



Community Development Block Grant (CDBG) and HOME Investment Partnerships (HOME) Programs Additional Information/Clarifications

Updated: November 14, 2023 (New questions are indicated in red)

QUESTION		ANSWER
Financial		
1.	Match points are only awarded if the funds are committed. What is the deadline to show commitment of funds?	Proof of commitment must be received by March 1. Scoring and final selections occur in March. It is the agency's responsibility to inform the County that funding has been committed.
2.	Can our agency request more or less than the funding limits?	Yes, but a funding limit waiver must be submitted to the UCPB with your full application. The UCPB will consider your request at the March funding allocation meeting.
3.	Please explain the loan nature of CDBG funding for Public Facilities projects.	Nonprofit organizations receive CDBG awards as half loan and half grant. The loan has no interest, with loan terms between 5-30 years depending on the amount of the loan. Annual repayment terms are calculated upon review of the proposed cash flow in the project. If the project is selected for funding, other terms will be negotiated during contract development and secured with a Deed of Trust and a Promissory Note.
4.	Do you fully fund projects that rank the highest?	Projects that rank highest in their respective categories are funded at their request until all of the funding is awarded. If there is not enough money to fully fund a request, the applicant will be asked if their application can move forward with the reduced funding amount.
5.	Is there a minimum match requirement for CDBG applications?	No, however there are up to 20 points associated with the amount of match provided for a project.

Eligibility – Neighborhood Improvements		
1.	How often is Census Tract/Block Group income data updated?	Eligible Census Tracts are updated every five years by HUD. Clark County is an exception criteria jurisdiction that lowers the eligible income limit below 51% and is determined annually. Please refer to the CDBG Clark County Low/Moderate Income Census Tracts document located at https://clark.wa.gov/community-services/community-development-block-grant . If the project you are proposing is not in a census-designated low-income area, a survey may be undertaken to try to establish eligibility. Staff is available to help with HUD survey requirements.
2.	Are ADA accessibility improvements allowed outside of a low-moderate income area?	Please contact staff to discuss specific sites and conditions, but, generally, yes if you are removing an architectural barrier.
3.	Our proposed project will be outside of an approved Low/Moderate census area, so an income survey will be required. Do we need to complete the survey prior to submitting the application for CDBG funds?	The survey needs to be completed prior to submitting the application for CDBG funds. Income survey's must be approved by HUD before conducted. Staff is available to help with HUD survey requirements.

4.	Are more detailed census tract and block group maps available?	Yes, contact Rebecca Royce for assistance in determining specific boundaries.
5.	Can funding be used for Design Engineering, or only for construction?	CDBG can be used for design and engineering as long as federal procurement requirements are followed. Staff can provide the federal provisions that would need to be included in the engineering contract. We encourage cities to take on the design and engineering so that construction can begin around the time the CDBG grant is received from HUD in the late summer.

Eligibility – Public Facilities

1.	What time frame should be used when answering the Limited Clientele Benefit Total Served question?	Answer the question using an annual, one-year total of unduplicated people served.
2.	Are programming and services eligible for funding?	Most programs would be considered a Public Service under HUD’s CDBG program. The Urban County Policy Board has determined that Public Service programs, as defined by the CDBG regulations, will not be funded through the County program. Public Service activities may be eligible for the City of Vancouver’s CDBG allocation. For more information on the City’s application process, see http://www.cityofvancouver.us/ced/page/community-development-block-grant-cdbg-and-home-programs .
3.	Can you provide examples of Public Facilities activities?	Previous projects include a senior day center, roof replacement for a mental health nonprofit, acquisition funds for a community center, and rehabilitation funds for a community center kitchen.

Eligibility – Economic Development Activities

1.	Can a business assistance program provide loans to both small businesses and to micro-enterprises?	When providing services to both Small Business and Micro-enterprises, any loan/grant funds need to be kept separate for each type of business. Loans/grants to small businesses require additional services to be provided with the loan and are subject to the Public Benefits standards while the loans/grants to micro-enterprises are not. In general, we recommend focusing on one type of business program, but this is not required.
2.	What type of reporting is required for small business assistance programs?	All economic development activities will be required to document the following activities at a minimum. Additional reporting will be determined based on the program provided. <ul style="list-style-type: none"> • Number of LMI business owners served, • Number of new business licenses created outside the City of Vancouver, • Number of jobs created or retained (directly because of this assistance), • Number of businesses with increased revenue.

