

# 2023–2024 APPLICANT GUIDE AND NOTICE OF FUNDING OPPORTUNITY

# CITY OF SHEBOYCAN

## CDBG PUBLIC SERVICE AGENCY APPLICANT GUIDE

Thank you for your interest in the City of Sheboygan's Community Development Block Grant (CDBG) program. This competitive program aims to develop viable urban communities by ensuring that decent housing and economic opportunities are available to low- and moderate-income individuals and families. Since 1975, Sheboygan has received and used CDBG funding to enhance equity amongst its residents through various programs, projects, and initiatives. To build upon a legacy of achieving shared goals, the Department of City Development welcomes collaboration with area nonprofit organizations.

Please know that there are several responsibilities your organization must be mindful of should you receive funding. Quarterly reporting requirements must be met in order to maintain compliance with the U.S. Department of Housing and Urban Development– the funding agency of CDBG– and with the City of Sheboygan, which administers the grant. The reports require in depth demographics including race, ethnicity, and income level. In addition, accounting standards must be adhered to and documentation must be saved and made available for monitoring. If you have questions about the administrative requirements, or your capacity to meet them, please reach out.

Applications are completed online through the City's portal, powered by Neighborly Software. City staff are available to answer questions throughout the application process so please don't hesitate to reach out with any questions or issues. Thank you for the work you do and for helping to make the City of Sheboygan a better place to live, work and visit!

In partnership,

Chad Pelishek

Chad Relisheh

Director of Planning and Development chad.pelishekesheboyganwi.gov

920.459.3383

Abby E. Block

**Grant Coordinator** 

abby.block@sheboyganwi.gov

920.459.3378

# APPLYING FOR FUNDING

# **REGISTRATION**

create your account

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# **USERS**

manage who has access to your agency's information

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# APPLICATION AND REPORT PREVIEW

a rundown of the application questions and those you'll find on the quarterly report **PAGE 12** 

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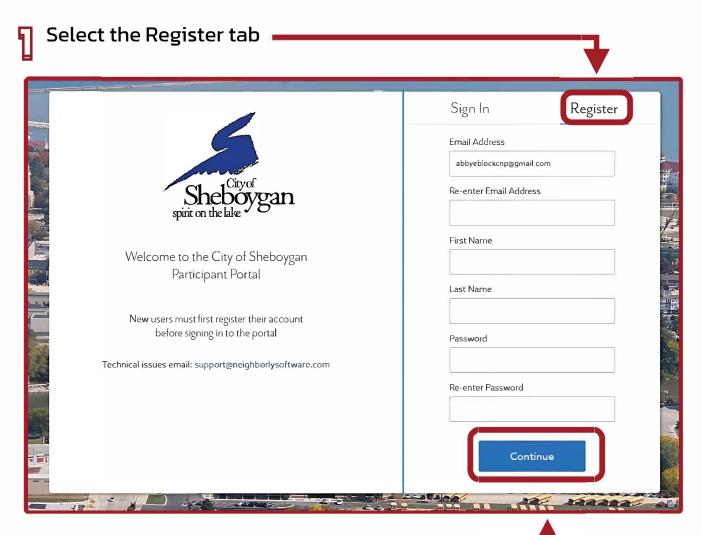
SUBRECIPENT ADMINISTRATIVE AND FINANCIAL SYSTEMS

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COMMUNITY DEVELOPMENT BLOCK GRANT APPLICANT GUIDE



It's important that each user have their own log-in credentials as all activities are attributed to the unique account and will be documented in the official audit log. Individuals who are already registered and associated with an agency can access the system using their existing username and password. Multiple people can be assigned to one agency. To register for the first time:



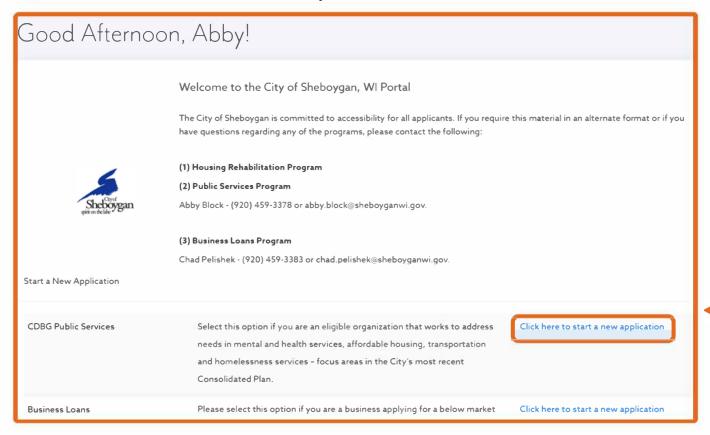
# Complete the form and select continue

For security purposes, the system will validate the registered address by sending an email with a registration link.

