

STATE OF WISCONSIN
Department of Administration



**COMMUNITY DEVELOPMENT BLOCK GRANT –
PLANNING
(CDBG-PLNG)**

GRANT APPLICATION INSTRUCTIONS

REVISED 01/02/2019



CDBG-PLNG PROGRAM CONTACT INFORMATION

Mailing Address: Wisconsin Department of Administration
Division of Energy, Housing and Community Resources
Bureau of Community Development
ATTN: CDBG-PLNG Applications
101 E. Wilson St., 6th Floor
P.O. Box 7970
Madison, WI 53707-7970

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PLEASE NOTE:

CDBG-Planning Grant Application materials can be downloaded from the Bureau of Community Development section on the Division of Energy, Housing and Community Resources website at: <https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGPlanningProgram.aspx>. Please **download the electronic document(s) prior to application submission** to ensure that you are referencing the most up-to-date version of the application as periodic revisions may have been made since this copy was printed.

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CDBG – Planning (PLNG) Grant Program Overview

Background:

The Community Development Block Grant (CDBG) program is a federal formula-allocated grant program under the U.S. Department of Housing and Urban Development (HUD). The program was created when Congress passed the Housing and Community Development Act, Title 1 in 1974 and is governed by rules set forth in the Code of Federal Regulations (24 CFR Part 570).

The Wisconsin Department of Administration (DOA) – Division of Energy, Housing and Community Resources (DEHCR) administers the State Community Development Block Grant Program that provides funding to units of general local government (UGLGs) that do not receive an annual allocation from HUD.

The primary purpose of the CDBG program is the development of viable communities through the provision of decent affordable housing, a suitable living environment, and the expansion of economic opportunities, principally for the benefit of persons of low- and-moderate income (LMI).

CDBG-Planning:

The purpose of the CDBG-Planning (CDBG-PLNG) grant program is to assist UGLGs in writing plans that address major local economic or community development proposals or unexpected economic activities that adversely impact the community. Not less than 90% of the funds awarded shall meet the National Objective of benefitting low- and moderate-income (LMI) persons.

Planning grants will be awarded at up to a 2:1 ratio (i.e., maximum \$2 CDBG for every \$1 Grant Match) in amounts up to \$50,000 for community-wide or neighborhood-, district- or site-specific planning and strategic development.

Community-Wide Plans: Planning grants are available for community-wide planning and strategic development activities that:

- emphasize collaboration among community stakeholders;
- address economic conditions such as assisting small business and responding to plant closings;
- identify strategies to increase access to affordable housing;
- improve community vitality by addressing slum and physical blight; or
- address other issues that will improve the well-being of LMI individuals.

Site-Specific Plans: Planning grants can also be used to undertake the above listed planning and strategic development activities for a specific neighborhood or district within a community or to help plan for the use or reuse of a specific site, for example, the adaptive reuse of a former hospital or school building, or potential use of a parcel of land.

UGLGs that have received a CDBG-PLNG award in the previous 18 months are not eligible for consideration at this time. In addition, CDBG-PLNG applications may not be considered if there are outstanding or unresolved instances of non-compliance associated with prior CDBG awards not limited to PLNG grants, including non-compliance related to administrative, financial management, underwriting, recordkeeping, reporting, auditing, completion, payment, reimbursement or other requirements except in cases where the award is provided to meet an "Urgent Local Need" National Objective.

CDBG-PLNG Grant Application Instructions

Application Submission:

Applications for CDBG-PLNG grant funding will be accepted on a continuous basis. The completed and signed original application (including all required application attachments) must be sent to:

Wisconsin Division of Administration
Division of Energy, Housing and Community Resources
Bureau of Community Development
ATTN: CDBG-PLNG Applications
101 E. Wilson Street, 6th Floor
P.O. Box 7970
Madison, WI 53707-7970

PLEASE NOTE:

- Applications submitted by fax or email will **not** be accepted.
- One (1) paper copy of the complete CDBG application must be submitted. *Part 2 Applicant Information* of the application must have the Chief Elected Official's (CEO's) ***original*** signature and *Part 3 Initial Eligibility* of the application must have the CEO's ***original*** written initials.
- All application materials and attachments (including maps) must be printed on standard 8.5" x 11" paper.
- Applications must be unbound. No staples, paper clips or spiral binding. Use rubber bands or binder clips to hold the application and its attachments together.
- Include an index for all attachments in the order specified in the application so that a reviewer can easily reference the relevant documents (refer to pages 10-18 of the *CDBG-PLNG Application*).
- It is the responsibility of the applicant to ensure that the CDBG application packet is complete for submission. Applications that are incomplete, missing the required attachments, or missing the original CEO signature in *Part 2* and original CEO written initials in *Part 3* of the CDBG application will **not** be reviewed.

Application Training:

Both community representatives and consultants are **strongly** encouraged to participate in one of the annual application training sessions presented by DEHCR staff. Training dates and information are posted on the Bureau of Community Development website.

Application Review & Funding:

The application review process is designed to ensure that CDBG funds are awarded to UGLGs for projects that:

- Meet all program eligibility requirements;
- Have a substantial impact on the community; and
- Demonstrate significant community need.

PLEASE NOTE: Projects that meet the National Objective of Benefitting Low- and Moderate-Income Persons will be given priority in the selection process.

