Climate Informed Science Approach (CISA) to determine the floodplain of concern for HUD-funded projects, when possible. The floodplain identified using CISA provides the elevation and flood hazard area that results from using a climate-informed science approach based on best-available, actionable hydrologic and hydraulic data. CISA maps can provide more accurate and forward-looking information than existing Flood Insurance Rate Maps (FIRMs), many of which have not been updated in years or decades. When CISA maps are not available for a particular HUD-funded project, the rule provides multiple alternate approaches to identify the FFRMS floodplain. This means with or without available CISA mapping, there will be a predictable, practicable option for compliance with the rule that still promotes resilience.

To implement the framework described in this rule, this final rule defines the FFRMS floodplain in a new 24 CFR 55.7. Additionally, projects within the FFRMS floodplain are required to complete the 8-Step Process unless excepted under 24 CFR 55.12 or 55.13 or permitted to complete an abbreviated 5-step process under 24 CFR 55.14. The 8-Step Process is used to ensure HUD and responsible entities consider how their actions affect floodplains and/or wetlands. The rule also allows for public notices required for environmental reviews to be published online on appropriate government websites.

Historic Preservation Compliance Requirements

Section 106 of the National Historic Preservation Act and the implementing regulations of the Advisory Council on Historic Preservation (36 CFR Part 800) require all CDBG applicants and recipients, in consultation with the State Historic Preservation Office (SHPO), to determine if any buildings, neighborhoods or archeological sites and resources listed or eligible for listing on the National Register of Historic Places are in the "Area of Potential Effect" (APE), and to determine the effect of the project on the APE. If the effect is adverse, the regulation requires the negotiation of ways to minimize or mitigate the effect.

Use Form DCA-9 and its attachment from SHPO to identify eligible and potentially eligible areas and buildings. Photographs keyed to a map (not the same photographs used to document the "severity of need" for the project) should be included with this form. The instructions for this form have more information on the photographic and data needs. Note that there is an attachment to the form with additional information that SHPO needs to review your project in a timely manner. DCA will send projects under consideration for funding awards to the State Historic Preservation Office at the Department of Natural Resources for review and comments. The results of this review will be included in funding awards as Special Conditions which must be complied with as part of the required Environmental Review. To hasten the process, consider seeking comments from SHPO prior to submitting an application to DCA as part of your own planning and project development.

The additional cost of negotiated mitigation measures is an eligible CDBG cost.

Note that further details regarding Environmental Review requirements can be found in the most recent *CDBG Recipients' Manual*. Please see the following website link for additional information: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc--annual-cdbg-competition-manuals--2.

Lead-based Based Paint Poisoning Prevention in Certain Residential Structures

HUD regulation 24 CFR Part 35 provides for the evaluation and control of lead-based paint hazards in Target Housing units and Child Occupied Facilities built prior to January 1, 1978. Requirements for compliance with this regulation vary, depending on the activity undertaken using federal funds. Every program utilizing federal funds (including CDBG) is required to comply with this regulation for activities including, but not limited to, rehabilitation, and homebuyer assistance. Further guidance is available in the *Guidelines for CDBG Residential Rehabilitation Program Manual*, or DCA staff is available on request to provide technical assistance.

Relocation Assistance

The Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA), as amended, and as implemented by DOT regulations 49 CFR Part 24 applies if tenants or homeowners (regardless of income) are displaced in conjunction with a CDBG activity. See also the applicability of the URA to property acquisition above.

The purpose of this part is: (a) to ensure that owners of real property to be acquired for Federal and federally-assisted projects are treated fairly and consistently, to encourage and expedite acquisition by agreements with such owners, to minimize litigation and relieve congestion in the courts, and to promote public confidence in Federal and federally-assisted land acquisition programs; (b) to ensure that persons displaced as a direct result of Federal or federally-assisted projects are treated fairly, consistently, and equitably so that such persons will not suffer disproportionate injuries as a result of projects designed for the benefit of the public as a whole; and (c) to ensure that agencies implement these regulations in a manner that is efficient and cost effective. Further guidance is available in HUD Handbook 1378 **or** DCA staff is available on request to provide technical assistance.

One-for-One Replacement of Demolished Housing Units

Section 104(d) of the Housing and Community Development Act is applicable if housing units are converted to non- "low- and moderate-income dwelling units" or if occupied or occupiable housing units are demolished. This section requires the one-for-one replacement of affected units within a specific timeframe. This section also makes provision for an alternative relocation payment formula for displaced persons who will be provided "tenant-to-tenant" relocation assistance. (See HUD regulations at 24 CFR Part 570.606 and 24 CFR Part 42). Further guidance is available in HUD Handbook 1378 **or** DCA staff is available on request to provide technical assistance.

Federal Labor Standards (Davis-Bacon, etc.)

These federal labor standards require the payment of US Department of Labor "prevailing wages" (at a minimum) for most construction projects. There are also extensive reporting and project monitoring requirements.

Civil Rights/Fair Housing and Equal Opportunity (FHEO)

A. General - Fair Housing Laws and Presidential Executive Orders

Fair Housing Act

Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended, prohibits discrimination in the sale, rental, and financing of dwellings, and in other housing-related transactions, based on race, color, national origin, religion, sex, familial status (including children under the age of 18 living with parents or legal custodians, pregnant women, and people securing custody of children under the age of 18), and disability.

Title VI of the Civil Rights Act of 1964
Title VI prohibits discrimination on the basis of race, color, or national origin in programs and activities receiving federal financial assistance.

Section 504 of the Rehabilitation Act of 1973
Section 504 prohibits discrimination based on disability in any program or activity receiving federal financial assistance.

Section 109 of Title I of the Housing and Community Development Act of 1974
Section 109 prohibits discrimination on the basis of race, color, national origin, sex or religion in programs and activities receiving financial assistance from HUD's Community Development and Block Grant Program.

Title II of the Americans with Disabilities Act of 1990
Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968
The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975
The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.

Title IX of the Education Amendments Act of 1972
Title IX prohibits discrimination on the basis of sex in education programs or activities that receive federal financial assistance.

Executive Order 11063
Executive Order 11063 prohibits discrimination in the sale, leasing, rental, or other disposition of properties and facilities owned or operated by the federal government or provided with federal funds.

Executive Order 11246
Executive Order 11246, as amended, bars discrimination in federal employment because of race, color, religion, sex, or national origin.

Executive Order 12892
Executive Order 12892, as amended, requires federal agencies to affirmatively further fair housing in their programs and activities, and provides that the Secretary of HUD will be responsible for coordinating the effort. The Order also establishes the President's Fair Housing Council, which will be chaired by the Secretary of HUD.

Executive Order 12898
Executive Order 12898 requires that each federal agency conduct its program, policies, and activities that substantially affect human health or the environment in a manner that does not exclude persons based on race, color, or national origin.

Executive Order 13166
Executive Order 13166 eliminates, to the extent possible, limited English proficiency as a barrier to full and meaningful participation by beneficiaries in all federally assisted and federally conducted programs and activities.

Executive Order 13217
Executive Order 13217 requires federal agencies to evaluate their policies and programs to determine if any can be revised or modified to improve the availability of community-based living arrangements for persons with disabilities.

B. Section 3

Section 3 of the Housing and Development Act of 1968, as amended and as implemented by HUD regulations at 24 CFR Part 75. Section 3 provides that, to the greatest extent feasible, training and employment opportunities shall be made available to lower income residents of the project areas where applicable programs are being carried out and that contracts be awarded to businesses owned in substantial part by lower income residents. The "project area" is the county in which the grant is made. See more details in the Appendices.

C. Affirmatively Furthering Fair Housing

Local government officials, in agreeing to accept CDBG funds, certify that they will "affirmatively further fair housing". This section outlines various options available to local government in meeting this grant obligation.

While the law does not specify what type of action recipients must take, it is clear that by virtue of receipt of CDBG funds, local government recipients are obligated to take some sort of action to affirmatively further the national goal of fair housing.

DCA does not dictate what sort of action recipients must take. DCA must, however, monitor local government recipients to determine what sorts of actions are taken. To accomplish this monitoring DCA has developed a **Fair Housing Checklist** which will be completed by the CDBG Program Representative as part of the normal project review process. A copy of this checklist is in the *Recipients' Manual, Appendix 1*.

In order to document what you have done to affirmatively further Fair Housing, it is important to keep records of actions taken. Copies of brochures provided to those relocated, minutes of meetings where fair housing is discussed, and any other records, must be available for review by your CDBG Program Representative.

The following checklist of possible fair housing activities is not meant to be all inclusive. It is meant to suggest the range of activities which would satisfy your obligation. Technical assistance is available from DCA if you wish to implement any of these suggestions.

Possible Actions to Affirmatively Further Fair Housing

- Analyze issues affecting fair housing choice which may exist in your community. Contact HUD or DCA for an analysis of any fair housing complaints from your area.
  - Review local zoning laws and procedures to determine whether they contribute to, or detract from, progress in fair housing. Establish a collection of zoning and land use planning material to have available for the use of local fair housing groups as well as recipient staff.
  - Provide funding for local fair housing groups (eligible under the CDBG Program) or provide financial or technical assistance to citizens wishing to organize such a group.
  - Adopt a local Fair Housing Ordinance or a resolution supporting the state and/or federal law.
  - Distribute brochures outlining fair housing law to persons attending community meetings or CDBG Public Hearings.
  - Post a fair housing poster at City Hall or Courthouse.
  - Require owners of rental property receiving CDBG-assisted rehabilitation loans to sign fair housing agreements as a condition of receiving assistance.
  - Develop an active public information and educational campaign to promote fair housing awareness in the community.
  - Include a discussion of fair housing in public meeting agendas.
  - Provide persons relocated to new housing with fair housing information and referrals.

Remember to document and keep records of everything you do in the area of fair housing.

Fair Housing Resources

- HUD, "Your Housing Rights: Live Where you Want to Live" (Fact Sheet). Copies are available from HUD.
- Fair Housing Poster, available from DCA.
- Sample "Certification of Property Owners Participating in CDBG Rental Rehabilitation Loan Program to Affirmatively Market Vacant Units", available from DCA/CDBG Section.

D. Section 504 Requirements

Local government recipients and sub-recipients must comply with Section 504 of the Rehabilitation Act of 1973, as amended. This requirement is similar to the "Americans with Disability Act" (ADA) which is also applicable. HUD has published implementation regulations at 24 CFR Part 8.

The general requirement is that no otherwise qualified individual with a disability (physical or mental) shall because a recipient's facilities are inaccessible to or unusable by individuals with disabilities, be excluded from participation in, denied benefits, or otherwise be subjected to discrimination under any program or activity that receives CDBG assistance. The definition of disability includes physical and mental factors and also includes those who may be regarded as handicapped (such as the spouse or children of a person with AIDS). Both building accessibility and employment practices are covered by Section 504.

There are seven (7) specific requirements which have an immediate effect on CDBG Recipients:

1. CDBG recipients must file an assurance of compliance. The Certified Assurances in the CDBG Application include this assurance.
2. CDBG recipients must issue periodic public notices of non-discrimination. This can be accomplished by including appropriate language in public hearing notices. The sample hearing notices included in this Manual reflects this requirement.
3. Employment practices are also covered by Section 504. Any CDBG recipient employing 15 or more persons must:
   a. Designate at least one person to coordinate efforts to comply with the regulation (Section 504 Coordinator); and
   b. Adopt formal grievance procedures that incorporate due process standards and that provide for the prompt and equitable resolution of discrimination complaints.
4. Communications: When a recipient communicates with applicants and beneficiaries by telephone, a telecommunication device for deaf persons (TDD's) or an equally effective system is required. The Georgia Relay Service (voice at 1-800-255-0135 or TDD at 1-800-255-0056 or at 711) is also available to provide this service. Georgia Relay makes it easy for Spanish-speaking TTY users and hearing callers to communicate by phone with Spanish Relay, which includes both Spanish-to-Spanish and Spanish-to-English service. To initiate a Spanish Relay call, dial 1-888-202-3972.

5. All meeting and public hearing spaces must be accessible, and procedures should be in place to ensure that persons with impaired vision or hearing can notify the local government that assistance is required.
6. The regulations require each recipient to conduct a self-evaluation. The evaluation must be done in consultation with interested persons, including individuals with handicaps or organizations representing such people.
7. When the self-evaluation identifies structural changes as being required, a written transition plan must also be prepared. The transition plan sets forth the steps necessary to complete the changes, including a time schedule. The plan should identify the agency official responsible for implementation of the plan.

E. Limited English Proficiency

Title VI of the Civil Rights Act of 1964, 42 U.S.C. 2000(d) and Executive Order 13166 require that recipients of federal funds take responsible steps to ensure meaningful access by persons with Limited English Proficiency (LEP persons).

LEP persons means those who do not speak English as their primary language and who have a limited ability to read, write, speak, or understand English, and may be entitled to language assistance with respect to a particular type of service, benefit, or encounter. Note that for the purposes of gathering data for those with LEP, DCA used the U.S. Census definition as any individual who speaks a language at home other than English as their primary language, and who speaks or understands English "not well" or "not at all".

DCA has taken a number of steps to address the needs of its LEP population, including requiring all recipients of CDBG funds to prepare a Language Access Plan within 60 days of award and requiring all applicants to acknowledge this requirement by preparing and submitting with the CDBG application the Acknowledgement of Subrecipient Language Access Plan Requirement and by preparing and submitting with the application the Language Access Plan Threshold Certification. The Language Access Plan Threshold Certification form is designed to determine whether an applicant's pre-award public hearing must be advertised in English and another language (most often Spanish). If in completing the form, the applicant's jurisdiction includes a population of more than 5% LEP persons in a single language or 1,000 or more LEP persons in a single language, the pre-award public hearing must be published in the applicable language. ***See Appendix S for a copy of the pre-award public hearing notice in Spanish.***

F. For Further Information

Review these HUD websites for more information or for a listing of applicable Fair Housing Laws and Presidential Executive Orders:

HUD FHEO Library
http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/library#Guidance

AFFH Resources and Training Material
https://www.hudexchange.info/programs/affh/resources/

Addressing Basic Compliance Rules in Your CDBG Application

In order to maximize an applicant's competitiveness on the Feasibility criterion, applicants should briefly address the major compliance laws, regulations, requirements, or policies that will be important factors in the proper implementation of their proposals. A brief statement (approximately one paragraph) on each of the major compliance areas on DCA 5 (Description of Activities) should convey to reviewers the applicant's intent to comply with the applicable laws and regulations and should also convey a basic understanding of the requirements.

All applicants should address the following, where applicable:

- Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA)
  - Property Acquisition
  - Relocation Assistance
- Section 104(d) of the Housing and Community Development Act
- Procurement
- Build America, Buy America Act (BABA)
- National Environmental Policies Act (NEPA) and Floodplain and Wetland Protection
- Historic Preservation Compliance
- Compliance with Lead-Based Paint regulations (for housing activities or Child Occupied Facilities).
- Labor Standards
- Civil Rights/Fair Housing and Equal Opportunity (FHEO)
  - Section 3
  - Affirmatively Furthering Fair Housing
  - Limited English Proficiency (when applicable)

In addressing these major compliance areas, applicants need to become familiar with recent updates to DCA polices regarding Civil Rights/Fair Housing and Equal Opportunity (FHEO). These updates can be found in Appendices of this Manual. These updates include a Language Access Plan, and a Section 3 Solicitation Package. This Appendix also includes a listing of applicable civil rights laws, their applicable regulations and coverage. Applicants should also be familiar with the Civil Rights/FHEO information provided in this Manual and in HUD's CPD Grantee Monitoring Handbook that can be found at: https://www.hud.gov/hudclips/handbooks/cpd-6509-2.

PART II: GENERAL AWARD INFORMATION AND REQUIREMENTS

Pre-Agreement Cost Approval (PACA)

Because projects often operate on schedules that are time-sensitive, CDBG regulations and DCA policy allow potential applicants to request pre-agreement cost approval (PACA) from DCA that authorizes the potential applicant to commence project activities and maintain project timetables while applying for CDBG assistance. Upon DCA's issuance of pre-agreement cost approval, a project may move forward prior to submission of an application or award of funds while maintaining the eligibility of the activities that take place prior to submission of an application and receipt of a grant award.

DCA strongly recommends that potential applicants contact DCA (through its Community Finance Division, Office of Community Development in Atlanta) to discuss pre-agreement cost approval prior to submission of a written request for pre-agreement cost approval.

DCA will only grant pre-agreement cost approvals that are in compliance with 24 CFR §570.489(b) and 24 CFR Part 58. Upon approval of pre-agreement costs, the applicant is eligible for reimbursement of eligible expenses *if* a CDBG award is made. Eligible expenses in compliance with DCA's written pre-agreement cost approval may also be counted as leverage.

