

Question & Answers – May 12, 2023 to May 18, 2023

1. Can a community set up a time to discuss project specifics with MEDC staff?

MEDC will be conducting office hours once a week beginning first week in June. The date and time for the office hours will be posted on the website: <https://www.miplace.org/programs/community-development-block-grant/disaster-relief/>

2. One of our local jurisdictions has been granted a Hazard Mitigation Grant project from FEMA that requires a local share amount (\$125,000). We would like to apply for the CDBG grant to cover that amount. However, as they have started the project and thus budgeted the share amount, this may be considered supplanting and wouldn't be allowed with the federal grants I am used to.

Can you check to see if this would be allowed?

In this instance the local share would not be eligible because the project has already started and there is already a budgeted amount and funds have been earmarked.

3. As we're working through potential projects, is it preferable for the community to submit a single, multi-faceted application (inclusive of housing, infrastructure/flood impact mitigation and community asset recovery) or for each project to submit independently?

Each project should be submitted on a separate application for each program. Programs are: Infrastructure and Public Facilities, Planning and Multifamily Housing. Open applications for each program is posted on our website: <https://www.miplace.org/programs/community-development-block-grant/disaster-relief/>

4. The City had a stormwater pump station that is not currently backed up with any generator and the increased frequency and intensity of storms in recent years has caused power outages that has led to backups in the stormwater system. The City is working on sizing a generator to handle the capacity of the pumps to keep them going when the power is out during storms, which typically happens when we get a lot of rainwater in the system. It said that equipment is not eligible for this funding, but does that include the cost of a new generator for the pump station?

Yes, the cost is eligible if the generator is permanently affixed and not able to be moved for other purposes or activities.

5. We would like to add river gauges and conduct flood inundation mapping along the Tittabawassee and Saginaw Rivers. I believe the indication was that this would be an eligible expense under the planning portion of the grant, but I want to make sure that is correct.

Depending on the details, it all may fall under Planning regarding just the mapping while the gauges are under Public Infrastructure. Attending an office hour session would be helpful to talk through details of your project specific. Refer to our website for dates and times:

<https://www.miplace.org/programs/community-development-block-grant/disaster-relief/>

Questions & Answers – May 19, 2023 to June 15, 2023

1. What is the match percentage of the total cost on this grant?

Please review the Scoring Criteria on our website:

<https://www.miplace.org/49b770/globalassets/documents/cdbg/guidelines--applications/infrastructure-program-scoring-criteria-medc-final-508.pdf>

“Budget and Leveraged Funding (10 points): Project budgets should include the sources and uses of available funding. MEDC will score higher projects that are able to leverage other sources of funding.”

There is not a “required” match, but applicants can receive points as stated above.

2. Where is the MEDC HUD LMI list of the census data located?

The information has been posted on our website under “APPLICATION” section.

<https://www.miplace.org/programs/community-development-block-grant/disaster-relief/>

3. Are grant administrators available to help administer the grant?

There will be grant administrators who will be available to help administer the grant. A list of the Certified Grant Administrators eligible for this funding round will be posted on the website.

4. Can Disaster Recovery funds help pay for an individual to write the application(s)?

Disaster Recovery funds cannot pay for individuals to complete an application. A community can utilize who they wish to write the application, but it cannot be paid by Disaster Recovery funds.

5. Is there a limit to how many projects can be submitted by a Community or entity?

No, however funds are made available for the eligible defined area, with the intent that funds are distributed throughout the area. It is strongly recommended that a community or entity prioritize which projects are more important to the community.

6. If a community has multiple projects does each project have to have its own public hearing?

The suggestion is to announce the public hearing in such a way as to state that multiple projects will be discussed. At the public hearing, project #1 should be discussed, questions, comments etc. Then move on to project #2 and so on.

7. A community indicated that there were several local street projects which were being funded by MDOT. Can CDBG-DR funds be utilized for these projects?

This type of project would need to tie back to the flooding disaster and meet a national objective. The documentation needed would be which agency is doing what and what is being paid for by whom.