3.	To provide assistance to small businesses, do they need to have fewer than 5 employees, and be low-moderate income?	This depends on the type of economic development activity you apply for. There are 2 general categories: <ul style="list-style-type: none"> • Micro-enterprise assistance: for businesses with 5 or fewer employees (including the owner) where the owner meets the LMI threshold under 80% AMI. This type of program offers more flexibility in the types of services that can be provided along with easier reporting requirements. This type of activity is not required to meet the Public Benefits Standard. • Small Business Technical Assistance: for businesses with more than 5 employees owned by households meeting the LMI threshold under 80% AMI. Programs offered under this category must meet income eligibility requirements, provide eligible activities, AND meet the Public Benefits standards (2 levels: individual and aggregate).
4.	Our main office is in Vancouver. Can we apply for funds to operate our program?	Staff costs to operate the program are eligible regardless of whether your main offices are located in the City of Vancouver (but must be in Clark County as a whole). We also ask that all programs be as accessible as possible to the businesses being assisted, which could mean meeting outside of your general offices at a location convenient for the business.
5.	Do all businesses we assist need to meet the 80% low-mod income requirement? I see a 70% requirement in the HUD guidelines.	Clark County requires that all businesses assisted with the funds meet the income requirement. The 70% threshold is for us as a CDBG entitlement agency across all of our economic development activities.
6.	If this is an ongoing program, do we apply for the same amount of funds as we have been awarded in the past?	Each program should apply for the amount of funds that are needed to operate the program each year based on need, regardless of previous awards.
7.	When will contracts be executed for Programs?	When Clark County receives a grant agreement from HUD, usually during the summer after awards are determined, contracts can be executed. If a program operates on a calendar year, the contract will begin January 1, but awardees can request an earlier start date if needed.

Eligibility – Affordable Housing

1.	For property acquisition, do we have to identify the location of the land to apply?	Indicate the general location of the property. If it is inside the City of Vancouver, the City must also provide funding to the project.
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Eligibility – Homelessness

1.	For agencies that provide Tenant-based Rental Assistance (TBRA), how do we apply for supportive services funding?	In the Affordable Housing and Homelessness application include the amount of supportive services funding in the budget table, up to a maximum of 30 percent of the Rent Subsidies funds requested. If no supportive services funds are needed, this should be explained in the application. Supportive Services funds will be awarded based on awarding of Rent Subsidy funds.
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2.	For TBRA programs, is the requirement for voluntary services a federal provision?	Yes, however case management and a housing stability plan are not considered a service and can be required. Examples of services which can only be offered on a voluntary basis include participating in employment search activities, credit repair classes, etc.
3.	Can rental assistance be used for a transitional group home?	Tenant-based Rental Assistance (TBRA) must allow the tenant to choose their housing unit. Project-based Rental Assistance is not eligible for funding.
4.	We would like to use TBRA funds for our current clientele. Do we have to take referrals from the Housing Solutions Center?	Yes, at this time, all Clark County-funded TBRA contracts must only take referrals from the Housing Solutions Center (HSC). If you work with people who are homeless and in a specific subpopulation, you can request that the HSC only refer this subpopulation to your agency for TBRA. However, rental assistance may not be conditioned upon program participation and the tenant may or may not engage in your other programs.
5.	With rental assistance, what is the definition of "households served have a behavioral health issue?"	Households self-identify if a household member currently has a behavioral health issue through the coordinated entry process. There is no requirement for an official diagnosis or that the household is seeking services.
6.	Can TBRA funds be used with other RRH funding?	TBRA Rent Subsidy funds tend to be more restrictive than other funding sources and would require the program adopt the more restrictive requirements in the contract. Agencies cannot pay a portion of rent with TBRA Rent Subsidy funds and another funding source. TBRA Supportive Services funds can only be used to support households receiving TBRA Rent Subsidy funds and cannot be used until TBRA Rent Subsidy funds are being used. Other agency funding can be used to support households in meeting their housing stability needs as long as those funds are not used for rent or for utility assistance.