IN NO EVENT WILL PRE-AGREEMENT COST APPROVALS ISSUED BY DCA ENSURE DCA FUNDING FOR THE REQUESTED PROJECTS. THE DCA ANNUAL COMPETITION IS VERY COMPETITIVE AND PRE-AGREEMENT COST APPROVAL DOES NOT IN ANY WAY INCREASE AN APPLICANT'S COMPETITIVENESS. ALL COSTS INCURRED BY APPLICANTS PRIOR TO THE CDBG AWARD DATE ARE AT THE APPLICANTS' OWN RISK. HISTORICALLY, ONE-HALF TO TWO-THIRDS OF CDBG APPLICANTS ARE NOT AWARDED FUNDS.

FY 2027 CDBG Available Funds

Approximately $41,000,000 in FFY 2027 CDBG funds is estimated to be available for distribution under the Annual Competition. The exact amount will be determined after Congress appropriates HUD's FFY 2027 budget and HUD applies its distribution formula to the appropriated funds.

Types of Grants

Applications under the Annual Competition must be for either a single-activity or multi-activity grant:

1) **Single-activity** grant applications must be structured to address problems within one of the following three areas: (a) neighborhood revitalization, (b) public facilities, or (c) economic development. Single-activity grant applications may qualify for Revitalization Area Strategy bonus points.

2) **Multi-activity** grant applications must involve two or more activities that address community development needs in a comprehensive manner. This funding component requires an applicant to address problems within more than one of the areas listed above (neighborhood revitalization, public facilities or economic development). The combination of various neighborhood revitalization, economic development and public facilities activities is encouraged. Multi-activity grant applications may qualify for Revitalization Area Strategy bonus points.

Maximum CDBG Grant Amounts

Single-Activity	Multi-Activity
$1,000,000	**$1,500,000**

The dollar amounts established are maximums. **Projects receiving regional cooperation bonus points are eligible to receive up to $2,000,000.** Application proposals should be developed that are consistent with the community's needs and ability to complete the program in a timely fashion. The DCA review process emphasizes the establishment of realistic goals and the development of resources needed to address the goals. Applicants are also encouraged to apply for other federal, state, or private funds in order to increase the resources at their disposal to address their community development needs.

Matching Requirements

All awards under the Annual Competition (except for CDBG single-activity neighborhood revitalization grants) must be matched by the recipient.

Even though cash match is not required for single-activity housing grants, single-activity housing applicants (as well as Multi-Activity applicants) are required to document and submit evidence of homeowner participation as a threshold requirement. Amounts over and above homeowner participation amounts will be counted as leverage provided all requirements for leverage as outlined in the CDBG Applicants' Manual are met. Homeowner participation will not be counted as leverage for single-activity housing applicants. For Multi-Activity housing applicants, the match requirements outlined below are applicable and homeowner participation may count toward cash match.

Required Cash Match:

- 0% match requirement for grant requests of $500,000 and less
- 5% match requirement for grant requests of $500,001 to $750,000
- 10% match requirement for grant requests of $750,001 to $1,000,000
- 15% match requirement for grant requests of $1,000,001 or more

Example match requirement: The match requirement for a $1million project would be $37,500. It is calculated as follows: 5% ($250,000) + 10% (250,000) = $37,500

The match must be cash, *whether loans, bond proceeds, grants, or appropriated funds*. The source can be either private or other non-CDBG (CHIP funds are not eligible for match) public funds. "In Kind" Services are not considered cash. Match cannot be designated for excessive grant administration nor may match be designated for contingencies.

DCA also considers "leveraging" of other funds and resources in the rating and review process. Any match contributed over and above the required minimum cash match will be counted as leverage when reviewing each application.

In accordance with applicable regulations, preliminary costs such as engineering estimates or fees for preparation of applications spent prior to a formal award are ineligible costs and may not be reimbursed or recovered if a grant award is made. However, the portion of these costs directly attributable to the submitted project may be counted as match or leverage. DCA will count up to $5,000 each toward the cost of grant writing services or the cost of preliminary engineering/architectural reports provided that adequate documentation is included in the application.

A separate letter(s) must be included documenting any funds/services to be included as match or leverage. Although the match must be a cash match and cannot consist of in-kind services, its source can be local public funds, other state or federal funds, or private investments or contributions. Whatever the source, to be counted as match or leverage, it must be evidenced by a firm written commitment, either a resolution or letter. Costs incurred prior to the submission of the application (and award) must be documented by invoices, cancelled checks or other acceptable documentation and meet all applicable requirements. Please refer to the instructions for Form DCA-8.

Limitation on Administration and Professional Fees

Note: DCA reserves the right to reduce the overall level of administrative or professional fees depending on the scope of the proposed project.

Use the following limits for administrative, engineering and/or architectural costs paid for with CDBG funds.

Type of Project	Administrative Cost Limit	Engineering/Architectural Cost Limit
Single Activity (Public Facility or Econ. Dev.)	6% of grant + $500* per unit to which plumbing improvements are made	-Engineering @ 12% of CDBG construction amount** -Architectural @ 10% of CDBG construction amount
Multi-Activity	7% of grant + up to $3,200* per unit rehabilitated. (Additional PDC's up to $900 may be considered for housing units undergoing Lead-Based Paint Hazard evaluation. See note in PDC Table below)	-Engineering @ 12% of CDBG construction amount** -Architectural @ 10% of CDBG construction amount
Single Activity Neighborhood Revitalization	7% of grant + up to $3,200* per unit rehabilitated (additional PDC's up to $900 may be considered for housing units undergoing Lead-Based Paint Hazard evaluation. See note in PDC Table below)	N/A
Special Note: Regardless of grant amount, a minimum of $25,000 for administrative fees is allowed.		

*Per unit charges (Project Delivery Costs) should be budgeted in the activity line item, not in administration.

**Under limited circumstances, CDBG may pay for more than 12% of the CDBG construction amount when DOT funds are used as match or leverage because DOT will not pay the cost of engineering for its projects. In these instances, the applicant should provide justification for additional engineering funds. In no case will CDBG pay more than 12% for engineering of the combined CDBG and DOT construction costs. DOT projects that require little if any engineering (e.g., street resurfacing) will not receive any special consideration.

The limit for CDBG engineering and/or architectural services cost is based on construction cost paid for with CDBG funds. Contingency line items included in Preliminary Engineering and Architectural Reports are not considered construction costs and may not be included in the calculation of maximum engineering and architectural fees.

Note: *Up to $1,000 for financial audit costs are also an allowable CDBG administrative expense, in addition to the percentages specified above*.

Project Delivery Costs (PDC)

In order to provide an incentive for jurisdictions to complete at least the number of housing units that is equal to the number indicated in their project application, DCA will provide a maximum of 7% of the CDBG housing or multi-activity grant award amount for General Administration combined with up to $ 3,200* Project Delivery Cost payment per completed unit of housing, subject to the following schedule:

Unit Type	Activity	Maximum PDC
Stick Built (including Modular)	Rehabilitation/Reconstruction	Up to $3,200
Stick Built (including Modular)	Down Payment or Second Mortgage Assistance	Up to $1,800
Manufactured ("mobile home") Owner owns unit AND land	Down Payment or Second Mortgage Assistance	Up to $1,300
Manufactured ("mobile home") Owner owns unit AND land	Reconstruction	Up to $1,700
Manufactured ("mobile home")	Rehabilitation	Up to $1,100
Manufactured ("mobile home") Owner owns unit only (long term lease on land)	Down Payment or Second Mortgage Assistance	Up to $1,100

*Additional Project Delivery Costs for Lead Hazard Control for rehabilitation of housing built prior to 1978 allowed by CDBG are as follows:

1. Inspection/Risk Assessment procurement and oversight, a maximum of up to $300 per unit.
2. Lead hazard control construction and clearance procurement and oversight, a maximum of up to $600 per unit.

Note: If the project administrator performs lead hazard evaluation (inspection/risk assessment) or clearance "in-house" (no procurement or oversight), the maximum PDC for this activity is $600

for procurement and oversight of the actual lead hazard control work by a qualified firm.

Project Delivery Costs must be reasonable and necessary and supported by documentation. PDC's should be budgeted on the appropriate activity line item, NOT in the General Administration line.

DCA reserves the right to reduce the overall level of administrative funds depending on the scope of the project. Jurisdictions can expect to receive approximately half of the regular Project Delivery Cost payment for certain activities that are less expensive administratively on a per unit basis, such as permanent relocation and multiple units of rental housing under one roof.

Build America, Buy America (BABA)

The Build America, Buy America Act (BABA) was enacted in the Infrastructure Investment and Jobs Act on November 15, 2021. It requires products purchased in connection with infrastructure projects funded by Federal financial assistance programs to be produced in the United States, known as the "Buy America Preference (BAP)". Specifically, this is a statutory requirement that Federal funding for infrastructure projects use "covered materials" that are "American-made." The BAP applies to the following products:

- Iron and steel;
- Manufactured products; and
- Construction materials.

For the purposes of BABA, an infrastructure project is defined as a project that includes, construction, alteration, maintenance, or repair. For purposes of BABA, "infrastructure" includes, at a minimum, the structures, facilities and equipment for roads, highways, and bridges; public transportation; dams; water systems including drinking water and wastewater systems; broadband; electrical transmission facilities and systems; utilities; facilities that generate, transport and distribute energy; and buildings and real property.

HUD issued updated guidance in January 2025 (CPD Notice 25-01) clarifying how the Buy America Preference (BAP) under the Build America, Buy America Act (BABA) applies to Community Planning and Development (CPD) programs, including CDBG.
Through this notice, CPD provides further clarification on when grantees should apply BABA's requirements to housing projects as described in M-24-02.

1. **Housing projects with one to four units are considered "private," consistent with HUD's definition of single-family housing. Housing projects with one to four units, including onsite utilities and related activities are therefore not considered public infrastructure and are not subject to the BAP.**
2. **Housing projects with five or more units are considered public infrastructure. Housing projects with five or more units are therefore subject to the BAP unless another BABA waiver or exemption applies.**

Applicability to CDBG Projects
Prior to funding, compliance with the Buy America Preference must be considered regarding the availability of products and the impacts of compliance on costs. **Additionally, these considerations must be addressed on form DCA-5 of CDBG applications.**

Three (3) general applicability waivers are currently in effect for HUD programs and apply to all Covered CPD Programs.

1. **Phased Implementation** – Waiver published March 15, 2023, establishes a phased implementation schedule for application of the BAP to HUD programs. Funds obligated by HUD after November 14, 2022, are subject to the BAP.
    a. **Iron and Steel** - BAP applies to iron and steel for CDBG projects awarded by DCA in 2023 and going forward.
    b. **Specifically Listed Construction Materials** – BAP applies to "Specifically Listed Construction Materials" for CDBG projects awarded by DCA in 2024 and going forward. Specifically listed construction materials include; metals other than iron or steel (non-ferrous metals), lumber, composite building materials, plastic and polymer-based pipes/tubes.
    c. **All Other Construction Materials** – BAP applies to "all other construction materials" for CDBG projects awarded by DCA in 2025 and going forward. All other construction materials include: glass, drywall, and other construction materials.
    d. **Manufactured Products** – BAP applies to manufactured products for CDBG projects awarded by DCA in 2025 and going forward. Manufactured products are defined as a material or supply used in an infrastructure project that is not iron or steel or a construction material. When two or more materials are combined, they should be treated as a manufactured product.
2. **Exigent Circumstances** - BAP may be waived if projects must be completed immediately to protect life, ensure safety, or prevent the destruction of property. Effective until November 23, 2027.
3. ***De Minimis*, Small Grants & Minor Components** - BAP waived for projects with a total cost of $250,000 or less. BAP waived for a de minimis portion that comprises no more than 5 percent of the total cost of covered materials used in a project, up to $1 million. Effective until November 23, 2027.

For more information on HUD's phased approach to BABA's implementation, please refer to the agency's notice "*Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance*". Additionally, on January 17, 2025, HUD released CPD Notice 25-01 "CPD Implementation Guidance for BABA's BAP" .

Project- Specific Waivers - Submission portal https://babawaiver.hud.gov/s/
Project-/product-specific waivers are available on a limited, case-by-case basis, after HUD's review, a public comment period, and final approval from the Made In America Office (MIAO). If more than one Federal agency is funding an infrastructure project, project-/product-specific waivers will require coordination among those Federal agencies prior to a determination by the MIAO. Please note, DCA CDBG Recipients' wishing to submit a waiver must coordinate this with DCA, as only direct HUD Recipients may submit waiver applications. As such, waiver applications will not be accepted by HUD from DCA CDBG Recipients. If you think a project-specific waiver is necessary, please contact DCA at cdbg.biz@dca.ga.gov .

There are three (3) categories of project-specific waivers:

- Public Interest: the application of the preference would be contrary to the public interest;
- Nonavailability: covered materials are not produced in the US in sufficient and reasonably available quantities or of a satisfactory quality; and,
- Unreasonable Cost: inclusion of domestically produced covered materials will

increase the cost of the overall project by more than 25 percent.

OMB guidance outlined the waiver review process for agencies to follow before issuing a waiver. Based on this guidance, HUD is developing its Department-wide project-specific waiver process. There are a number of considerations, impacting the project implementation, to be made in the development of CDBG applications. For HUD, and therefore DCA, to consider a project or product-specific waiver a project must:

- Have a detailed justification for the use of goods, products, or materials mined, produced, or manufactured outside the United States.
- A certification that there was a good faith effort to solicit bids for domestic products supported by terms included in requests for proposals, contracts, and nonproprietary communications with potential suppliers.
- In addition, at a minimum and to the greatest extent practicable, each proposed waiver submitted for consideration by the Made In America Office (MIAO) should include the following information, **as applicable**:
    - Waiver type (nonavailability, unreasonable cost, or public interest).
    - Recipient name and Unique Entity Identifier (UEI).
    - Federal awarding agency organizational information (e.g., Common Governmentwide Accounting Classification (CGAC) Agency Code).
    - Financial assistance listing name and number
    - Federal financial assistance program name.
    - Federal Award Identification Number (FAIN) (if available).
    - Federal financial assistance funding amount.
    - Total estimated infrastructure expenditures, including all Federal and non-Federal funds (to the extent known).
    - Infrastructure project description and location (to the extent known).
    - List of iron or steel item(s), manufactured products, and construction material(s) proposed to be excepted from Buy America requirements, including name, cost, country(ies) of origin (if known), and relevant PSC and NAICS code for each.
    - A certification that the Federal official or assistance recipient made a good faith effort to solicit bids for domestic products supported by terms included in requests for proposals, contracts, and nonproprietary communications with the prime contractor.
    - A statement of waiver justification, including a description of efforts made (e.g., market research, industry outreach), by the Federal awarding agency and, and in the case of a project or award specific waiver, by the recipient, in an attempt to avoid the need for a waiver. Such a justification may cite, if applicable, the absence of any Buy America-compliant bids received in response to a solicitation.
    - Anticipated impact if no waiver is issued.
    - Any relevant comments received through the public comment period.

For more information on HUD's project specific waiver process, please refer to Notice CPD-23-12: CPD Implementation Guidance for BABA's Domestic Content Procurement Preference as Part of the Infrastructure Investment and Jobs Act. Also, DCA's BABA Guidance can be found in Appendix Y.

Please note: DCA CDBG Recipients' wishing to submit a waiver must coordinate this with DCA, as only direct HUD Recipients may submit waiver applications. As such, waiver applications will not be accepted by HUD from DCA CDBG Recipients. If you think a project specific waiver is necessary, please contact DCA at CDBG.Biz@dca.ga.gov.

Procurement for Application Development and other Professional Services

REMINDER FOR 2027 CDBG APPLICATION CYCLE

Note the following updates for procurement of Application Development and other Professional Services below:

All professional procurements should be done prior to CDBG application preparation and submission. For example, prior to CDBG application submission, both grant application services and grant administration services should be solicited using the same Request for Proposal (RFP). This avoids the appearance of a conflict of interest that can be created when a grant writer in a later procurement process submits and receives an award for grant administration services. This approach is also applicable for engineering/architectural services. In other words, preliminary reports and design and construction services should all be procured using the appropriate RFP or Request for Qualification (RFQ) process.

Local governments often rely on grant writers and engineers/architects to assist them in navigating complex federal and state requirements; however, having a grant writer or engineer/architect assist in the procurement process (e.g., developing an RFP or RFQ) can also create the appearance of a conflict of interest. DCA's procurement guidance regarding grant writing/grant administration published at https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration can assist by making the process easier for local governments by providing step-by-step instructions. DCA will also assist local governments with the procurement process by providing technical assistance as needed. Please contact Brittney Hickom at brittney.hickom@dca.ga.gov or (404) 679-1597 with your procurement questions. Always consult the latest CDBG Recipients' Manual for DCA's procurement policies and procedures. These are contained in Chapter 3, Section 4 and at: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc--annual-cdbg-competition-manuals--2.