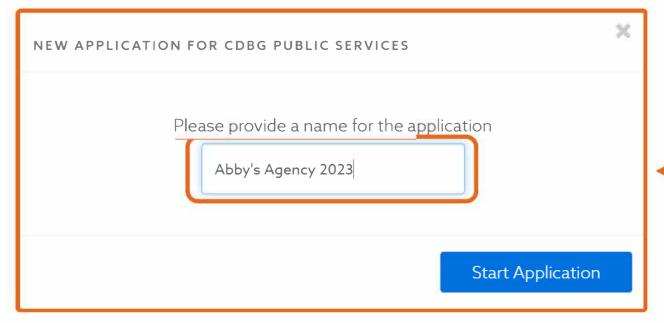
Note: If you do not receive the system email within 2 minutes, check your spam or bulk mail folder. If the email appears in that folder, you should right click on the email to indicate "Not Junk" or "Not Spam" to ensure you receive other system emails.

# NAVIGATING THE PORTAL

Click on the link to start a new application from the CDBG Public Service section of the landing page



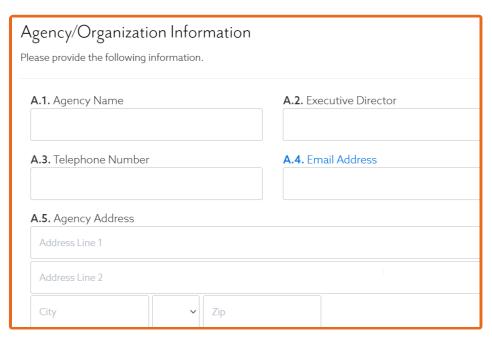
When labeling your application, please use your organization name followed by the year



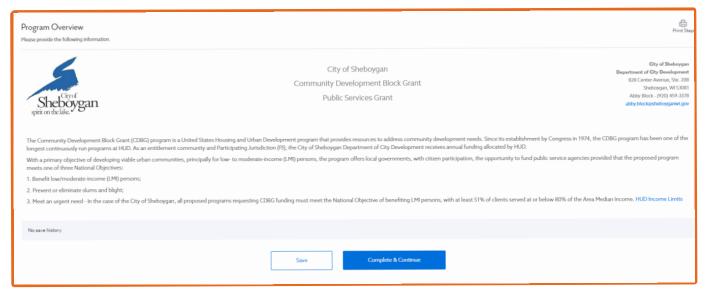


Use the menu to navigate through the application sections.



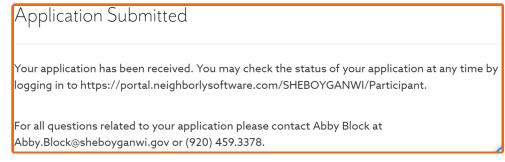


Please note: Each section includes the option to "Save" or "Complete & Continue" which submits and locks that section. Only the System Administrator can reopen sections marked complete. If you wish to continue working on a section, use the save function until finished and ready to submit.



You should see the confirmation screen below after completing and submitting your application. If you don't, please contact the Grant

Coordinator to ensure it is received by the deadline.





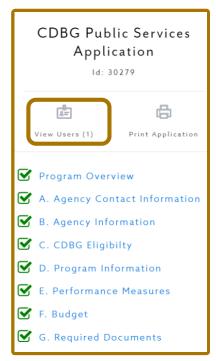
If you wish to grant others access to your organization's application information, the individual(s) must first register in the system and may then be added using the email address associated with their Neighborly account.

Please note: In addition to viewing all of an organization's information, users registered to an agency are also able to take action on its behalf. This includes submitting applications as well as quarterly reports and draw requests, should you be awarded funding. Registered users may only be removed from under an organization's umbrella by a system administrator. To request a user's removal, please contact the Grant Coordinator.

## To give a user access to your organization's portal:

Select "View Users"





2 Click on "Add a User"



Users		
Email addresses added below will have access to view information in your application and make changes.		
EMAIL		
abby.block@sheboyganwi.gov		
Add a User		

Enter the email address the individual used when registering in the portal



# Community Development Block Grant NOTICE OF FUNDING OPPORTUNITY

## for Public Service Agencies

ISSUE DATE: January 24, 2023 CLOSING DATE: February 28, 2023

#### CONTACT

Abby Block Grant Coordinator Department of City Development Phone: (920)459-3378 abby.block@sheboyqanwi.gov

#### APPLICATION INFORMATION

#### REASONABLE ACCOMMODATION

The City of Sheboygan's Department of City Development will provide reasonable accommodation to allow for equal participation in the Funding Opportunity application process. This document will be provided in alternate formats, upon request.

#### **NOTICE OF SOLICITATION**

In addition to providing required notification via the City's publication of record, *The Sheboygan Press*, the City will provide notification to all known interested organizations currently on the Department's distribution list. A copy of this Notice of Funding Opportunity (NOFO) will also be posted to the *department's website*.

Please note: Failure of the City to notify any interested party or parties directly regarding the availability of this NOFO shall not void or otherwise invalidate the NOFO process.