7.	For the budget table, are housing costs that are not actual rent payments, such as deposits, application fees, and utilities, considered to be “rental subsidies” or “client services”?	<p>Under the County Request budget section, “Rental Subsidies” include:</p> <ul style="list-style-type: none"> • Rent and/or utility payments paid on behalf of a client, • Utility payments include electric, gas, water and trash services, • Security deposit grants (no more than two times the monthly rent – paid directly to landlord), • Housing Quality Standards (HQS) inspections, • Tenant income determination/ redetermination. <p>Rent Subsidy funds are restricted and cannot pay for housing case management or other staff and operating costs.</p> <p>To support the program, County staff will allocate 30% of the Rent Subsidy request with Supportive Services funds. Eligible expenses for these funds include:</p> <ul style="list-style-type: none"> • Personnel Costs: Salaries and benefits for staff time related to the program and program supervision including Housing Quality Standards (HQS) inspections and data collection and entry. • Operating Costs: Telephone, training costs, mileage, supplies, insurance, and other operating costs. • Supportive Services: Move-in costs, including security deposit, first and last month’s rent; Moving costs, including truck rental and temporary storage fees (up to three months); Landlord incentives (up to \$3,000); Late fees; Costs associated with application fees and background/credit check fees; Additional costs may be invoiced with prior written County Program Contact approval. <p>Although Supportive Services funds are more flexible, the amount of funding is limited and not intended to cover the full costs of the program.</p> <p>Any costs that are not identified above should be listed under the other funding sources and explained in the Budget Narrative section.</p>
8.	If this is an ongoing program, do we apply for the same amount of funds as we have been awarded in the past?	Each program should apply for the amount of funds that are needed to operate the program each year based on need, regardless of previous awards.
9.	When will contracts be executed for Programs?	When Clark County receives a grant agreement from HUD, usually during the summer after awards are determined, contracts can be executed. If a program operates on a calendar year, the contract will begin January 1, but awardees can request an earlier start date if needed.

Joint Projects

1.	Can I do a project in the City of Vancouver?	The City of Vancouver is a separate HUD entitlement jurisdiction. Clark County is only able to fund projects in the City of Vancouver for which the City of Vancouver commits funds, and these projects must also show a benefit to county residents.
2.	Do both the project and the clients have to be outside the City of Vancouver?	If an applicant is only requesting funds from the County, both have to be outside the City of Vancouver to be eligible for funding. If the applicant is requesting funds from both the County and the City, and the property is inside the City limits, some of the clients must be from the County.
3.	Are joint Public Facilities projects proportionately funded with the City of Vancouver, even if the City partially funds the project's requested amount?	Yes, the County would reduce its award proportionately to what was awarded by the City.
4.	How do you determine the proportion of funding to request from each jurisdiction on a joint rental housing project in the City of Vancouver?	HOME regulation 92.201 states that both jurisdictions for joint projects must make a "financial contribution," but it does not require proportionality of funding between the jurisdictions. As long as the City has made an investment in a rental housing project (or provided relief of a significant tax or fee) the County can fund the project at the UCPB's recommended amount.
5.	If the City awards funding other than CDBG or HOME funds, will this count as match?	Yes, provided the source of funding is not federal. City awards such as the Affordable Housing Fund and tax abatements count towards match.

Other Federal Requirements

1.	Do Davis Bacon wage rates apply to housing projects?	For CDBG funded projects, Davis Bacon does not apply to projects of eight housing units or fewer. Applicants must determine whether State prevailing wage applies. For HOME funded projects, Davis Bacon does not apply to projects of twelve housing units or fewer. Applicants must determine whether State prevailing wage applies.
2.	Who should sign the Anti-Lobbying Certification?	For local government, the city manager or mayor should sign the document. The executive director or chair of the board of directors should sign for a non-profit organization.
3.	Is there a template for the E-Verify MOU?	No, there is no template. Agencies are able to obtain a copy of their MOU through the E-Verify website if needed. More information regarding E-Verify is included within the Requirements section of the RFA.
4.	What does "Presumed Benefit" mean for population served? Does that mean all of the people served count as low-income?	If the population served is considered a "presumed benefit" clientele by HUD's definition, then you do not have to collect income information. These are groups defined by HUD to be made up principally by people who can be presumed to be low-income. (Specifically: Abused Children, Elderly Persons, Battered Spouses, Homeless Persons, Severely Disabled Adults, Illiterate Adults, Persons Living with AIDS, and Migrant Farm Workers)
5.	Do we have to bid out our project?	Yes. Because funds through this RFA are federal dollars, federal procurement requirements must be followed. More information is available at 2 CFR Part 200.318.