8. Can CDBG-DR funding be used to expand an existing landfill?

An example would be: If the existing landfill became obsolete before the end of its life expectancy due to the amount of debris attributed to the disaster. This type of project may be considered if there is proper documentation identifying the amount of extra capacity that was utilized due to the flooding disaster. This project would have to tie back to the disaster and meet a national objective.

9. A farmer's market located in a floodplain was destroyed by the flooding disaster.

Can a new farmer's market facility, owned and operated by a non-profit, be an eligible project for this funding?

Yes, the community would be responsible for submitting the application and would also be responsible for the monitoring the project. There would need to be a subgrantee agreement in place. Additionally, there should be no program income generated by the project. This project would have to tie back to the disaster and meet a national objective.

10. The majority of flooding in a community occurred in a non LMI community. However, infrastructure mitigation activities are very important to stop or curtail future flooding. Can "urgent need" national objective be utilized?

Urgent need is an option. However, this should be a discussion for the next "office hours" since there are numerous considerations.

Questions & Answers - June 16, 2023 – June 23, 2023

1. Is the Planning Grant application currently open or does it open in July? Is the Planning Grant a separate grant application from the infrastructure grant?

The Planning Grant-Notice of Funding Availability (NOFA) is being finalized and should be available in late July. There will be a separate application from the infrastructure grant, and it will have its own set of parameters.

2. Can a USDA grant be matched with CDBG-DR funds?

The MEDC encourages other funding sources combining with CDBG-DR to fund a project. A letter of commitment will be required of other funding sources.

It is important that each funding source be separated in the application budget. The budget reflects funding activities with funding sources.

3. If a FEMA grant has been received, but no engineering or construction has occurred, can a community begin the engineering portion of work to get the project kicked off if there is still an intention to apply for CDBG-DR as match?

The rules for a FEMA grant should be followed since the CDBG-DR funding has not been awarded.

Any activity started prior to CDBG-DR award would not be eligible for reimbursement of CDBG-DR funding.

4. Is more than one quote for any work being proposed needed? For example, zoning, hydrology study or a street project.

Federal requirements under 2 CFR Part 200 will apply for any work completed on a CDBG-DR potential project. Discussion of specifics is encouraged since documentation of procurement will be needed for all projects. (Office Hours)

5. If a grant is approved by MEDC who will handle the administration of the project?

After grant award, the MEDC staff will work with each community to identify the need for grant administrative assistance and procurement of a Certified Grant Administrator (CGA).

Communities/subrecipients will be responsible for administering the grant award.

Questions & Answers - June 24, 2023 to July 11, 2023

1. **What should be included in the project budget?**

The project budget should include line items for all project costs for example: engineering, environmental review, the certified grant administrator, as well as, a construction cost estimate. These should be itemized.

2. **Is there a sample “fraud waste and abuse” policy?**

No. However a fraud, waste and abuse policy should include what processes and procedures are in place or will be in place in your community outlining what is being done to make sure that safeguards are in place to ensure that CDBG-DR funds are being spent correctly for eligible projects, that the costs were determined properly and that duplication of benefits will be adhered to. HUD’s Office of Inspector General will be hosting a conference that all grantees will be asked to attend in Spring of 2024.

3. **If we have a Fair Housing Plan which has been adopted, do we need to create a new one for this grant?**

No, depending on the age of the plan, updates might be necessary, but a rewritten plan is not needed.

4. **Clarification was requested on when grant applications are due**

As posted on our web site, the due date for the infrastructure and public facilities is August 22nd at 5pm.

5. **How many letters of support should be in the application?**

There is no specific number of letters of support that are needed. The quantity of support letters is not important, it is the quality of the support letters. What do they say and how the letters provide support from key individuals such as a City Engineer, Public Works Director, Water Treatment Board chairman, etc.

6. **What is the maximum amount allowable for a Certified Grant Administrator (CGA)?**

There is no maximum amount for a CGA. If a community receives more than one project a CGA may be working on multiple projects in the same community and thus compensation will be based on what tasks need to be completed. MEDC will work with grantees to develop a Request for Proposal (RFP) related to the CGA

7. **Are there specific public comment guidelines that are needed?**

Public participation is important. The Grant Administration Manual (GAM) Chapter 11 gives guidance on what needs to be done at the very least. Documentation of what has been done to date to engage the public, businesses, or other groups within the community should be documented.

