



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

Updated: November 23, 2021 (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.	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 such as loan deferral or shared appreciation 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 – CDBG Infrastructure

1.	Have the low-moderate census maps been updated? Are they the same as last year?	Census maps are updated every five years or when exception criteria changes. The census maps were last updated by HUD in April 2019. 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 pre-application for CDBG funds.
4.	Are more detailed census tract and block group maps available?	Yes; contact Samantha Whitley or 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 – CDBG Social Service

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.	Programming and services are not eligible for CDBG Social Service funding?	Most programs would be considered a Public Service under the CDBG program. The Urban County Policy Board has determined that Public Service programs, as defined by the CDBG regulations, will not be funded through County CDBG funds. 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 Social Service activities?	Recent projects funded 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.
4.	Can CDBG be used to assist small businesses or only microenterprise?	Clark County currently only funds microenterprise assistance due to eligibility and reporting requirements.

Eligibility – HOME

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.
2.	For agencies that provide Tenant-based Rental Assistance (TBRA), do we complete a CDBG and a HOME application?	Only a single Housing and Homelessness application is required for rental assistance and for the corresponding case management from CDBG funding. The budget must show the amount of CDBG funding requested, up to a maximum of 20 percent of the HOME funds requested. If no CDBG funds are needed, this should be explained in the application. CDBG funds will be awarded based on awarding of HOME funds.
3.	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 offered on a voluntary basis include participating in employment search activities, credit repair classes, etc.
4.	How much is available?	The amount available is comprised of our annual HUD entitlement amount, plus any program income and repayments made over the past year. The HUD entitlement is usually around \$450,000 annually, with roughly an additional \$250,000 in program income recycled to new projects each year.
5.	Can rental assistance be used for a transitional group home?	HOME Tenant-based Rental Assistance (TBRA) must allow the tenant to choose their housing unit. Project-based Rental Assistance is not eligible for funding.
6.	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 take only referrals from the Housing Solutions Center. If you work with people who are homeless and in a specific subpopulation, you can request that the HSC only refer this subpopulation to you for TBRA. However, rental assistance may not be conditioned upon program participation and the tenant may or may not engage in your other programs.
7.	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.
8.	Can CDBG and HOME funds be used with other RRH funding?	HOME funds tend to be more restrictive than other funding sources and would require the program adopt the more restrictive requirements. CDBG and HOME funds cannot be used in tandem with other funding for services eligible under other funds. For example, you cannot pay a portion of rent with HOME funds and another funding source. CDBG case management funds can only be used to support households receiving HOME funds and cannot be used until HOME funds are being used for rent assistance.

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 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 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 HOME funding to request from each jurisdiction on a joint rental 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 Prop 1 funds or tax abatements count towards match.

Other Federal Requirements

1.	Do Davis Bacon wage rates apply to housing projects?	<p>For CDBG, Davis Bacon does not apply to projects of eight housing units or fewer. Applicants must determine whether State prevailing wage applies.</p> <p>For HOME, Davis Bacon does not apply to projects of twelve housing units or fewer. Applicants must determine whether State prevailing wage applies.</p>
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 CDBG funds are federal money, 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?	CDBG or HOME funds may not be used to reimburse any work done before contract execution. There is also an environmental review requirement with CDBG and HOME 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.

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 CDBG and/or HOME 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 and 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 tenant-based rental assistance with case management 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 for both CDBG and HOME on the last Friday of October; Completed CDBG and HOME applications on the first Friday of December.
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
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 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 would like to adjust the amount of our request, but I am unable to enter numbers in the blanks. How can I change this amount?	You need to Add Row to enter the amounts. Please refer to the guidance document located at https://clark.wa.gov/sites/default/files/media/document/2021-09/Guidance%20-%20Affordable%20Housing%20and%20Homelessness%20Application.pdf . 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.