

Community Development Block Grant CARES Act



Program Instructions

Indiana Office of Community and Rural Affairs
One North Capitol, Suite 600
Indianapolis, IN 46204



Hoosier Enduring Legacy Program

Table of Contents

General Grant Information	4
Minimum Requirements of Grant Applicants	4
Available Maximum Grant Amounts	4
Match Requirements	4
In-kind Match Requirements	4
General Eligibility Criteria	5
Grant Administration and Procurement Requirements	5
Application Process & Submission	6
Expenditure Deadline	6
Application Threshold & Evaluation	6
Readiness to Proceed	6
Granting Process	7
Reporting Requirements	7
Program limitations	7
Technical Assistance	7
National Objective of the Federal Act Requirement	7
A. Benefit to Low- and Moderate-Income Persons – Area Basis	7
Income Survey	7
B. Benefit to Low- and Moderate-Income Persons- Limited Clientele Basis	8
C. Benefit to Low- and Moderate-Income Persons- Job Retention	8
CARES Act Requirements	9
Prevent, Prepare, or Respond Tieback	9
Duplication of Benefits	11
Selecting Activities	12
Ineligible Activities	12
Eligible Activities	13
Other eligible costs	15
Projects Combining Eligible and Ineligible Activities	16
Public Hearing & Citizen Participation Plan	16
Application Narrative Guides	18
Construction Projects	18
Application Narrative Guide	18
Public Service Program & Economic Development Project	20

Application Narrative Guide.....	20
Planning Application	22
Narrative Guide.....	22
Owner Occupied Rehabilitation	24
Application Narrative Guide.....	24

General Grant Information

The Grant Application Instructions are designed to provide information about The Office of Community and Rural Affairs (OCRA) Community Development Block Grant CARES Act (CDBG-CV) program and to provide instructions for preparing and submitting a funding request.

The goal of the CDBG-CV program through OCRA is to help communities, with eligible populations, to carry out eligible activities that prepare, prevent or respond to the coronavirus pandemic. Projects must demonstrate the following:

- They meet the goal of the Federal Act;
- They meet the goal of the CARES Act;
- The particular project is designed to prepare, prevent or respond to the coronavirus pandemic;
- The funds granted will have a significant impact on residents;
- The community has demonstrated a strong commitment to the project and its sustainability; and
- The project is ready to proceed and be complete within 18 months upon construction grant funded or within 12 months upon planning grant or program grant funded.

Minimum Requirements of Grant Applicants

This grant opportunity is available to eligible non-entitlement local unit of government selected to participate in the Hoosier Enduring Legacy Program. Eligible local units of government are counties, cities, or incorporated towns. Unincorporated areas must apply through the county in which they are located. The lead applicant must have the legal capacity to carry out the proposed project or program.

The lead applicant may contract with a not-for-profit organization to carry out an eligible program's or project's activities, provided that the organization can document its non-profit status with the U.S. Internal Revenue Service, the Indiana Department of Revenue, and the Indiana Secretary of State.

Available Maximum Grant Amounts

OCRA has made \$9 million in CDBG-CV funds available for the Hoosier Enduring Legacy Program. OCRA has established a maximum grant award of up to \$1 million.

OCRA will review the level of grant assistance requested and will consider the appropriateness of the project's scope, reasonableness of budget, and demonstrated need. If OCRA determines that a lesser amount is appropriate, it may be necessary to revise the project and budget before award.

Match Requirements

Communities are required to allocate a minimum of 30% of the community's CLFRF allocation (ARPA) to projects in the Strategic Investment Plan. OCRA will match the community investment one to one for the implementation of SIP projects up to \$1 million. Applicant or subrecipient must provide proof of the availability of those funds at the time of application.

In-kind Match Requirements

All requests to use in-kind match must be submitted two (2) weeks before the application deadline via email to CDBG program Director at cdbg@ocra.in.gov.

Eligible sources of the in-kind match include but are not limited to:

- The appraised fair market value of donated land. (Land donations by applicants, developers, organizations, or individuals with financial or ownership interest in the project are ineligible as an in-kind match);
- Volunteer labor is calculated at \$15.00 per hour regardless of the type of work; and
- Donated goods or services valued at regular cost.

In-kind match requests must include:

- A summary of the request that shows a breakdown of how the amount was calculated.

- A letter from the chief elected official requesting the use of In-Kind match and identifying the amount requested.
- Supporting documentation, including a commitment letter from the donor regarding what is being donated and the value; and
- In the case of land donation, a copy of the fee appraisal (a review appraisal is not required) and all supporting URA documentation.

General Eligibility Criteria

To be eligible for CDBG-CV assistance, projects must meet the following minimum requirements:

- All proposed projects must meet the CARES Act requirements. Eligible CDBG-CV activities must show clear tieback to coronavirus, avoid duplication of benefits, and meet all applicable expenditure deadlines.
- All proposed projects must meet a National Objective of the CDBG-CV Program and be an eligible activity under Section 105 (a) of the Housing and Community Development Act of 1974.
- In general, the proposed project must meet one of two national objectives:
 - **Benefit to a low- or moderate-income person or households, defined as:**
 - **LMI Area Benefit** – the proposed activity benefits all residents in a defined area in which at least 51% of the residents are LMI persons. LMI information is provided by HUD mapping tool using American Community Survey data. If a new income survey is used, it must be completed before the application deadline.
 - **LMI Limited Clientele** –The proposed activity benefits persons that qualified based on income at least 51% of those persons are LMI persons or the proposed activity benefits a “presumed clientele.”
 - **Presumed Clientele:** the proposed activity benefits a defined group of persons in a “presumed” LMI class. The following clientele are presumed by HUD to be of low and moderate income: abused children, homeless persons, elderly persons, persons living with AIDS, battered spouses, Migrant farm workers, Adults meeting the Census definition of severely disabled.
 - **LMI Job Retention-** the proposed activity results in the retention of jobs and at least 51% of the retained jobs are held by LMI persons.
 - **LMI Housing-** (Only for Owner Occupied Rehab Program) To show that a project will benefit low- and moderate-income people, awardees will be responsible for verification of income for each household participating in the program.
- If the lead applicant has previously received any CDBG funds through OCRA or the Indiana Housing and Community Development Authority (IHCD), the applicant must **NOT** have:
 - any unresolved monitoring/audit findings.
 - any overdue grant reports or closeout documents; or
 - any Program Income collected from any previous CDBG grant must be obligated for use, that has been approved by OCRA, before the submission of a new CDBG-CV application. Please contact the CDBG staff at cdbg@ocra.in.gov for additional information regarding Program Income.