Questions & Answers – July 12, 2023 – July 21, 2023

1. Can jurisdictions outside of Saginaw, Midland, Gladwin, Iosco, Arenac and Wayne Counties apply for CDBG-DR money?

No, the CDBG-DR funds are designated to be used in disaster areas which were declared by the Federal and State government and received funds through Congressional Authorization for specific areas.

2. Can work which was completed before the submittal of an application be funded/reimbursed?

No, work which was completed before application approval will not be eligible for funding or reimbursement.

3. How long after the August 22nd due date will awards be made?

MEDC will make every effort to make determinations as quickly as possible. A specific timeframe cannot be made because it is unknown how many projects will be submitted and how complex the projects might be. Expectations would be 30 – 90 days.

4. Is there a preferred national objective?

No, there are no additional considerations for a particular National Objective.

5. Once a project is approved can expenses such as engineering be included?

The cost/estimate of project engineering should be included in the project application budget. You should not include incurred engineering costs completed prior to project application approval.

6. How will applications be submitted?

Project applications should be emailed to the web site as a zip drive. If the application is too large one can use multiple emails as long as the documents are clearly marked in subject line “application”, “Part 1”, “Part 2” etc.

7. There was a question regarding LMI data and how to access this.

On the CDBG-DR website, Section “Application” look for the document “HUD Low to Moderate Income Summary Data”

8. When aggregating several smaller projects does an entire application need to be produced including the statement of assurances and various policies for each project?

No, only “**Section 2: Project Information**” on the application will need to be completed for each smaller project which is part of an aggregate project.

9. What is the policy regarding program income?

The MEDC discourages projects which will produce program income. If a project is generating program income and is a priority for the community, MEDC should be contacted to discuss the particulars of that project.

10. Do all policies such as a fair housing ordinance and an excessive force policy need to be approved by a legislative body before submittal?

No, the policies and or ordinances can be marked draft and should be included in the application with information regarding when the ordinances will be on an agenda for approval.

11. Is it advisable to use google map to document flood mitigation activities?

Yes, there is no prescribed documentation source for what can be submitted in the application. The important factor is that any documentation submitted be relevant and is tied back to the application.

12. If CDBG-DR is being used as a match to a FEMA grant, and engineering on the FEMA grant is being completed at present, will that jeopardize the CDBG-DR funds since work is being done before the grant award?

No, you should be documenting the FEMA timeline in your application and you should be working on the FEMA grant as needed. The CDBG-DR grant is not meant to slow down or supplant FEMA requirements.

13. Will there be another application round for infrastructure funding?

At this point it is hard to give a definitive answer until the number and cost of projects received is known. The information in the project description says there may be a second round but if MEDC receives enough projects that are qualified there may not be the need for a second round.

14. Should contingency be included in the project budget?

Yes, contingency should be a part of the overall estimated budget.

15. Will there be the ability to adjust the budget concerning Certified Grant Administrators once RFQs are received and a Certified Grant Administrator is chosen?

Yes, the Certified Grant Administrator line item in the budget is an estimate at the time of the submittal of the application.

16. What is a definition of a contractor?

A contractor would be someone who provides a service related to construction, engineering, architecture, environmental review, etc.

17. Would the purchase and installation of a generator be considered a project?

Yes, as long as it meets a national objective and has a tie back to the disaster.

Questions and Answers July 22-July 28, 2023

1. **Is there a Public Participation Form?**

Yes, there is a Public Participation Form which has been added to the CDBG-DR web site.

2. **Is it necessary to list all the CDBG grant projects which may not be closed out on the application?**

No, there is no need to list all the projects. What can be done is to list a year and the number of projects that are open/underway. For example, 2019 - seven projects, 2020 - 16 projects.

3. **There was a question about the anti-displacement plan for a participating jurisdiction. There was a concern that perhaps the community did not have a plan.**

It was communicated that a community that receives federal funding should have an anti-displacement plan. A plan that was passed previously can be used. The current plan may be of a different name.

4. **In the application there is a question regarding listing jurisdictions that will benefit from a particular project.**

The community that is submitting the application should be listed. The second question in the application - the community should be listed along with any communities which might benefit, for example City of Glenco/County of Morris.

