

1. GENERAL INFORMATION

In response to COVID-19, the U.S. Department of Housing and Urban Development (HUD) has allocated Community Development Block Grant CARES Act (CDBG-CV) funding to the City of Lewiston. The City of Lewiston announces the availability of approximately \$274,067 to support COVID-related expenses incurred by public service agencies since January 21, 2020, to prevent, prepare for, and/or respond to COVID-19. The CDBG-CV funds were authorized by the Coronavirus Act, Relief, and Economic Security Act (CARES Act) announced last year.

Per the expedited amendment process approved by HUD, the City of Lewiston amended its 2015-2019 Consolidated Plan, and 2019 Annual Action Plan to enable the use of the CDBG-CV funds. The amended plans serve as the City of Lewiston's budget and formal application to HUD to disburse the CDBG-CV funds.

After careful consideration of the CDBG-CV guidelines, the City of Lewiston identified priority eligible activities as public services (public or nonprofit agencies) and public facility and infrastructure improvements. Nonprofits must hold 501c3 status under the IRS Code and have filed IRS 990. All entities must provide a Dun and Bradstreet number (DUNS).

2. THRESHOLD REVIEW AND FUNDING EVALUATION CRITERIA

The City has established threshold criteria that must be met for an application to be considered for funding. Incomplete will not be considered. The threshold review will be completed by the Community Development staff. All applications that meet the threshold criteria will be considered by the Lewiston Loan Qualification Committee for funding.

Threshold Criteria:

- Eligible to apply for CDBG funding and not disbarred or otherwise considered ineligible by HUD (24 CFR 570)
- Meets a National Objective. Please see page 2 for descriptions on how applications qualify for the National Objective.
- Eligible CDBG activity
- Benefits low/moderate-income individuals or households
- Ensures non-duplication of benefits
- Prevents, prepares for, or responds to COVID-19
- Consistent with 2020-2024 Consolidated Plan

Required attachments at the time of application:

- Copy of the latest 501c3 letter of determination of non-profit status
- Financial Statements, Compilation or Audit
- Most recent 990 or 990EZ
- Mission Statement
- List of Board Members and Contact Information

Required attachments to the application, if funded:

2021 CDBG-CV Entitlement Program Application Guidelines

- Nondiscrimination Policy
- Conflict of Interest Policy
- Organization’s Procurement Policy (if you are requesting reimbursement on supplies/materials)
- Organization’s Grievance Policy for both employees and clients
- Organization’s Termination Policy for employees and clients
- Organization’s Protected Personal Identification Information Policy
- Organization’s Duplication of Benefits Procedures

3. **CDBG PROGRAM REQUIREMENTS**

A. **CDBG National Objective**: CDBG Public Service projects must benefit at least 51 percent low- and moderate-income persons. Determination is based on limited clientele or area benefit activity.

A minimum of 70 percent of all CDBG-CV funds must be used for activities that meet the low- and moderate-income national objectives.

Low and moderate-income (LMI): LMI is defined as having an income equal to or less than 80 percent of the area median income, adjusted for household size. The specific household income limits are based on U.S. Census Bureau estimates, updated and issued by HUD annually.

Fiscal Year (FY) 2021 HUD INCOME LIMITS April 1, 2021

Household Size	30% Area Median Income	50% Area Median Income	80% Area Median Income
1	\$14,950	\$24,950	\$39,900
2	\$17,420	\$28,500	\$45,600
3	\$21,960	\$32,050	\$51,300
4	\$26,500	\$35,600	\$59,650
5	\$31,040	\$38,450	\$61,550
6	\$35,580	\$41,300	\$66,100
7	\$40,120	\$44,150	\$70,650
8	\$44,660	\$47,000	\$75,200

Limited Clientele Activity: This is the category most often used for public service activities. Limited clientele activities are activities limited to a specific group of persons. At least 51 percent of those served must be low- and moderate-income persons. Services qualifying under this category **serve a specific clientele**, rather than providing service to all persons in a geographic area. Limited clientele activities may qualify as either a **presumed benefit activity** or a **direct benefit activity**. A **presumed benefit activity** is one that **exclusively** serves a specific group of people that HUD categorically considers to be low- and moderate-income persons. These categories include: abused children, battered spouses, elderly persons, homeless persons, illiterate adults, persons living with AIDS, migrant farm workers, and severely disabled adults as defined by the Bureau of Census. The project sponsor must document that the activity is designed to be used exclusively by a category of persons presumed by HUD to be low- and moderate-income.

2021 CDBG-CV Entitlement Program Application Guidelines

If the clientele served does not fall under one of the presumed benefit category of persons, it may qualify as a direct benefit activity which serves low- and moderate-income persons. The project sponsor must verify and maintain documentation regarding the family size and income of each person served. At least 51 percent of the clientele served must be low- and moderate-income persons or the activity funded must be limited exclusively to low- and moderate-income persons.

LMI Area Activity: The nature and location of the activity may also support a conclusion that primarily low- and moderate-income persons are served. To qualify under this definition, the service provided must be both of such nature and in such location that it may reasonably be concluded that the activity’s clientele will primarily be low- and moderate-income persons, but the benefits of this type of activity are available to all residents in the area regardless of income. The project sponsor must provide and maintain documentation showing a map of service area delineating boundaries and of income characteristics of the area in the form of surveys or ACS data.