Grant Administration and Procurement Requirements

An OCRA Certified Grant Administrator is required for this program. All grant administrators involved in the projects must be fully OCRA Accredited CDBG Grant Administrators. This certification must be current at the time of application. A list of Certified Grant Administrators and other related information can be found at www.in.gov/ocra/2536.htm.

Per federal regulations, projects funded with CDBG-CV must use the Qualifications Based Selection (QBS) procurement method for architectural and engineering services. All other professional services must be procured using the Request for Proposal (RFP) method. These methods are required regardless of the sources of the funds being used to pay for the service. Please contact your Community Liaison for more information.

NOTE: Private firms or non-governmental entities that perform project development and administration activities for CDBG-assisted projects (project development, environmental review, grant application preparation, procurement

assistance, grant administration) will NOT be allowed to perform architectural, engineering, planning, or other related services/activities for grantees or their non-profit sub-recipients on those projects.

Application Process & Submission

A separate application must be submitted for each project requesting CDBG-CV funds. Applications must be submitted via the Indiana Electronic Grants Management System (INeGMS). The system is accessed via the main CDBG webpage at www.in.gov/ocra/cdbg.htm.

The application must be submitted no later than January 21, 2024 for:

- **Construction projects**

The application must be submitted no later than June 21, 2024, for:

- **Public services programs**
- **Economic development programs**
- **Planning projects**

This is a one stage application process: Applicants should be aware that preparing a complete application is a complex process that requires a substantial investment of time and resources. Submission of an application requires detailed supporting materials and documentation. Therefore, such materials and documents must be referenced in narratives using the file name and page number. For example, (Filename-00). Failure to comply with submission requirements could render an application ineligible.

Reminders

- Review each section and make sure all information is accurate.
- Use line breaks to separate paragraphs in the narratives.
- Pictures should be in a single PDF file at the highest resolution possible with clear captions and dates.
- Be sure to reference the file name and page number of each piece of supporting documentation that has been uploaded, and do not include uploads that are not discussed or referenced in the narrative, or related to the project unless federal or state policy requires.
- There should be no handwritten notes, dates, etc. within any upload.

Expenditure Deadline

CDBG- CV funds are available for limited purposes under the CARES Act. **Failures to apply by the due date will limit a grantee's ability to complete projects and ensure OCRA meets the expenditure deadline of all CDBG-CV funds by Jan. 21, 2026.** Applicants must take the expenditure deadline into account during the project development phase.

Application Threshold & Evaluation

OCRA will review each application and evaluate it to determine if it (1) meets a national objective, (2) is an eligible activity, (3) meets funding requirements, including prevent, prepare, or respond tieback and duplication of benefits, (4) meets a specific level of readiness to proceed. If any documentation needs to be included, the grant administrator will be contacted to remediate the submission promptly.

Readiness to Proceed

Given the limited amount of time to expend CDBG-CV awards, applicants should submit a complete application that abides with all other federal cross-cutting requirements including sufficient information to ensure the project has demonstrated it is ready to proceed. The applicant must certify that the following elements have been completed and submitted: project financing (match), engineering, permits & site control documentation.

For further guidance on the requirements please contact [Grant Services](#).

Granting Process

Grant Services will contact each community after threshold review and successful application evaluation to start the next steps in the granting process.

Reporting Requirements

CDBG-CV programs must report certain accomplishments and information quarterly, semi-annually, or annually. The Grant Agreement will indicate submission due dates and activity completion benchmarks for the project. UGLGs are required to follow all reporting requirements outlined in the Grant Agreement timetable.

Program limitations

Hoosier Enduring Legacy Program participants may only apply for additional CDBG competitive funding after they have achieved Release of funds (ROF) and an executed contract is in place with all projects undertaken with CDBG-CV funding as part of the Hoosier Enduring Legacy Program.

Technical Assistance

Applicants are strongly urged to take advantage of technical assistance available through their Community Liaison throughout the project development phase and application process so that a complete and compelling application can be submitted. A map of community liaison districts is located at <http://www.in.gov/ocra/2330.htm>.

Applicants can also find current information on OCRA Community Development Block Grant – [CARES Act webpage](#). Questions regarding the CDBG-CV Program can be directed to Senior CDBG Program and Policy Analyst by emailing pguerrero@ocra.in.gov or cdbg@ocra.in.gov.

National Objective of the Federal Act Requirement

All CDBG-CV-funded projects must meet a National Objective of the CDBG Program. As amended, title I of the Housing and Community Development Act of 1974 identifies the national objectives of the CDBG-CV program. The lead application must demonstrate that it meets the required National Objective by providing all the required documentation and answering all relevant questions related to the chosen National Objective for the project. Select one of the following National Objective and answer the questions outlined below.

A. Benefit to Low- and Moderate-Income Persons – Area Basis

To show that a project benefits an area of low- and moderate-income people, the following questions must be answered in the application on **Section 3: National Objective page**:

- 1) What are the boundaries of the service area?
- 2) How do the boundaries correspond to the project's intended beneficiaries?
- 3) Using HUD Census data or a certified income survey, what percentage of persons in the service area are of low-to-moderate income?
- 4) How were the income characteristics of the target population determined?
- 5) Is the proposed facility available to all service area residents?

Income Survey

The following documentation **MUST** be provided in the application if using an income survey that was approved under OCRA's previous income survey policy (prior to June 5, 2022):

- 1) Detailed map(s) showing the location and boundaries of the service area, including street names.
- 2) HUD LMI Data Maps and Worksheet
- 3) The methodology of the income survey, the low-to-moderate income worksheet, and the sample survey instrument must be included.
- 4) Preapproval email to conduct an income survey from OCRA CDBG program staff.