5. **Should a Certified Grant Administrator (CGA) be engaged before the application is submitted?**

No, a Certified Grant Administrator should not be engaged until a community knows that a project will be funded. For purposes of an estimate, a placeholder of \$25,000 in the application Budget should be utilized for the Certified Grant Administrator cost.

6. **How should FEMA projects be handled when documenting the application form?**

HUD CDBG-DR can be utilized as match to a FEMA funded project. The amount of the FEMA grant should be recorded in the application budget, as well as, the amount of the CDBG-DR requested. If a FEMA project was denied or if components were denied by FEMA, that information should be clear in the budget. The reason for FEMA denial should be in the project write-up and description.

7. **Is there a Sample Authorizing Resolution template?**

Yes, a sample authorizing resolution template has been added to the CDBG-DR web site.

8. **If a current Citizen Participation Plan does not have all the requirements in it, does a new plan need to be developed and approved?**

Not necessarily. A community should look at their previously federal funded projects or other programmatic initiatives which require a citizen participation plan. In some cases, the missing item might be in other documents. The community should submit what it has and MEDC staff will work with the community, if need be, regarding the plan and missing information.

Questions and Answers July 28, 2023 – August 3, 2023

1. **What is referred to when there is the phrase cross cutting Federal Compliance?**
This refers to Fair Housing, Section 3 and Labor Standards.
2. **If a project is being submitted on behalf of a non-profit, does the organization need site control?**
Yes, site control is required for projects. Documentation of site control should be included in the application where applicable.
3. **In the event of purchasing a property, what is the correct process for determining a fair market price?**
The hazard mitigation process for valuing the property to be purchased from the flood zone is to use a State licensed appraiser. If the seller is not in agreement with the initial valuation, they can hire their own State licensed appraiser to challenge the dollar amount.
4. **Can a community submit an application on behalf of a non-profit?**
Yes. However just like any other application, the project must have a tie back to the disaster, must meet a national objective and must meet the requirements of the infrastructure program.
5. **Is the ten million dollar maximum per project or community?**
The ten million dollar maximum is per project. Please be aware that there are a number of jurisdictions that will be submitting projects so although there is not a dollar amount allocated to specific areas there will be an effort to make sure that funds are distributed throughout the disaster area(s) equitably.
6. **We are looking for clarity as to the eligibility for a 338 Corporation to apply for CDBG-DR Planning funds. Secondly, if eligible, could you please clarify the funding caps, for resiliency planning studies specifically.**

Here is the language within the posted 2020 NOFA on our website related to Planning:

“The 2020 Planning Program will award funds to eligible planning activities within the identified HUD/State MID counties of Midland, Gladwin, Saginaw, Arenac, and Iosco that aim to minimize future risks through intentional comprehensive and land use planning, building requirements, zoning ordinances, studies and strategic plans.”

“Eligible applicants to this program include the State and local government entities located within the Most Impacted and Distressed (MID) Areas.”

“Applicant requests for funding cannot exceed \$500,000 for State HMP and related activities, \$150,000 for local Hazard Mitigation Plans, and \$300,000 for Resilience Planning.”

Below is the link to the 2020 NOFA:

https://www.miplace.org/4a1e9e/globalassets/documents/cdbg/resources/planning-nofa-2020_508.pdf

Questions and Answers
Office Hours - August 15,2023

1. Would a study about the sanitary sewer system be eligible for a planning grant?

Yes, a study concerning the sanitary sewer system would be eligible. The study should be linked to hazard risk mitigation.

2. Is the 40% funding rule for all projects or just for housing projects?

The 40% funding cap is for housing projects only. The cap on a project basis is 10 million dollars.

3. When are the Planning and the Housing applications due?

Planning applications are due September 24th, and Housing applications will be announced shortly.

4. Can a CDFI submit an application directly for a housing project?

No, an application must be submitted through a local unit of government.

5. A number of specific questions were raised about the scope of the populations to be served for multi-family housing and where the data was received in making the decisions. Additionally, there was a broader discussion about the parameters of the multi-family housing program.

The Multi-family housing program will be the topic of the next Office Hours on Tuesday, August 22nd.