

**HUD Call – ICDBG CARES Act Funding
May 20, 2020**

Q&A FROM WEBINAR ON 5/15/2020

1. Where is the NOFO – ICDBG 210-20-11
2. There is no page limit.
3. There is no format or template for the budget
4. There is no font type or any other formatting requirement
5. Implementation date should begin roughly a month after the submission date
6. You can do more than one project within a single application
7. You can combine categories
8. In general, state recognized tribes are not eligible; it's same as the regular ICDBG
9. Is there a relationship between the award and the ICDBG award amounts? NO
10. There are webinars on the HUD Exchange website that go through the environmental review process.
11. Follow-up usual guidelines with regards to Service Area. There is no limitation on service area.
12. Funds cannot be used to advance a project underway except to the extent that it has been affected by COVID-19 (prevent, prepare or respond to COVID-19)
13. There is no weighting with regards to whether or not a project is a “band-aid” vs. a prevention project. There is no weighting although we might down weight a project that takes more than a year.
14. We will notify folks on a rolling basis.
15. To determine whether your project is eligible, please reach out to your area office.
16. Extending wifi to homes is likely allowable/eligible.
17. There is a regulation that allows up to 20% of funding to be used for admin. Thus, you can use funds to pay a consultant to prepare the application.
18. Retrofits of government buildings would not be eligible.
19. You can repair homes of elders in so far as you are presenting, preparing and responding.
20. Developing housing for the homeless insofar as you are preventing, preparing and responding.
21. There are no waivers for existing grant caps given in the notice.
22. Same rules apply for indirect costs with regards to ICDBG
23. No match requirements
24. Extensions apply to all SF 425s
25. The last possible day for funds to be expended is September 30, 2025 but the intent is for these monies to be spent rapidly. So, we will be looking closely at the applications to ensure that funds are being spent within 12 months and no more than 3 years for large projects.
26. 2020 ICDBG grants will be announced soon.
27. You will need to comply with citizen participation. You need to look now at how you are going to make those plans available to the public and provide them with a chance to provide feedback. You will need to attest to this as part of your application. So, you are required to comply with citizen participation. You should submit a tribal resolution to the effect that you complied with citizen participation, although this is not required to be submitted by June 1. No funds, however, will be disbursed without such a resolution.

PRESENTATION OF OPPORTUNITY

1. Check waivers that are available including removal of 15% cap which applies to both 2019 and 2020 grants
2. Funding is to be used to **supplement** not **supplant** other funding. Gets at double-dipping
3. Everyone eligible for regular ICDBG is eligible for this
4. If you can't get a tribal resolution authorizing application, you will need to apply for a waiver.
5. Items that must be included
 - a. Standard Form-424(Application for Federal Assistance), available at <https://www.grants.gov/forms/sf-424-family.html>. Select "Application for Federal Assistance (SF-424)" from the list of forms. Click on "Enable All Features" if prompted to do so. This may be necessary for the form to appear.
 - b. [HUD-2880](#)(Application/Disclosure/Update Report).
 - c. [HUD-4123](#)(Cost Summary)
 - d. Project Description Summary. Information submitted must include:
 - i. A written description of the activities, projects, or programs that the applicant plans to undertake, and how the activities, projects, or programs are tied to preventing, preparing for, and/or responding to COVID-19.
 - ii. A written statement describing how the funded activities will be carried out successfully, timely and within the proposed timeline, and in compliance with program requirements.
 - iii. A narrative description of the implementation timeline (as also reflected in the [HUD-4125](#)(Implementation Schedule)).
 - iv. Applicants should be mindful to propose appropriate implementation timelines. HUD reserves the right to reject activities, projects, or programs with implementation timelines that are so lengthy that HUD determines, based on its best judgment and discretion, that the activities, projects, or programs proposed cannot be justified as reasonably preventing, preparing for, and responding to COVID-19.
 - v. If HUD questions the proposed timelines, HUD will notify the applicant of this deficiency and work with the applicant to ensure that the revised Implementation Schedule is reasonably set to allow the applicant to reasonably prevent, prepare for, and respond to COVID-19.
 - vi. If the applicant fails to revise the Implementation Schedule to HUD's satisfaction, HUD reserves the right to only fund a portion of the application or reject the entire application and award an ICDBG-CARES grant to the next fundable applicant.
 - vii. If an otherwise complete application includes a questioned implementation plan they will retain their original date stamp while HUD works with the applicant to revise the proposed Implementation Schedule.
 - viii. Applications with Implementation Schedules longer than 12 months will be accepted **provided the applicant provides HUD with justification**, including supporting documentation, demonstrating why the proposed timeline is reasonably set to prevent, prepare for, and respond to COVID-19.