DCA is also reminding local governments that DCA's procurement policies for professional services should be followed regardless of the source of payment for those services. In other words, even if local funds pay all or part of the cost of professional services related to a CDBG project, DCA's CDBG procurement policies should be followed.

Newly enacted requirements (effective April 28, 2019) based on the passage of House Bill 322, which amends, Code Section 36-80-27 and reads as follows: If a bid or proposal opportunity is extended by a county, municipal corporation, or local board of education for goods, and services, or both, valued at $100,000.00 or more, such bid or proposal opportunity shall be advertised by such respective local governmental entity in the Georgia Procurement Registry, as established in subsection (b) of Code Section 50-5-69, at no cost to the local governmental entity. Each advertisement shall include such details and specifications as will enable the public to know the extent and character of the bid opportunity. The Georgia Procurement Registry can be found at the following web site: https://doas.ga.gov/state-purchasing/georgia-procurement-registry-local-governments/gpr-overview.

CDBG payments for professional services are subject to the "competitive negotiation" requirements of the most recent version of the *CDBG Recipients' Manual*. These provisions apply, typically, to contracts with private consultants, engineers and architects, and are not

necessary when contracting with Regional Commissions. Note, however, that RCs that wish to subcontract directly with private consultants must use the procedures in this section and follow the requirements of the *CDBG Recipients' Manual* before entering into subcontracts with private consultants. Alternately, the local government may contract with both an RC and private consultant provided the requirements herein are followed for the procurement of the private consultant.

To comply, the applicant government (not the individual or firm proposing to provide services) must:

- **Step 1. Establish or appoint a local Selection Review Committee**
  The city or county must establish a Selection Review Committee to determine the evaluation criteria and to rate proposals for services. This committee may consist of the entire local governing body (council/board of commissioners), a subset of this council/ board, as appointed by the Mayor/Chairman, or a combination of elected officials and city/county staff. Cities/counties should have a minimum of three members on the committee.

  Committee members may not have any potential conflicts of interest with any of the individuals, firms, or agencies under review (e.g., family relationships, close friendships, business dealings) and no person who might potentially receive benefits from CDBG-assisted activities may participate in the selection, award, or administration of a contract supported by CDBG funding if he or she has a real or apparent conflict of interest. For further guidance regarding potential conflicts of interest, please see the most recent version of the CDBG Recipients' Manual at the following web page: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc--annual-cdbg-competition-manuals--2.

- **Step 2. Determine the Selection Criteria to Evaluate Respondents**
  Determine what evaluation criteria will be used to rate the proposals submitted to the city/county. Prepare a Ratings Criterion Score sheet to evaluate and score each proposal received.

- **Step 3. Develop the Request for Proposals (RFP) Package**
  Develop a Request for Proposal (RFP) package that includes "evaluation factors" selected by the Review Committee and their level of importance. The RFP package should include the submission deadline and instructions for submission, a local point of contact for any questions regarding the RFP, and a format for a Statement of Qualifications.

- **Step 4. Advertise the RFP**
  Proposals must be solicited from an adequate number of qualified sources to permit reasonable competition consistent with the nature and requirements of the procurement. The Request for Proposals must be publicized and reasonable requests by other sources to compete must be honored to the maximum extent practicable. "Solicitation" requests by the Recipient must be specifically addressed to a list of more than one potential proposer identified by the City/County. To "publicize" the RFP, the applicant must also offer the RFP through publication in a newspaper with adequate circulation or publication by other means such that reasonable exposure to potential proposers can be expected. Allow 30 days for responses.

If the contract will be for more than $100,000 it must be advertised on the Georgia Procurement Registry (https://ssl.doas.state.ga.us/gpr/).

Send an email or letter with a copy of the solicitation package to a minimum of 7 "known providers" when soliciting firms to develop applications/administer projects. When soliciting engineering/architectural services, the solicitation package should be sent to at least 10 known providers. If sending letters by mail, DCA requires that letters be sent certified return receipt to provide the required documentation. Sole source approval is required from DCA when competition is adequate, leading to only one response being received. Emails must be sent with a Request Delivery Receipt and Request Read Receipt to provide equivalent documentation when using this method.

As a service to applicants, recipients and others, DCA maintains a list of consultants who have expressed an interest in making proposals on CDBG projects. This is not an "approved" list. DCA does not approve or disapprove consultants. This is the applicant's or recipient's responsibility. The list can be found by visiting https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration-0.

- **Step 5. Review and rate proposals**
  After the submittal deadline, the committee should review and rate each of the proposals received. Committee members should use the evaluation criteria established in step 2 above. Each committee member should score the proposals; all scores can then be averaged to determine the highest scoring proposal. The firm with the highest average points should be selected.

  If a Section 3 business submits a bid and requests a preference, the city/county must give priority to the greatest extent possible to the business. In this instance, the city/county should contact Brittney Hickom at brittney.hickom@dca.ga.gov or (470) 698-8166 for further guidance to ensure compliance with the federal Section 3 requirements.

- **Step 6. Approve the selected contractor and award contract**
  The City Council/Board of Commissioners has final authority to award the contract to the selected contractor. The review committee should present a recommendation to the city/county attorney and to the governing board for final approval. A contract for services should be prepared between the city/county and the selected consultant.

  Note: Compliance with BABA must be spelled out in agreements for services, construction contracts, and procurement contracts. Generally, the architect/engineer's contract should include, as a basic service, obtaining and maintaining all BABA documentation (particularly manufacturers' certifications) during construction, which shall be transferred to the recipient. The architect or engineer will need to certify to this action at the project's end.

  Letter(s) or emails thanking unsuccessful respondents for making a proposal should then be sent. Based on evaluation criteria contained in the RFP, this letter should briefly state the reasons why the respondent was not hired.

- **Step 7: Record keeping**
  The city/county must maintain and make available all documentation utilized during the RFP process, including but not limited to:
  - Copy of the full RFP
  - Proof of publication of the RFP (by full tear sheet from newspaper or screen shot of web site; photo of posting on bulletin board)
  - List of firms/individuals that were sent RFPs
  - Copies of proposals received
  - Scoring sheet that shows the rankings for each of the submitted proposals
  - Meeting minutes indicating the council/board approved the selection of the selected firm for service
  - Executed contract for services with applicable federal language
  - Documentation of any correspondence with a Section 3 business

Also, consult with the Procurement Instructions for Grant Writing/Administration or Architects/Engineers at the following link in order to ensure that required steps in the procurement process are followed: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration-0.

Because CDBG funds cannot be used to pay for any application development costs, applicants are cautioned only to obligate CDBG funds for grant administration services and not for grant writing services. Contracts should initially only obligate the applicant to pay for costs of application development using local or other non-CDBG sources. Communities are encouraged to include a contingent contract for administrative services that will become effective if the CDBG application is funded, however the community chooses to address this requirement the contract must be executed. ***Note: Even if local sources of funds are planned for grant administration services and no CDBG funds are budgeted for this activity, this procurement process described herein and in the most recent version of the CDBG Recipients' Manual must be followed for both grant writing and grant administration services based on the requirements of federal regulations.***

If an acceptable procurement process was followed for an application that is being resubmitted because it was denied in the previous program year, it is not necessary for the local government to re-advertise for professional services if they choose to retain the same firm for the same application for the same project. Any older procurements will not be valid, and a new advertisement and solicitation of RFP's is required. **Complete documentation including a copy of the advertisement, Georgia Procurement Registry evidence (if applicable), award and contract documents, including the local government's meeting minutes approving the selection committee's recommendation, and a summary of all Request for Qualification/Proposal responses will be required to be submitted in Appendix A of the application**.

Sole Source Requests: For procurement processes that result in requests for sole source approval from DCA, the procurement process must be fully documented to DCA's satisfaction before DCA will grant approval, including but not limited to the following: 1) a description of the procurement process; 2) documentation of advertisement of the Request for Proposals; 3) a list of the active, qualified consultants or engineers/architects that were emailed/mailed the Request

for Proposals; 4) certified return receipt documentation that the Request for Proposals were mailed to the required number of active, qualified consultants or engineers/architects, or adequate email documentation that the Request for Proposals were delivered as required; and 5) an opinion from the local government's attorney stating the project was advertised in compliance with all applicable laws, rules, and regulations. All sole source requests must be submitted prior to the April 2, 2027, deadline. For further guidance regarding procurement for professional services, please see the most recent version of the CDBG Recipients' Manual at the following web page: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration-0.

For further guidance on the steps required for professional procurement, please see the following DCA web link: https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/compliance-administration-0.

Application Submission Deadlines

To participate in the FFY 2026 CDBG Annual Competition, **all applications must be submitted to DCA by April 2, 2027**. Applications must be submitted through DCA's GrAAM system via the application portal by 11:59 p.m. on April 2, 2027. The portal and required forms can be accessed via the following solicitation link: https://gn.ecivis.com/GO/gn_redir/T/c60t5im4lcb.

Note 1: For Revitalization Area Strategy (RAS) designation and bonus points for the FFY 2026 Annual Competition, the deadline for application submission is also April 2, 2027. Please see the *CDBG Revitalization Area Strategy Applicants' Manual* for further details.

Required Application Format

CDBG applications must be accessed and submitted via the eCivis portal. The application and required forms can be accessed using the solicitation link. Should you have any questions or concerns about this process, please contact DCA at cdbg.biz@dca.ga.gov, for technical assistance please submit a request via email to support.eCivis@eunasolutions.com.

The online application is generally formatted to match the required application format for paper submissions used in recent CDBG Annual Competitions. Instructions for accessing applications and monitoring an application's progress can be found in the GrAAM user guide.

Application Summary:	Applicant Information B. Resolution to Submit
Goals (Application Template):	Proposed Accomplishments
Community Development Needs Assessment: (Formerly DCA-3)	Community-wide and target area problem and solution identification process
DCA-4:	Description of Needs to be Addressed 4.A Photo Documentation of Need 4.B. Photo Key Map
DCA-5:	Description of Activities 5.A Financial Plan Form (Housing & Multi-Activity applications only)
DCA-6:	Low- and Moderate-Income Benefit Calculation

6.A LMI and Minority Calculation Worksheets
6.B Summary Table of Survey
6.C Sample Survey Forms
6.D Supplemental Beneficiary Documentation

DCA-8 & Budget Worksheet: Budget Analysis
8.A Documentation of Match and Leverage
8.B Supplemental Budget Documentation

DCA-9: Environmental Review Information
9.A Section 106 Review Form
9.B Photos of Project Area of Potential Effect
9.C DCA-9 Photo Key Map
9.D State Historic Preservation Office Findings
9.E Concurrent Notice / Request for Release of Funds

DCA-10: Certified Assurances

DCA-12: Maps
12.A Target Area Map
12.B Concentration Maps (Low-Mod, Minority, Housing Deficiency)
12.C Topographic Map
12.D Floodplain Map
12.E Wetlands Map
12.F Housing Unit by Unit Map (for housing and multi-activity projects only) showing the following attributes:
i. Condition (Standard, Substandard, Dilapidated)
ii. Occupancy (owner, renter, vacant)
iii. Type of structure (Stick/site built or MHU)
iv. Proposed activity

DCA-13: CDBG Disclosure Report

Additional Documentation

Threshold & Compliance Documentation
Civil Rights Compliance
SAM Certification
Language Access Plan Acknowledgement and Certification
Public Hearing Documentation
(include tear sheets as evidence that the pre-award public hearing has been held, whether in English or Spanish or both)
Tribal Consultation Report
Service Delivery Strategy Forms and Map
Local Government Compliance Status
Conflict of Interest Documentation

Procurement Documentation
Copy of the advertisement
Georgia Procurement Registry evidence, if applicable
Summary of all Request for Qualification/Proposal responses
Award Documents, which includes the local government meeting minutes approving the committee recommendation
Contract Documents

Other Application Documentation

	Resident Letters Documenting Need Supplemental Documentation of Need (3rd party letters, etc.) Additional Letters of Support Ongoing Operation and Maintenance Plan Community Planning Documentation Section 504 Accessibility Checklist
Bonus Point Documentation	
	Evidence of Release of Funds Evidence of EIP/RDF Loan Fund Closure Evidence of Regional Cooperation and Regional Impact Evidence of Robust Citizens Participation Process Evidence/Request for Verification of Applicant's Workshop Attendance Senior GICH Community
Engineering/Architectural Report	
	Preliminary Engineering/Architectural Report
Housing Work Write-Ups	
	Unit Work Write-ups/Estimates

Request for Exception to "Every Other Year Rule" – Indicate if the local government is requesting an exception to the every other year rule. If so, indicate by the selection the type requested.

Overview of Rating and Selection System

Single- or Multi-Activity applications will be rated separately to assign points for Feasibility, Strategy, Need, and Impact. All applicants will be compared to each other to establish demographics scores.

Applications will be rated and scored against each of the following factors, using any additional and/or supplemental information, data, analyses, documentation, commitments, assurances, etc. as may be required or requested by DCA for purposes of evaluating, rating, and selecting applicants under this program. The maximum score is 420 points.

Categories	Maximum Points
Program Feasibility	50
Program Strategy	50
Program Need	125
Program Impact	
• Cost Per Person	30
• Demographic Need - absolute number in poverty	15
• Demographic Need - percent of poverty persons	15
• Demographic Need - median household income	15
Leverage of Additional Resources	20
Bonus points for Revitalization Area Activities	20
Bonus points for State Priority Projects	10
Bonus points for Regional Cooperation	20
Bonus points for Robust Citizen Participation Activities	10
Bonus points for Readiness to Proceed	5
Bonus points for Return of RLF Funds	5
Bonus points for Workshop Attendance	10
Bonus points for Senior GICH Community	20
Point Reduction for Missing Elements	Up to -25 points
Maximum Total Points	**420**

Rating Factors

Strategy

Program Strategy A maximum of 50 points will be determined in part by the following factors and will be compared to other Applicants: 1) an analysis of the community development needs of the jurisdiction (e.g., public facility, housing, and other community development needs); 2) the discussion of the alternative target areas considered within the jurisdiction, including the rationale for the target area selected in relation to the jurisdiction's community development needs, the alternative target areas considered, and the DCA Concentration Maps for housing deficiencies, minority, and low- and moderate-income areas; 3) an analysis of the community development needs of the target area chosen, the strategic alternatives considered in addressing those needs, and the efforts that the applicant has made or will make to address the identified problems; 4) an analysis of the alternatives considered to address the project needs identified in the application; 5) the proposed solution matches the identified project needs, and its consistency with a locally adopted plan; 6) a discussion of previous efforts to address the identified need; 7) a discussion of the previous efforts to resolve or address the identified problem, and 8) the commitment by the

applicant to maintain and operate the proposed project, facility or system, including an analysis of the steps taken by the applicant to adopt practices, programs, policies or ordinances to prevent the reoccurrence of the identified problem (copies of these local practices, programs, policies or ordinances should be included in the application when applicable to document local action on identified problems or for further explanation of the local strategies planned or underway to address the identified problems).

Pursuant to federal law, CDBG applicants must identify their community development and housing needs, including the needs of very low- and low-income persons, and the activities to be undertaken to meet such needs. The purpose of the community needs assessment or problem identification process is to have communities ascertain their most pressing problems and critical needs, both on a community-wide basis and of the selected target area. Such a process should promote better coordinated strategies for addressing local needs, particularly as they affect very low- and low-income persons.

A standard format for undertaking a **Community Development Needs Assessment** has been developed and is a required component of the application. The Community Development Needs Assessment should be consistent with the application. While the proposed project in the community's CDBG application does not have to be the highest priority community need, the rationale for the activity's selection must be present. The reasons for such, could include the availability of other, more appropriate local, state or federal resources, which would justify submitting a CDBG application for other than the top-ranked community need.

Points will be awarded by a review panel based on how well the applicant, compared to others, addresses the strategy factors.

Note: the review panel has the discretion to assign 0 points to the Strategy category when a National Objective is not met, the project is otherwise ineligible, or the lack of equivalence between the target area boundaries and the area of benefit results in an ineligible project, when, for example, an area of benefit boundary that is larger or smaller than the target area boundary reduces the low- to moderate-income benefit below 70 percent. The rules also provide activities of the same type serving different areas must be considered separately on the basis of their individual service area.