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Funding decisions will be based on the applicant's demonstration of how the proposed project meets **ALL** of the following eligibility requirements:

1. The proposed project is an eligible CDBG activity.
2. The proposed project meets a CDBG National Objective.
3. The fiscal capacity of the UGLG to meet the match requirements, including providing match funding that is within the 2:1 ratio allowed (maximum \$2 CDBG for every \$1 of Grantee Match) toward the total project costs.
4. The UGLG meets the citizen participation requirements including the adoption of a Citizen Participation Plan (CPP) and has held a public hearing (providing adequate advance notice to the community of upcoming meetings in accordance with the advance notice specifications in the UGLG's CCP [in effect on the date of the first notice] **and no less than the equivalent of a Class 2 Notice** prior to the meeting) prior to the submission of a CDBG application.
5. The UGLG has identified a specific project that needs further planning.
6. The specific project will serve a public purpose.
7. The specific planning cost estimates are reasonable (cost estimates must be reflected in the Proposed Project Budget section of the application).
8. The planning for the specific project has the support of local community or economic development organizations or business groups.
9. The UGLG has the capacity and capability to conduct the planning or commits to the retention of professional planning services.
10. The planning will likely result in the implementation of the specific project being planned.

Applicants that meet the minimum program eligibility requirements and have no outstanding or unresolved issues of non-compliance with prior CDBG awards will be considered for funding.

Award Notification:

Once the final funding decision has been made, an award letter will be sent to the UGLG, or if no award was granted, the UGLG will be contacted and notified with a written decision.

Appeals Process for CDBG Grant Applicants Not Funded:

Applicants for CDBG-PLNG program assistance have the right to appeal if the application is denied. A formal Appeals Process is available for UGLGs who feel that a non-funding decision has been made in error. The Appeals Process provides an opportunity for an UGLG to have its application reviewed a second time to ensure no errors were made during the review process.

To be considered for an appeal:

- The appeal must include the application name and a short summary of the reason why the UGLG is appealing the decision.
- The appeal must be filed with the Bureau Director within thirty (30) days of the date the applicant received written notice of the decision.
- The Bureau Director will review the application and will make a decision whether to reverse the denial.

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- If the Bureau Director denies the appeal, the applicant may file an additional appeal with the Secretary's office within thirty (30) days from the date of the Bureau Director's denial letter.
- The Secretary's office will review the application and will make a final determination.

Implementation Training:

The State of Wisconsin is responsible for ensuring that the CDBG-PLNG program is implemented in compliance with State and Federal regulations and in accordance with program guidelines. UGLGs awarded CDBG funds will be required to participate in the first CDBG grantee implementation training presented after the award has been granted. Information regarding the next available implementation training session can be found at:

<https://doa.wi.gov/Pages/LocalGovtsGrants/TrainingAndTechnicalAssistance.aspx> or by contacting your Project Representative.

Federal Grant Requirements:

Federal reporting and compliance requirements apply to CDBG-PLNG projects, including Procurement and Contracting, Acquisition, Anti-Displacement and Relocation Assistance provisions, Environmental and Equal Opportunity regulations.

In addition, in accordance with 2 CFR Part 200, non-federal entities that expend \$750,000 or more in federal funding in any one calendar year must undergo an independent Single Audit.

Additional Application, Award, and Grant Information:

Check the DEHCR website for additional information on the CDBG requirements, grant timelines, training sessions, and other updates:

<https://doa.wi.gov/Pages/LocalGovtsGrants/CommunityDevelopmentPrograms.aspx>.

Guidance for Completing the CDBG-PLNG Grant Application

PART 1: GRANT REQUEST

Grant Request (CDBG funds), Applicant Match and Total Project Cost:

Under the CDBG-PLNG program applicants may request CDBG funds at a 2:1 ratio allowed (i.e., maximum \$2 CDBG for every \$1 Grantee Match) toward the total project cost, up to \$50,000. For example, the City of Yourville is applying for a planning grant to study the reuse of the vacant former high school. The total project cost is \$60,000. The City is requesting \$40,000 in CDBG-PLNG funds. The remaining \$20,000 will come from \$10,000 in City funds and a \$10,000 grant from the Smith Foundation.

Amounts requested must be consistent with the financial data provided in *Part 6 Budget and Matching Funds* of the Application.

CDBG-PLNG Applicants must demonstrate a minimum match investment amount that meets the 2:1 ratio allowed (maximum \$2 CDBG for every \$1 of Grantee Match) toward the total grant award. Private or public funding may be used for the required match. To be eligible for funding through the CDBG-PLNG program:

- A. The proposed project must be consistent with the State's current CDBG program goals, included in the Annual Action Plan:
- ensuring the affordability of basic services that enhance community vitality;
 - promoting improved housing and economic opportunities for low- and moderate-income households;
 - supporting revitalization of established neighborhoods, downtown business districts and blighted sites;
 - assisting with capital improvement projects that support previous planning efforts and are part of broader community development strategies;
 - improving accessibility to public facilities;
 - encouraging the use of energy efficient design, retrofitting, and equipment, as well as projects that benefit bicyclists and pedestrians; and
 - responding to natural and man-made disasters or catastrophic events.

Wisconsin's Annual Action Plan is available at:

<https://doa.wi.gov/Pages/LocalGovtsGrants/ConsolidatedPlan.aspx>.

- B. CDBG funds must be used for one or more CDBG-PLNG eligible activities. CDBG-PLNG grant funds can be used for the preparation of plans, studies, analyses, data gathering, and identification of actions that will implement plans. The types of plans that may be paid for with CDBG funds include, but are not limited to, the projects and costs shown in the following table.