#### **ACCESS TO REFERENCED DOCUMENTS**

This document contains active hyperlinks. Prospective applicants who are unable to access the Internet may request copies of the documents referenced in this NOFO.

#### CITIZEN PARTICIPATION

United States Department of Housing and Urban Development (HUD) program regulations require that citizens be given the opportunity to examine and appraise the City's use of funds. A public hearing will be held following the draft publication of the City's Annual Action Plan, which outlines the proposed activities for the upcoming Program year, including the allocation of funds for public services.

Following the hearing, the city will allow at least 30 days to receive citizen comments before submitting the Annual Action Plan to the U.S. Department of Housing and Urban Development. Notice of the hearing and the public comment period will be published in the Sheboygan Press, on the City's webpage, and through various other media platforms.

## **AGENCY REQUIREMENTS**

#### NON-PROFIT AGENCY

Applicant agencies must be a not-for-profit public or private agency. Applicants must be established and in operation at the time of application.

#### **FAITH-BASED AGENCIES**

HUD issued a final rule amendment allowing faith-based agencies to compete for CDBG funds on the

same basis as other non-profits. However, faith-based agencies may not use CDBG funds to support inherently religious activities such as worship or religious instruction. Religious activities must be offered separately from the CDBG supported activity and agencies may not discriminate against a program beneficiary on the basis of religion or religious belief. *Please see CPD Notice 04-10* for more info.

#### **ACTIVE GOVERNING BODY**

Governance of applicant agencies must be vested in a responsible and active voluntary board, which meets at least quarterly and establishes and enforces policies.

#### **PERSONNEL**

Applicant agencies must provide for adequate administration of the program to ensure delivery of the funded services. If requested, agencies must provide a copy of Personnel Policies and Drug-Free Workplace Policies.

#### NON-DISCRIMINATION

The City is required to ensure that funded agencies conduct business in compliance with non-discrimination requirements under various federal laws. If requested, agencies must provide a copy of their Equal Opportunity in Employment Policies.

#### **INSURANCE**

At time of agreement signing, funded agencies must provide a declaration of insurance that includes multi-peril property and liability, worker's compensation, automobile liability, and any other coverage deemed necessary by the City. The documentation submitted to the City must contain an indemnification and hold harmless clause and list the City as an additional insured.

#### PROGRAM REQUIREMENTS

#### **CLIENTS SERVED**

CDBG funds may only be used to provide services to those residing within the City of Sheboygan limits. To be eligible for CDBG funding, a public service program must serve those whose incomes are less than 80% of Area Median Income (see page 20 for info on where to obtain the latest income limits.) Documentation of the benefit to low- and moderate- income persons is required of all programs funded. *Please see CDBG National Objective 24 CFR 570.208.* The method of income verification shall be approved by the City.

#### **MONITORING**

The City may conduct on-site inspection by City staff. This monitoring will include, but is not limited to, the inspection of all records and other materials deemed pertinent to evaluating performance, compliance, or program quality relative to contractual requirements. Site visits may include a HUD representative. Additional follow up visits may be scheduled to provide technical assistance if necessary. City staff will work to ensure monitoring visits disrupt the agency as little as possible.

#### **ELIGIBLE ACTIVITIES**

CDBG regulations allow the use of funds for a wide range of public services, including but not limited to:

- Employment services (job training);
- Crime prevention and public safety;
- Child care;
- Drug abuse counseling and treatment;
- Health services;

- > Education programs;
- > Services for senior citizens;
- Services for homeless persons;
- Youth programming

#### **INELIGIBLE ACTIVITIES**

Per CDBG regulations (*Please see <u>24 CFR 570.207</u>*), funds awarded by the City of Sheboygan shall not be used to support or pay for the following:

> The provision of *income payments*. Payments made to an individual or family, which are used to

provide basic services such as food, shelter (including payment for rent, mortgage and/or utilities), or clothing except when:

- a. The income payments do not exceed three (3) consecutive months; and
- b. The payments are made directly to the provider of such services on behalf of an individual or family.
- Political activities
- General government expenses
- Religious activities

#### **ELIGIBLE EXPENSES**

Eligible expenses are <u>direct costs</u> associated with program delivery only. Administrative expenses not to exceed 10% of the total award may be utilized for overhead and associated costs.