- ix. HUD will consider all relevant factors including, but not limited to: the nature of the activities, projects, or programs being proposed, the size of the ICDBG-CARES grant requested, any disruption in supply chains, barriers caused by a short or disrupted construction season, infrastructure challenges, impact of COVID-19 on the applicant's operations and its ability to carry out activities, projects, or programs more expeditiously.
 - x. *New Housing Construction Projects*: HUD **will only fund applications that propose to carry out new housing construction that is clearly designed to prevent, prepare for, and respond to COVID-19** (e.g. to reduce overcrowding), and that the applicant plans to carry out expeditiously.
 - xi. *Economic Development Projects*: Due to other available CARES Act resources, HUD encourages non-economic development projects before submitting an ICDBG-CARES application to carry out economic development projects. **HUD will consider funding economic development projects only after ICDBG-CARES activities are fully funded first**, and if ICDBG-CARES funding remains available.
 - e. [HUD-4125](#)(Implementation Schedule). Upon a finding of good cause, HUD may approve an applicant's request to revise the Implementation Schedule at a later date, in the event of a reasonable delay.
 - f. Detailed budget information, including any pre-award costs incurred that the applicant seeks reimbursement for and documentation supporting those reimbursable costs.
 - g. Waiver Request(Tribal Organizations only) -If unable to get a tribal resolution due to sheltering in place, **the applicant must include a request to HUD to waive the tribal resolution requirement in 24 CFR 1003.5(b) along with a justification to show that good**
6. **Citizen Participation:**
- a. Public meetings are not required before applying for ICDBG-CARES grant funding; **However, applicants will be required to publish or post information on applicant plans to ICDBG-CARES funds and accept and consider comments received**
7. **Eligible Purposes:**
- a. "To prevent, prepare for, and respond to coronavirus, for emergencies that constitute imminent threats to health and safety"
 - b. HUD will only fund ICDBG-CARES applications that propose to carry out projects and activities that meet one or more of these eligible purposes.
8. **Urgency and Immediacy of Threat:**
- a. The urgency and immediacy of the threat need not be independently verified before approval of an application. The urgency and immediacy of the threat will be presumed by HUD, unless HUD has evidence to the contrary.
9. **Nonrecurring Threats and Impact on Service Area:**
10. Applications need not demonstrate that COVID-19 is a non-recurring imminent threat and that it has an impact on an entire service area. HUD will presume these criteria are met unless HUD has evidence to the contrary.
11. **Available Resources:** (PIH Notice 2020-05)

- a. Applicants do not have to demonstrate that other tribal funding sources cannot be made available to alleviate the threat.

12. Coordination and Duplication of Benefits:

- a. Coordinate locally and with other federal agencies to ensure that funds are used appropriately to address gaps in funding, avoid unnecessary overlap in effort, and to avoid any duplication of benefits.
- b. Eliminate duplication of benefits by ensuring federal financial assistance is not provided for the same costs paid by any other source, or private insurance.

13. Can expend more than 20% on administrative costs

14. Any program income derived must be spent on ICDBG activities

15. Grant ceilings are based on existing grant formulas

IHBG-CARES Funding Formula	Grant Ceiling
More than \$2 million	\$3 million
More than \$750,000 but less than \$2 million	\$1.5 million
Less than \$750,000	\$900,000

16. Eligible purposes: Prevent, prepare, respond.

- a. •Short-term and long-term activities that meet the purposes of the CARES Act
- b. Reduce or mitigate short-term, medium-term, and longer-term risks and vulnerabilities of tribal communities to COVID-19, e.g., activities that reduce overcrowding
- c. HUD encourages ICDBG-CARES grantees to prioritize expending these funds ASAP given the ongoing COVID 19 National Emergency
- d. HUD reserves the right to reject activities, projects, or programs with implementation timelines that are so lengthy that HUD determines that the projects or activities cannot be justified as reasonably preventing, preparing, or responding to COVID-19.
- e. ICDBG-CARES grants do not have to comply with the primary objective of the Housing and Community Development Act of 1974
- f. no less than 70% of expenditures of the grant must be for activities which meet the criteria set forth in 24 CFR 1003.208(a)-(d)