NOTES: Maps and Related Topics

Wetland and Floodplain Maps: Wetland and floodplain maps should be included with the application to assist DCA in determining project feasibility in addition to USGS topographic maps from the 7.5 minute, 1: 24,000-scale quadrangle series. All Preliminary Engineering Reports and Preliminary Architectural Reports should include an original signature and the appropriate professional stamp. Points may be not be awarded for feasibility without these features.
* Please provide a FEMA Flood Insurance Rate Map (FIRM) showing the project site relative to the floodplain, and a National Wetlands Inventory (NWI) map from the USFWS Wetlands Mapper showing any wetland areas. Each map should include detailed, target area boundaries.

Service Delivery Strategy (O.C.G.A. §36-70-20): In addition, state law requires that all projects funded be consistent with the community's adopted Service Delivery Strategy (O.C.G.A. §36-70-20). The appropriate citation of the Strategy along with attachments and service area maps should be included in the application, along with a signed certification that the project is consistent with the Strategy. Maps should include the project area, or facility, in relation to the approved service

area for that activity. If the project is not covered by the adopted Strategy by April 2, 2027, it will not be eligible for funding.

Concentration Map Requirement: DCA has long required concentration maps from the applicant jurisdiction that show concentrations of minorities, low- and moderate-income, and housing deficiencies. DCA requires that concentration maps be prepared using DCA's online mapping tool or an approved equivalent. Please see this tool at: https://georgia-dca.maps.arcgis.com/apps/webappviewer/index.html?id=a547b61dac0545d29101ff902cbf8c3e. This will generate consistent maps from applicants that will allow each applicant to respond to its jurisdiction's concentrations. All applicants must create these maps using DCA's online tool, ***and keeping their concentrations in mind, should include on the Community Development Needs Assessment form a narrative that indicates how and why the applicants' target areas were chosen.*** The target area must be identified on each map.

Feasibility

The Feasibility criterion is designed to test for items beyond the Threshold requirements that are critical in carrying out the project in a timely manner, within budget, in compliance with HUD's requirements, and that establish clear standards for project implementation, such as complete engineering and architectural reports and consistency across narratives, budgets, and cost estimates. Applicants will be compared in terms of project feasibility. The following factors are considered in an analysis of such items as: 1) verification and reasonableness of cost to ensure the proposed project is a cost effective solution; 2) documentation that all project financing sources needed for the project will be available; 3) documentation that preliminary engineering, architectural, site plans and preliminary work-write ups have been prepared and support the proposed project; 4) adequacy of planning for any required property that must be acquired for the project; 5) adequacy of planning for compliance with applicable state and federal laws, including fair housing and 6) adequacy of methodology to establish target area demographics; 7) ability to sustain operations and adequately budget for future operations, maintenance and replacement upon completion of the project.

A maximum of 50 points for feasibility will be awarded by a review panel based on how well each applicant, compared to others, addresses the feasibility factors.

Note that the review panel has the discretion to assign 0 points to the Feasibility category when a National Objective is not met, or the project is otherwise ineligible.

Water/Sewer Applications

Water / Sewer Applications should address the following:

- EPD requirements.
- The need for household plumbing improvements.
- The feasibility of plumbing improvements.
- Proper abandonment of wells/septic tanks.
- House connections/reconnections.
- How house connections/reconnections will be paid for.
- System Capacity. If additional water or sewer customers will be added, please address the current system's capability to add customers.

Buildings/Limited Clientele Applications
All funded CDBG projects that propose and implement the construction or renovation of buildings for the purpose of serving a limited clientele population must also adhere to DCA's Continued Use Policy for a period of 10 years. This policy is made part of the grant conditions upon award. The purpose of the Continued Use Policy is to ensure that buildings funded by CDBG funds are used for their intended purpose for a minimum of 10 years. The primary means for enforcing the Policy is through the grant conditions, DCA monitoring, and local oversight. Due to the length of time involved, 10 years, and the possibility for divergence from the original grant purpose over time, DCA is asking that all applicants for building projects provide basic information regarding building ownership, lease terms (where applicable), and other means of building control (where applicable). The information provided should include the following:

1. The legal name of the entity that will own the building.
2. The proposed lease terms: number of years, lease amount, other lease arrangements such as which entity will pay for utilities and insurance, and terms or renewal.
3. Anticipated program income, if any.
4. Other arrangements such as property reversion clauses or liens.

Because the only eligible applicants for CDBG funds are local governments and because local government ownership of CDBG-funded buildings helps ensure local oversight of continued use requirements, this approach has historically been the most common ownership structure; however, other approaches that involve strong public-private partnerships are also possible. These approaches require additional explanation to assist DCA in understanding how the Continued Use Policy will be enforced, especially in the event of dissolution of the private entity when the private entity owns the building. The narrative on DCA 5 (Description of Activities) should include, in addition to items 1-4 above, information regarding the applicant's plans for oversight of the Continued Use Policy should unexpected events occur. In addition, any existing agreements, leases, or reversion clauses should be included in the application's appendix. In the event of funding, DCA may also Special Condition the grant award to require any agreements needed to ensure positive outcomes for the dollars provided. For workforce development center projects, please contact the appropriate Community Finance Division staff for further assistance.

Program Need

The purpose of the Need score is to access the living conditions and quality of life for target area residents. Critical to this assessment is the level of need of each project type posed in the application. In addition, clear documentation of all conditions described in the stated need must be included in the application. Without documentation, the described need, regardless of how dire, will not receive points. **Any applicant that scores 0 points on this criterion will be ineligible for funding.** A high need is defined as significant health and safety issues and a low need is defined as minimal health and safety issues or amenity issues only.

Applicants should explain and justify all long term planned phasing of future projects for the chosen area, especially when 100% of the identified need is not met.

A maximum of 125 points for program need will be awarded by a review panel based on how well each applicant, compared to others, addresses the need factors.

Program Impact

The purpose of the Impact score is to gauge the positive result that is expected once the project is completed. This criterion is a combination of objective factors and qualitative factors in order be able to compare similar projects against each other. The following factors will be considered: 1) the number of persons benefiting; 2) the cost per person benefiting (the cost per person is calculated by dividing the total CDBG grant by the total number of people benefiting, i.e., the total population of the target area or the total number of projected clientele to be served); 3) the absolute number of people in poverty for the applicant jurisdiction, 4) the percent of people in poverty for the applicant jurisdiction, and 5) the median household income of the applicant jurisdiction. Items 3 through 5 are calculated by DCA and utilizes the most recent Census data available.

Points for Impact will be awarded by a review panel based on how well each applicant, based on a quantitative analysis of the following factors, compared to others in the same project type category.

1. Cost per person benefitting compared to other similar applications. Based on percentile rank x 30.

2. Demographic Need - absolute number of people in poverty. Applicants will be compared in terms of the number of persons in the entire jurisdiction whose incomes are below the poverty level. Scores will be obtained by dividing each applicant's number of persons in poverty by the greatest number of persons in poverty of any applicant in the group and multiplying by 15.

3. Demographic Need - percent of people in poverty Applications will be compared in terms of the percentage of population below the poverty level in the entire jurisdiction. Scores will be obtained by dividing each applicant's percentage of persons in poverty by the highest percentage of persons in poverty of any applicant in the group and multiplying by 15.

4. Demographic Need - median household income Applicants will be compared in terms of their median household income for the entire jurisdiction. Scores will be obtained by dividing each applicant's median household income into the lowest median household income of any applicant in the group and multiplying by 15.

A maximum of 75 points for program impact will be awarded by a review panel based on a quantitative analysis of these factors, compared to others in the same project type category.

Leverage

Leverage includes additional resources committed to and directly related to the project, including cash above the required minimum cash match amount, the purchase of equipment and furnishings with non-CDBG funds, and additional grants and loans from other sources. Only items that would not otherwise have been provided will be counted. A "reasonable" value, including valuation methodology, must be assigned to donated and "in-kind" items. Up to 20 points can be assigned for leverage of additional resources.

Leverage amounts will only be assigned when firm commitments from all claimed funding sources are included in the application.

Non-CDBG costs related to the proposed construction of new items which serve CDBG target area needs as well serving a larger service area (such as a new water storage facility) will be counted proportionally with the CDBG target area population serving as the numerator and the population of the service area serving as the denominator. DCA reserves the right to use a different method in calculating proportionality if required by the circumstances of an applicant's proposal.

Leverage must be for a CDBG eligible activity and the beneficiaries must be within the CDBG target area(s) unless otherwise provided in this manual (e.g., furnishings and equipment may be counted as leverage). In addition, leverage must be related to the CDBG project proposed in DCA-5 and the needs described in DCA-4.

All leveraged funds must be related and timely.

What is not leverage?

On-going operation and maintenance costs are not counted as leveraged resources**.**
Costs not clearly related in terms of location or benefit to the proposed project beneficiaries are not counted as leverage.
Costs of CDBG audits above $1,000 will not be counted as leverage.
Contingencies will not be counted as leverage.
Applicants are advised to justify all leverage claims.

The leverage score will be calculated as follows:

1) Total dollar value of leverage for each applicant will be calculated and then divided by the total population of the applicant in order to obtain a per capita leverage figure reflective of each applicant's relative effort.

2) Applications will be assigned to one of five groups:
   - Multi-activity
   - Housing
   - Economic Development
   - Water and/or Sewer
   - Other Public Facilities

3) The applications will then be ranked within these groups, based on per capita leverage amounts, from no leverage (no points) to highest per capita leverage and points assigned based on the percentile ranking. If no applicant within any of the groups listed above has $0 leverage, a proxy score of $0 will be inserted to ensure that if leverage is provided by the applicant a score greater than 0 will result.

4) Up to 20 points can be assigned for leverage of additional resources. The ranking will be established using the range of applicants' per capita leverage amounts (from 0 to the highest per capita leverage) and calculating a percentile score for each applicant's per capita leverage amount within the range. This percentile score will be multiplied times 20 to establish the points for per capita leverage. For example, if an applicant's per capita

leverage amount is $300 and if $300 represents a percentile score of 50 percent, the leverage points will be 12.5 (.50 x 20= 10).

Revitalization Area Strategy Bonus Points

The Revitalization Area Strategy (RAS) bonus points, procedures, and application process is fully described in the *CDBG Revitalization Area Strategy Applicants' Manual*. Please review this manual in detail regarding bonus points under the CDBG Annual Competition. A synopsis of the Revitalization Area Strategy points and requirements are provided below. For FY2027 funds, all RAS applications, annual updates, or renewals must be submitted in full no later than April 2, 2027, in order for RAS benefits to be applicable to the 2027 Annual Competition, including but not limited to the ability to apply for CDBG funds in RAS areas every year and bonus points.

Bonus points for Revitalization Area Activities: Points will be awarded for utilizing existing state redevelopment programs, initiatives and incentives in eligible areas. Following receipt of a designation, a CDBG applicant may be awarded up to 20 points for CDBG project activities occurring within a DCA-approved Revitalization Area as follows:

Revitalization Area Threshold Requirement (5 Bonus Points): In order to be eligible for Revitalization Area designation and bonus points, a local government must establish a local redevelopment area and plan pursuant to O.C.G.A. 36-61-1 et seq. ***Note that the RAS boundaries must be within both the local urban redevelopment area established pursuant to O.C.G.A. 36-61-1 et seq. and one or more Census Block Groups with a poverty rate of 20% or greater.*** Additionally, the local government must describe the activities it will undertake to promote economic empowerment through meaningful job creation for the unemployed and low- and moderate-income residents as well as activities to promote the substantial revitalization of the area.

Local Redevelopment Tools (maximum of 5 Bonus Points): Points may be earned through the use of such tools as State Enterprise Zones, Tax Allocation Districts, Community or Business Improvement Districts, Land Bank Authority or other geographically targeted tax, investment, or other redevelopment programs within the eligible area. In order to receive these points, the applicant must provide as proof the resolution or ordinance creating the redevelopment tools for which bonus points are sought.

Investment Partnerships (maximum of 5 Bonus Points): Points may be earned through the incorporation into the local program of certain job creation/retention, revitalization, residential improvement or social service funding programs geographically targeted to the areas of eligibility. Various programs including public programs chartered by the State of Georgia, GHFA, the U.S. Department of Treasury, the SBA, the USDA, the Federal Home Loan Bank, the TVA, HUD, and DOL. The leveraging of private funds from various philanthropic, non-profit and/or faith-based organizations will also be rewarded. In order to receive these points, the applicant must provide documentation showing a firm, long-term commitment by investment partners or a long-term commitment by the applicant to use investment partners as part of their Revitalization Area strategy. A long-term commitment by the applicant may be demonstrated by past use of investment partners, plans to incorporate investment partners in its current CDBG project, and the necessary local capacity to use investment partners on an ongoing basis.

Collaboration (maximum of 5 Bonus Points): Points may be earned through the demonstration that initiatives will be created and/or undertaken within the eligible area by private for-profit and not-for-profit community stakeholders. Such stakeholders may include local lending institutions, community or neighborhood- housing organizations, community-based development

organizations, community development corporations, community development entities, and other similar organizations. In order to receive these points, the applicant must show that the collaborative stakeholder organizations have a firm commitment to the community, have taken responsibility for carrying out one or more aspects of a Revitalization Area strategy, have sound financial and administrative practices, and the ability to carry out the functions for which they are taking responsibility. Such evidence will include letters of commitment, agreements, programmatic material, articles of incorporation and registration from the Secretary of State, audited financial statements or financial reviews, budgets, IRS determination letter for 501(c) 3 statuses, or other evidence of capacity and commitment. ***Note: If approved by HUD and the State, applicants may pursue benefits under HUD's comprehensive revitalization approach [24 CFR Part 570.483(e) (5)] that confers certain benefits including the possibility that some additional activities will carry the presumption of low- and moderate-income benefit.***

Revitalization Area Designation

Revitalization Areas will generally be designated or reauthorized through a separate designation process as outlined in the Revitalization Area Strategy Manual, on RAS Forms 1 and 2, and at https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/revitalization-area/ras. Communities may also request designation within an annual round application. However, communities seeking designation are strongly encouraged to meet with DCA as soon as possible to discuss their request for designation. Applicants who fail to obtain designation (and bonus points) will have their CDBG applications ranked and rated as either a regular single- activity or multi- activity competition as appropriate. **The deadline for submission of applications for RAS designation (initial applications, annual updates or renewals) for consideration under the 2027 competition is April 2, 2027 by 11:59 p.m**. **Communities seeking designation, annual updates, or renewals are strongly encouraged to meet with DCA as soon as possible to discuss their request for designation**.

1) Area Strategy Plan and Map – A community that wishes to take advantage of the Revitalization incentives of the CDBG program must first submit a properly adopted Redevelopment Plan for the proposed area that meets the requirements of the Georgia Urban Redevelopment Act pursuant to O.C.G.A. 36-61-1 et seq. Such plan should include a map of the proposed revitalization area indicating that the area is composed of one of more census block groups with a 20 percent or greater poverty rate.

2) Map Requirements: Applications shall contain a map of the revitalization area. Such map shall be prepared in accordance with the minimum map standards and specifications as outlined in the CDBG Application Manual. Additional mapping requirement information can be found in the RAS Applicants' Manual.

3) Strategy Plan Requirements:
   I. Citizen Participation –Along with the area map and description submitted, the locality must provide evidence that a local citizens' participation process was used that not only meets the requirements of 24 CFR 91.115 and 24 CFR 570.486(a), but also demonstrates that local residents fully support the proposed strategy. Such evidence may include, but is not limited to, minutes and advertisements of public meetings, advisory committee lists and minutes, letters of support from participating organizations and signed petitions from area residents.

II. Local Revitalization Area designation is valid for three years at which time the sponsoring entity must reapply for designation with DCA. Applications for designation must include an assessment of the economic conditions of the proposed area.

III. Each year, designated Revitalization Areas must submit an Annual Update report to DCA that includes the activities and projects undertaken in the area and information on the economic conditions of the revitalization strategy area.

IV. There is no limit to the number of revitalization areas a community may designate, although parcels within a single designated area must be contiguous.

Bonus Points for Readiness to Proceed

Five bonus points may be earned through the demonstration of a project's readiness to proceed. Points may be earned through ***documentation*** in the application that the NEPA review is complete and funds have been released by DCA.

Bonus Points Based on Project Type

Each state administering the CDBG program is allowed the flexibility of determining its priorities from a range of eligible activities under Section 105(a) of the Housing and Community Development Act of 1974. A maximum of ten (10) points may be earned for projects in the categories of Housing / Neighborhood Stabilization and Water and/or Sewer. Multi-activity and Multi-infrastructure projects will be analyzed and the budget pro-rated to determine if the majority of the project (greater than 50%) qualifies for the bonus points.