A full list of planning activities eligible under Section 105(a)(12) of the Housing and Community Development Act of 1974 and 24 CFR 570.205 can be found at:

https://www.hud.gov/sites/documents/DOC_17133.PDF and

https://www.ecfr.gov/cgi-bin/text-idx?rgn=div5;node=24:3.1.1.3.4#se24.3.570_1205.

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Examples of Eligible CDBG-PLNG Projects and Costs:	Examples of Ineligible CDBG-PLNG Projects and Costs:
Comprehensive plans	Engineering, architectural, and design costs related to a specific activity
Individual project plans	Direct development of a CDBG application
Community development plans	Other costs of implementing plans
Capital improvement plans	Operating costs for an organization
Small area and neighborhood plans	Construction or any other non-professional services
Local analyses of impediments to fair housing	Any otherwise eligible planning project costs incurred prior to the date of grant award by DEHCR
Downtown Revitalization Plans	
Functional plans (such as plans for housing, land use, energy conservation, or economic development)	
Environmental and historic preservation studies	

Project Title

This is a brief statement to provide the nature of the project.

- Example 1: Yourville Senior Center Relocation/Expansion Plan
- Example 2: Former Smith Brothers Brewery Site Redevelopment Plan

Brief Project Description:

This description should identify the eligible activity(s) and how the overall proposed project is consistent with one of more of the CDBG Program goals.

- Example 1: Develop plan to relocate and expand local senior center, with services exclusively directed toward individuals who are age 62 or older [National Objective #1 LMI – Limited Clientele].
- Example 2: Develop plan to identify redevelopment options for the recently closed Smith Brothers Brewery [National Objective #2 Slum and Blight Prevention/Elimination].

Project Begin and Completion Dates:

To ensure CDBG program goals and objectives are met, projects awarded funding under the CDBG-PLNG program must be feasible. To be considered feasible, proposed projects' activities should begin within 6 months of the award date, and the project should be completed within 24 months of the award date.

PART 2: APPLICANT INFORMATION

Applicant:

Enter the UGLG's full name (e.g., Village of Yourville), check the appropriate box for government type, and enter the Senate and Assembly district numbers. Provide the joint applicant information, if applicable.

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For the population, enter the number of residents according to the 2013-2017 U.S. Census American Community Survey (ACS) 5-Year Estimates data for the municipality, unless the proposed project is qualifying based on a community-wide income survey of **all** residents living within the boundaries of the municipality or the HUD LMI Summary Data for the UGLG. If the project is qualifying based on a community-wide income survey of **all** residents, then enter the total population for the municipality as recorded on the *Income Survey Results Income Tabulation* form. If the project is qualifying based on HUD LMI Summary Data for the UGLG, then enter the total population for the municipality as recorded on the HUD LMI Summary Data record.

Enter the full names and titles of the Chief Elected Official (CEO) and municipal staff, contact information, Dun & Bradstreet Data Universal Numbering System (DUNS) number and federal employer identification number (FEIN) for the UGLG.

Provide the contract/invoice amount for CDBG application preparation services, if applicable, or enter "N/A" if the UGLG did not contract with any entity to assist with preparing the application.

The CEO must sign and date the application. The CEO's signature must be an **original** signature in *Part 2 Applicant Information* of the CDBG application.

Application Contact:

Enter the full name, title and contact information for the person designated by the UGLG to serve as the contact if DEHCR has any questions regarding the UGLG's application. This may be the person from a contracted third party preparing the application on behalf of the UGLG or another designated individual.

Current CDBG Assistance:

Enter the information requested for all current/open CDBG awards from all CDBG programs. The Award Date is the date of the initial award letter and the Performance Period End Date is the date recorded as the end of the grant period (e.g., completion report/closeout report submission due date) in the CDBG grant agreement. Contact DEHCR for guidance as needed.

UGLGs that have received a CDBG-PLNG award in the previous 18 months will not be eligible for consideration at this time.

In addition, CDBG-PLNG applications may not be considered if there are outstanding or unresolved instances of non-compliance associated with prior CDBG awards not limited to planning grants, including non-compliance related to administrative, financial management, underwriting, recordkeeping, reporting, auditing, completion, payment, reimbursement or other requirements except in cases where the award was provided to meet the "Urgent Local Need" National Objective.

DEHCR will also continue to evaluate projects' feasibility after awards are made. Successful applicants will be required to submit semi-annual project performance reports to DEHCR as part of the project grant agreement and will be monitored at least once during the agreement period by a Project Representative.

PART 3: INITIAL ELIGIBILITY

Items #1-15 in *Part 3 Initial Eligibility* of the CDBG application must be acknowledged as “Yes” for the application to be eligible for a CDBG award. The CEO’s initials must be **original** written initials in *Part 3* on the CDBG application.

UGLGs interested in submitting a CDBG-PLNG application must contact DEHCR to schedule a pre-application meeting or conference call at DOACDBG@wisconsin.gov. Applications submitted without a pre-application meeting or conference call will not be accepted.

Citizen Participation:

Federal regulations require that UGLGs provide citizens with advance notice of and opportunity to comment on proposed activities in an application to the State for CDBG assistance. Citizen participation is required in the planning and administration of CDBG projects. All CDBG applicants must prepare and implement a written Citizen Participation Plan (CPP) as specified in Section 104 (a)(3) of the Housing and Community Development Act of 1974 as amended. UGLGs must demonstrate compliance with federal citizen participation requirements at the time of application. UGLGs that do not comply with citizen participation requirements will be deemed ineligible for CDBG funding, and the application will **not** be considered for funding.

SPECIAL NOTE: The CPP must reflect current information and the minimum required components shown in the *Sample Citizen Participation Plan* template found in the provided attachments to the CDBG application.