B. Eligible Activities: Funds may ONLY be used to cover costs for activities associated with preparing for, responding to, or recovering from the COVID-19 pandemic. Applicants may use CDBG-CV funds for public services and public facilities and infrastructure. Public service activities must be either a new or expanded service. Although not inclusive, the chart below outlines examples of eligible activities.

Buildings and Improvements, Including Public Facilities	
Acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements.	Rehabilitate a facility for testing, diagnosis, or treatment.
	Reconstruction of roads/sidewalks (expansion) to allow for social distancing.
	Acquire and rehabilitate, or construct, a group living facility that may be used to centralize patients undergoing treatment.
	Installation of wiring, fiber optic cables, and permanently affixed equipment such as receivers for areas to receive broadband/internet service.
Rehabilitation of buildings and improvements.	Rehabilitate a senior center, community center, or homeless shelter by replacing the HVAC system and/or installing air purification system.
	Acquisition and/or rehabilitation of a building to expand capacity of homeless shelters to accommodate social distancing and isolation.
	Installation of wifi routers/extenders in affordable buildings for LMI residents.

2021 CDBG-CV Entitlement Program Application Guidelines

Public Services	
Provision of assistance to primarily Low-and-Moderate Income persons.	Carry out job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
	Provide testing, diagnosis, or other services at a fixed or mobile location.
	Provide equipment, supplies, and materials necessary to carry out a public service (e.g., childcare for working parents with distance learning school kids).
	Deliver meals on wheels to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.
	Installation of wiring, fiber optic cables, and permanently affixed equipment such as receivers for families to receive broadband/internet access.

C. Cap on Assistance: The CARES Act eliminates the 15 percent cap on the amount of grant funds that can be used for public service activities.

D. Eligible Expenses: CDBG-CV funds may be used for the following:

- Labor, supplies, and materials
- Operation and maintenance of the facility where a public service is located

E. Minimum Required Documentation:

- An activity description that includes: a) the name of the agency providing the service(s); b) a detailed narrative of the service(s) being provided
- Limited Clientele National Objective – income self-certification and demographic information
- Area Benefit National Objective - map of service area delineating boundaries and of income characteristics of the area in the form of surveys or ACS data
- A project budget detailing where the CDBG-CV funds will be used

F. Duplication of Benefits Requirement: A duplication of benefits review will be conducted for each CDBG-CV eligible activity. A duplication of benefits occurs when assistance is provided to a person or entity (i.e., beneficiary) to address costs and/or losses and that person or entity (i.e., beneficiary) receives assistance for the same costs and/or losses from other funding sources. The funding sources not only include CARES Act sources, but also other federal, state, philanthropic, and local government sources.

2021 CDBG-CV Entitlement Program Application Guidelines

For a list of other likely federal sources and guidance, see the [CDBG-CV Duplication of Benefits Quick Guide \(hudexchange.info\)](https://www.hudexchange.info).

The City will recaptures all funds associated with duplication of benefits. To avoid issues, applicants must develop and maintain adequate procedures to prevent a duplication of benefits. Procedures must include a requirement of repayment of any duplicative assistance by persons/entities receiving CDBG-CV funds and a method to assess whether CDBG-CV funds will duplicate financial assistance that is already received or likely to be received by acting reasonably. A copy of the duplication of benefits procedures must accompany the CDBG-CV application.

4. PROGRAM ADMINISTRATION REQUIREMENTS

A. Environmental Review:

The City will conduct an environmental review on every property and activity that receives City assistance in accordance with 24 CFR Part 58 and Part 50 and as further described in CDBG regulations 24 CFR 570.604. NO work may commence on the property until the review is complete and the Subrecipient Agreement is signed.

B. Procurement:

All subrecipients receiving CDBG-CV funds must follow the procurement requirements specified in 2 CFR Part 200.317-200.326.

C. Fair Housing and Equal Opportunity:

Applicants are required to ensure that CDBG-CV funded projects comply with fair housing, equal opportunity, and nondiscrimination laws.

D. Labor Standards:

Applicants are required to ensure that CDBG-CV funded projects comply with labor standard regulations specified in 24 CFR 570.603.

E. Uniform Relocation Act:

All subrecipients receiving CDBG-CV funds must comply with the requirements of this Act, and so notify tenants/businesses where applicable.

F. Monitoring:

The City will monitor all projects through mechanisms, including review of quarterly reports received from the subrecipient, communications, and desk and/or on site monitoring visits.

G. Conflict of Interest:

All subrecipients receiving CDBG-CV funds must comply with conflict of interest regulations specified in 24 CFR Part 570.489(h) and F.S. 112.3143.

H. Expenditure Timeframe:

A minimum of 80 percent of CDBG-CV funds must be expended within three years of the City's contract execution with HUD, effectively June 18, 2023.

5. Application Submission:

To apply for funding, the applicant must submit an application to Jessica Wilson, Community Development Coordinator, via email to jwilson@lewistonmaine.gov.

Applications will be received on a rolling basis until CDBG-CV funding no longer remains available.