

### Agenda

9:00 - 9:10 Introductions & Orientation (WebEx and Materials)

9:10 - 10:00

CDBG-I Program Basics

- Program Overview
- Funding, Deadline & Process
- LMI Eligibility, Project Area, Pre-Qualifications for LMI
- Compliance Requirements

\*We will take a 10 minute break after this portion of the training.

10:10 – 11:50 Project Priority System Guidance for CDBG-I Program

- Priority Rating System
- Common Errors

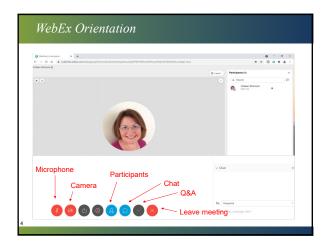
11:50 – 12:00 Wrap-Up & Submittal Requirements



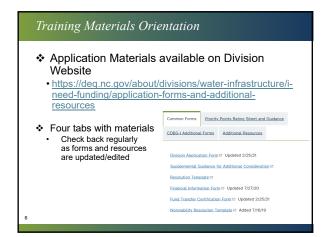
### CDBG-I Unit Current Staff

- Compliance Specialist & Interim/Acting Supervisor
  - Colleen Simmons, AICP & CPM
- Program Engineer
  - John Tucker, P.E.
- Grants Coordinator
  - Stacey Starkey
- Grants Representatives

  - Stephanie Morris Eastern NC
    Allysa Rouse, MPA Piedmont and Western NC



# WebEx Etiquette Please stay muted except for questions The Q&A feature Use if you do not have a microphone Use chat If having WebEx issues Use the "hand-raise" feature and wait to be called on to speak Recording in progress



### CDBG-I Program Overview

- Federally-funded program from the U.S. Department of Housing and Urban Development (HUD)
- Program aims to:
  - Create healthy living environments through financing public water and sewer infrastructure; and
  - Mitigate public and environmental health problems in areas where the percentage of low-to-moderate (LMI) income persons is at least 51% LMI.
- Each project must meet the Benefit to low-tomoderate income people National Objective.
- Only non-entitlement communities can apply.

### CDBG-I Program Basics – Funding Overview



- Approximately +- \$22 million for 2021 funding round
- Maximum grant is \$2 million over 3 years
- No more than 3 open grants within 3 years

Application Deadline: September 30, 2021



# CDBG-I Program — Funding Process Pre-Qualifications for LMI DUE & HUD Releases 2021 Income Limits Sept. • Applications are DUE Oct. • Staff Reviews of Applications Jan. • SWIA Meeting for Awards Mar. • Notice of Award/Decline & Contracts

### Project Area & LMI Eligibility

- \* Appendix A: Determining the LMI Percentage of the Project Area
- The project area must first be established before LMI is determined.
  - The project must serve the entire project area.
  - LMI % in application must represent the project area.
  - Project map details needed
- LMI Determination
  - Census Data (area wide)
  - Income Surveys

- Allowing again this year four methods:
  - Door-to-Door (Face-to-Face)

  - Telephone
  - Online
- Read Appendix A carefully for what is required for each method and how to handle above income, etc.
- Surveys are good for 18 months prior to application submission deadline.

2020 and 2021\* Income Limits only
 \*Released on May 3<sup>rd</sup>
 (https://www.hudexchange.info/resource/5334/cdbg-income-limits/)

### Income Surveys, continue.

- Common Errors
  - Door-to-Door surveys were not signed.
  - · Data transfer from income surveys to tabulation sheet.
  - Household size and income limits circled do not



### LMI Eligibility

- Must include Survey Methodology, Surveys, Census data (if used), Income Survey Summary/Tabulation Sheet, Map, etc. in Tab 3.
- . Must gather demographic data of project area.
- ❖ Do Not round LMI calculations (i.e., 75.24%, not 75%)
- \* Recommendations:
  - Engage the community.
  - · Assure confidentiality.
  - · Utilize community leaders.
  - Plan for language needs.