A CDBG grant may be made only if the UGLG certifies that it has established and is following such a plan. The CPP must include, at a minimum, the elements listed below:

- A. Provision for and encouragement of citizen participation, with particular emphasis on participation by persons of low- and moderate-income (LMI) who are residents of target area neighborhoods in which the CDBG funds are proposed to be used. The UGLG must meet this requirement by doing **at least one** of the following:
 1. Establish a committee composed of persons representative of the community's demographics. This committee shall include at least one LMI person and one resident of the designated target area. This committee will assume the responsibility for coordinating all required elements of the CCP. All committee members must be residents of the community.
 2. Distribute timely notification of all required meetings to 100 percent of the designated target area or neighborhood. UGLGs not having a target area, must design a notification system which will reach a majority of the community's LMI population. All notifications of meetings and available assistance must be worded in such a way as to encourage LMI participation.
- B. Provision to citizens of reasonable and timely access to local meetings, information, and records relating to the UGLG's proposed and actual use of funds. To meet this requirement, the applicant must:
 1. Attempt to have at least one of the public hearings in the target area; **and**
 2. Give adequate advance notice to the community of upcoming meetings in accordance with the advance notice specifications in the UGLG's CCP (in effect on the date of the first notice) **and no less than the equivalent of a Class 2 Notice** prior to the meeting; **and**

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3. Specify in the CPP and execute the method(s) by which notices of public hearings must be given (all Citizen Participation public hearing notices for the CDBG program must be published in the local newspaper *unless* the UGLG does not have a local designated newspaper for posting public hearing and meeting notices, posting in lieu of publishing notices for public hearings and meetings is standard practice for the UGLG **and** the notice is posted in at least three locations within the community); **and**
 4. In all meeting announcements, include where, and during what hours, information and records relating to the proposed and actual use of funds may be found.
- C. Provision for technical assistance to groups representative of LMI households that request such assistance in developing proposals with the level and type of assistance to be determined by the UGLG. To meet this requirement, the applicant must include in the adopted CCP:
1. The type of assistance generally available; and
 2. The procedure used to request the assistance.
- D. Provision for public hearings to obtain citizen views and to respond to proposals and questions at all stages of the community development program, including at least:
1. The identification and development of housing, public facility and economic development needs;
 2. The review of proposed activities; and
 3. The review of program performance (for which hearings shall be held after adequate public notice, at times and locations convenient to potential or actual beneficiaries and with accommodation for individuals with disabilities).
- E. Provision of timely written answers to written complaints and grievances within 15-working days where practical. To meet this requirement, the applicant must:
1. Include complaint/grievance procedure steps in the CCP; and
 2. Develop a procedure to ensure compliance with the 15-working day response time.
- F. Identify how the needs of non-English speaking residents (including the hearing impaired) will be met in the case of public hearings where a significant number of non-English speaking residents reasonably can be expected to participate. To meet this requirement, the UGLG must:
1. Identify all non-English speaking populations in the community (regardless of American or Wisconsin citizenship) and make a determination of their special needs; and
 2. Include evidence in the CCP that the community has conducted a review of this matter consistent with the Housing and Community Development Act of 1974 as amended.

24 CFR 570.486 (5)

“There must be reasonable notice of the hearings and they must be held at times and locations convenient to potential or actual beneficiaries, with accommodations for the handicapped. Public hearings shall be conducted in a manner to meet the needs of non-English speaking residents where a significant number of non-English speaking residents can reasonably be expected to participate.”

NOTE REGARDING NON-VIOLENT CIVIL RIGHTS DEMONSTRATIONS:

An additional citizen participation related requirement regarding non-violent civil rights demonstrations applies to CDBG projects. To be eligible for CDBG funding, an UGLG must have a policy in place that prohibits the use of excessive force and enforces state and local laws prohibiting the barring of entrances and exits for non-violent civil rights demonstrations. UGLGs must submit a policy that complies with this requirement. The required language is shown in the *Sample Resolution to Adopt the Policy to Prohibit the Use of Excessive Force and the Barring of Entrances/Exits for Non-Violent Civil Rights Demonstrations* found in the provided attachments to the CDBG application.

Citizen Participation documents to be submitted by applicants include:

1. UGLG’s *Citizen Participation Plan*, which is current and has been adopted by the UGLG’s governing body, with the adoption date shown on the Plan;
2. Public Hearing Notice(s) as published in the local newspaper with proof of publication in accordance with the specifications set forth in the UGLG’s CCP in effect on the date of the first notice (a *Sample Public Hearing Notice* can be found in the provided attachments to the CDBG application);
3. A completed Citizen Participation Certification (a *Citizen Participation Certification* form can be found in the provided attachments to the CDBG application);
4. Meeting minutes from the Public Hearing as a record of actions taken; and
5. The sign-in sheet(s) from the Public Hearing(s) (*only required of the meeting minutes do not include a list of attendees*); and
6. UGLG’s policy for prohibiting the use of excessive force and the barring of entrances and exits for non-violent civil rights demonstrations.

Authorization to Submit CDBG Application:

The Applicant must submit a resolution signed by the Chief Elected Official (CEO) of the UGLG requesting the funds authorizing the submission of the CDBG-PLNG Application. A *Sample Authorizing Resolution to Submit CDBG Application* form can be found in the provided attachments to the CDBG application.

Statement of Assurances and Lobbying Certification:

The Applicant must submit the *Statement of Assurances* and *Lobbying Certification* forms, signed by the CEO of the UGLG applying for CDBG funds, as verification that the UGLG will comply with the grant requirements as specified in these documents. The *Statement of Assurances* and *Lobbying Certification* forms are found with the provided attachments to the CDBG application.