Bonus Points for Regional Cooperation and Regional Impact

A maximum of 20 bonus points may be earned for projects displaying regional cooperation with regional impact. The proposed project must evidence a regional initiative through a revenue and cost sharing agreement or other intergovernmental agreement by multiple jurisdictions or two of more counties that results in regional impacts, benefits, or service delivery. Projects receiving regional cooperation bonus points are eligible to receive up to $2,000,000. DCA reserves the right to determine if a project meets the intent of regional cooperation. Successful regional applicants are not restricted from applying for the following year's CDBG Annual Competition, provided that all other eligibility criteria are met. Applicants are strongly encouraged to contact DCA to determine if a project meets this criterion.

Bonus Points for Robust Citizens Participation Process

Required by Section 104(a)(2) of the Housing and Community Development Act and by regulations at 24 CFR 570.486(a)(6), a citizens participation plan is vitally important to the success of CDBG funded activities undertaken by local governments. Compliance reduces the number of legal challenges and citizen complaints against the local government recipient. The goal of these bonus points is to incentivize communities who undertake a robust citizens participation process which provides citizens -- especially low- and moderate-income citizens of the community where CDBG-funded activities will take place -- an opportunity to participate in an advisory role in the planning, implementation, and assessment of the programs and projects. Bonus points will be awarded for demonstrated extra efforts providing an opportunity for citizens, especially LMI citizens, to participate in an advisory role in the planning, implementation, and assessment of the programs and projects funded through CDBG activities. Examples of "extra efforts" include various outreach and engagement efforts, such as; utilizing the water bill, social media, ad flyers to announce public hearings, conducting public hearings well in advance of the

application at convenient locations and at times convenient to working persons, and conducting more than one public hearing.

These bonus points will be allocated using a scaled approach for efforts above and beyond the minimum Citizen Participation Requirements out lines in the CDBG Applicants' Manual. A maximum of ten (10) bonus points may be earned for projects displaying a robust citizens participation process.

Bonus Points for Closing EIP/RDF Local Revolving Loan Fund & Returning Funds

Five bonus points may be earned through the closing and returning of all funds in the community's EIP/RDF Local Revolving Loan Fund. These points may only be applied to the community's next Annual Competition CDBG application, which must be submitted within two program years from the date of the closing of the RLF. If an Annual Competition CDBG application is not submitted within this time frame, these bonus points will expire.

In order to receive the points, a locality must return all RLF assets to the state to remove itself from the administrative requirements of the RLF program by April 2, 2027. This will generally require that a locality return all of its cash on hand and set up a plan with DCA to return any payments from its loan receivables on a periodic basis. Any assets returned to the state will be added to the state's existing CDBG allocation or used to capitalize a statewide revolving loan fund and used to fund additional economic development projects.

Bonus Points for Workshop Attendance

Applicants with local government staff attending the 2026 CDBG Summit, specifically the compliance and application development general sessions, will be eligible to receive 10 bonus points, with the submission of supporting documentation.

Bonus Points for GICH Senior Year Communities

The Georgia Initiative for Community Housing (GICH) Senior Year is a new, competitive program for GICH Certified Alumni Communities with a mission to holistically invest affordable housing funds into Georgia communities based on their strategic vision. The goal for the Georgia Department of Community Affairs (DCA) is to braid targeted investments in 1-2 targeted and competitively selected alumni communities. Those braided investments may include guaranteed awards or strong competitive advantage within Low Income Housing Tax Credit Program (LIHTC), CHIP, and CDBG. As an expansion of the GICH curriculum, participants will receive targeted technical assistance and education from DCA and other housing and community development experts on how to best implement their communities housing plans. Participants will also be eligible to receive select DCA funding resources that result in direct housing investments. Senior GICH communities will be eligible to receive up to 20 bonus points when submitting an application with a housing component (Neighborhood Revitalization or Multi-Activity).

Reduction of Points for Omissions and Inconsistencies

Points will be deducted for missing required components or concepts, not to exceed 25 points. Applicants will be provided an Applicants' Manual fully detailing application requirements.

Final Ranking and Grant Selection

The points received by each applicant on the rating factors will be totaled and the total scores ranked accordingly. Grant awards will be based on this final ranking to the extent funds are available. In case of ties, the applicant with the highest percentage of funds benefiting low- and

moderate-income persons will be given priority.

Disposition of Applications

Grant commitments will be forwarded to local units of government whose applications are approved for funding.

Applicants whose programs are denied will be notified of the denial. DCA's decisions regarding awards and denials will be based on the Method of Distribution as approved by HUD, this Applicants' Manual, the rating and selection criteria outlined herein, and the final ranking of all applications based on the points awarded to each applicant. DCA will fund the applications in order of rank beginning with the top-ranked application until funds are depleted. DCA's funding decisions are final and DCA may waive any irregularities consistent with the Method of Distribution and this Manual. After the awards, the CDBG staff will review applications with local official's staff or their designees at the request of the certifying representative of the local government.

Pre-Funding Site Visits

The Department of Community Affairs may make at least one unannounced site visit to the applicant's projects area(s) during the application review process. The purpose of the visits will be to verify information contained in the application and to compare similarly proposed projects.

Technical Assistance Policy

The Department of Community Affairs will provide technical assistance on request from the unit of local government. In addition to the Applicants' Workshop, a Recipients' Workshop will take place after grant commitments have been made that will explain the fundamentals of program implementation.

Other workshops, more narrowly focused on specific topics such as contracts, financial management, acquisition, relocation, environmental review and housing may be sponsored by the Department from time to time.

Please note that although DCA staff can provide technical assistance in the form of guidance and information at the application stage, staff cannot write application proposals for local governments. The annual CDBG process is competitive. Each application is ranked relative to the entire pool of applications. Any technical assistance provided by DCA staff does not guarantee project funding.

Contents of Preliminary Engineering Reports

Preliminary planning and engineering reports generally include, but are not limited to, the following:

Executive Summary

- Brief description of Project Area needs, Conclusions and Recommendations

Introduction

- Purpose and Scope (project objectives and methodology of evaluation)
- Authorization
- Previous Studies

Background

- Target Area description
- Plans and photos of Target Area
- Population density
- Population projections (if available)
- Narrative describing existing conditions including description of needs to be addressed
- Map of existing conditions, particularly of existing conditions to be addressed with CDBG funds, including pipe sizes, other relevant measures of existing infrastructure, and all existing structures

Evaluation of Alternatives

- Descriptions of alternatives considered, including cost estimates of each alternative (capital, operation and maintenance & user fees)
- Street and road projects should include the advantages and disadvantages of alternative typical sections (curb and gutter versus shoulder and ditch section)
- Assessment of impacts on Target Area residents & property owners (land, right-of-way and easement acquisition requirements)

Description of Proposed Project

- Identification of applicable federal, state and local design standards
- DOT standards identify a 25-year flood design standard for local road drainage improvements. Standards greater or less than 25 years must be explained and justified in the CDBG application.
- Drainage projects should include site specific preliminary hydrologic and hydraulic calculations for each drainage shed
- Drainage projects should include a description of project outfall(s) and consideration of downstream impacts
- Required Permits
- Operation and maintenance requirements, responsible party (Grantee, GaDOT, other) and operation and maintenance capability (available staff, equipment and expertise)
- Narrative describing the proposed improvements including a description of the impact of the proposed improvements on the quality of life of target area residents
- Map of proposed improvements, including pipe sizes, other relevant measures of proposed infrastructure, and all existing structures
- Fire Coverage Maps (existing and proposed maps should be two separate maps as opposed to including two fire coverage color rings on one map), when applicable
- All projects inclusive of hydrants are required to hydrants to match Rule 120-3-3-.04 Georgia's Rules of Safety Fire Commissioner

Detailed Project Budget

- Construction and material costs
- Design and oversight fees
- Grant Administration
- Funding sources
- Projected Operating Revenues and Expenses (if applicable)
- Projected User Fees (if applicable)

Project Schedule

All Preliminary Engineering Reports should include an original signature and an engineering stamp. Points may be deducted for feasibility without these required features.

Contents of Preliminary Architectural Reports

Preliminary Architectural Reports generally take the following format.

Executive Summary

- Brief description of Project Area needs, Conclusions and Recommendations

Introduction

- Purpose and Scope
- Authorization
- Previous Studies

Background

- Project Area conditions including description of needs to be addressed
- Description of existing facilities, if any, including existing floor plan with all dimensions and descriptive labels for all rooms.
- Projections of future needs

Evaluation of Alternatives

- Descriptions of alternative solutions considered (new construction, renovation, additions to existing structures), including cost estimates for each alternative
- Site selection criteria
- Location relative to population served
- Adequacy of infrastructure (access, water, fire protection, sanitary sewer, storm drainage)
- Soil conditions, and topographic constraints
- Assessment of impacts on existing residents & property owners, if any

Description of Proposed Project

- Identification of applicable federal, state and local design standards
- Preliminary Site Plan showing proposed ingress – egress, vehicle circulation on-site, drop-off area, regular parking and accessible parking, service access (dumpster location with truck access, mechanical room access), extensions of utilities (water, sanitary, electric, telephone), access road improvements, emergency vehicle access
- Description of storm drainage outfall(s) and consideration of downstream impacts
- Description of proposed/improved facilities, including preliminary floor plan with all dimensions and descriptive labels for all rooms
- Required permits

Detailed Project Budget

- Construction and material costs (cost per square footage should be avoided)
- Design and oversight fees
- Grant Administration
- Funding sources
- Projected Operating Revenues and Expenses (if applicable)

Project Schedule

All Preliminary Architectural Reports should include an original signature and an architectural stamp. Points may be deducted for feasibility without these required features.

Part III: Making Your Application More Competitive

This Chapter provides guidance on how to address the application rating factors of feasibility, strategy and impact. These factors represent a total maximum score of 400 points or a majority of the points available to an applicant. For an overview of the rating and selection system, see Part II, Application Review Process.

The score of an application based on strategy, feasibility, impact and need are determined by a DCA staff review of similar applications. Utilizing this information should make your application more competitive.

For All Applications:

- Have all forms been prepared properly and properly executed?
- Are 51% or more of the beneficiaries inside the boundaries of the applicant? If not, has a joint application been proposed? If not, has DCA provided an exception in writing to this requirement?
- Make sure all activities are eligible.
- Has a CDBG National Objective been met? (Area Benefit or Limited Clientele) (70% or > L/M Income benefit; 100% for housing L/M benefit)
- Address utility relocation needs and costs.
- Make sure the project schedule is reasonable.
- Clearly address and disclose any conflict of interest issue.
- Have all administrative, engineering and architectural, and PDC limitations been adhered to?

Strategy (50 points maximum):

The following factors are considered:

1) an analysis of the community development needs of the jurisdiction (e.g., public facility, housing, and other community development needs);
2) the discussion of the alternative target areas considered within the jurisdiction, including the rationale for the target area selected in relation to the jurisdiction's community development needs, the alternative target areas considered, and the DCA Concentration Maps for housing deficiencies, minority, and low- and moderate-income areas;
3) an analysis of the community development needs of the target area chosen, the strategic alternatives considered in addressing those needs, and the efforts that the applicant has made or will make to address the identified problems;
4) an analysis of the alternatives considered to address the project needs identified in the application;
5) the proposed solution to the project needs and the degree to which the proposed solution matches the identified project needs, and its consistency with a locally adopted plan; and
6) the commitment by the applicant to maintain and operate the proposed project, facility or system, including an analysis of the steps taken by the applicant to adopt practices, programs, policies or ordinances to prevent the reoccurrence of the identified problem (copies of these local practices, programs, policies or ordinances should be included in the application when applicable to document local action on identified problems or for further explanation of the local strategies planned or underway to address the identified problems).

All applications will include a detailed approach to addressing the target area's community development needs using the proposed CDBG funding along with other near-term sources of funding and other resources. Resources could include, for example, local code enforcement efforts as well as the implementation of other local ordinances. The application should demonstrate how CDBG funding, along with other efforts, will lead to transformative results within a reasonable timeframe. (See Criterion 3 above.)

Note that the review panel has the discretion to assign 0 points to the Strategy category when a National Objective is not met, the project is otherwise ineligible, or the lack of equivalence between the target area boundaries and the area of benefit results in an ineligible project, when, for example, an area of benefit boundary that is larger or smaller than the target area boundary reduces the low- to moderate-income benefit below 70 percent. The rules also provide activities of the same type serving different areas must be considered separately on the basis of their individual service area.

Some of the basic components essential in addressing project strategy are as follows:

- The analysis of community development needs should include demographic information for population and population trends as well as the current unemployment rate of the applicant jurisdiction.
- The analysis of community development needs should include at a minimum an assessment of housing conditions, infrastructure (water and sewer, roads and drainage), and public buildings.
- A description of the process used to choose the project target area(s), the alternative target areas considered, and the rationale for the target area(s) chosen in relation to the community development needs of the jurisdiction.
    - Although an extensive description of alternative target areas considered is not required, briefly describing the areas, neighborhoods, or other districts within the jurisdiction and their needs will assist DCA in determining whether the applicant is making a comprehensive examination of its community development needs before deciding which target area(s) to address. While information regarding subareas of a jurisdiction can be difficult to obtain, good data sources include the most recent American Community Survey (ACS), the jurisdiction's comprehensive plan, and local surveys and knowledge.
    - If the chosen target area(s) is not within one or more of the DCA Concentration areas for housing deficiencies, minority, or low-to moderate-income people, explain why a target area(s) within a DCA Concentration was not selected. Keep in mind that there may be many valid reasons for choosing a target area(s) outside of an area of concentration. It is important, however, to explain to DCA the reasons that the chosen target area(s) is outside an area of concentration.
- When a target area(s) is chosen, please provide a detailed review of its community development needs. These needs will at a minimum encompass housing conditions, infrastructure and public buildings.
    - Community development needs of the target area should include these data elements: 1) number of residential units, vacant and occupied; 2) whether residential units are renter or owner occupied; 3) the condition of residential units based on a windshield survey (standard, substandard, or dilapidated); 4) the public services available in the target area and their condition (e.g., availability and quality of water, sewer, garbage pickup, street and drainage, and recreation services);

and 5) the condition and availability of public buildings, especially to serve low- to moderate-income people.

- The plans/strategies to address the needs of the target area(s) chosen, and the efforts that the applicant has made or will make to address the identified problems.
    - These plans/strategies should address all the needs of the target area and may refer to existing plans/strategies that will have a positive impact on target area(s) needs. These plan/strategies may include jurisdiction-wide efforts that will positively impact target area(s) residents. New plans/strategies may also be needed to begin to address the problems described. Plans/strategies should be documented in the application with the applicable excerpt.
    - Efforts to address existing problems should be described and documented, whether ongoing or planned. Descriptions should be complete, but do not have to be extensive. Often, a paragraph to describe an existing effort along with relevant documentation will be sufficient to address the effort that is cited in the application. As an example, a paragraph description of the jurisdiction's efforts to maintain its public facilities in the target area with such initiatives as rate structure changes, other projects or funding applications for projects that address target area needs, ongoing maintenance efforts that are documented with staffing level descriptions, budgets and work orders, capital budgets/improvement plans, etc. Each effort cited will need the brief, paragraph description described here along with relevant documentation.
- An analysis of the alternatives considered to address the project needs identified in the application
    - The alternatives considered under this criterion should include an evaluation of the various strategic approaches that could be used in addressing the project needs that will be addressed by the CDBG application. These alternatives generally ***do not include*** construction methods (e.g., curb and gutter vs. ditching, cured in place pipe vs. dig and replace). Instead, strategic alternatives include approaches that address the most efficient and effective means of addressing the project needs through consideration of innovative institutional arrangements, new technologies, or policies or practices that significantly addresses the needs described, lowers cost, or increases the sustainability of the service.
- The proposed solution to the project needs and the degree to which the proposed solution matches the identified project needs, and its consistency with a locally adopted plan. (Criterion 5)
    - This criterion addresses whether project needs (i.e., the subset of the target area's needs that will be addressed by the application) are well described and that the proposed activities address these needs. Here, a thorough description of the project needs should be provided as well as the proposed solutions. ***DCA will review whether the project needs are well described and documented, whether the proposed solution addresses the needs described, and whether the needs described and documented by citizens or other sources are consistent and aligned with the proposed solution.*** For example, citizens comments, work orders, and other documentation should be consistent with the project needs described and the proposed activities. Describing or documenting project needs that are not consistent with the proposed solution may lead to an unclear application and points could be reduced.
    - The proposed solution to the project needs should also be listed and described in a local plan. The plan should be specific enough so that the proposed project can be readily identified as an integral component of a well thought out plan. Vague plans (e.g., water and sewer improvements in the county) indicate that the local

planning process has been limited in scope and may need to be revisited. An example of a better plan statement would be: "increase water pressure in the northwestern quadrant of the city in order to provide fire protection to all residential and commercial structures in the area."