If using an income survey that was initiated under OCRA's current policy (effective June 5, 2022):

- 1) All completed income survey documentation for construction projects should be submitted for final approval in eGMS at least 10 days before the corresponding application due date. See [OCRA Income Survey Policy \(Effective 06/05/22\)](#).
- 2) All income surveys for both construction or public services projects must be approved by OCRA in eGMS ahead of the application due date.

B. Benefit to Low- and Moderate-Income Persons- Limited Clientele Basis

There are eight groups of people presumed by federal regulations to be made up of at least 51% low- and moderate-income persons. Those groups are as follows:

- Senior citizens (people who are 62 years of age or older);
- Migrant farm workers;
- Abused children;
- Battered spouses;
- Severely handicapped adults;
- Homeless persons;
- Illiterate adults;
- Persons with AIDS

For Limited Clientele projects serving other persons, the benefit to low- and moderate-income persons must be documented by an income verification process utilizing HUD income thresholds and should include at least three (3) months of data of beneficiaries.

For a limited clientele project, the following questions will need to be answered in the application on **Section 3: National Objective page**:

- 1) Who will use the proposed facility? Are the beneficiaries in a group presumed to be low- and moderate-income, or will beneficiaries be qualified based on income?
- 2) Will any other groups or the general public also use the facility? If so, to what extent?
- 3) If the facility is to be used on an income-eligible basis, how will income and family size information of users be documented?
- 4) How was the percentage of low- to moderate-income users determined or estimated?

C. Benefit to Low- and Moderate-Income Persons- Job Retention

The following questions must be answered in the application on **Section 3: National Objective page**:

- 1) Who will be the beneficiaries served by the program? How will beneficiaries be qualified to receive CDBG-CV assistance?
- 2) What is the objective of the program? What type of businesses will participate? How will the UGLGs determine the income qualification for program participants?
- 3) How will the UGLGs select participants and ensure the program meets the LMI requirements?

Note: OCRA will provide the FTE calculation sheet to assist applicants' compliance with the 51% LMI requirement. The FTE calculation sheet must be attached to the grant administration documents. In determining LMI National Objective compliance with job retention only **Permanent** jobs may be counted; temporary jobs may not. Full time jobs require a worker to work at least 1400 hours per year or 30 hours a week.

- **Part time** jobs require a worker to work at least 875 hours but less than 1400 hours per year or an average of less than 30 hours per week. Part-time jobs **must** be converted to Full Time Equivalents (FTE). An FTE is defined as two part time jobs.
- **Seasonal** jobs may count only if the seasonal job lasts long enough and provides sufficient income to be considered the employee's principal occupation. (Contact CDBG staff prior to counting seasonal jobs towards LMI benefit.)

CARES Act Requirements

CDBG-CV funds can be used for the same wide range of activities that are eligible under the CDBG regulations; however, the CARES Act requires that all activities assisted with CDBG-CV funds must be used to **prevent, prepare for, and respond to COVID-19**, and grantees must have adequate **policies and procedures in place to prevent duplication of benefits**.

Prevent, Prepare, or Respond Tieback

HUD requires all CDBG-CV funds be used for coronavirus-related needs to satisfy the CARES Act statutory purpose. **Projects must prevent, prepare for, or respond to the coronavirus**. Applicants can evaluate if a project meets the prevent, prepare, or respond tieback by designing projects that address the direct effect or indirect effects of the pandemic. Applicants can choose to design projects to drive economic recovery, infrastructure, services, and overall community resiliency to respond to the coronavirus. The rationale for its connection to addressing coronavirus will vary but must be documented in the application as part of your project review and eligibility analysis.

Guidance for justification & documenting prevent, prepare for, or respond tieback.

The justification for the project must be incorporated in the narrative section of the application, including the project description and project need. Clearly explain how the activities or strategies are focused on documented local qualitative and/or quantitative data on coronavirus effects or impacts. Consider backward and potential forward-looking risks or vulnerabilities when considering the justification for the activity.

Local data documentation can be satisfied through community members' letters, surveys, or letters of support from local providers clearly explaining the need for the project. Justification and documentation can be related to coronavirus risk to the overall economic, service, housing, and infrastructure serving LMI neighborhoods in the community. Other documentation of data-related topics such as:

- ✓ Disproportionate impact on vulnerable communities
- ✓ Behavioral & Mental health
- ✓ Educational attainment gaps
- ✓ Growing food insecurity
- ✓ Increased need for reliable broadband access
- ✓ Business ecosystem

Employing quantitative data strengthens the justification for the project, and the prevent, prepare and respond (PPR) tieback documenting requirements can be better fulfilled by using a mix of local anecdotal data and other sources of information. Applicants are strongly encouraged to consult with CDBG staff for assistance with projects prepare, prevent for, or respond to the coronavirus tieback. Please refer to the following sources of information to identify best resource for tieback:

- Hoosier Enduring Legacy Program: Community Profile data provided by Civic Lab
- Indiana's leading source for economics & demographic data: <https://www.stats.indiana.edu/>
- Indiana Maps: <https://www.indianamap.org/>
 - A collection of authoritative data and web service
- Indiana State Library data: <https://www.in.gov/library/collections-and-services/isdc/statistics-by-topic/>
 - Vast menu of data topics
- Indiana Department of Health data: <https://www.coronavirus.in.gov/>
- Coronavirus Hospital Admissions
- Emergency Department Visits
- Coronavirus Deaths
- COVID-19 Cases
- SARS-CoV 2 Wastewater concentration
- Youth and COVID-19
- County data
- CDC: National Center for Health Statistics: <https://www.cdc.gov/nchs/index.htm>
- Indiana Department of Workforce Development data: <https://www.in.gov/dwd/data/>