Fair Housing:

Per HUD regulations at 24 CFR 570.487(b), recipients of CDBG funds must take some action(s) to affirmatively further fair housing as part of the CDBG project. A *Potential Fair Housing Actions* form can be found in the provided attachments to the CDBG application.

The applicant must complete this form by selecting three (3) actions that will be taken to affirmatively further fair housing and submit it with the application materials. If the project is funded, the selected actions will be included in the Grant Agreement timetable and the UGLG will be required to implement them by the specified due date.*

**If the UGLG adopts a new/updated Fair Housing Ordinance during the process of preparing the CDBG application, this activity may be considered an act of strengthening the local fair housing law and included as one of the three (3) required actions.*

Other fair housing related requirements also apply, as summarized below.

All applicants must submit with the CDBG Application a current Fair Housing Ordinance, which has been adopted by the UGLG's governing body, with the adoption date shown on the Ordinance, and referencing the most current Fair Housing state statutes [ss. 106.50 Wis.]. For more information visit: <http://docs.legis.wisconsin.gov/statutes/statutes/106/III/50>.

If the protected classes for equal opportunities in housing are included in the Fair Housing Ordinance, the protected classes list should be up-to-date, reflecting the current state statutory language. The current protected classes list for fair housing is also available on the State of Wisconsin Department of Workforce Development Equal Rights Division website:

https://dwd.wisconsin.gov/er/civil_rights/housing/housing.htm

A *Sample Resolution to Adopt Fair Housing Ordinance* template and a *Sample Fair Housing Ordinance* template, which include citations of the current fair housing state statute, may be found in the provided attachments to the CDBG application.

All applicants must have a current adopted *Residential Anti-Displacement and Relocation Assistance Plan* (RADRAP) in place prior to being awarded CDBG funds. A *Residential Anti-Displacement and Relocation Assistance Plan* template with the required language for a RADRAP may be found in the provided attachments to the CDBG application. An adopted RADRAP, with the adoption date shown on the Plan, must be submitted with the completed application.

Environmental Review:

The National Environmental Policy Act of 1969 (NEPA) applies to **every CDBG project**. Regulations governing *Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities* can be found in 24 CFR Part 58, which is available via the following link: <http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=d4966c17222ec9dc63a434ad9599aa6c&rgn=div5&view=text&node=24:1.1.1.1.33&idno=24>.

Planning-only activities are considered “Exempt” activities (i.e., activities that have no physical impact on the environment). However, the UGLG must still submit documentation of the project’s Exempt status to DEHCR Environmental Desk for review once a grant is awarded.

Documentation includes completed copies of the cover page, Project Description, and Determination of Categorical Exclusion or Exemption from the *Environmental Report* along with the *Statement of Activities* form and *Determination of Exemption* form. All of these forms can be found in the *Bureau of Community Development CDBG Implementation Handbook, Chapter 4: Environmental Review*, at:

<https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGImplementationHandbook.aspx>.

At the completion of the environmental review process, DEHCR will issue a *Letter of Concurrence*. In addition, please note that:

- A grantee may not commit any HUD assistance funds or non-HUD funds until an award has been made and the environmental review has been completed. Exceptions may be granted for pre-award costs if approved by DEHCR in advance; and
- DEHCR cannot disburse funds until the environmental review process is complete and an award and executed grant agreement are in place.

Procurement and Professional Services:

An UGLG may procure a consultant to serve as the administrator of a CDBG-PLNG grant; however, all consulting services for which CDBG funds will be used must follow established federal, state and local procurement policies. Information on procurement requirements may be found in the *Bureau of Community Development CDBG Implementation Handbook, Chapter 3: Procurement and Contracting*, at:

<https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGImplementationHandbook.aspx>.

A community may choose to use consultants to assist in creating a CDBG funded community-wide or site-specific plan. DEHCR requires the competitive procurement of services through a Request for Proposals (RFP) process for the procurement of planners, grant writers and consultants.

The State is not responsible for or part of any contracts between the UGLG and any professional services provider (for application preparation, grant administration, etc.); the UGLG is responsible for ensuring CDBG contract requirements are met; and fees paid for grant application and grant administration may be published on DEHCR’s web page.

For grants awarded, DEHCR staff is available to provide technical assistance on the procurement processes and requirements.

Exception for Wisconsin Regional Planning Commissions (RPCs): Wisconsin RPCs are public entities that provide intergovernmental planning and coordination efforts for a region. Federal provisions include an exception regarding competitive procurement requirements when an UGLG contracts with these types of organizations for professional services. Competitive

procurement processes specified within the Federal regulations that are otherwise applicable to professional services funded with CDBG dollars are not required/applicable for RPC contracts.

The Applicant must acknowledge that the State is not responsible for or part of any contracts between the Applicant and any professional services provider (for application preparation, grant administration, etc.); the Applicant is responsible for ensuring CDBG contract requirements are met; and fees paid for grant application and grant administration may be published on DEHCR's web page.

Debarment:

To be eligible for CDBG funding, the UGLG cannot be debarred from receiving federal grant funds. DEHCR will verify this certification on the federal System for Award Management (SAM) at <https://SAM.gov/SAM/> during the application review process.

Incomplete Applications:

An incomplete application may be denied before review and denial of incomplete applications cannot be appealed.