- The commitment by the applicant to maintain and operate the proposed project, facility or system, including a description of the steps taken by the applicant to adopt practices, programs, policies or ordinances to prevent the reoccurrence of the identified problem (copies of these local practices, programs, policies or ordinances should be included in the application when applicable to document local action on identified problems or for further explanation of local strategies planned or underway to address the identified problems).
    - This criterion requires that applicants provide DCA strong assurances that the proposed project will be maintained over time. DCA considers all grant awards to be long-term investments, and local government participation in project maintenance is critical. Please be as specific as possible and provide applicable documentation. A letter from the Chief Elected Official committing to long-term maintenance is a first step toward this documentation, but is insufficient to receive full points under this criterion. Documentation of other efforts to prevent the reoccurrence of the identified problem is highly suggested.

- With Buildings:
    - Is the proposed site accessible?
    - Is a new level of service being provided?
    - Is the proposed benefit number reasonable? (Project only unduplicated beneficiaries over the period of one year. For example, if a senior center has a meal program that is attended by 50 people a day Monday through Friday, the beneficiary count will be 50.)
    - Is there a similar building in the city/county?
    - Have potential environmental impacts including historic structures on site or in the vicinity, archeological sites, etc., been considered?
    - Has the applicant taken into consideration that a Phase One environmental review must be performed as part of the Environmental Review Record?
    - Provide a clear before and after picture of the existing and proposed facility and program, including floor plans, customers served, and programs offered. Consider using a chart to show use and times of use for activities in the proposed facility. If a new or relatively new organization will provide services in a DCA-funded facility, consider preparing a brief business plan to assist in demonstrating the organization's capacity to provide the proposed services.
    - Focus on the needs of clients. The needs of staff are secondary unless they affect clients directly.
    - Discuss why other buildings in the community are not available.

- **STATE LAW REQUIRES THAT ALL PROJECTS FUNDED BE CONSISTENT WITH THE COMMUNITY'S ADOPTED SERVICE DELIVERY STRATEGY (O.C.G.A. §36-70-20). HAS A MAP OF THE PROJECT AREA, OR FACILITY, IN RELATION TO THE APPROVED SERVICE AREA FOR THAT ACTIVITY BEEN INCLUDED? KEEP IN MIND THAT *IF THE PROJECT IS NOT COVERED BY THE ADOPTED STRATEGY BY APRIL 2, 2027, IT WILL NOT BE ELIGIBLE FOR FUNDING. CERTAIN TYPES OF APPLICATIONS ARE NOT ROUTINELY INCLUDED IN SERVICE DELIVERY STRATEGIES, INCLUDING BUT NOT LIMITED TO SENIOR CENTERS, BOYS AND GIRLS CLUBS, HOUSING ACTIVITIES AND OTHER TYPES OF SERVICES TO LIMITED CLIENTELE. ALL ACTIVITIES MUST NOW BE INCLUDED IN THE SERVICE DELIVERY STRATEGY.***

Feasibility (50 points maximum):

The Feasibility criterion is designed to test for items beyond the Threshold requirements that are critical in carrying out the project in a timely manner, within budget, in compliance with HUD's requirements, and that establish clear standards for project implementation, such as complete engineering and architectural reports and consistency across narratives, budgets and cost estimates.

The following factors are considered:

1) verification and reasonableness of cost;
2) documentation that all project financing sources needed for the project will be available;
3) documentation that preliminary engineering, architectural, site plans and preliminary work-write ups have been prepared and support the proposed project;
4) adequacy of planning for any required property that must be available for the project;
5) adequacy of planning for compliance with applicable state and federal laws, and
6) adequacy of methodology to establish target area demographics

Some of the basic components essential in addressing project feasibility are as follows:

- verification and reasonableness of cost
    - Ensure that cost estimates are professionally prepared.
    - Are unit costs reasonable?
    - Are unit costs consistently applied to alternative construction methods?
    - Are budgets prepared consistent with the professionally prepared cost estimates?

- documentation that all project financing sources needed for the project will be available
    - Have all additional sources of funding been confirmed? (Match, Leverage, etc.)
    - Are all project and programs confirmed and committed?
    - Who will operate and staff programs, are they committed?
    - Will permits be required? Address all types of permits needed and indicate the time required to secure permits. (Railroad, DOT, etc.)
    - Have all financing and program resources been committed in writing by the appropriate official? For example, are the appropriate resolutions, letters, loan approval included in the application?
- documentation that preliminary engineering, architectural, site plans and preliminary work-write ups have been prepared and support the proposed project
    - With Streets and Drainage projects:
        - Are design standards identified?
        - What is the standard? (Drainage standards greater or less than a 25-year flood should be explained and justified.)
        - Was a drainage study completed that includes downstream impact?
    - Be sure that architectural and engineering reports are signed and stamped by a certified professional.
    - Also see the section of this manual entitled Contents of Preliminary Engineering Reports and Contents of Preliminary Architectural Reports for details regarding what should be included in these reports.
- adequacy of planning for any required property that must be available for the project
    - Will property acquisition be needed? If so, provide reasonable estimates of the number of parcels needed, their costs and the proposed procedures for compliance with the URA.

  - If a site is required, documentation such as a purchase agreement or an equivalent document or letter showing the owner's willingness to sell or donate should be included.
- adequacy of planning for compliance with applicable state and federal laws
  - Are all environmental, tribal, and historic preservation issues or concerns addressed?
  - Have all applicable federal laws and regulations that may be triggered by the proposed project been addressed in the application? For example, have the URA, Section 104(d), NEPA, floodplain and wetland notice, historic preservation, relocation, and Section 3 requirements been addressed as applicable? See especially the narrative in the Basic Compliance Rules for CDBG regarding Civil Rights/FHEO requirements.
- adequacy of methodology to establish target area demographics
  - Have the benefit number and L/M Income percentage been accurately counted or reasonably estimated based on an acceptable survey methodology? (See Appendix C of this Manual for further details on acceptable survey methodologies.)
  - Has the survey methodology been described thoroughly on Form DCA-6 or in an attachment?
  - Include the survey form used to determine the number of beneficiaries and the L/M percentage.
  - Include the table of results from the survey. The table should include the summary of the survey by street (see sample), whether vacant or occupied, if occupied, the number of people in the household, the low- to moderate-income status of the household, and the racial and ethnic status of the household. The table should summarize each category so that totals are easily reviewed by DCA.
  - DCA will accept as documentation of low- and moderate-income status area surveys that are three years old or less. Specifically, surveys that are older than January 1, 2023, will not be accepted for the 2027 Annual Competition. Additionally, due to HUD's transition policy for American Community Survey 2016-2020 data, census qualifying projects are not permitted to use data older than the current 2016-2020 low-to-moderate income survey data in the 2027 Annual Competition.
  - Note that vacant units are not considered households and cannot be surveyed.
- With Building projects, has the following information been provided?
  - The legal name of the entity that will own the building.
  - The proposed lease terms: number of years, lease amount, other lease arrangements such as which entity will pay for utilities and insurance, and terms or renewal.
  - Anticipated program income, if any.
  - Other arrangements such as property reversion clauses or liens.

Need (125 points)

The purpose of the Need score is to access the living conditions of target area residents. Critical to this assessment is the level of need that is documented in the application. Without documentation, the described need, regardless of how dire, will not receive points. In addition, any applicant that scores 0 points on this criterion will be ineligible for funding. A high need is defined as significant health and safety issues and a low need is defined as minimal health and

safety issues or amenity issues only. The quality of the need documentation is critical in establishing the level of need.

- ***To a great extent, an applicant's need score is determined by the documented severity of need compared to other similar applications.*** The severity of need is often determined by the extent to which the need described affects the health and safety of LMI residents.
- Include letters from third parties that provide evidence and validation of need, such as letters from environmental health specialists, EPD consent orders/letters.
- Include letters from residents describing problems shown in the application.
- Provide accurate and detailed photographs, preferably dated, numbered and keyed to a map. High scores are generally possible only when good photographs (dated and keyed to a map) are provided that depict health and safety needs. Photographs for housing projects should show both interior and exterior conditions.
- Include reports from building inspectors and/or rehab advisors on housing applications.
- Include news reports discussing problems shown in the application, if available.
- With Buildings document overcrowding and other existing building inadequacies with photographs.

Impact (75 points maximum):

The purpose of the Impact score is to gauge the positive result that is expected once the project is completed. This criterion is a combination of objective factors and qualitative factors in order to be able to compare similar projects against each other.

The following factors will be considered: 1) the number of persons benefiting; 2) the cost per person benefiting (the cost per person is calculated by dividing the total CDBG grant by the total number of people benefiting, i.e., the total population of the target area or the total number of projected clientele to be served); 3) the absolute number of people in poverty for the applicant jurisdiction, 4) the percent of people in poverty for the applicant jurisdiction, and 5) the median household income of the applicant jurisdiction. Items 3 through 5 are calculated by DCA and utilizes the most recent Census data available.

Some of the basic components essential in addressing project impact are as follows:

- How many people will benefit?
- What is the cost per person benefiting?
- How does the project impact on the benefiting population's quality of life, living environment or opportunities for economic advancement? Can you substantiate this in any way other than through a good narrative?
- Fully describe your application's impact on the need. What percentage of the need will be met?
- Avoid low-density population target areas, unless an extremely high need exists.

Additional Competitiveness Guidance

Applicants are further reminded that proposed projects compete heavily (300 out of 390 total points) on program strategy, feasibility, need and impact. **For this reason, applicants should supplement funding requests with engineering reports, historic assessments, market**

studies, etc., in order to adequately and thoroughly address strategy, feasibility, need and impact questions.

See Part II, Contents of Preliminary Engineering and Architectural Reports, for information on items that should be included in preliminary engineering and architectural reports.

- Applicants proposing housing or reconstruction must complete a Financial Plan (see Appendix H), that summarizes proposed activities. The Plan must be attached to DCA-5.

- Remember that similar projects will be compared against each other and rated on strategy, feasibility, need, and impact. Applicants are encouraged to invest adequate time and resources to increase the chances that their community's application will compare favorably.

Part IV: INSTRUCTIONS FOR COMPLETING APPLICATION FORMS

Note that all required forms are available at the DCA web site and the application solicitation link and can be accessed from:

https://dca.georgia.gov/financing-tools/infrastructure/community-development-block-grants-cdbg/annual-cdbg-competition/cdbg#toc--annual-cdbg-competition-resources--2
or https://gn.ecivis.com/GO/gn_redir/T/c60t5im4lcb

Application Summary

Please complete the information fields in the following manner:

- **Section 1:** Enter name of applicant, official mailing address, Unique Entity Identifier (formerly known as DUNS), Block Group ID, project Longitude, Project Latitude, project address, e-mail, and telephone number and area code of the city or county who is making the application. Applicants must provide the following geographic identifiers for the Target Area on DCA 1: Block Group ID (12-digit code including State Code, County Code, Census Tract and Block Group), Target Area Address (with city, and zip), and the Target Area Longitude and Latitude. (Note: List all Block Group IDs in the project target area. Do not specify block groups when the entire census tract is covered. If specifying block groups for a project covering more than one census tract, please indicate which tract includes the given block groups.)
- **Section 2:** Enter name, job title, agency, mailing address, e-mail, and telephone number and area code of the grant writer/contact person regarding the application. This person may be contacted during the review process to answer direct questions or to provide additional information regarding the application. If applicable, enter name, job title, agency, mailing address, e-mail, and telephone number and area code of the grant administrator (if known).
- **Section 3:** Briefly title the program (e.g., "Target Area Water Improvements") and provide a brief description of project activities. Please include all activities and briefly quantify the described activities. A needs description is not necessary for this item. An example of a brief title and description might be:

  "Provide new water lines and service connections for the Eastside Neighborhood to benefit 53 persons, all of whom are members of low-income households."

  Choose the "Type of Applicant" from the drop-down menu: City, County, Joint, or Regional. Attach a project location map. Enter the program duration in months, the program proposed start date, the program proposed end date, the total CDBG funds requested, and indicate the application type by selecting the appropriate radial button.
- **Section 4:** Enter the Certifying Official's information and attach the resolution to submit.

Proposed Accomplishments

The purpose of this information is to provide a quantified summary of the accomplishments proposed by the applicant to be undertaken with CDBG funds. Note that similar details will be

provided at project completion to collect data on actual accomplishments. Be sure to make an entry for all proposed CDBG funded activities.

- **Project Name**: The program and project name should auto populate from the information from populated into the Section 1: Application Summary.
- **Target Units & Expenditure Columns**: Enter the proposed accomplishments in the input fields situated to the right of the appropriate CDBG activity. For example, if the application proposes building renovations to benefit a program with 56 enrollees, enter "1" for the number of facilities proposed and "56" for the number of persons served.

Application Goals

Program: CDBG 2023 Annual Competition
Project name:

Goal / Objective	Target Units	Direct Cost Expenditure	Matching Expenditure	Program Income Expenditure
Water and Sewer Facilities	0.00	$ 0.00	$ 0.00	$ 0.00
Subgoals				
a. Water and Sewer Facilities - Number of Persons Served	0.00	$ 0.00	$ 0.00	$ 0.00
b. Water and Sewer Facilities - Number of Low/Moderate Income Persons	0.00	$ 0.00	$ 0.00	$ 0.00
Acquisition, Disposition	0.00	$ 0.00	$ 0.00	$ 0.00
Subgoals				
a. Acquisition, Disposition - Number of Structures	0.00	$ 0.00	$ 0.00	$ 0.00
b. Acquisition, Disposition - Number of Parcels	0.00	$ 0.00	$ 0.00	$ 0.00

Note: See instructions for DCA-6 for detailed information on counting persons to benefit.

Community Development Needs Assessment

Pursuant to federal law, CDBG applicants must identify their community development and housing needs, including the needs of very low- and low-income persons, and the activities to be undertaken to meet such needs. The purpose of the community development needs assessment or problem identification process is to have communities ascertain their most pressing problems and critical needs on a community-wide basis. Rationale for the selection for the target area will be addressed in this section.

The community development needs assessment should be consistent with the application. While the proposed project in the community's CDBG application does not have to be the highest priority community need, the rationale for the activity's selection must be present. The reasons for such, could include the availability of other, more appropriate local, state or federal resources, which would justify submitting a CDBG application for other than the top-ranked community need.

Please check the column you think most accurately describes your Community's facilities and/or operations in each of the categories listed.

Please give a brief explanation at the bottom of each section describing any problem categorized as "Inadequate".

In preparing the Community Development Needs Assessment, as well as, DCA-5, it is important to keep in mind the following terms:

Jurisdiction—means the incorporated boundaries of the applicant, i.e., city or county boundaries. Areas of Need—means a subarea of the jurisdiction. When providing a rationale for the applicant's choice of target area(s) as the focus of the CDBG application, it is important to review multiple potential target areas within the jurisdiction to demonstrate to DCA that a thorough review has been conducted at the local level that assesses areas of greatest need throughout the jurisdiction. At this stage of assessment, target areas can be relatively large and regional in nature but should be consistent with logical planning districts within the jurisdiction. For example, target areas could be at the neighborhood level, or even at a larger level of analysis such as districts that have common needs and opportunities. An example of this would be a section of a county that has a similar residential character with a common commercial center. After the local assessment is complete and a target area(s) is chosen, it must meet the characteristics required by the CDBG program, i.e., be at least 70 percent low- to moderate-income (100% for housing activities) and have boundaries that are consistent with the area of benefit of the CDBG activities that are proposed (including those activities funded by match and leverage dollars).

CDBG Target area—This will be the target area or target areas that will be the focus of the CDBG application. As noted above, the CDBG target area must be at least 70 percent low- to moderate-income (100% for housing activities) and have boundaries that are consistent with the area of benefit of the CDBG activities that are proposed (including those activities funded by match and leverage dollars). Multiple CDBG Target Areas may be chosen as the focus of a CDBG application. The applicant is cautioned, however, to avoid diluting the impact of a project over multiple target areas. Similarly, large CDBG Target Areas may also dilute the impact of the proposed project and reduce the applicant's score under the Impact criterion.

Project needs—means the activities within the chosen CDBG Target Area that will be addressed by the CDBG application. Project needs will not necessarily include all CDBG Target Area needs. Often other local efforts will be ongoing or planned that will impact all the needs described for the Target Area, leading to a potentially higher scoring application. For example, an applicant may be addressing the Target Area's sewer needs via a capital improvements plan for wastewater treatment improvements downstream, and limit the project needs to be addressed by the CDBG application to the Target Area's water needs.
City-wide or County-wide applications are also eligible. These will primarily be building projects that impact low – to moderate-income people across a jurisdiction. In planning for this kind of CDBG application, it is still important to review all community development needs within a jurisdiction and to review potential target areas as a way of assuring a thorough review of the existing community development needs of low- to moderate-income people before selecting a jurisdiction-wide CDBG proposal.