#### **INELIGIBLE EXPENSES**

Expenses which CDBG funds may not be used for include but are not limited to:

- **Promotion of Agency:** Costs of advertising and public relations designed solely to promote the non-profit agency, including promotional items, models, gifts, and souvenirs
- Contributions or donations: Contributions or donations, including cash, property, and services, regardless of the recipient
- ➤ **Entertainment costs:** Costs of amusement, diversion, and social activities and any costs directly associated with such costs (such as tickets to shows or sports events, meals, lodging, rentals, transportation, and gratuities.)
- Fundraising: Costs of organized fund raising, including financial campaigns, endowment drives, solicitation of gifts and bequest, and similar expenses incurred solely to raise capital or obtain contributions
- > Goods or services for personal use: Costs of goods or services for personal use of the organization's employees

#### SUPPLEMENTAL DOCUMENT REQUIREMENTS

■ Budgets for current and past fiscal years■ Most recent Audited Financial Statements

**Documentation of income verification** process

The following documentation must be included at the time of submission in order for application to be considered complete and eligible for review: IRS **Tax-Exempt Determination** Letter Articles of Incorporation Current **Bylaws** ☐ **Board of Directors** list (include name, any office held, phone number, address and occupation/affiliation for each member) ☐ Designation of Authorized Official (submit signed letter from the Chairperson of the governing body that lists the name, title, address and phone number for each individual able to act on the agency's behalf.) Authorization to Request Funds (submit minutes from the meeting that includes the Board's motion or resolution authorizing the agency to submit application to the City requested CDBG funding.) Agency Organizational Chart Resumes of key staff including the Program Manager and Fiscal Officer ☐ **Job Descriptions** of CDBG-funded positions

(submit a written explanation or copies of actual client intake/data collection forms)

#### 2023 APPLICATION TIMELINE

January 24	Notice of Funding Opportunity released
February 24	Last date for technical assistance from City staff
February 28	Applications due no later than 4:00 pm
March/April	Staff threshold review and funding recommendations compiled
April 1	PROGRAM YEAR BEGINS*
TBD*	Annual Action Plan, including Public Services allocation, sent to Common Council for referral to the Finance and Personnel Committee
TBD*	Finance and Personnel Committee evaluates applications and makes funding recommendations for adoption by the Common Council
TBD*	Common Council makes final funding decision. Public hearing and comment period on draft of the Annual Action Plan commences.
TBD*	Award notifications sent to agencies
TBD*	Eligibility evaluations and Environmental Reviews completed by staff
Late summer- early fall**	Agreements sent to agencies for signing

#### **IMPORTANT:**

\* This timeline is dependent upon the City receiving its allocation notice from Congress, typically in late March to early April.

The Department of Planning and Development is unable to make funding recommendations or move forward with submitting the Annual Action Plan prior to receiving notice of the amount awarded.

However, the Program Year runs from April 1-March 31 and agencies are responsible for tracking and providing the required information for the entire Program Year. Please see the Quarterly Report Form, included in the Application Preview section, for more information.

\*\* Similarly, the timing to release agreements relies upon when HUD presents its funding contract to the City for signing.

#### SUBMISSION INFORMATION

Please submit the application, including all required documents, via the City of Sheboygan's online portal available at <a href="https://portal.neighborlysoftware.com/sheboyganwi/participant">https://portal.neighborlysoftware.com/sheboyganwi/participant</a> no later than 4pm on Tuesday, February 28, 2023.

Allowing adequate time to deal with potential technical difficulties is strongly encouraged. If you don't receive a confirmation message via email immediately following your submission, or if there are barriers that prevent you from applying electronically, please call the Grant Coordinator at 920.459.3378.

Incomplete applications will be disqualified and late applications will not be reviewed. Please make sure all necessary items are included!

#### **EVALUATION AND AWARD INFORMATION**

#### MINIMUM SUBMISSION REQUIREMENTS

City Development staff will perform a threshold review of submitted applications to ensure that the following minimum requirements are met:
<ul> <li>☐ The activity is eligible under HUD regulations (<u>24 CFR 570.200-24 CFR 570.207</u>);</li> <li>☐ The activity meets the CDBG National Objective to benefit low- to moderate-income (LMI) persons and aligns with an area of focus in the City's Consolidated Plan;</li> <li>☐ The application is complete, with all requested information and documents included;</li> <li>☐ The application was received prior to the 4pm deadline on February 28, 2023</li> </ul>
<b>APPLICATION EVALUATION</b> All applications that meet the minimum threshold will be presented to the Finance and Personnel Committee for evaluation. The Committee will then make their recommendation for funding allocation to the Common Council for adoption.
The committee will consider the following in its evaluation process:  Past performance;  Demonstrated ability to implement and administer the program and maintain compliance with applicable federal, state, and local regulations;  Value (cost per beneficiary);  Positive impact on the community as made apparent through rational and accountable performance metrics.

#### **NOTICE OF AWARD**

Agencies awarded funding will receive notice of their allocation following the Common Council's adoption of the 2023 Annual Action Plan. The 2023 Program Year runs April 1, 2023 to March 31, 2024.

Have questions about this NOFO or the CDBG program? Do you require an alternative format or other accommodations in order to complete the application? Would you like to request copies of the referenced documents linked in this document? Unclear on information in the Guide or struggling with questions in the application? Want to get your organization on the City's distribution list? We're here to help!

#### PLEASE CONTACT

Abby E. Block, *Grant Coordinator*<a href="mailto:abby.block@sheboyganwi.gov">abby.block@sheboyganwi.gov</a>
920.459.3378

## **APPLICATION PREVIEW**

В.