PART 4: CDBG NATIONAL OBJECTIVE AND PROJECT BENEFICIARIES

To ensure compliance with federal regulations requiring that CDBG-funded activities meet a national objective, an applicant must clearly document how the objective is met. The planning project activity must meet either the National Objective of Benefit to LMI Persons or for the Prevention or Elimination of Slum and Blight.

Beneficiaries:

Check the appropriate box (for Yes or No) to report whether the project will have community-wide benefit.

When entering the number of individuals who will benefit from the project and the number who meet the qualification of LMI, enter the numbers from the source used to determine the population and number of LMI persons in the service area (i.e., primary beneficiary area) for the proposed project. Examples:

- Downtown blight elimination plan that has community-wide benefit: Enter the population data from the U.S. Census 2013-2017 American Community Survey (ACS) 5-Year Estimates data; and enter "N/A" for the LMI qualification question.
- Comprehensive Plan update, which has community-wide benefit, and at least 51.0% of the residents living in the community are LMI according to the HUD LMI Summary Data (LMISD) – the service area must be coterminous with the community boundaries to use HUD LMISD to qualify the project: Enter the numbers for population and LMI persons according to the HUD LMISD for the local government.
- Neighborhood revitalization plan with at least 51.0% of the beneficiaries in the specified neighborhood being LMI according to an income survey: Enter the numbers for the population and LMI persons according to the income survey data, as calculated on the *Income Survey Results Income Tabulation* form.

- Senior Center project: Enter the number of persons age 62 and older in the community, according to the U.S. Census 2013-2017 ACS 5-Year Estimates data.

National Objective:

To ensure compliance with federal regulations requiring that CDBG-funded activities meet a national objective, the application must clearly document how the objective is met. CDBG Planning projects may qualify by meeting the Low- and Moderate-Income (LMI) benefit or Slum and Blight prevention/elimination National Objective.

Benefit to Low- and Moderate-Income Persons:

Under the CDBG Planning program, a project can meet the LMI National Objective by serving a community or an area in which at least 51.0% of the residents are LMI persons (area basis) or by providing services to a group of persons principally made up of LMI individuals (i.e., low- and moderate-income clientele classified as limited clientele (LMC)).

A. Area Benefit

An activity may qualify as benefitting LMI persons on an area basis if at least 51.0% of the persons residing in the area served by the activity (i.e., the service area) are of low- to moderate-income. Determining whether an activity qualifies as benefitting LMI individuals on an area basis requires the UGLG to determine both the area served by the activity and the percentage of LMI persons residing in the project service area (i.e., location in the primary beneficiaries of the project live.) Service areas may or may not be coterminous with census blocks or other officially designated boundaries.

When a service area is coterminous with municipal boundaries (i.e., the project will have community-wide benefit), census blocks/tracts or other officially designated boundaries, HUD LMI Summary Data (LMISD) should be used to the greatest extent feasible to determine the percentage of LMI residents within the area.

Using **HUD Local Government LMISD** for determining Area Benefit is only allowed for projects having community-wide benefit (i.e., all residents in the community are primary beneficiaries of the project) *or* projects having primary benefit to multiple entire municipalities.

- Data on LMI residents in Wisconsin municipalities (i.e., the overall LMI percentage for each municipality) is available at: <https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-local-government/> (select "Wisconsin" link).
- A project area map showing the area in which the planning activity(ies) is occurring must be provided in the attachments and the nature of the plan described in *Part 5 Project Need* in the CDBG application must reflect that the project has primary benefit to *only and all* residents in the entire community *or* to *only and all* residents in *all* of the municipalities involved if combining LMISD of multiple municipalities to calculate the total population and LMI percentage.
- If the project involves planning related to water/sewer main, well, and/or street improvements, the locations of the mains, wells, and/or streets that will be the focus of the plan must be shown on the project area map.
- If the project will have community-wide benefit to two or more entire communities and the HUD LMISD are used to determine Area Benefit, an LMI calculation worksheet that shows the calculations used to determine LMI percentage for the

total service area must also be submitted as an attachment with the completed CDBG application. Contact DEHCR for guidance on calculating the LMI percentage using the HUD LMISD of multiple local governments.

Using **HUD Census Block LMISD** for determining Area Benefit is only allowed when the service area is coterminous with one or more census blocks/tracts (i.e., all residents in the census block(s)/tract(s) are primary beneficiaries of the project).

- Data on LMI residents in Wisconsin census blocks and tracts is available at: <https://www.hudexchange.info/manage-a-program/acs-low-mod-summary-data-block-groups-places> (select “Wisconsin” link).
- A project area map showing the area in which the planning activity(ies) is occurring in relation to the boundaries of the selected census block(s)/tract(s) must be provided in the attachments, and the of the plan described in *Part 5 Project Need* in the CDBG application must reflect that the project has primary benefit to *only and all* residents in the selected census block(s)/tract(s).
- If the project involves planning related to water/sewer main, well, and/or street improvements, the locations of the mains, wells, and/or streets that will be the focus of the plan must be shown on the project area/census block/tract map.
- If all residents in multiple census blocks/tracts are primary beneficiaries and the HUD LMISD for multiple census blocks/tracts were used to determine Area Benefit, an LMI calculation worksheet that shows the calculations used to determine the LMI percentage for the total service area must also be submitted as an attachment with the completed CDBG application. Contact DEHCR for guidance on calculating the LMI percentage using the HUD LMISD of multiple census blocks/tracts.