Form DCA-4: Description of Needs to be Addressed

This form asks you to describe the community development needs to be addressed by your grant request, i.e., the project need(s). The next form, DCA-5, is where you describe how those needs will be addressed through the activities funded by the grant and through other local efforts. Please keep this distinction in mind when filling out these two forms.

- For all applicants, describe the project needs (e.g., housing, public facilities, economic development) which have been identified. In order to be competitive, **all** existing conditions related to the proposed needs should be described including but not limited to: housing conditions, street, drainage, water system, sewer system, etc. Identified project needs not met under the program (if any) should be explained.

- Description of citizen participation efforts should be addressed.

Form DCA-5: Description of Activities

- **Header**: Indicate the name of the jurisdiction for which the application has been prepared. Check whether this is an Original Application form or an Amended form. Include date of amendment if applicable. DCA will write in the project number if funded. This number should be included on any amended forms.

- Describe in detail each activity, identifying each activity by name and activity number, to be undertaken with CDBG funds. This description should be specific and provide sufficient detail concerning the nature, scope, location and purpose of activities and how they are designed in accordance with applicable law, regulation and how they relate to each other.

- Housing activities should include descriptions (narrative and photographic) for each unit proposed, including estimates of activity cost (by housing unit) as well as the basis for determining cost. Descriptions of units should illustrate problems in each unit in sufficient detail to justify projected costs.

  Note: When preparing cost estimates keep in mind that the work under the program, if it is funded, may occur as far as 30 months after submission of the grant application. All housing activities are subject to the "20% Rule" that requires PRIOR DCA approval to exceed the application cost estimate by more than 20% (including change orders).

- Applicants proposing housing rehabilitation or reconstruction must complete a Financial Plan (See Appendix H) that summarizes proposed activities. The Plan must be attached to DCA-5

  Note: *Rehabilitation* of units built prior to 1978 is required to conform to HUD Regulations 24 CFR Part 35 (Lead Based Paint Poisoning Prevention). The application should demonstrate an understanding of the requirements of this rule (and budget for required activities accordingly).

- Applicants are instructed to list administration as the last activity. Architectural design or engineering, and related activities should be considered as a component of each activity and not as a part of the program's administrative costs. Please refer to the description of eligible activities in Part I of this Manual and/or contact DCA staff for further guidance.

- DCA will consider activity line item (not administrative) budget requests for "extraordinary compliance or administrative measures" when the applicant can demonstrate that administrative allowances are insufficient to adequately compensate for costs such as archeological surveys, archival photographs or other unforeseen costs of complying with the requests of Tribes or Historic Preservation, environmental impact statements, etc., or other compliance or administrative measures necessary due to a high number of complex and complicated cases relative to property that must be acquired in order for the project to proceed. DCA will consider such requests as outlined above on a case-by-case basis and may deny or amend the request. DCA recommends that such requests be discussed with DCA prior to application submission.

- Applicants should be aware that DCA may request reviewing comments from State, Federal and other agencies involved financially or with any other interest in the proposed project. Any comment with significant adverse impact upon project feasibility or strategy may reduce the score. Applicants may choose, therefore, to solicit reviewing agency comments at the outset, and, as necessary, incorporate reviewing comments into application narratives, engineering reports, etc., prior to application submission.
- Applicants are further advised to discuss the impact proposed activities will have upon the needs identified in the Community Development Needs Assessment. Applicants are encouraged to address most, or all of the project needs identified, whether through proposed CDBG activities or other local efforts. All applicants should also describe how activities will interrelate with each other to address the identified project community development needs.

Applicants should also include a project implementation schedule with Form DCA-5.

The following example is included for guidance.

Activity	***Initiate***	***Completion date***
Award	N/A	October 2027
Clearance of all Grant Award conditions	November 2027	April 2028
Complete environmental, floodplain & historic assessment etc. and receive release of funds	November 2027	April 2028
Design water system	November 2027	July 2028
Acquisition titles & plats for easements	January 2027	October 2027
Design approvals	July 202	September 2027
Bidding	November 2028	December 2028
Award and Construction	January 2029	June 2029
Housing rehabilitation policy	November 2027	January 2028
Applications and rehabilitation	February 2027	June 2028
Initiate & complete close-out	July 2029	October 2029

Conformance with the **Georgia Planning Act**: One of the review factors considered as a project strategy question is the conformance of the proposal with the locally adopted Comprehensive Plan, as approved by DCA. In order to demonstrate conformance, applicants should discuss on Form DCA-5 how the proposal conforms to the Plan, including citations or quotes from pertinent

pages of the Plan.

In addition, state law requires that all projects funded demonstrate that the project is not inconsistent with the community's adopted **Service Delivery Strategy (O.C.G.A. §36-70-20)**. The appropriate citation of the Strategy along with any attachments and service area maps should be included in the application, along with a signed Certification that the project is not inconsistent with the Strategy.

Lastly, DCA-5 should address and detail the applicants' understanding of all relative Federal Requirements.

Form DCA-6: Low/Moderate Income Benefit and Civil Rights Data Calculation

Under the CDBG program, applications are required to have at least a 70% benefit to low- and moderate-income persons (51% for economic development and 100% for direct housing activities) for each activity (administrative budgets are excluded). Income limits are included in this manual as Appendix B. The applicant is also advised to refer to Part I of this Manual for the definition of "low- and moderate-income". In addition, data must be provided to demonstrate compliance with applicable civil rights statutes. Appendix C, *Guide to Acceptable Survey Methodology*, includes a sample of an income survey form applicants may consider using.

Each step of the calculation is described below. Applicants must use Form DCA-6 for display of the information.

- In column 1 list each CDBG funded activity number. Do not include administration. If the same activity will be implemented in different areas of the community, provide a separate line for each component (i.e., Area 1 and Area 2). See Note on Activity Numbering System preceding the forms, and the numbering scheme on DCA-7.
- In column 2 show the total number of persons that the activity will serve.
- In column 3 provide the total number of minorities who will be served by the activity. "Minority" is defined as any non-white (including Hispanic) person.
- In column 4 provide the total number of non-minority persons who will be served by the activity. A "non-minority" is defined as a white person. The sum of columns 3 and 4 should equal column 2.
- In column 5 show the number of low- and moderate-income persons that the activity will serve.
- In column 6, divide column 5 by column 2 to show the percent of low- and moderate-income persons that the activity will serve.
- In column 7 show the amount of CDBG funds requested for the activity.
- In column 8 multiply column 7 by column 6 to show the amount of the funds for the activity that will be used to benefit low- and moderate-income persons.
- At the bottom of column 7 show the total amount of funds requested by adding up the amounts for each activity.
- At the bottom of column 8 show the total amount of funds that will benefit low- and moderate-income persons by adding up the amount of funds to benefit low- and moderate-

income persons for each activity.

- In box 9 determine the overall benefit to low- and moderate-income persons by dividing the total of column 8 by the total of column 7 and enter the percent in the "Total Benefit".
- Describe the methodology used to determine the number of minorities/ non-minorities and the number of low and moderate-income persons to be served by each activity. Attach additional sheets if needed and include any survey form used to determine benefit.

Applications may be considered ineligible for competition without a complete, appropriate and acceptable description of the method used.

In the case of public buildings in which a service is provided, list the current total number of persons using the facility and the number who are low- and moderate-income. **Do not provide the number of visits to the facility**. If applicable, also list the projected number of persons to be served and the number of these who are low- and moderate-income.

Also, for public buildings, provide the source of the information and indicate how low- and moderate-income status is documented. Note that for certain "limited clientele" buildings, L/M income status is generally presumed to be 100%. This includes elderly persons, handicapped persons, abused children and certain other groups. Contact DCA for guidance if needed.

For certain other public buildings, including health centers, information on family size and income of center users **must** be available to document low- and moderate-income benefit.

When a survey is used to determine the number of persons benefiting and their income status, the following information at a minimum must also be provided in the methodology section of DCA-6:

- ✓ # of households in the target area (geographic area of benefit)
- ✓ # of households interviewed (vacant housing is not counted as households)
- ✓ # of persons living in the households interviewed (minority vs. non-minority)
- ✓ # of low- and moderate-income households interviewed
- ✓ # of persons living in the low- and moderate-income households interviewed
- ✓ # of households interviewed in which the income was above the low- and moderate-income levels
- ✓ # of persons living in the households in which the income was above the low- and moderate-income levels
- ✓ Description of how the sample (if any) was selected and how the total number of households in the target area was determined. To be a valid sample survey the sample must be a "random sample" chosen using an acceptable methodology. Please use DCA's *Acceptable Survey Methodology* publication (see Appendix C) for guidance in this area.
- ✓ Description of how the survey was completed, including who did the interviews, when they were completed (time and day) and other details.
- ✓ **The actual survey form used must be provided.**

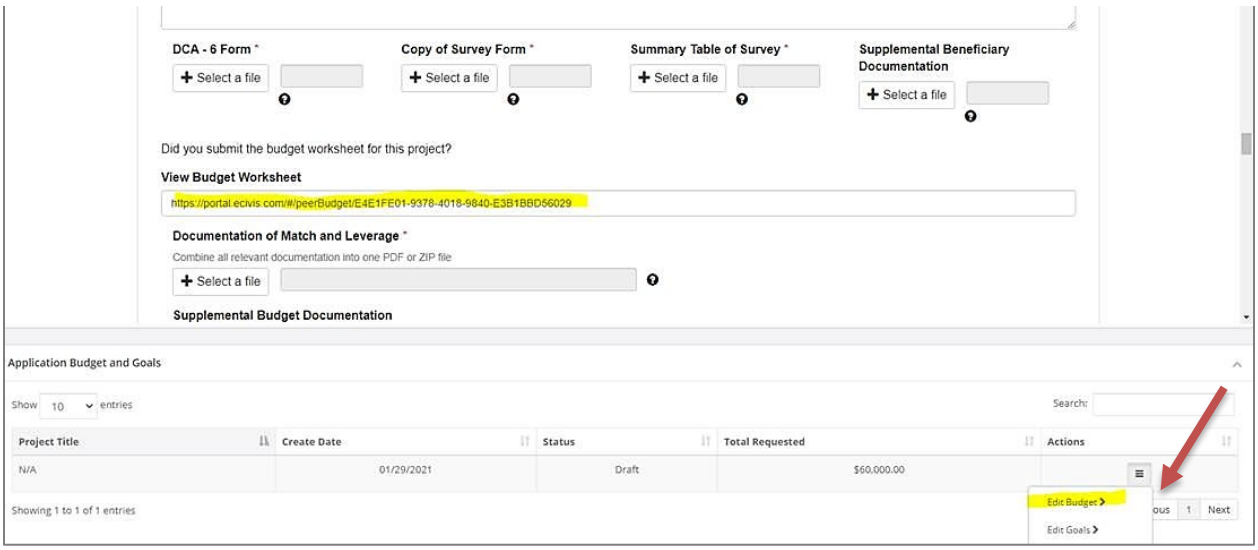
Include the table of results from the survey. The table should include the summary of the survey by street (see sample in Appendix E), whether vacant or occupied, if occupied, the number of people in the household, the low- to moderate-income status of the household, and the racial and ethnic status of the household. The table should summarize each category so that totals are easily reviewed by DCA.

Note that the total number of people benefiting on DCA-6 (total of column 2) may not reconcile to the total number of people benefiting on DCA-2. Some activities are combined on DCA-2 to form larger HUD-recognized categories that DCA must use in reporting beneficiaries to HUD.

Budget Worksheet – Application Portal

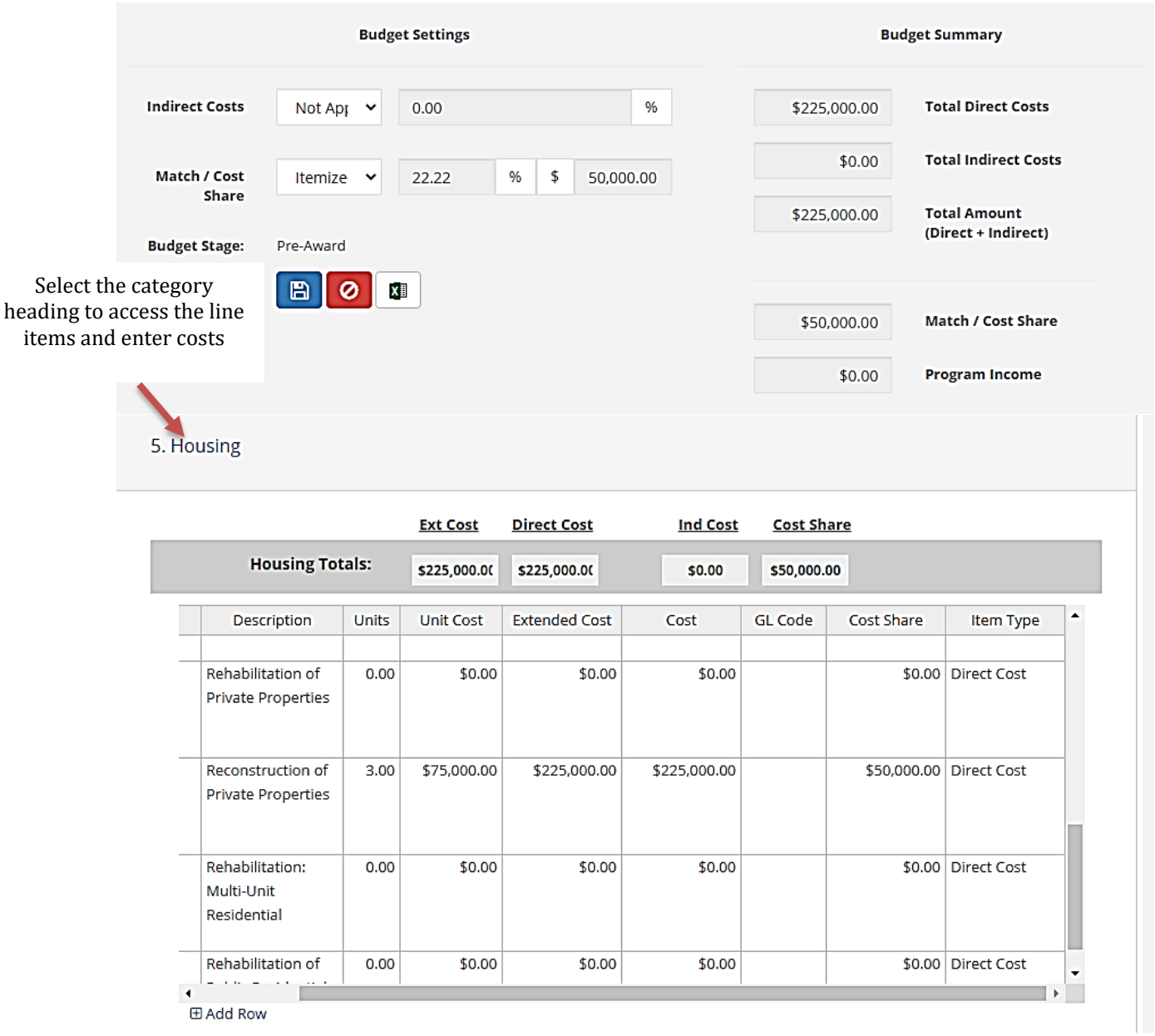
The budget worksheet should include an assessment of CDBG funds budgeted for the project and be consistent with activity and cost summaries outlined on forms DCA-5 (activities summary). Instructions for accessing and completing the Budget Worksheet can be found in the eCivis User Guide, Unit 2 of the *Pre-award Grants Management for Applicants* Section. The user guide can be accessed at https://s3.amazonaws.com/files.ecivis.com/training/eCivis+Grants+Network+Master+User+Guide+2020.pdf.

To edit the budget, please select "Edit Budget" from the "actions" menu below the application entry section of the portal. The "View Budget Worksheet" link in the application entry section is for viewing the budget only.



- ✓ There are 3 basic sections to the budget worksheet: budget settings and summary, line items, and narrative.
- ✓ Amounts allocated for each type of activity being undertaken (admin, engineering/architect, housing, public facility, other) in the line items section will be populated in the summary section.
- ✓ Housing applications including rehabilitation activities for units constructed prior to 1978 should budget an additional 25% of the total estimated rehabilitation cost to fund compliance with lead-based paint regulations.