- Hoosiers by the numbers: COVID-19 data
 - Unemployment
 - Jobs in demand
 - Workforce Economics
- Indiana Department of Natural Resources: <https://www.in.gov/dnr/>
- Indiana Housing & Community Development Authority dashboard: <https://www.in.gov/ihcda/dashboard/>
- Family and Social Services Administration data: <https://www.in.gov/fssa/carefinder/statistics-and-reports/>
 - County data: Childcare centers & capacity
 - County data: Childcare licensing
- Stats Indiana: Childcare data & Economics: <https://www.stats.indiana.edu/topic/childcare.asp>
- Indiana Management Performance Hub data:

<https://www.in.gov/mph/projects/opioid-epidemic/>

- Indiana Department of Education data: <https://www.in.gov/doe/it/>
- Indiana food insecurity: <https://map.feedingamerica.org/>
- Indiana broadband access: <https://pcrd.purdue.edu/ruralindianastats/broadband/ddi.php?variable=ddi-overview&county>
- Census Bureau: <https://www.census.gov/quickfacts/IN>
- Pew Research Center: <https://www.pewresearch.org/>
- HUD CDBG Data Quick Guide: <https://files.hudexchange.info/resources/documents/CDBG-Consolidated-Plan-Data-Quick-Guide-Additional-Resources.pdf>
- Other reputable institutions, government websites or national studies

- A. The following must be included in the application narrative in **Section 4: Project Description:**
- 1) **Application Narrative:** provide a detailed, easy to understand description of the activity and clear measurable outcomes for the activity as it relates to COVID-19.
- B. The following must be included in all applications narrative and uploads in **Section 5: Project Need:**
- 1) **Application Narrative:** provide a clear and concise summary of the impact of the CDBG-CV assistance to the community and a description explaining how the proposed project prevents, prepares to, or responds to the coronavirus pandemic. Utilize local data (quantitative or qualitative) and/or state data to justify the need for the activity is needed to adequately prevent, prepare for, or respond to coronavirus.
 - 2) **Application Uploads:** Answer the following questions in a separate document and include in the uploads. Document must be labeled CARES Act Justification-00. Document should include page numbers. CARES Act justification must demonstrate the impact of the CDBG-CV assistance by addressing the following:
 - a) How will proposed activity prepare, prevent, or respond to the coronavirus pandemic?
 - b) How is the project designed to address an established health and/or economic need or ongoing need due to COVID-19 in the community?
 - c) Why is the proposed activity the best solution to address the effect of COVID-19?
 - d) Are local data, state data and other data included to adequately describe a relation between the program and the need? If the data is not evident, how will the community benefit from the program as it relates to COVID-19?

- 3) **Application Uploads:** Upload local and/or state data of documented coronavirus effects or studies used to justify the activity is adequate to prevent, prepare for, or respond to coronavirus. Document must be labeled PPR Tieback Data-00.
 - If the activity selected is Owner Occupied Rehabilitation or Economic Development assistance to for profit or microenterprises: Upload the application to be used to evaluate the assistance provided.
 - **Local applications must, at a minimum:** Incorporate in the local application a prevent, prepare for, or respond tieback for program participants to justify the need for the assistance. This requirement can be fulfilled by incorporating questions to the application and/or documentation requirement as part of the application process.

Duplication of Benefits

Many communities have received federal stimulus funds from the CARES Acts, American Rescue Plan (ARP), or other federal allocations that can be used for the same eligible activities as CDBG-CV, as such OCRA must consider any duplication of benefit.

Per the Stafford Act “Duplication occurs when an agency has provided assistance which was the primary responsibility of another agency, and the agency with primary responsibility later provide assistance.” CDBG-CV funds cannot be used to pay for eligible costs that have already been paid for, or will be paid for, by another Federal program, insurance, charitable giving, or other sources. If this occurs, the grantee must repay its CDBG-CV grant.

The procedures described below are applicable to all CDBG-CV grantees and sub-recipients and must be incorporated in the design and administration of projects undertaken by grantees and sub-recipients.

To determine if any duplication has or will occur, each applicant must complete the [Duplication of Benefit form](#) and upload it with their application. On the form, applicants will provide details on any federal stimulus funds received and their status. Any of those funds that are not yet obligated could be considered duplicative of CDBG-CV funds and could decrease an award. HUD has developed a [CARES Act Programs spreadsheet](#) to assist in the duplication of benefits analysis. All other sources of CDBG-CV assistance received, or available to be received, must be disclosed during the application process and must be verified when reasonably possible. CDBG-CV assistance is intended to supplement—not supplant—other public, private and nonprofit sector resources that have already been provided for the same need or loss and are legally required to constitute a duplicative source of financial assistance.

A grantee must also verify that subrecipients, assisted individuals or families, businesses, and other entities that receive CDBG-CV assistance have not previously received, or will not receive, duplicative assistance from another source before CDBG-CV assistance is provided.

- A. The following must be included in all applications narrative for programs that will be providing direct assistance to persons, households, or businesses in **Section 6: Financial Impact:**
 - 1) **Application Narrative:** provide a clear and concise summary of how duplication of benefit will be avoided and explain the local policies and procedures that will be used to prevent the duplication of benefits.
- B. The following documentation must be upload to application for programs that will be providing direct assistance to persons, households, or businesses in **Section 6: Financial Impact:**

- 1) **Application Uploads:** Answer the following questions in a separate document and include in the uploads. Document must be labeled DOB Process-00.
 - a) How duplication of benefit will be avoided?
 - b) Include the established local policies and procedures that will be used to prevent duplication of benefits and checklists that will be used. Please use the naming format: DOB Process-00. For example, DOB Process-01.

Policies and procedures must, at a minimum:

- (1) Assess whether CDBG-CV funds will duplicate financial assistance already received for related unmet need and period of performance. Grantees should complete an analysis of duplication of benefits including:
 - a) Assess Need: Determine the amount of need (total cost)
 - b) Determine Assistance: Determine the amount of assistance that has or will be provided from all sources to pay for the cost.
 - c) Calculate Unmet Need: Determine the amount of assistance already provided compared to the need to determine the maximum CDBG-CV award (unmet need)
 - d) Document analysis: Document calculation and maintain adequate documentation justifying determination of maximum award.
- (2) A subrogation clause should be included in the assistance agreement for any person or entity receiving CDBG-CV, to ensure repayment of assistance is provided if it is determined to be duplicative.
- (3) For economic development assistance providing CDBG-CV funds, grantees should incorporate complete an analysis of duplication of benefits into their program design, application intake, and verification procedures, and underwriting procedures should demonstrate the following:
 - a) How due diligence is conducted by grantee, subrecipient and/or contractor.
 - b) How grantee and its subrecipients, contractors and/or partners assess and become familiar with other assistance sources that may be available to pay for coronavirus-related needs.
 - c) Grantees monitoring re-verification or calculation of the need at the end of the grant performance period.