B. Income Survey

If an activity's service area is not coterminous with community or census block/tract boundaries or there is reason to believe that the HUD LMISD do not accurately reflect income levels in the area, an UGLG may elect to conduct a survey to determine the percentage of LMI residents in the service area. If a survey is used to determine Area Benefit, an applicant must demonstrate that the survey is methodologically sound and submit documentation of the survey instrument, responses, and results in the attachments to the CDBG application. The attachments must include the following:

1. Map of Project Area (with project location/geographic area that will be the focus of the plan and Service Area/beneficiary area boundaries marked);
2. Map of Income Survey Area (with survey area boundaries marked; residences surveyed marked; and responding, non-responding and vacant residences marked or provided on a separate sheet);
 - For income surveys with small populations (generally under 50 residences), residences that were surveyed must be marked on the income survey map when feasible, with responding, non-responding, and vacant residences labeled. For income surveys with larger populations (generally 50 or more residences), the income survey map must include a marked boundary around the residential area/homes where the survey was conducted, with the residences included in the survey that sit on the borders of the boundary clearly marked. The list of responding, non-responding and vacant residences may be provided on a separate sheet rather than being marked on the income survey map.

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- When marking responding, non-responding and vacant residences on the income survey map or providing the list of addresses on a separate sheet, **do not include the responses regarding the family size, income levels and race/ethnicity with the residential address or contact information.** The specific responses for each residence should be recorded on a separate sheet with the assigned survey number as the identifier, rather than the address/contact information identifiers, for greater confidentiality.
- 3. *Income Survey Results Income Tabulation* (form provided in the *Income Survey Guide*);
- 4. *Income Survey Results Race/Ethnicity Tabulation* (form provided in the *Income Survey Guide*);
- 5. Income Survey form used to conduct the Income Survey (sample template provided in the *Income Survey Guide*);
- 6. List of addresses in the service area/survey area, including the street address where the residence is located and mailing address if used to distribute the survey and it is different than the actual residential street address;
- 7. List of other contact information associated with the addresses of residents surveyed, if methods other than mailing and door-to-door/in-person methods were used to distribute/conduct the survey (e.g., telephone, email, etc.);
- 8. List(s) of survey numbers for surveys distributed/conducted with the response data tracking for each, including the date(s) the survey was distributed/conducted or attempts were made to distribute/conduct the survey for the address, date surveyed (i.e., date survey was returned or date survey interview was conducted), family size information, income level information, and race/ethnicity information; and
- 9. Income Survey letter and/or other related correspondence sent to residents (if applicable) regarding the survey distribution and collection process (sample letter template provided in the *Income Survey Guide*).

NOTE: For data from an income survey to be accepted for calculating the LMI percentage for the service area, the following criteria must be met:

- the survey was *initiated* (first distributed/administered) on or after July 1, 2014 (after the HUD LMISD began being based on American Community Survey 5-Year data);
- the HUD income limits in effect at the time the survey was *initiated* were the income thresholds used/listed on the survey form;
- no significant demographic, economic, and non-economic changes in the service area occurred since the survey was conducted;
- the survey distribution and collection process (from start to finish) was held within a reasonable period of time that can be verified as methodologically sound;
- the survey data calculations are accepted as valid and methodologically sound;
- the survey data are submitted for the CDBG application on the most current versions of the *Income Survey Results Income Tabulation Form* and *Income Survey Results Race/Ethnicity Tabulation Form* provided in the current *Income Survey Guide*, with the LMI percentage calculated according to the specifications in the most current *Income Survey Results Income Tabulation* form; **and**

- all requirements set forth in the most current *Income Survey Guide* that are deemed necessary by DEHCR to verify the survey is valid and methodologically sound are met.

Guidance for conducting an income survey is provided in the *Income Survey Guide*, which is available on the Bureau of Community Development website:

<https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGPlanningProgram.aspx> [document linked under “Additional Reference Materials” section].

C. Combination of HUD LMI Summary Data and Income Survey Data

A project may have beneficiaries in both areas for which HUD LMISD local government and/or census block(s) data are available/used to determine the population and number of LMI persons in the area, and other areas for which HUD LMISD are not available/used and instead income survey data are used to determine the population and number of LMI persons in the other area(s). If data from both sources are used to calculate the LMI for the entire service area, check this option in Part 4 on the application. The total LMI calculation for the entire service area must be made by aggregating the data, dividing the total population by the total number of LMI persons (i.e., the sum of the HUD LMISD population and income survey population numbers, divided by the sum of the HUD LMISD total LMI persons and income survey total LMI persons numbers). An LMI calculation worksheet that shows the calculations used to determine the LMI percentage for the total service area must also be submitted as an attachment with the completed CDBG application. Contact DEHCR for guidance on calculating the LMI percentage using a combination of HUD LMISD and income survey data.

D. Limited Clientele

An activity that provides benefits to a particular group of persons rather than residents within a specified service area may qualify as benefitting LMI individuals based on serving limited clientele (i.e., low- and moderate-income clientele (LMC)). Activities that exclusively benefit one of the following groups are presumed by HUD to be made up of principally LMI persons:

- abused children;
- elderly persons;
- battered spouses;
- homeless persons;
- severely disabled adults;
- illiterate adults;
- persons living with AIDS; and/or
- migrant farm workers.

Activities that principally benefit LMI persons may qualify as serving limited clientele. Contact DEHCR and/or refer to 24 CFR 570.208(a)(2) for additional guidance regarding limited clientele projects.

Prevention or Elimination of Slum and Blight:

Activities that qualify under the National Objective of Preventing or Eliminating Slum and Blight address deteriorated infrastructure and living conditions which have long-lasting effects on community viability. Slum and blight can be addressed on an area wide basis or a spot basis.