17. Eligible Activities

- a. Rehabilitation of, and other improvements to, housing to prepare units to be used to temporarily house persons that need to quarantine/shelter-in-place,
- b. Rehabilitation of housing to improve ventilation to reduce the risks of COVID-19.
- c. New Construction of housing, including tiny homes, when such construction is done expeditiously and carried out to reduce overcrowding or to otherwise prevent, prepare for, and respond to COVID-19.

d. Acquisition of modular homes or RVs to meet an immediate need to provide housing for medical workers, and other essential service providers and front-line staff.

e. Public Facilities and Infrastructure

- i. Applicants may acquire, construct, rehabilitate, or install public works, facilities, and site or other improvements, when carried out expeditiously to prevent, prepare for, and respond to COVID-19. Examples include:
- ii. Construction of permanent or temporary facilities for testing, diagnosis, or treatment of COVID-19.
- iii. Rehabilitation of facilities to establish an infectious disease treatment clinic.
- iv. Acquisition, rehabilitation, or construction of a group living facility that may be used to centralize patients undergoing treatment.
- v. Retrofitting of a food bank to ensure that employees and volunteers can safely work in the facility and distribute food.
- vi. Construction or conversion of structures that can serve as temporary emergency shelters to shelter homeless persons and minimize risk of community spread.
- vii. Paying for the operation and maintenance expenses of existing shelters and other public facilities (not including staffing costs) designed to ensure homeless persons are provided safe shelter and to minimize the risk of community spread.
- viii. Acquisition or conversion of a motel or hotel building or similar facility to expand capacity of hospitals to accommodate isolation of patients during recovery.
- ix. Expanding or repairing water lines to ensure families have access to water to adhere to CDC guidelines and prevent the spread of COVID-19.
- x. Purchase of water tank trucks and other water distribution equipment, supplies, and facilities to support families without access to water.
- xi. Purchase of emergency ambulances and related specialized equipment and tools to expand medical and other emergency services
- xii. Expanding cell towers and broadband infrastructure capacity needed to assist communities lacking internet and phone service to conduct business, allow students to participate in distance learning, support telehealth strategies, and provide other community services, provided such activities can be carried out expeditiously.

f. Public Services

- i. Applicants may provide new or quantifiably increased public services. ICDBG-CARES funds are not subject to the 15% cap on public services that normally applies to ICDBG grant funds. Examples include:
- ii. Up to 6 months of emergency payments in the form of rental assistance, utility assistance (including internet access to allow children to engage in distance learning), food assistance, clothing, medical, and other emergency assistance.
- iii. Placement of homeless persons in hotel/motels, and other non-congregate sheltering, to minimize infection.

- iv. Job training to expand the pool of health care workers and technicians that are available to treat disease within a community.
 - v. Providing security to ensure the health and safety of community members and to secure construction sites and community facilities from theft or vandalism.
 - vi. Testing, diagnosis or other services at a fixed or mobile location.
 - vii. Increasing the capacity and availability of targeted health services for infectious disease response within existing health facilities.
 - viii. Equipment, supplies, and materials necessary to carry-out a public service.
 - ix. Purchasing groceries for a food bank or distribution to vulnerable
 - x. Delivering meals to quarantined individuals or individuals that need to maintain social distancing due to medical vulnerabilities.
 - xi. Acquisition or leasing of telehealth equipment or services to allow assisted residents access to health care providers from home.
18. ONAP will begin accepting applications on June 1 and will be considered and awarded on a first-come, first-serve basis.
19. If all required materials are not submitted, the application will be considered incomplete and lose its place in line.
20. If demand for funding exceeds available funding, HUD reserves the right to set-aside the balance of funding for those in greatest need.

Q&A

1. Anything that is typically eligible under ICDBG would be eligible under this opportunity as long as it ties back to COVID-19 – prepare, prevent, respond.
2. You can only make one application.
3. You will need to adhere to the CFRs with regards to non-competitive procurement
4. There is an express prohibition against general welfare payments. However, you are allowed to provide payment for rent, medical payments, etc., for up to six months if someone is at 80% or less of median income. But as a general matter, you cannot use these funds to provide general welfare payments.
5. There is a general prohibition against all forms of supplanting. However, if it is only generally stated that a tribe is committing to a project, but has not allocated those funds, that would not be considered supplanting.
6. The email submission must come from the AOR.
7. Be sure to look at the waiver notice if you have any questions regarding project eligibility
8. Ceiling limits are based on allocation under IHBG Cares