6.	Are we allowed to start work before being awarded funding?	Funds allocated through this RFA may not be used to reimburse any work done before contract execution. There is also an environmental review requirement with the funding. Therefore, projects may not break ground or undertake a “choice limiting” action until after a contract is signed. Design, if not using CDBG funds, is encouraged before contract, and may be counted as match.
7.	Can we use previous anti-lobbying forms, or do we need to re-sign them with updated dates?	Each application requires a newly signed Anti-lobbying certificate.

Miscellaneous

1.	What documentation is needed to meet the public meeting requirements?	<p>Cities/Towns/County:</p> <ul style="list-style-type: none"> • Each city, before it may submit its application, must hold a public meeting to inform the residents about program objectives, eligible activities, and to solicit public comment on local needs. Proposed projects must be consistent with the Consolidated Plan, local plans and community strategies. • Submit information documenting authorization of submittal of the application by the City Council or Board of Councilors (e.g., a copy of the Council minutes and/or resolution). <p>Nonprofit Agencies:</p> <ul style="list-style-type: none"> • Nonprofit agencies proposing projects in specific cities must provide information about their project to the city at a regularly scheduled city meeting before their application is submitted to the County. • Submit information documenting authorization of submittal of the application by the Board of Directors. • Public meetings are only required for construction-associated activities. Applications for TBRA and Economic Development activities do not require public meetings.
2.	Are public meetings required to be held before the pre-application or the final application is due?	Public meetings are required prior to submission of the final application. They should, however, occur before the pre-application since the purpose is to gather information of what projects are desired by the community.
3.	What time are applications due?	All applications are due at 11:59 pm PST on their respective due dates: Pre-applications are due October 31, or the Monday after if this date falls on a weekend. Completed applications are due on December 1, or the Monday after if this date falls on a weekend.
4.	Do multiple users have to use the same login?	More than one person can access an application to complete it. Contact Clark County staff to add others you wish to have access to your application.
5.	Can multiple agency contacts be listed?	The application allows listing one additional contact.
6.	Do we need to be registered on SAM.gov?	No, you do not need to be registered on SAM.gov to apply, but will need to register to verify your agency, and any subcontractor’s, debarment status.

7.	If we previously conducted public outreach for a project and we are applying for additional funding, do we need to do additional public outreach?	While additional public outreach is recommended, we will accept public outreach that was conducted for the project within the past two years.
8.	Do we have to be enrolled in E-Verify prior to application, or prior to contracting?	County procurement policy states, "Unless already on file with Clark County, all respondents must submit a copy of their E-Verify MOU or proof of pending enrollment with their proposal."
9.	Can we apply for funding if we haven't identified a specific property yet?	Yes, as long as you know if the property will be located within the city limits of Vancouver, so the proper funding split is requested. All Affordable Housing construction projects within the city limits of Vancouver are considered a joint project and must be financially supported by the City of Vancouver to receive county funding.
10.	I am unable to enter numbers in the questions with tables. How can I change this amount?	You need to Add Row to enter the information. Please refer to the guidance document for the application type for more detailed instruction. Additional information is also available on our website at https://clark.wa.gov/community-services/cdbg-and-home-applications .
11.	What documentation is to be uploaded for the Service Partnership MOU in the Asset and Economic Development application section?	This pertains to question C7. Please see the Guidance document listed under Asset and Economic Development on our website for information on completing each question of the RFA. https://clark.wa.gov/community-services/cdbg-and-home-applications
12.	What documents are recommended to be uploaded in the Other Document Uploading section?	This is provided for applicants to upload any additional documentation to support their application. It is not required, nor does it tie to any specific question.
13.	How much funding is available?	The amount available is comprised of our annual HUD entitlement amount, plus any program income and repayments made over the past year. Please refer to the pre-submittal conference documentation for more information.