#### A. AGENCY CONTACT INFORMATION

1.	Agency Name			
2.	Executive Director			
3.	Telephone Number			
4.	Email Address			
5.	Agency Address			
6.	Federal Tax ID #			
7.	DUNS #			
8.	Primary Contact Name			
9.	Primary Contact Title			
10.	Telephone Number			
11.	Email Address			
12.	Date of Incorporation:			
13.	Is the organization a Tax-Exempt Nonprofit Organization under IRS Code 501(c)?  Yes  No			
AG	ENCY INFORMATION			
1.	What is your organization's mission?			
2.	Are your programs delivered by:  Staff Dolunteers Both			
3.	How does your organization ensure quality service delivery?			
4.	. Why is CDBG funding from the City of Sheboygan important to your organization? How does it advance your mission?			
5.	How does the community support your organization and the work you do?			
6.	Please briefly describe the fiscal process from creating the budget to the day- to-day management and oversight. What accounting practices does your agency utilize to ensure finances are accurate and transparent?			
7.	Does your organization have financial stability goals?  Yes No  If Yes is selected, please explain:			
8.	Have you ended any of the last three fiscal years with a deficit?  Yes  If Yes selected, please describe any actions taken:			

<ol><li>What have you accomplished w</li></ol>	What have you accomplished with previously awarded CDBG funding?				
proceedings?	· _ ·				
11. Are you or your organization inv Yes  No If Yes selected, please explain:	,	uits?			
12. Must your organization complet  Yes  No  If required, total Federal expen	J	,			
13. Does your organization have mo Yes  No If Yes selected, are you require	. ,				
CDBG ELIGIBILITY					
1. National Objective					
<ul><li>Meets the needs of low to meet low to moderate inc</li></ul>	•	. At least 51% of participants must			
abused children, illiterate	The program meets the needs of one specific group of people (low-mod limited clientele): abused children, illiterate adults, battered spouses, homeless persons, elderly persons, migrant works, persons with AIDS, disabled persons				
☐ The program provides hou	using assistance to low- and	d moderate-income households			
☐ The program creates or re	tains jobs for low- to mode	erate-income persons			
2. Type of Project					
☐ Facility/Public Improvemer	nt 🗌 Housing	Public Services			
3. Activity Category  Acquisition  Duby  ADA Improvements	olic Facilities	Public Services			
4. Certification of Eligibility – Estima this Program Year (April 1 to Marca. Total number of recipient b. Total number expected to c. Total number of anticipat d. Total number of CDBG-fu	ch 31) ts you expect to serve to be funded with CDBG ted LMI recipients	er of individuals you expect to serve			
5. Data Source		□ .			
Low/Mod Job Creation	Limited Clientele	Census Tract			

C.

#### D. PROGRAM INFORMATION

1. Program Name

		2.	What is the proposed program's objective or purpose? (What need or problem will it address?)		
		3.	Please select the type of program you are requesting funding for (select all that apply):		
			<ul> <li>□ Employment</li> <li>□ Education</li> <li>□ Crime Prevention</li> <li>□ Drug Abuse</li> <li>□ Energy Conservation</li> <li>□ Fair Housing Counseling</li> <li>□ Senior Services</li> <li>□ Youth Services</li> <li>□ Homebuyer Down Payment Assistance</li> <li>□ Housing Rehabilitation</li> <li>□ Homelessness</li> <li>□ Other (please describe)</li> </ul>		
		4.	What outcomes does the program hope to achieve? (What is the result or change being sought?) Give at least three (3).		
			a		
			b		
			C		
		5.	How does the program align with the areas of focus highlighted in the City of Sheboygan's <u>Consolidated Plan</u> ?		
		6.	The funding requested will be used for:		
		7.	If this is an existing program, HUD requires the program(s) to show a quantifiable increase in the level of service. Please describe how your organization meets this threshold.		
		8.	Describe the proposed services: Who will you reach? Where will services be provided? When will services be provided?		
		9.	What indicators will you track? How will they convey your program's level of effectiveness?		
		10.	What makes this program unique? What gap does it fill?		
E.	PERF	ORM	ANCE MEASURES		
		1.	Objective of Project: Identify which objective will be addressed by the activity proposed in this application. (Choose only one objective:)		
			<ul> <li>■ Suitable Living Environment - This objective relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment.</li> <li>■ Decent Affordable Housing - This objective focuses on housing programs where the purpose of the program is to meet individual family or community needs and not programs where housing is an element of a larger effort.</li> </ul>		