DOB Resources

- For more information, review OCRA's duplication of benefits disclosure clarification [video](#).
- See Duplication of Benefits (DOB) Guidance, CDBG-CV [Duplication of Benefits Resources](#).
- For more information on DOB HUD requirements, visit Federal Register, [Docket No. FR-6218-N-01](#), section III.B.9 Duplication of Benefits
- For more information on DOB HUD requirements, visit Federal Register, [Docket No. FR-6218-N-01](#), section III.B.9 Duplication of Benefits

Selecting Activities

CDBG-CV funds may only be used to fund community development activities carried out **to prevent, prepare for, or respond to coronavirus. By law, use of funds for any other purpose is unallowable.**

Ineligible Activities

This list is not meant to be all-inclusive; please consult your Community Liaison for questions regarding specific projects.

The following is a list of **some** of the projects that are not eligible for CDBG-CV funding:

- Activities that do not prevent, prepare, or respond to COVID-19
- The acquisition, construction, or rehabilitation of buildings for the general conduct of government;
- Real property acquisition for ineligible activities;
- General equipment purchase;
- Purchase of items that are living (plants, trees, sod, animals, etc.);
- General government expenses;
- Maintenance and operation costs;
- Political activities of any nature; or
- Direct construction of new housing.
- Income payments to residents
- Religious purposes

Eligible Activities

The following general activities are eligible for CDBG-CV funding. This list is not meant to include or to exclude any particular project.

A. Public Facilities and Infrastructure Projects:

In general types of activities that are eligible for CDBG-CV funds include unmet community facilities construction or rehabilitation needs that prevents, prepares for, or responds to COVID-19, in addition to meeting CDBG program requirements.

- Public Facilities must be owned by a local government or non-profit agency. It is the responsibility of the applicant to assure the non-profit status of the entity. Applications for community facilities must provide evidence of the ability to operate and maintain the facility for the purpose intended.
- Examples of eligible activities include:
 - a) Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements.
 - Acquisition of property to carry out COVID-19 relates services.
 - Construct a public facility, such as a park, childcare or senior center.
 - Creation of outdoor areas with shade covers and seating that ensure physical distancing.
 - Reconstructing degraded water lines to ensure potable water.
 - Increase storm water and sewer capacity to increase community hygiene.
 - b) Rehabilitation of buildings and improvements
 - Rehabilitate a public facility HVAC system to improve indoor air quality and ventilation.
 - Technology improvements to support remote access.
 - Rehabilitation of public facility incorporating social distance measure and facilities to increase hygiene such as wash station, hand sanitation stations, etc.
 - ADA barrier removal and compliance
 - c) Owner Occupied Rehabilitation Programs eligible activities include:
 - Rehabilitation of these activities of privately own residences
 - Roof repair or replacement
 - ADA accessibility up to the threshold of the home
 - Heating and cooling replacement

- Lighting and electrical upgrades
- Water heater replacement

For examples, on eligible Public Facilities and Infrastructure Projects refer to [Appendix A](#). Please consult with the CDBG staff to determine if the proposed public facilities and infrastructure project is eligible.

B. Public Services Programs:

In general, to utilize CDBG-CV funds for a public services activity, it should address unmet needs in the effort to prevent, prepare for, or respond to COVID-19 by providing needed public services in lead applicant jurisdiction. The service must be a new service or a quantifiable increase in the level of an existing service in the 12 months preceding the submission of the state’s Consolidated Plan Annual Action Plan to HUD.

- When proposing activities that represent a new expansion of current programming, the application (and proposed budget) should describe how CDBG-CV grant funds will only be used on the proposed expansion activities. Applications should clearly describe how proposed activities represent new programming or new expansion of current programming.

CDBG-CV funds may be used for eligible cost including:

- Pay for labor, supplies, and material as well as to operate and/or maintain the portion of a facility in which the public service is located. This includes the lease of a facility, equipment required to carry out the service, and other property needed for the public service.

For example, on eligible public service activities refer to [Appendix B](#). Please consult with the CDBG staff to determine if the proposed public service eligible cost is eligible.

C. Economic Development Programs:

In general, types of activities that are eligible for CDBG-CV funds includes Special Economic Development or Microenterprise activities:

- a) Special Economic Development relates to assistance to for-profit businesses with 100 employees or less including:
 - **Direct Assistance to For-Profit Businesses:** Grantees can create program that provide financial assistance to for-profit businesses. The type of assistance includes forgivable grants to cover for eligible activities such as:
 - Working capital
 - Operating costs
 - Capital to adapt to new market conditions and to mitigate risk in terms of business facilities, equipment, systems, and staffing.

The assistance to private for-profit businesses must have underwritten including duplication of benefits analysis as part of the financial assistance origination. The business must retain low to moderate income jobs and demonstrate that CDBG-CV assistance is needed due to business disruption related to coronavirus.