### Census Data

- Must use FY2021 ACS 5-Year 2011-2015 LMI Summary Data put out by HUD in April (https://www.hudexchange.info/programs/acs-low-mod-summary-data/)
- Use Area-Wide LMI Percentages to be eligible for:
  - Water / Wastewater Plant work
  - · Major Outfalls, Major Water Mains
  - Major Pump stations

### Pre-Qualification for LMI

- Allowing again area-wide LMI data to be used for line work with pre-qualification (see pg. 4)
- ❖ May use 2020 LMI pre-approval if:
  - Project location, project scope, street addresses showing the scope of the project, and the LMI have not changed.
  - Must include in application 2020 pre-approval letter.
- Page 57 of Guidance explains how to fill out form.
- ❖ Pre-approval deadline is July 12, 2021



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### Floodway

- We can fund projects in the floodplain and only certain ones in the floodway (per HUD Notice CPD-17-013)
  - Only this allowed in floodway is construction, installation, or repair of linear infrastructure located entirely below ground level or entirely above base flood elevation may comply with Part 55
  - No new construction or ground disturbance within the floodway.

### Compliance Requirements

- ❖ Tab 8 of Application
  - See pg. 5<sup>1</sup>-53 of CDBG-I Program Priority Rating System Guidance
- Public Hearing
  - See Appendix B: Public Hearing and pg. 51
- ❖ Compliance Statements and Certifications
- HUD Required Forms (see Appendix C: Instructions for HUD Forms)
- ❖ Sam.gov
- Applicant's Capacity
- Applicant's Audit (must be current)



### Compliance Requirements, continue.

- ❖ Common Errors:
  - Forms not signed or dated.
  - Forms not filled out correctly.
  - Project descriptions do not match.



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### Priority Rating System

- Used to rank projects for funding.
- Claim the points you can document.
- Provide ALL required documentation.
- ❖ Additional information will NOT be requested.
- Read FY2021 CDBG-I Guidance carefully.
  - Describes the required narratives, maps and documentation.

    • Clarifications, edits, updates in RED



### Priority Rating System

- Categories:
  - Category 1 Project Purpose (Max 15 points)
  - Category 2 Project Benefits (Max 20 points)
  - Category 3 System Management (Max 15 points)
  - Category 4 Financial Situation (Max 50 points)
- Presentation will focus on problem areas / common
- CDBG-I program does not use the affordability index / calculator



### Common Error Across all Categories

- Lack of clear and detailed narratives.
- Lack of clear and detailed maps.
- Unclear connection to project and problem.

## Category 1 – Project Purpose

- \* Required narrative and documentation must be behind Tab 4.
- What problem is the project solving?
  - Must describe problems and how the project will resolve them.
- Can claim more than one purpose for a project type. Will award on highest scoring purpose.\*



### Category I – Project Purpose

- Combined Water / Wastewater Applications\*
  - Existing infrastructure in same street that needs rehabilitation or replaced only.
  - · No new construction.
  - · "Same footprint"
  - Will rank project by lowest scoring project purpose.
  - Must have:
    - · Separate scorecards;
    - · Separate budgets;

    - Separate support documentation; in addition to
       A total budget combining both project types (water & wastewater).



### I.B. Resolve Failed Infrastructure

- Can earn 5 Points.
- Common Errors
  - · Missing documentation.
  - Narrative is not clear on what is getting resolved and why.

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### I.C Rehab/Replace Infrastructure

- Can earn 10 points
- Common Errors:
  - Narrative does not clearly state what is getting rehab/replaced (size, linear footage, etc.).
  - Discussing overflows in one part of town, but the actual project area is elsewhere and there is no connection or explanation for how the project will fix said overflows.
  - Using age documentation and not providing link to infrastructure.
  - Map not clear.

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### I.C.1 Rehab/Replace Infrastructure

- Can earn 5 Points
- Common Errors:
  - Narrative and application budget do not:
    - Show at least 50% of the construction cost must be associated with replacing old infrastructure.
    - Break out cost of replacing old infrastructure vs. newer infrastructure in your budget.
  - Narrative wasn't clear on which streets were old
  - · Age documentation was not clear.



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### Category 2 – Project Benefits

- Required narratives and documentation must be behind Tab 5
- Must show a direct connection between the project and the benefit claimed in the application.
- Project Benefit points max out at 20, even if there are more benefit points that can be claimed.
- When a single application includes multiple project types, Project Benefit points must match the Project Purpose that was claimed.

