CDBG Office Hours

Team HCD CDBG

Wednesday, April 13, 2022
How to ask a question

• Webinar questions:
  – Click “Q & A” chat bubble to submit a question to the team
  – You may ask questions anonymously, but if you want your name, organization, or region associated with your question, you will need to type it in the “Your Name” box
  – The team will read questions out loud throughout the presentation and will provide answers if possible
  – All questions will be saved and recorded as part of the public record
Announcement: CDBG-CV FAQs

- CDBG-CV FAQs are now available on our website. You can find them on the CDBG webpage under the 'Training and Technical Assistance' Section
- Direct link to the CDBG-CV FAQs: Community Block Development Grant Coronavirus (CBDG-CV) Frequently Asked Questions (FAQs) (ca.gov)
- This document contains questions received from Office Hours and e-mails from Grantees
- The FAQs will be updated periodically as we receive more questions
- Each question is tagged by its applicability
- Questions are categorized by common topics
Clarification: NEPA Environmental Review Records

– For 2021 Awardees who were requested to submit revised GA and Activity NEPAs, staff has received revised direction:

– There are two acceptable ways to account for General Administration in a NEPA Environmental Review Record:
  #1 – Prepare a standalone General Administration NEPA CENST Environmental Review Record for the amount of the General Administrative funds in your Standard Agreement Budget
  #2 – Prepare a combined NEPA Environmental Review Record for the Activity and General Administration ensuring that you list that General Administration will be part of the activity.

– Either of these two methods is acceptable.

– Staff has been notified regarding this clarification and will provide updated direction on needed NEPA corrections.
CDBG Program Updates

2020 CDBG NOFA
- 1 Pending SA routing for final approval

2021 CDBG NOFA
- 64- applications submitted and reviewed for threshold
- The Notice of Conditional Contract Award Letters went out on March 29, 2022

2022 CDBG NOFA
- Drop date TBD. Deadline dates will be updated to correspond with the NOFA date.
- Finishing internal review process. All workshops will be posted along with training materials on the CDBG website once materials have been ADA remediated.
- Eblast will go out once posted.
Completed Trainings

✓ 1/6/22 Single Audits- What are they and why do they matter?
✓ 1/11/22 DUNS Number & Debarment Workshop
✓ 1/13/22 Resolution Training
✓ 1/19/22 2022 NOFA Workshop
✓ 1/19/22 State Objectives, What you need to know
✓ 1/26/22 Racial Equity Workshop
✓ 1/27/22 2022 NOFA Workshop
✓ 2/3/22 National Objectives & Matrix Codes
✓ 2/3/22 NEPA level of review workshop
✓ 2/8/22 How to write an effective narrative
✓ 2/17/22 eCivis Budget Training
Upcoming Training Continued….

• TBD 2022 Application Technical Assistance Session – Has been rescheduled until after the NOFA has dropped and the application has been opened. Look for notification of the new date.

• To register for these trainings, please visit HCD's Eventbrite page at California Dept. Housing & Community Development Events | Eventbrite
CDBG-CV

• CDBG-CV1
  ❖ 82 Approved and Executed

• CDBG-CV2 and 3

➢ 145 Submitted Applications:
  ➢ 0 Awaiting Corrections
  ➢ 0 Routing
  ➢ 4 Pending Signatures
  ➢ **141** Approved
Management Memo re: Advancing Funds

• On April 1, HCD released a management memorandum on how grantees with Business Assistance and Microenterprise CDBG-CV awards can request to receive advance funding to support their program goals.

• Link: Management Memo #22-01 Advance Funding for CDBG-CV Microenterprise and Business Assistance Grantees
Questions and Answers: Recap from Prior Office Hours
Consecutive Assistance Pt. 1

**Question:**
If client A received utility assistance 6 months ago and received assistance 2x's, can they submit a 3rd request 6 months later vs consecutive months?

**Answer:**
Unfortunately, no. If a client received assistance for a previous period under your program, they are not eligible to receive assistance a second time.

From: Office Hours 03/30/22
**Consecutive Assistance Pt. 2**

**Question:**
For subsistence payments for CDBG-CV for the 2nd and/or 3rd month of payments is it the payments or do the utility and mortgage statements have to be in the 2nd and 3rd month. The reason I ask is because it may take time to process a client’s file due to various reasons and so the statements might be Feb, April, May but payments were made in March, April, May.

**Answer:**
The way that the subsistence payment works is that only the first month of payment can be for arrearages/backdated/accumulated payments. In the case of this example that you provided, the February and March payments can be made in March, and the April in April and the May payments can be made in May.

From: Office Hours 04/06/22
**Question:**
We have been given guidance that in CDBG-CV subsistence payment programs the household can receive more than one payment and in more than one month whether consecutive or not. It just must be within the time frame.

**Answer:**
The clock starts at the first payment and benefits must be provided within the time frame of three consecutive months, or 6 consecutive months if you are going to do the lead-based paint requirement. For example, if you had a February payment and an April payment, and they did not need assistance in March, that would still be three consecutive months. It is considered to be three consecutive months whether they receive assistance in all three months or not.