- **Economic Development Technical Assistance Services to For-Profit Businesses:** Grantees can create program to provide technical assistance and/or case management services to for-profit businesses to build capacity to prevent, prepare for, and respond to coronavirus. CDBG-CV funds can be used to cover for eligible activities such as
 - Workshops
 - Assistance in developing business plans.
 - Marketing

- Referrals to lenders or technical resources
- b) Microenterprise assistance must meet HUD definition of a microenterprise, a commercial enterprise that has five (5) or fewer employees, one (1) or more of whom is the owner. The assistance is only eligible to business that meet HUD microenterprises definition.
- Local governments must partner up with small business development center, Community Development Finance Institution (CDFI) or Economic Development Agency (EDA) or show local capacity to carry out, administer and implement a microenterprise assistance program.
 - Qualifying business owners must be meet low to moderate income requirements to receive assistance.
 - General types of activities that are eligible microenterprise activities include:
 - Technical assistance, advice, and business services to owners of microenterprises and persons developing microenterprises.
 - Expand services to help microenterprises to prevent, prepare for, and respond to coronavirus.
 - Financial assistance (grants) to establish, stabilize, and expand microenterprises to revitalize communities and local economies affected by coronavirus or to prepare for and prevent future outbreaks.
 - General support to owners of microenterprises and persons developing microenterprises. It may include activities as peer support programs, counseling, childcare, or transportation.
 - Training, technical assistance, or other support services to increase the capacity of recipients or subrecipients to carry out microenterprise activities.
 - Wrap around services providing microenterprises with workshops for adapting businesses practices.

For examples, on eligible Economic Development programs refer to [Appendix D](#). Please consult with the CDBG staff to determine if the proposed economic development activity is eligible.

D. Planning Projects:

In general, CDBG-CV funds can be used to address unmet needs for planning projects that prevent, prepare for, or respond to COVID-19. A planning activity aims to provide communities the opportunity to solve problems and meet citizen needs through a holistic community planning process that will enable the community to effectively plan for a comprehensive coronavirus recovery, respond or prepare to mitigate future outbreaks.

- Planning activities must meet OCRA [minimum planning requirements](#)

For examples, on eligible planning projects refer to [Appendix E](#). Please consult with the CDBG staff to determine if the proposed planning activity is eligible.

Other eligible costs

A. General Administration: Reasonable and eligible costs associated with the administration of a proposed activity. **This includes costs related to labor standards and environmental review, if applicable.** OCRA has established a maximum of 2.5% of the grant, if paid with CDBG-CV.

B. Property Acquisition

- Surveying and appraisal costs
- Legal costs related to the acquisition.

- Actual purchase costs of land or easement provided URA is followed, and the property is not purchased before release of funds.

Projects Combining Eligible and Ineligible Activities

Depending on a community's needs, it may be appropriate for a project to combine CDBG-CV eligible and ineligible activities. Such a project may still be eligible for CDBG-CV funds, provided:

- that the budget delineates the costs of the eligible and ineligible activities;
- that CDBG-CV funds will not pay for any ineligible activities; and that ARPA or local funds are available to cover for the ineligible items of the project.

Please consult your Community Liaison for further guidance or CDBG Program Director for further guidance.

Public Hearing & Citizen Participation Plan

Two public hearings must be held prior to the submission of the application. Pursuant to IC 5-3-1-2, public hearing notices must be published at least 10 full days prior to the hearing date. The public hearing cannot occur until the 11th day or after. **Note: New public hearings must be held for each grant, regardless of prior application(s).**

Pursuant to IC 5-3-1-2, public hearing notices must be published at least 10 full days prior to the hearing date. **The public hearing cannot occur until the 11th day or after.** Public hearing notices must contain the detailed project description information listed on page 31 of the OCRA CDBG Handbook. Applicants should be aware of local newspaper deadlines for submitting advertisements. Some smaller newspapers are published weekly and will require that the advertisement is placed well in advance of the public hearing. Other methods of advertising the public hearings are also encouraged. All public hearings must be accessible to disabled persons. Public hearings should also be made convenient to the low- and moderate-income residents who will benefit from the project.

The public hearing notice and the publisher's affidavit documenting publication dates, the dated sign-in sheet and signed minutes must be attached to the application for **both public hearings**. The affidavits are the **only** application document accepted after the application due date. **The affidavits must be received within as part of the application. OCRA is not responsible for reminding applicants to submit the documents.** Public hearing documentation should be packaged independently, as Hearing 1 and Hearing 2.

Minutes must be signed and dated by the party that recorded them. If a third party, such as a grant administrator, takes the minutes of the meeting, the applicant must include a document stating that the third party is acting as the applicant's representative. It is recommended that an audiotape of the public hearing be recorded and kept until the grant is closed out. OCRA may request transcripts of the public hearings.

- Place all documents from each public hearing together in the application. Do not separate by type of documentation.
- All public hearing ads submitted with the application must be of sufficient size to be readable upon review.
- Minutes should be a transcript that documents the topics of discussion and comments made. Not merely state, "there was a discussion."

- Minutes are a great source of quotes showing residential impact.

All questions regarding Limited English Proficiency must be answered on the Citizen Participation page. Please attach the Four Factor Analysis and Language Access Plan as required.

For more information, please contact your [Community Liaison](#)

For Planning Projects Only

Two public hearings must be held at different stages of project development. One public hearing must be held prior to the submission of the application, and the second must be held after OCRA approval of the planning study. After approval by OCRA of the draft document, the second public hearing must be held to solicit public comment on the draft document. At this second hearing, the lead applicant must approve the plan by resolution. A sample resolution can be found on OCRA's website (see [Sample Local Resolution Approving Plan](#)). This hearing must follow all of the same guidelines discussed above in the Public Hearing and Citizen Participation section of this application packet. A copy of the second public hearing notice, the publisher(s) affidavit, sign-in sheet, minutes, and the resolution approving the plan at the local level must be forwarded to the CDBG Program Director. Receipt of these documents and approval of the document must occur prior to submission of the request for final draw down of the funds, or the draw request will be denied.

Application Narrative Guides

Construction Projects Application Narrative Guide

Section 3: National Objective

This section would depend based on the National Objective of the Federal Act selected for the activity. Refer to the information above to guide the narrative and uploads required for this section. Generally, LMA National Object is used for these types of projects.

Section 4: Project Description

Project Description

Is there an easy-to-understand with non-technical terms detailed description of the project? How does it relate to COVID-19?

What is the project's objective(s) and desired outcome(s) related to COVID-19? Be specific, action-focused, achievable, realistic, and time-bound.

Scope of Work

Is the scope of work clear and logical for the type of project? Are ineligible items noted?

Does the scope of work correlate with detailed budget? Include per item costs.