- ✓ Please refer to the Eligible Activities section in Part I, Appendix A, and Appendix G, for assistance in determining the eligibility of specific activities.
- ✓ The match/leverage input field is located in the budget line items as "cost share". Numerical values placed into the line-item fields will be reflected in the Budget Settings and Summary section, as shown in the figures below:



- Note that a **cash match** contribution is required of all projects except for CDBG single-activity housing applications as follows: a) 0% for amounts up to $500,000 in CDBG funds; b) 5% for amounts from $500,001 to $750,000 in CDBG funds; c) 10% of amounts from $750,001 to $1,000,000 in CDBG funds; d) 15% of amounts greater than $1,000,001.

- For example, the minimum required cash match to receive a $750,000 grant would therefore be $22,500, and to receive a $1,000,000 grant would be $47,500. Although the match must be a cash match and cannot consist of in-kind services, its source can be local public funds, other state or federal funds, or private investments or contributions. Whatever the source, it must be evidenced by a firm written commitment to be counted as match (either a resolution or letter).

- Finally, please note that DCA will assign "leveraging" points for other funds and resources, over and above the required minimum cash match. All leverage claims must be listed on this form. Leverage will also include documented fees/in-kind donations for planning and preliminary engineering services specific to the CDBG project paid, invoiced, or otherwise documented prior to application submission. A separate letter must be included documenting any funds/services to be included as leverage. Please see the section on *Leverage of Additional Resources* in this manual for more complete instructions on what may be counted as leverage.

- *In accordance with applicable regulations, preliminary costs such as engineering estimates or fees for preparation of applications spent prior to a formal award are ineligible costs and may not be reimbursed or recovered if a grant award is made. However, the portion of these costs directly attributable to the submitted project may be counted as match or leverage. DCA will count up to $5,000 each toward the cost of grant writing services or the cost of preliminary engineering/architectural reports provided that adequate documentation is included in the application.*

✓ General Administration - Enter the eligible CDBG costs of general administration. **Do not include** Project Delivery Costs with administrative costs. These costs are to be included with line-item costs for activities that are eligible for PDC's.

Note that contingencies may no longer be listed as a separate line item. Contingencies may be included as part of other construction line-item budgets and should be described and listed on preliminary cost estimates such as PERs and housing cost estimates.

✓ A separate line item has been placed at the bottom of this section for program income. Enter the amount of program income expected to be received (if any) and applied to program activity costs. This would include any income received from previous CDBG projects that is not reserved, by DCA approved local policy, for economic development activities.

✓ The purpose of the narrative section is to allow applicants to describe, in detail, the resources available, or to be made available, for each activity. Applicants are encouraged to provide sufficient quantifiable data and to describe supporting efforts for the proposed program.

Form DCA-8: Budget Analysis

♦ General Information:
The purpose of this form is to allow applicants to describe, in detail, the resources available, or to be made available, for each activity. Applicants are encouraged to provide sufficient quantifiable data and to describe supporting efforts for the proposed program.

Form DCA-8 should be backed-up by credible estimates of program cost prepared by individuals and agencies qualified to provide them.

- Line-Item Instructions:
  - ✓ In column 1, list the activity name and number. See note on numbering system on page the last page of this document.
  - ✓ In column 2, briefly itemize CDBG funds allocated for each activity, consistent with Section A of the Budget Summary (Form DCA-7, formerly required). These brief summaries can reference additional detail that may be included in architectural or engineering reports and attached to the application. The purpose of this form is to allow a review panel to compare unit costs. Be sure to provide units and costs (i.e., "construct 5,000 SF health center @ $75 SF -- total cost: $375,000).

    Total engineering and architectural costs must be itemized here and shown in columns 3 through 6.

    Housing applications including rehabilitation activities for units constructed prior to 1978 should budget an additional 25% of the total estimated rehabilitation cost to fund compliance with lead-based paint regulations.

    Sufficient detail should be provided in this column to support proposed engineering and inspection fees. Such data should include detail on proposed services, as well as estimated fees for design services, conferences, travel, resident and periodic inspections, tests, surveys, printing and reproduction, additional services, etc. Please refer to Part II of this manual that addresses Limitations on Administrative and Professional Fees.

    Preliminary (pre-award) fees are not reimbursable. CDBG funds may not be allowed for total proposed engineering fees if sufficient justification is not provided. Documented pre-award fees paid for planning and legitimate preliminary engineering services (in depth and well-documented studies, etc.) specific to the CDBG project may be shown as leverage in column 5. Fees paid and donated services for the preparation of an application may also be eligible as leverage.

  - ✓ In column 3 reference the CDBG cost, if any, for each item shown in column 2. If the item in column 2 will not be paid for with CDBG funds, indicate by placing a -0- in column 3.
  - ✓ In column 4 reference the [Reserved] cost, if any, for each item shown in column 2. If the item in column 2 will not be paid for with [Reserved] funds, indicate by placing a -0- in column 4.
  - ✓ In column 5a show the amount of "other funds", match and leverage (not CDBG) that will be used to pay for itemized costs. The source of these funds should be identified on column 5b
  - ✓ In column 6, enter the total amount of funds available to carry out the proposed activity. On each page of DCA-8 use block 7a to subtotal columns 4, 5 and 6. On the final page, use block 7b to total all pages.
  - ✓ For an explanation of leverage contributions or other actions in support of the project, please use block 8 (the space at the bottom of Form DCA-8). Be specific. Attach clear commitments from the appropriate agencies. IN ORDER TO BE CONSIDERED FOR CREDIT FOR LEVERAGE CONTRIBUTIONS, A VALUE MUST BE PLACED ON THESE CONTRIBUTIONS IN COLUMN 5. The following is an example of how Form DCA-8 may be completed

- ✓ For competitive reasons, applicants are encouraged to obtain credible estimates for all costs. Examples of "other funds" could be: a) local government, b) federal agency, c) private sector, d) program income or e) state agency

The following is an example of how Form DCA-8 may be completed:

1 *Name/Number*	*2* *Itemized Unit Cost*	*3* *CDBG Funds*	*4* *[Reserved] Funds*	*5* *Other Funds*	*6* *Total*
A-03j-01 Waterlines	Construction	$300,000 (see Eng. Report)		$10,000 (Local Cash)	$310,000
	Engineering and inspection, etc. (See Eng. Report)	$30,000		-0-	$30,000
	Administration & Audit	$13,000		-0-	$13,000
	Resurfacing at culvert locations by DOT (see DOT letter)	-0-		$10,000 GA DOT	$10,000
	ROW Restoration, etc.			$10,000 Any Town	$10,000
7.	**Totals**	**$343,000**	**-0-**	**$30,000**	**$373,000**
8.	**Narrative for Match and Leverage Funds:** The City of Any Town will use its crews to perform fine grading and grassing, right of way restoration, clean-up, etc. This cost is estimated at $10,000. Please see attached letter. Also see attached letter committing local cash and the **8.**attached letter from GA DOT.				

Form DCA-9: Environmental Review Checklist

Note: *This form is self-explanatory*.

Form DCA-10: Certified Assurances

Note: *This form is self-explanatory. Be sure to attach a description of any possible conflict of interest situation and a copy of the resolution authorizing submittal of the application.*

ENSURE CHIEF ELECTED OFFICIALS THOROUGHLY REVIEW THIS DOCUMENT PRIOR TO SIGNING.

Form DCA-11: Cooperating Agreement

Note: *This form is self-explanatory.*

Form DCA-12: Maps

Applicants must submit map(s) that are clearly legible and will enable DCA staff to find the proposed activity site(s) without local assistance during a site visit.

All map(s) must include a scale, north arrow and legend. More than one scale of map may be used to show detail, but all scale(s) must be indicated on the respective maps. A larger community-wide map should indicate the boundary of the area represented by more detailed maps. More than one type of requested information can be included on a map if it is clearly legible. A legend must be included to indicate what different colors or patterns represent. **In addition, applicants should provide complete source information for all data provided on their submitted maps.**

Maps must, at a minimum, include the following information:

- Project activity location(s). For **housing and multi-activity** projects this includes all existing conditions described on the Community Development Needs Assessment and the proposed improvements identified on Form DCA-5 (i.e., house-by-house analysis of renter / owner, occupied / vacant, standard / substandard / dilapidated, acquisition / relocation / demolition, stick-built or modular / manufactured homes, lot lines, etc.). **All project activity maps should include existing land use information, i.e., lot lines, housing, commercial, and industrial units, and if possible, whether units are owner or renter occupied. Maps must include identifiers for ALL major structures (sheds, or similar appurtenances may be excluded) in the Target Area(s) with a map key identifying occupancy, condition, type of construction, and activity proposed for the unit (where applicable).**
- **All project activity maps should include existing land use information, i.e., lot lines, housing, commercial, and industrial units. Maps must include identifiers for ALL major structures (sheds, or similar appurtenances may be excluded) in the Target Area(s) with a map key identifying occupancy and low-mod income status.**
- For public facility activities show the locations of facilities proposed, together with the location(s) of facilities to be replaced. For centers, show existing and proposed locations;
- Project activity service area(s);
- For the applicant's jurisdiction, the location of areas of concentration of low- and moderate-income persons, using DCA's online mapping tool at https://georgia-dca.maps.arcgis.com/home/index.html.
- For the applicant's jurisdiction, the location of areas of concentrations of minorities, using DCA's online mapping tool at https://georgia-dca.maps.arcgis.com/home/index.html; and
- For the applicant's jurisdiction, the location of areas of concentration of housing

deficiencies, using DCA's online mapping tool at https://georgia-dca.maps.arcgis.com/home/index.html.

- ***A MAP OF THE PROJECT AREA, OR FACILITY, IN RELATION TO THE APPROVED SERVICE AREA FOR THAT ACTIVITY MUST BE INCLUDED WITH THE APPLICATION.***

Note: In cases when low- and moderate-income persons, substandard housing units and/or minority people are dispersed throughout the community, indicate this on the map's legend; and 1) display the location of the proposed activity(s) and its service area; 2) indicate the numbers and percent of L/M income families, minorities and substandard housing located within the jurisdiction making application; and 3) provide the same data for the CDBG service area(s).

Any required information excluded from required maps may lead to a reduction in the strategy score.

In order for review panels to assess feasibility, strategy and compliance with floodplain and wetland requirements, applicants are encouraged to submit with their applications USGS topographic maps from the 7.5 minute, 1:24,000-scale quadrangle series.

Form DCA-13: CDBG Disclosure Report

All applicants must complete and submit Parts I and II of the Disclosure Report. At the completion of Part II of the report, some applicants will find that they must complete Parts III, IV, V and VI of the Report.

Part I requires the applicant's name, address, phone number; indication as to whether this is an initial report or an update; the amount of CDBG funds being requested; the amount of any CDBG program income that will be used with the CDBG grant; and the total amount of CDBG assistance.

Part II asks two questions. If the answer to both questions is "no," the applicant must provide the certification at the end of Part II but is not required to complete the remainder of the report. If the answer to either question is "yes" then the applicant must complete the remainder of the Report.

Part III requires information on any other Federal, State and/or local assistance that is to be used in conjunction with the CDBG project.

Part IV requires the identification of interested parties. Interested parties are persons and entities with a reportable financial interest in the project. If an entity (such as a corporation, partnership, etc.) is being disclosed, the disclosure in Part IV must include an identification of each officer, director, principal stockholder or other official of the entity. Please indicate if the person or entity is a "sole proprietorship." <u>All consultants, developers or contractors involved in the application for CDBG assistance, or in the planning, development or implementation of the project, must be identified as an interested party.</u> Also, any other person or entity that has a pecuniary interest in the project that exceeds $50,000 or 10 percent of the CDBG assistance, whichever is lower, must be listed as an interested party. Pecuniary interest means any financial involvement in the project, including (but not limited to) situations in which a person or entity has an equity interest in the project, shares in any profit on resale or any distribution of surplus cash or other assets of the

project or receives compensation for any goods or services provided in connection with the project. (The following are not considered interested parties: local CDBG administrative staff, recipients of housing assistance, and rehabilitation contractors as long as the rehabilitation agreement is between the property owner and the contractor.)

Part V requires applicants to identify the sources and uses of all funds to be used in conjunction with the CDBG funded project. The sources and uses must include all the other assistance identified in Part III as well as the CDBG funds identified in Part I, items 3a, and 3b).

Part VI requires the certification of the Chief Elected Official.

Form: Civil Rights Compliance Certification

All applicants must complete the form and submit a signed certification with the application.

Form: Evidence of Compliance with System for Award Management

All applicants must ensure they have a current SAM account and must submit documentation of the account with the application. See sample provided.

Form: Acknowledgement of Subrecipient Language Access Plan Requirement

All applications must submit the required Acknowledgement with the application.

Form: Language Access Plan Threshold Certification

All applicants must complete the form and submit a signed certification with the application.

PART V: APPLICATION FORMS

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Form	Title	Page
N/A	Note on Activity Numbering System	101
N/A	Application Summary	N/A
N/A	Summary of Proposed Accomplishments	N/A
DCA – 4	Description of Need	DCA-4
DCA-5	Description of Activities	DCA-5
DCA-6	Low- and Moderate-Income Benefit and Civil Rights Data Calculation	DCA-6
Budget Worksheet	Budget Summary	N/A
DCA-8	Budget Analysis	DCA-8
DCA-9	Environmental Review Information	DCA-9
DCA-9A	SHPO Environmental Review Form	DCA-9A
DCA-10	Certified Assurances	DCA-10
DCA-11	Cooperating Agreement	DCA-11
DCA-12	Map(s)	DCA-12
		DCA-13
DCA-13	CDBG Disclosure Report	
N/A	Civil Rights Compliance Certification	
N/A	Evidence of Compliance with System for Award Management (SAM)	
N/A	Acknowledgement of Subrecipient Language Access Plan Requirement	
N/A	Language Access Plan Threshold Certification	

Note on Activity Numbering System

The activity number is used in this application on the Description of Activities (DCA-5), Low- and Moderate-Income Benefit and Civil Rights Data Calculation (DCA-6), and the Budget Worksheet. In all instances, the activity should be referred to both by the activity number and activity name, as it appears on the Budget Worksheet.

The activity number system has two components:

- The prefixes indicate the purpose of the activity as follows:
  - A = Administration
  - E = Economic Development
  - H = Housing
  - P = Public Facility
  - T = Engineering
  - S = Architecture

- The second component is the budget code, which can be found on page 102. Every code is comprised of three (3) alpha or numeric characters followed by a hyphen and then two (2) additional numeric characters. This code indicates the type of activity.

For example:

- P-001-00 = Acquisition of Property for a Public Facility
- H-001-00 = Acquisition of Property for Housing
- A-21A-00 = Grant Administration

Line #	Budget Code	Activity Description
01	001-00	Acquisition of Property (all acquisitions)
02	002-00	Disposition of Property
03	003-00	Public Facilities and Improvements (other)
04	003-01	Domestic Violence Shelter
05	003-02	Group Home
06	003-03	Learning Center
07	03A-00	Senior Centers
08	03B-00	Centers for the Disabled/Handicapped
09	03C-00	Homeless Facilities (not operating costs)
10	03D-01	Boys and Girls Club or other At Risk Facility
11	03D-02	Youth Shelter
12	03E-00	Neighborhood Facilities
13	03G-00	Parking Facilities
14	03M-01	Child Care Center
15	03M-02	Head Start Center
16	03P-01	Health Center - Mental
17	03P-02	Health Center - Physical
18	03P-03	Health Center - Mental and Physical
19	03Q-00	Abused and Neglected Children's Facilities
20	03F-00	Parks, Playgrounds and other Rec. Facilities
21	03J-03	Fire Protection Facilities and Equipment
22	003-04	Public Utilities, other than Water & Sewer Fac.
23	03K-01	Street Improvements
24	03J-01	Water Facilities
25	03J-02	Sewer Facilities
26	03L-00	Pedestrian Walkways
27	03K-02	Flood and Drainage Facilities
28	03S-00	Facilities for AIDS Patients (not operating)
29	004-00	Clearance
30	005-01	Public Services (General)
31	05H-00	Employment Training
32	006-00	Interim Assistance
33	008-00	Relocation Payments and Assistance

Line #	Budget Code	Activity Description
34	009-00	Payments for Loss of Rental Income
35	14C-00	Rehabilitation of Public Residential Structures
36	14A-01	Rehabilitation of Private Properties
37	015-00	Code Enforcement
38	14A-02	Reconstruction of Private Properties
39	003-05	Site Development
40	012-00	Housing – Construction
41	005-02	Homebuyer Education
42	013-00	Down payment/Closing Cost Assistance
43	17C-00	ED - Acquisition
44	17B-00	ED - Public Facilities and Improvements
45	14E-00	ED - Commercial and Industrial facilities
46	18A-00	ED - Assistance to Private For-profit Entities
47	X00-00	Other - General (Attach Description)
49	020-00	Planning
50	21A-00	Administration (General)