From: Office Hours 04/06/22
Question:
Does HCD have guidance on how to do debarment checks now that SAM.gov is using Unique Entity Identifiers? I have to change the validated data in my Microenterprise Setup Forms (an excel file) from DUNS to UEI.

Answer:
HCD does not have specific guidance, but we do still need this validated data. They should still have the same debarred search process, you will just be using the unique entity identifier, instead of the DUNs number.
**Question:**
Will Income Studies be allowed in the 2022 NOFA or are they considered Planning and Tech Asst and therefore not allowed this year?

**Answer:**
This is allowable. The only thing we are not funding under the 2022 NOFA is the over-the-counter list.

From: Office Hours 04/06/22
NEPA Language

**Question:**
Are we able to keep the "not to exceed" statement on the NEPA as well?

**Answer:**
It is ok to keep the “not to exceed” language in that document. Previous guidance was incorrect.

From: Office Hours 04/06/22
Advanced Funding

**Question:**
What is the thinking on setting the advance amount at $45,000?

**Answer:**
It was determined that this was an amount that could cover funds to small businesses to get smaller jurisdictions started. Providing advances adds significant risk to the CDBG program, and so this is what we were able to start with as a pilot.
Question:
I am interested in best practices from entities implementing business assistance under CV and how they are encouraging businesses to apply

Answer:
Some ideas: Hold Business loan program informational workshops. Then provide follow-up one on one technical assistance sessions with each applicant two weeks later to review the completeness of their applications. These follow up sessions are scheduled events. This helps organize the process and keep everyone on track. You can continue to schedule and hold these series of workshops and individual TA until the funds are exhausted.

Do direct outreach: speak to city council members - ask them who is hurting, and show up in their store front with a business card and flyer.

Know the needs of the business in your community. Will they need Technical Assistance? Do they need new business plans to account for higher wages? Do they need assistance adapting to the "new normal"? Do research and engagement to understand needs and tailor programs accordingly.

From: Office Hours 04/06/22
DUNS vs SAMS

**Question:**
What can you tell us about the change regarding the use of DUNS vs SAMS relative to funding applications as well as CDBG funded businesses loans and grants at the local level?

**Answer:**
This change is the way for the federal government to consolidate their requirements to one place. Best practice would be to make sure that contractors are registered in the system and have their unique identifier.

From: Office Hours 04/06/22
Question:
Can you provide what demographic information is required for each type of services (housing rehab, vs food bank vs economic development, etc) provided per the answer provided for 3/30 question.

Answer:
Demographic Information that is required: Income level, number of people in the household, race/ethnicity information, female head of household, senior citizen, disability.

From: Office Hours 04/06/22
Question:
Follow up on collecting demographics - For more details, we are providing COVID test to their employers. I think trust will vary significantly by employer, but with an already sensitive topic, we are concerned we will not receive HUD-adequate levels of information.

Answer:
It's important that those who are in need of assistance can receive it, even if they are hesitant to provide the requested demographic information. However, demographic information does need to be asked for and it is a requirement for HUD reporting, so it is about making sure we are asking in the best way possible. HCD will discuss internally regarding providing guidance on what to do when these circumstances arise.

From: Office Hours 04/06/22
Single Audit Threshold

**Question:**
Do CDBG payments to subrecipients from grantees count towards the $750k/single audit threshold?

**Answer:**
Yes. The $750k threshold is based on federal expenditures. When you receive an award from HCD, you as the grantee are receiving the award. Whether you pass this along to beneficiaries in the form of cash or a service is irrelevant.

From: Office Hours 04/06/22
Beneficiary Data

Question:
Does anyone have recommendations on how to maximize beneficiary data collection for populations less inclined to provide personal information to a government agency? Ex: Migrant farm workers. We will provide a survey, but any additional ideas are appreciated.

Answer:
We will get some best practices ideas out to you on this. Using trusted subrecipients is a good first step. Having folks who are culturally competent administering the survey is helpful. We will get you some more guidance.
ED Chapter Update

**Question:**
How are you doing with the ED Chapter?

**Answer:**
We have met with upper management to review the ED chapter and is currently undergoing final touches. It will be posted in the near future and we will send out an eblast to let you all know that it has been published on our website.

From: Office Hours 04/06/22
Microenterprise Assistance

Question:
Are Microenterprises who received an initial award for 2020 Covid impacts, that was under the Jurisdiction's Program Guidelines award cap, eligible to receive additional funds for 2021 impacts after they have filed their 2021 taxes? For example, we had an initial award cap of $20k. Jane businesswoman had $10k in losses in 2020 and received $5k in CA Relief grant and got $5k in CDBG from us. In 2021, she still had to be closed due to the tiered restrictions and had another $5k losses in 2021. Can we issue another award?

Answer:
This is entirely dependent on your policies and program guidelines. There is not a HUD rule about this, but you must be consistent in your policies and program guidelines so that every business is given the same opportunities.

From: Office Hours 04/06/22
Questions and Answers