Project Development and Support

Provide documentation of a robust project development process. Was there an evaluation of alternative solutions? Were multiple methods of public input used?

Provide high-quality, clearly labeled maps that identify the project area.

Section 5: Project Need

Impact of Issue

Is there documentation of 1-to-3-year history of issue as it relates to COVID-19 that this project would address? (*Documentation must not be older than 2020*)

How prevalent is the issue? Is the description compelling? Is adequate documentation included in the uploads?

Is there a risk of the issue(s) significantly impacting residents that this project would address? Is adequate documentation included in the uploads?

Residents Support

Is this activity a community priority including residents and local unit of government?

Does the activity selected have residential support, and is the need for the project outlined and documented?

Current Conditions

Are the current system/facility conditions well explained and documented?

Are the current, proposed, and future uses explained? If project is an expansion, does it explain why it is necessary with documentation?

Are high-quality color pictures showing conditions within the past 3 years included? Does every picture have a caption and date stamp? If no pictures, are reasons provided?

Prepare, Prevent or Respond Tieback

How will the project prepare, prevent, or respond to the coronavirus pandemic?

How is the project designed to address an established health and/or economic need or ongoing need due to COVID-19 in the community?
Why is the project the best solution to address the effect of COVID-19?
Are local data, state data and other data included to adequately describe a relation between the project and the need? If the data is not evident, how will the community benefit from the project as it relates to COVID-19?
Section 6: Financial Impact
Previous Efforts
Is there a summary of the efforts made by the community to counter the impacts on residents?
Is supporting documentation provided detailing previous efforts?
Sustainability
Is there an adequate sustainability plan for this project? How will the community utilize the facility post-covid? Is supporting documentation provided?
Is there commitment to maintain the project past the 5-year closeout window? Is the commitment documented in the application?
Financial Options
Are other sources of funds being leveraged or committed to this project?
Does the community clearly outline the need for CDBG-CV funds to fulfill the activity?
Match Requirement
Is the Hoosier Enduring Legacy Program match requirement followed?
Is the community's CLFRF or local funds allocation to projects in the adopted strategic investment plan well explained and documented?
Fund Balances
Are the fund balances and relevant documentation for the applicant and sub-recipient adequately explained?
Are all discretionary fund balances accounted for and explained?
Is the duplication of benefits form provided?
Is fiscal responsibility (roles) of the applicant and sub-recipient adequately shown?

**Public Service Program & Economic Development Project
Application Narrative Guide**

Section 3: National Objective

This section would depend based on the National Objective of the Federal Act selected for the activity. Refer to the information above to guide the narrative and uploads required for this section. Generally, LMC or LMJ National Objective is used for these types of projects.

Section 4: Project Description

Program Description

Is there an easy-to-understand with non-technical terms detailed description of the program? and how does it relate to COVID-19? Identified whether the program is new or an expansion of an existing program

What is the program’s objective(s) and desired outcome(s) for the targeted population as it relates to the ongoing need due to COVID-19? Be specific, action-focused, achievable, realistic, and time-bound.

Scope of Work

Is there a scope of work for the recipient and/or sub-recipient?

Note: *the application and proposed budget should describe how funds will only be used on the proposed expansion programs.*

Does the scope of work correlate with detailed budget? Are item costs included and ineligible items noted?

Will the program be implemented and completed within a reasonable amount of time allowing for the full expenditure of funding amount requested?

Program Development and Capacity

Is the history of the program explained as it relates to COVID-19 with key dates identified. If the program is new or an expansion of a current program, is there a clear summary of the robust program development process? Were multiple methods of public input used?

What is the recipient and/or subrecipients capacity to serve the target population? How will the program enhance recipient and/or sub-recipient capacities to serve the target population?

Section 5: Project Need

Impact of Issue

How prevalent is the issue? Is relevant documentation included?

Is there a risk of the issue(s) significantly impacting the targeted population that this program would address? Is adequate documentation included in the uploads?

Conditions and Residential Support

If the program is an expansion, are the current program conditions well explained and documented?

Is this program a community priority including residents and local unit of government?

Does the program selected have residential support? Is the need for the program outlined and documented?

Prepare, Prevent or Respond Tieback

How will the program prepare, prevent, or respond to the coronavirus pandemic?

How is the program designed to address an established health and/or economic need or ongoing need due to COVID-19 in the community?

Why is this program the best solution to address the effect of COVID-19?

Are local data, state data and other data included to adequately describe a relation between the program and the need? If the data is not evident, how will the community benefit from the program as it relates to COVID-19?

Section 6: Financial Impact
Program Management
Is there an overview of how the program will be managed?
Is the roles of the community and others managing the program defined?
Have any program management processes been defined? Including the selection and criteria of program participants.
How will duplication of benefit be avoided? What are the local policies and procedures that will be used to prevent the duplication of benefits? Is adequate written local policies and procedures provided in the uploads?
Is there a strategic marketing plan for the program?
Financial Administration and Sustainability
Does the community clearly outline how funds will be managed?
Is there an adequate sustainability and growth plan for this program once grant funds have been exhausted? Is adequate documentation included in the uploads?
Did the community and, the subrecipient provide a summary of the current financial status with supporting documentation?
Fund Options
Are other sources of funds being leveraged or committed to this program?
Does the community clearly outline the need for CDBG-CV funds to fulfill the activity?
Match Requirement
Is the Hoosier Enduring Legacy Program match requirement followed? Is adequate documentation provided?
Is the community's CLFRF or local funds allocation to projects in the adopted strategic investment plan well explained and documented?
Fund Balances
Are the fund balances and relevant documentation for the applicant and sub-recipient adequately explained?
Are all discretionary fund balances accounted for and explained?
Is fiscal responsibility (roles) of the applicant and sub-recipient adequately shown?
Draft Activity Materials
Did the community provide the required draft materials to be used including applications, marketing material, DOB policies & procedures? Were the materials logical?

Planning Application Narrative Guide

Section 3: National Objective

This section would depend based on the National Objective of the Federal Act selected for the activity. Refer to the information above to guide the narrative and uploads required for this section.

Section 4: Project Description

Project Description

Is there an easy-to-understand with non-technical terms detailed description of the plan? How is the activity related to COVID-19?