A. Area Basis

Per 24 CFR 570.483, an activity can qualify as addressing slum and blight on an area basis if all of the following can be documented:

1. The local government has passed a formal resolution declaring the area as a blight as defined by Wisconsin Law under Section 66.1331, Wisconsin Statutes, Section 66.1333, Stats. and Section 66.1337, Stats; **and**
2. At least 25% of properties throughout the area experience and document *one or more* of the following conditions (based on language found in 24 CFR 570.483):
 - physical deterioration of buildings or improvements;
 - abandonment of properties;
 - chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial building;
 - significant declines in property values or abnormally low property values relative to other areas in the community;
 - known or suspected environmental contamination; or
 - the public improvements throughout the area are in a documented general state of deterioration; **and**
3. The assisted activity addresses one or more of the conditions which contributed to the deterioration of the area.

NOTE: Applications must include a map of the designated blighted area, including a total number and percentage of buildings in that area that are blighted, in the attachments to the CDBG application.

B. Spot Basis

An activity may qualify as addressing slum and blight on a spot basis when the activity is not located in a designated slum or blighted area. Spot basis can be met if the community specifically identifies eligible activities that treat one or more of the following conditions:

- acquisition;
- clearance;
- relocation;
- historic preservation;
- remediation of environmentally contaminated properties; and/or
- rehabilitation of buildings or improvements (limited to eliminating conditions detrimental to public health and safety).

NOTE: Applications must include a map of the designated blighted location in the Attachments to this application.

PART 5: PROJECT NEED NARRATIVE RESPONSE I & II

The project need narratives for Response I and Response II must not exceed one-half (½) page for each response, single-spaced with not less than 11-point font. Information on pages exceeding these limits will not be considered.

Any additional/supporting documentation must be limited to no more than ten (10) pages per narrative response and titled using the *Checklist* on pages 10-11 of the application form. Applicants must ensure that the additional documentation provided supports the information and data included in the application.

PART 6: BUDGET AND MATCHING FUNDS

Enter the total amount of matching funds committed to the project. This must be consistent with the financial information provided in *Part 1* of the CDBG application and entries in the *Budget and Matching Funds* table in *Part 6*.

A waiver request letter must be submitted to DEHCR if the Matching Funds contribution does not meet the 2:1 ratio allowed (maximum \$2 CDBG for every \$1 Grantee Match) toward the total project cost. The waiver request must be on municipal letterhead signed by the UGLG's CEO and attached to the application. The letter must include justification and a brief explanation of the hardship imposed if the UGLG were to meet the 2:1 ratio requirement.

Complete the table summarizing the local match and other public and private match funding sources* for the project. Indicate the status of all funding sources, as applied, pending, committed, secured/awarded and/or other. Check all that apply for each funding source. For any sources with a status of "Other", provide a brief explanation (no more than a one sentence narrative per source.) **Provide all available documentation supporting each source, status and level of commitment of funding.**

****Report only match funding sources that the UGLG intends to utilize/accept. If the UGLG reports on the CDBG application secured matching funds that it does not intend to utilize/accept for the CDBG project, receives a CDBG award, and then causes delay in the Grant Agreement execution process due to needing to secure alternative funding; then DEHCR may rescind the CDBG award.***

For the purposes of this application, the terms used to describe the status of funding are defined as:

- Applied – the UGLG has applied/submitted an application to the funding source for matching funds;
- Pending – the UGLG has applied for matching funds and received a response from the funding source, indicating the UGLG is eligible or potentially eligible for funding, but the UGLG has not yet received a firm commitment of funding;

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- Committed – the UGLG’s local governing body has formally approved the use of funds from the funding source as matching funds for the CDBG project; and/or has formally approved the acceptance of funds from the funding source (e.g., acceptance of a loan, acceptance of an award, etc.) and committed the available or awarded funds to the CDBG project;
- Secured/Awarded – the UGLG has received notification from the funding source that the funds are available to/awarded to the UGLG and/or funds are on-hand in the UGLG’s bank account(s) available for use; and
- Other – any other status that requires further explanation not covered in the other status options (e.g., the Intent to Apply has been submitted; the UGLG intends to submit a bank loan application upon receiving the CDBG award; revenue bonds will be issued on a future date; a referendum has been passed; a referendum has been approved to be on the ballot for a future election; etc.).

PART 7: PLANNING

Applications will be reviewed to determine whether the proposed CDBG project supports and further promotes recent plans adopted/approved by the UGLG. On the application, briefly explain in the space(s) provided how the proposed project is consistent with the goals and objectives of or a continuation of another plan or other plans. Provide the title and date of adoption/approval of the plan(s). Include copies of relevant pages of the plan(s) in the attachments with the completed CDBG application. Mark the relevant sections of the text on the attachment(s), and label plan pages with the page number and the plan’s title and adoption/approval date. [Do not attach a full copy of the entire plan(s).]

ATTACHMENTS AND SUPPORTING DOCUMENTATION

Applicants **must** complete the *Attachments and Supporting Documentation Checklist* found in the CDBG application. The *Checklist* lists the required as well as optional attachments and supporting documentation for the CDBG application. Applicants **must** fill out the *Checklist* to note all the documents attached. Also, the cover pages at the end of the CDBG application **must** be used to separate each set of supporting documents. By using the *Checklist* and the cover sheets provided as well as following the **required** document order will ensure the application is complete, documents can be found easily, and the application may be quickly reviewed.

Fillable forms and sample documents can be found electronically on the Bureau of Community Development Website at:

<https://doa.wi.gov/Pages/LocalGovtsGrants/CDBGPlanningProgram.aspx>.