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### 2.A Infrastructure Replacement, Repair or Merger

- Can earn 15 points
- ❖ Common Errors:
  - · Maps did not show spill locations
  - · No documentation
  - Narrative was not clear does not link problem with project area.
  - No proof that at least one SSO reach a body of water due to I/I in project area.
  - Project area not shown on map.
  - · Backup documentation did not match narrative.

2.A. points does not accommodate for failing WWTPs

### 2.A.1 Where 20% are Failing

- Can earn 5 points
- Common Errors
  - Documentation does not state "failing" nor specify which addresses are failing.
  - Narrative and map not being clear and detailed.



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### 2.E.1 & 2.E.2. Addresses Enforcement Documents

- ❖ Can earn 5 points for 2.E.1 or 3 points for 2.E.2
- Common Errors
  - Project seeking funding does not address enforcement document(s).
  - Response documentation in application stating problem was already addressed.
  - NOV is due to administrative or O&M error.
  - · No documentation.
  - NOV documentation for spills did not happen in project area or there was not a link to project area and spill.

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### 2.G Low Pressure in a Public Water System

- Can earn 5 points
- Common Errors
  - Application does not provide valid testing or modeling data.
  - Required documents not provided.
  - If low pressure is due to 2-inch lines, documentation not provided per guidance.

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### 2.H.1 & 2.H.2 Contamination of Water Source

- Can earn 15 points for 2H1 or 10 points for 2H2
- Common Errors
  - Well contamination documentation not provided.
  - Narrative language on how project will solve contamination.
  - Narrative language on affected population, connections, length and diameter of waterlines(s) needed

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## 2.J Reduce Water Loss w/30% Loss or More

- Can earn 10 points
- Common Errors
  - · Failure to provide audit data.
  - · Local Water Supply Plan lists lower water loss.



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### Category 3 – System Management

 Required narrative and documentation must be inserted behind Tab 6



Points may be earned for either line item 3.A.1 OR line item 3.A.2., but NOT BOTH.



### 3.A.1 Asset Management Plan (AMP) – 10 points

- Common Errors
  - No narrative provided.
  - AMP has not been implemented.
  - Does not meet CIP requirements.
  - Does not have all assets (inventoried and/or assessed) for the utility seeking funding.
  - · Electronic copy is missing.
  - Each asset item does not have unique identifier.
  - None "poor" assets in project not explained.
  - Project not highlighted or found in AMP.
  - AMP was not adopted within 2 years from date of application deadline.

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### 3.A.2 Capital Improvement Plan (CIP) – 3 points

- Common Errors
  - No application narrative.
  - Missing resolution or board meeting minutes approving & adopting CIP within 2 yrs. of application deadline.
  - · Missing cost estimates.
  - Not spanning 10 years from date of adoption.
  - Project is not clearly shown.
  - Missing electronic copy of CIP with project highlighted.

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### 3.B System Operating Ratio

- Can earn 5 points
- Common Errors:
  - Required forms not provided.
  - Not looking at the five years' worth of data

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### 3.C Approved Source Water Protection Plan / Well Head Protection Plan

- Can earn 5 points
- ❖ Common Errors
  - An approved plan by Public Water Supply Section.
  - No approval letter of plan.
  - · Lack of narrative.



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### 3.D Water Loss Reduction Program

- Can earn 5 points
- Common Errors
  - Use of old annual audit numbers.
  - All three years of audit do not show greater than 10% water loss
  - Narrative states how hidden leak detention is conducted.



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## Category 4 – Financial Management

Required narrative and documentation must be inserted behind Tab 7



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### 4.E. Utility Rates

- Can earn up to 15 points
- Common Errors:
  - Missing NCDEQ water and sewer rate form and certified rates

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### Wrap Up – Submittal Requirements

- See pgs. 10-12 and 51-53 of CDBG-I Program Priority Rating System Guidance
- All project descriptions must match and have a well-defined project area, including street names.

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### Wrap Up – Submittal Requirements

- Must provide three (3) bound copies (three-ring binders)
  - · Label one "Original" and two copies.
  - Label the spines of the notebooks with the applicant's name and application date.
  - · All 3 copies must have the same documentation.

Applications must be at the Division by 5:00pm regardless of delivery method used, by September 30, 2021.



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Contact Information	
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DEQ <sup>3</sup> September of Principles	_