		☐ <b>Creating Economic Opportunities</b> - This objective applies to the types of activities related to economic commercial revitalization or job creation.			
	2.	Expected Outcome of Project: Identify which outcome category best reflects what you are seeking to achieve (the results) in funding this particular activity. (Choose only one outcome:)			
		Availability / Accessibility - This outcome category applies to activities that make services, infrastructure, housing, or shelter available or accessible to low- and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low- and moderate-income people.  Affordability - This outcome category applies to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people. It can include the creation of maintenances of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.  Promoting Livable or Viable Communities - This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefits to persons of low and moderate income, or by removing or eliminating slums or blighted areas through multiple activities or services that sustain communities or neighborhoods.			
F.	BUDGET				
	1.	Total Cost of Project			
	2.	Grant Amount Requested			
	3.	Percent Request Total (auto calculated)			
	4.	Total Other Funding			
	5.	Other Funding Sources:			
		a. Name			
		b. Amount			
		c. Other Agency Funding Status:			
		☐ Pending ☐ Approved ☐ Declined			
	6.	Proposed Budget			
		a. Budget Category			
		b. Amount			
		c. Description			
G.	REQUIRE	DOCUMENTS (please see list on page 9)			
Н.	CERTIFICA	ATION			

# Reports > Quarterly Reports

☐ Pro	ject Informat	ion 🗆	Accompli	shments	☐ Narrati	ve 🗌 Sub	omit
Project Information							
Please pro	Please provide the following information:						
1. Proje	1. Project Name:						
2. Amo	2. Amount Awarded for Project Year:						
3. Finar	ncial Informa	tion To Date:					
TO D	ATE INFORM	ATION:	Т	OTAL AMO	UNT		
Ехр	enses Accrue	d					
Am	ount Submitte	ed to the City					
	mbursed by th t programs d	e City id CDBG fund	ds suppc	ort this qua	arter?		
<b>5.</b> Were	goals met?						
	O Yes O No						
If N	If No was selected, please explain:						
<b>6.</b> Please list any expenses accrued during the quarter for which reimbursement will be sought:							
EVDE	NSE TYPE	ADMIN, ST SUPPORT,	-	P.P.O.	G R A M	TOTAL AMOU	NT
	NSE TIPE					TOTAL ANOU	
	Add Row						
	Save			Соі	mplete & C	ontinue	

☐ Project Information	Accomplishments	☐ Narrative	Submit	
Accomplishments				
Please provide the follow	ing information:			
BENEFICIARIES - INC	COME			
Number of Extremely Low	Income persons assisted	(<30% AMI)		
Number of Low Income pe	ersons assisted (30%-50%	AMI)		
Number of Moderate Inco	me persons assisted (50%	5 - 80% AMI)		
Number of persons assist	ed who are NOT Low to M	loderate Income		
Totals				
BENEFICIARIES - RA	CE/ETHNICITY			
White - Hispanic				
White - Non-Hispanic				
Black/African American -	Hispanic			
Black/African American -	Non-Hispanic			
Asian - Hispanic				
Asian - Non-Hispanic				
American Indian/Alaskan Native - Hispanic				
American Indian/Alaskan Native - Non-Hispanic				
Native Hawaiian/Other Pacific Islander - Hispanic				
Native Hawaiian/Other Pacific Islander - Non-Hispanic				
American Indian/Alaskan	Native & White - Hispanic			
American Indian/Alaskan	Native & White - Non-His	panic		
Asian & White - Hispanic				
Asian & White - Non-Hisp	panic			
Black/African American 8	White - Hispanic			
Black/African American &	White - Non-Hispanic			
Am. Indian/Alaskan Nativ	re & Black/African America	ın - Hispanic		
Am. Indian/Alaskan Native & Black/African American - Non-Hispanic				
Other Multi-Racial - Hispanic				
Other Multi-Racial - Non-	Hispanic			
Totals				

PUBLIC SERVICES	
Total Number of Persons Assisted	
Of the Total Persons Assisted, the Number with New or Continuing Access to a Service or Benefit	
Of the Total Number of Persons Assisted, The Number of Persons With Improved Access to a Service or Benefit	
Of the Total Number of Persons Assisted, The Number of Persons that  Receive a Service or Benefit that is No Longer Substandard	
Totals	
Project Information Accomplishments Narrative Submit	
Narrative Narrative	
Please provide the following information.	
Please provide a narrative regarding any accomplishments or barriers during this quart upload any supporting documentation below.	ter. You may also
Documentation	
Quarterly Report Supporting Documents	Upload File