What is the plan's objective(s) and desired outcome(s) related to COVID-19? Be specific, action-focused, achievable, realistic, and time-bound.

Scope of Work

Is the scope of work clear and logical for the type of planning project? Are ineligible items noted?

Does the scope of work correlate with detailed budget? Include per item costs.

Project Support

Is there documentation of a robust development process for the planning project? Was there an evaluation of alternative solutions? Were multiple methods of public input used?

Are there high-quality, clearly labeled maps that identify the expected area covered by the plan?

Section 5: Project Need

Impact of Issue

Is there documentation of 1-to-3-year history of issue as it relates to COVID-19 that this plan would address? *(Documentation must not be older than 2020)*

How prevalent is the issue? Is the description compelling? Is adequate documentation included in the uploads?

Is there a risk of the issue(s) significantly impacting residents? Is adequate documentation included in the uploads?

Current Conditions & Residents Support

Are the current community conditions well explained and documented?

Are high-quality color pictures showing conditions within the past 3 years included? Does every picture have a caption and date stamp? If no pictures, are reasons provided?

Is this activity a community priority including residents and local unit of government? Does the activity selected have residential support, and is the need for the plan outlined and documented?

Prepare, Prevent or Respond Tieback

How will the proposed plan prepare, prevent, or respond to the coronavirus pandemic?

How is the proposed plan designed to address an established health and/or economic need or ongoing need due to COVID-19 in the community?

Why is the proposed plan the best solution to address the effect of COVID-19?

Are local data, state data and other data included to adequately describe a relation between the activity and the need? If the data is not evident, how will the community benefit from the activity as it relates to COVID-19?

Section 6: Financial Impact

Previous Efforts

Is there a summary of the efforts made by the community to counter the impacts on residents?

Is supporting documentation provided detailing previous efforts?
Sustainability
Is there an adequate sustainability strategy for this plan? Does the community have an adequate strategy and timeline in place for updating and adopting this plan?
Is there commitment to adopt and implement the plan? Is the commitment documented in the application?
Financial Options
Are other sources of funds being leveraged or committed to this project?
Does the community clearly outline the need for CDBG-CV funds to fulfill the activity?
Match Requirement
Is the Hoosier Enduring Legacy Program match requirement followed? Is adequate documentation provided?
Is the community's CLFRF or local funds allocation to projects in the adopted strategic investment plan well explained and documented?
Fund Balances
Are the fund balances and relevant documentation for the applicant and sub-recipient adequately explained?
Are all discretionary fund balances accounted for and explained?

Owner Occupied Rehabilitation Application Narrative Guide

Section 3: National Objective

The only allowable National Objective for Owner Occupied activity is low-to moderate income household (LMH). Refer to the information above to guide the narrative and uploads required for this section.

Section 4: Project Description

Project Description

Is there an easy-to-understand with non-technical terms detailed description of the program? and how does it relate to COVID-19?

What is the program's objective(s) and desired outcome(s) for the targeted population as it relates to the ongoing need due to COVID-19? Be specific, action-focused, achievable, realistic, and time-bound.

Scope of Work

Are the program's selection criteria clearly defined and consist of both objective and subjective factors?

Are the terms of the grants clearly defined? Was public input on the terms considered?

Program Development and Capacity

Is the history of the program explained as it relates to COVID-19 with key dates identified. If the program is new, is there a clear summary of the robust program development process? Were multiple methods of public input used?

What is the recipient and/or subrecipients capacity to serve the target population?

Section 5: Project Need

Impact of Issue

Is there documentation of 1-to-3-year history of issue as it relates to COVID-19 that this plan would address?
(Documentation must not be older than 2020)

How prevalent is the issue? Is the description compelling? Is adequate documentation included in the uploads?

Is there a risk of the issue(s) significantly impacting residents that this program would address? Is adequate documentation included in the uploads?

Residents Support

Is this activity a community priority including residents and local unit of government?

Does the activity selected have residential support, and is the need for the plan outlined and documented?

Current Conditions

Are the current community conditions well explained and documented?

Are high-quality color pictures showing conditions within the past 3 years included? Does every picture have a caption and date stamp? If no pictures, are reasons provided?

Prepare, Prevent or Respond Tieback

How will the program prepare, prevent, or respond to the coronavirus pandemic?

How is the program designed to address an established health and/or economic need or ongoing need due to COVID-19 in the community?

Why is the program the best solution to address the effect of COVID-19?

Are local data, state data and other data included to adequately describe a relation between the activity and the need? If the data is not evident, how will the community benefit from the activity as it relates to COVID-19?
Section 6: Financial Impact
Previous Efforts
Have there been previous efforts to address the issue(s) this program would cover by the community?
Is supporting documentation provided detailing previous efforts?
Program Management
Is there an overview of how the program will be managed?
Is the roles of the community and others managing the program defined?
Have any program management processes been defined? Including the selection and criteria of program participants.
How will duplication of benefit be avoided? What are the local policies and procedures that will be used to prevent the duplication of benefits? Is adequate written local policies and procedures provided in the uploads?
Is there a strategic marketing plan for the program?
Financial Administration and Sustainability
Does the community clearly outline how funds will be managed?
Is there an adequate sustainability and growth plan for this program once grant funds have been exhausted? Is adequate documentation included in the uploads?
Did the community and, the subrecipient provide a summary of the current financial status with supporting documentation?
Financial Options
Are other sources of funds being leveraged or committed to this program?
Does the community clearly outline the need for CDBG-CV funds to fulfill the activity?
Match Requirement
Is the Hoosier Enduring Legacy Program match requirement followed? Is adequate documentation provided?
Is the community's CLFRF or local funds allocation to projects in the adopted strategic investment plan well explained and documented?
Fund Balances
Are the fund balances and relevant documentation for the applicant and sub-recipient adequately explained?
Are all discretionary fund balances accounted for and explained?
Is the duplication of benefits form provided?
Draft Activity Materials
Did the community provide the required draft materials to be used including applications, marketing material, DOB policies & procedures? Were the materials logical?