# **KEY TERMINOLOGY AND COMMON ACRONYMS**

- **Annual Action Plan**: provides a concise summary of the actions, activities, and specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified in the City's *Consolidated Plan*.
- Code of Federal Regulations (CFR): contains the general and permanent regulations of the federal government of the United States, establishing the means by which agencies are to implement and adhere to federal statutes passed by Congress. Divided into 50 titles that represent broad areas subject to federal regulation, the CFR is published annually and compiles material and amendments from the Federal Register, released daily. View the CFR for more information.
- Community Development Block Grant Program (CDBG): a federally-funded grant program designed to help cities and towns meet a broad range of community development needs.
- Consolidated Annual Performance and Evaluation Report (CAPER): a report submitted by all CDBG *Grantees* to HUD share accomplishments and progress toward *Consolidated Plan* goals. View the City's CAPER for more information.
- **Consolidated Plan**: the *Grantee's* five-year roadmap. Designed to help jurisdictions assess their affordable housing and community development needs, the Plan serves as the framework for a community-wide dialogue to identify priorities, enabling data- driven, place-based investment decisions that align and focus funding from block grant programs.
- **Federal Register:** the official journal of the federal government which contains government agency rules, proposed rules, and public notices. Published every weekday (except for federal holidays) since 1934, the final rules promulgated by federal agencies and published in the Federal Register are ultimately reorganized by topic and codified in the *Code of Federal Regulations (CFR)* which is updated annually. View the **Federal Register** for more information
- **Grantee:** the pass-through entity that receives a CDBG grant and administers CDBG funding (the City of Sheboygan in this case.)
- Low- to moderate-income (LMI): defined as having an income equal to or less than the Section 8 Housing Assistance Program's limits based on household size. Established by HUD annually.

For current LMI limits, please visit HUD's **CDBG income limits** page and select the appropriate fiscal year.

- Presumed eligible: benefitting a clientele generally presumed by HUD to be comprised of principally LMI persons, currently the following groups:
  - abused children
  - > illiterate adults
  - elderly persons
  - persons with AIDS

- battered spouses
- homeless persons
- > migrant workers
- disabled persons
- **Subrecipient:** an organization that receives CDBG funds from a *Grantee* to undertake eligible activities.
- **Subrecipient Agreement:** a contract between the Subrecipient and the grantee (in this case, the City of Sheboygan) which outlines details of the project and the terms of the grant.
- **United States Code (USC)**: the codification of general and permanent laws (also known as statutes) enacted by the United States Congress. The USC is organized into broad categories titles. View **the USC** for more information.
- U.S. Department of Housing and Urban Development (HUD): the federal agency which administers the CDBG program.

# **OVERVIEW OF THE CDBG PROGRAM**

#### ABOUT THE COMMUNITY DEVELOPMENT BLOCK GRANT

The CDBG program is authorized by Title I of the Housing and Community Development Act of 1974. Providing funding to cities and counties to develop viable urban communities, grants are awarded to carry out a wide range of community development activities including neighborhood revitalization, economic development, and improved community facilities and services. Congress votes annually to determine overall program funding for the year.

All funded projects or programs (activities in HUD-terms) must meet one of three CDBG national objectives:

- 1) Benefitting low- to moderate-income persons;
- 2) Preventing slum or blight; or
- 3) Addressing urgent community needs. (Almost always related to natural disasters.)

#### CDBG IN SHEBOYGAN

The City of Sheboygan receives approximately \$1 million in CDBG funding each year. Of this, 15% or approximately \$150,000, can be allocated to nonprofit organizations as subrecipients. These funds are then used to carry out programs that align with the City's identified priority needs, as found in the *Consolidated* (5 year) and *Annual Action Plans*. Organizations apply for a portion of the annual funds available, setting goals for the number of individuals they plan to serve, housing units they aim to preserve, jobs they seek to retain or create, or other metrics, which the Department of City Development uses to measure progress.

#### ANNUAL ALLOCATION PROCESS

Each winter, the Department of City Development issues a Notice of Funding Opportunity (NOFO), inviting applications for CDBG-eligible projects. Submitted applications are reviewed for completeness by the Grant Coordinator and those which are eligible are then presented to the Finance and Personnel Committee.

The committee evaluates all applications and makes a funding recommendation to the City of Sheboygan's Common Council. After several opportunities for residents to voice their opinions, as outlined in the Citizen Participation Plan, Common Council votes on the allocation of funds. These recommended allocations are then formed into an *Annual Action Plan*, which is reviewed, and ultimately approved, by HUD, prior to the distribution of funds to subrecipients.

This manual highlights key policies and requirements for subrecipients of the City of Sheboygan's Community Development Block Grant (CDBG) program. It should be treated as a supplement to - not a substitute for - CDBG regulations. It is also meant to familiarize public service agencies with the Neighborly Software platform. Please note that the City reserves the right to add, remove, or change the policies, procedures, or forms found in this manual.

If an applicant has questions or is unsure of how to proceed at any point in the CDBG program cycle, they are encouraged to call the Grant Coordinator at (920) 459-3378 for assistance. The following online resources are also available to assist agencies:

- Playing by the Rules A Handbook for Subrecipients on Administrative Systems contains valuable information specifically for CDBG subrecipients.
- **HUD's Guide to Writing Measurable Goals** offers guidance on formulating goals for the year.
- **CPD Monitoring Guide** This handbook was created for HUD staff who are responsible for grantee monitoring and gives an inside glimpse of what that process entails. Helpful for the grantee and its subrecipients to be familiar with as they are themselves monitored.
- For the full regulatory language regarding the program, please take a look at 24 CFR Part 570: Community Development Block Grants

# **ADMINISTRATIVE AND FINANCIAL SYSTEMS**

CDBG subrecipients must maintain administrative and financial records in compliance with CDBG and HUD requirements. Applicant agencies should have fiscal management systems in place that enable them to make sound financial decisions and to demonstrate compliance with all applicable federal, state and local laws, rules, regulations, and requirements. If you are concerned about your organization's adherence to, or management of, administrative and financial systems, please contact the Grant Coordinator for technical assistance.

#### SUBRECIPIENT AGREEMENT

Agencies awarded CDBG funding must enter a contractual relationship with the City of Sheboygan. The contract or "subrecipient agreement" serves three key purposes:

- 1. It **fulfills legal requirements** by presenting the rules of the CDBG program and the conditions under which funds are provided.
- 2. It **outlines the project and serves as a yardstick** for monitoring subrecipient performance.
- 3. It **provides an essential vehicle for training** subrecipient staff on how to operate the CDBG program.

The Subrecipient Agreement is a legally executed contract when properly signed by the four signatories, two representing the City and two representing the agency. The Subrecipient Agreement and the program year to which it is associated follows the HUD-designated program year for Sheboygan which is from April 1 to March 31 each year.

## **INTERNAL CONTROLS**

The applicant will be responsible for establishing and maintaining a system of internal controls to protect the integrity of any awarded grant funds. To the greatest extent possible, the system should provide for adequate separation of duties so that no one individual has authority over all fiscal functions. Where separation of duties is not possible due to staff limitations, management should assume an oversight role for the overall functions to be performed.

At a minimum, applicants should use the following as a guide regarding segregation of duties:

- No individual shall have complete control over all phases of any significant transaction. In other words, the same person cannot authorize payment, record transactions, and signchecks.
- Record keeping must be separate from operations and the handling and custody of assets.

- Monthly reconciliations and verifications of cash balances with bank statements shall be made by employees who do not handle or record cash, or sign checks.
- Actual lines of responsibility shall be clearly established and adhered to as closely as possible.
- Persons preparing payrolls should not handle the related paychecks.
- All persons who handle financial transactions shall be bonded in accordance with State law.

#### RECORDS RETENTION

Records pertaining to CDBG awards must be retained for seven years after expiration of the agreement and any amendments. If there is any litigation, claims, or audit findings extending beyond this period, subrecipients must retain the records until resolved. Records for property acquired with CDBG funds must be retained for four years after final disposition.

#### REPORTING

All subrecipients are required to submit a report of their accomplishments each quarter. The reporting periods and due dates are as follows:

**Quarter 1**: April 1 – June 30 (report due: July 20)

**Quarter 2**: July 1 – Sept 30 (report due: Oct 20)

Quarter 3: Oct 1- Dec 31 (report due: Jan 20)

Quarter 4: Jan 1 – March 31 (report due: April 20)

#### **RECORD KEEPING REQUIREMENTS**

Every subrecipient is required to establish and maintain three major categories of records:

**ADMINISTRATIVE RECORDS:** files and records related to the overall administration of the subrecipient's CDBG activities. They include:

personnel files	☐ property management files
the Subrecipient Agreement	□ program policies
correspondence with grantee	□ reports
articles of incorporation	☐ bylaws of the organization
tax status	□ board minutes
contracts and other agreement files	□ application files

<b>FINANCIAL RECORDS:</b> related to the stewardship and oversight of CDBG funds				
including:				
	chart of accounts	$\hfill\Box$ accounting procedure manual		
	ledgers and journals	□ procurement files		
	bank account records	☐ financial reports		
	audit files	☐ property management files		
	source documents (purchase orders,	invoices, canceled checks, etc.)		

**PROGRAM FILES:** documentation of the activities undertaken with respect to specific individual beneficiaries, property owners, and/or properties as found in the complete case files.

#### FINANCE AND ACCOUNTING PROCEDURES

A Subrecipient's financial transactions with CDBG funds are subject to federal audit and the subrecipient's financial management system must meet the audit requirements as specified in **2CFR §200.501** 

Subrecipients must be prepared to explain how and why transactions were made, and be able to account for any funds expended during an audit with City officials or HUD auditors. During an audit, the auditor will examine records to ascertain if:

- Funds have been properly budgeted and approved.
- Any budget revisions have been documented and approved.
- Personnel charges are properly allocated and based on payroll documents such as time and attendance records.
- All expenditures can be traced to source documents (i.e... invoices, canceled checks).
- Reimbursement requests have been timely.
- Only allowable activities have been claimed as costs toward the project.
- The subrecipient's accounting system reflects all assets, liabilities, etc.
- Property has been managed and inventoried properly.
- In-kind costs and costs billed to other funds are clearly documented.
- If there are billings for indirect costs, an indirect cost allocation plan has been approved.
- Subrecipients managing more than one CDBG project maintain separate files for each project.