



# **Community Development Block Grant (CDBG): Issues and Updates**

## **DLG Office of Federal Grants**



# What's new:

## **2024 Guidelines:**

Public Facilities applications must now include a letter from the provider stating that they agree with the project and have the capacity to serve the proposed project.

## **Labor:**

The USDOL is revising the Davis Bacon regulations. Some of the changes are:

- Exempt Workers: re-defined the classification
- Truck Drivers: re-defined when DB applies
- Demolition: is no longer exempt
- Wages Rates: changed when a new decision is required on an on-going project.
- When two wage classes apply: If one class is 20% or more of the project cost, or over \$2.5M




# Labor Continued:

When is a new wage decision required?

- Contract or change order:
  - to include additional and substantial work
  - to require the contractor to perform work for an additional time period
  - an option to extend the term of the contract

There is also a clause on the contract's award anniversary, if certain criterion apply

- Resource Book: <http://www.dol.gov/agencies/whd/prevaling-wage-resource-book>
- Prevailing Wage Topic videos: <https://www.dol.gov/agencies/whd/government-contracts/construction/presentations>



## What's new: 24 CFR Part 58 - Environmental

Radon 24 CFR 50.3(i) 7 58.5(i)(2)

- Requires consideration of radon gas in buildings.
- Radon testing is not required HOWEVER mitigation IS REQUIRED if levels exceed 4.0pCi/L or greater

HUD Federal Flood Risk Management Standard (FFRMS) 24 CFR Part 55

- Expands the concern from the 100-year floodplain to a newly defined FFRMS floodplain
- Prefers the use of Climate Informed Science Approach (CISA) to determine the floodplain of concern
- Updates HUD's Minimum Property Standards
- This does not replace the requirements set forth in Part 55, just expands



# What's new: Part 200

## **Part 200 Changes**

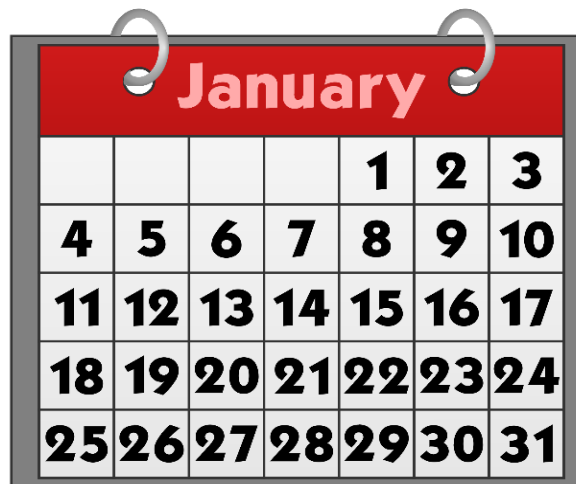
- Substantial Improvement Elevation Requirements
- Manufactured Housing Elevation
- On Site Floodway

## **On-Line publications**

# Issues / Concerns: Environmental

## Environmental Reviews:

- Conducting the correct level of review
- Using the correct forms
- Completion of the forms
- Exempt activities a written determination **MUST** be made and placed in the ERR prior to incurring expenses
- Using the correct language in the Notices
- Calculating the appropriate comment periods





# Issues / Concerns: Payments

**New:** We now require invoices with every request

## **Issues with Draw Requests:**

- Not including the *applicant's* name, instead using the project name
- Not properly numbered
- Miscalculations
- Not completing the Use of Other Funds
- Not completing the Project Status
- On ARC draws not including the ARC assigned number
- On ARC not including the Additional information sheet
- Timely submittal
- You should never have “cash on hand”.
- If your city or county has program income, please enter that amount on the draw sheet.
- If you have Program Income on the books with DLG, you must apply that to your recently awarded grant or your next application.

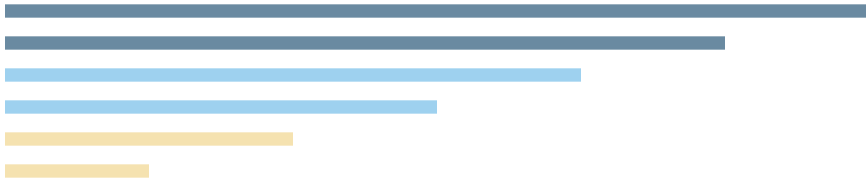


# Issues / Concerns: Financial

## **New:**

- The audit threshold will rise to \$1,000,000 in October.
- Please use updated forms, PI reports, PCR, public notice, etc. downloaded, before submission, from the DLG web page or handbook.





# Local Surveys and Census



# Local Surveys and Census

**REMEMBER**

**CDBG projects  
are activity  
driven.**



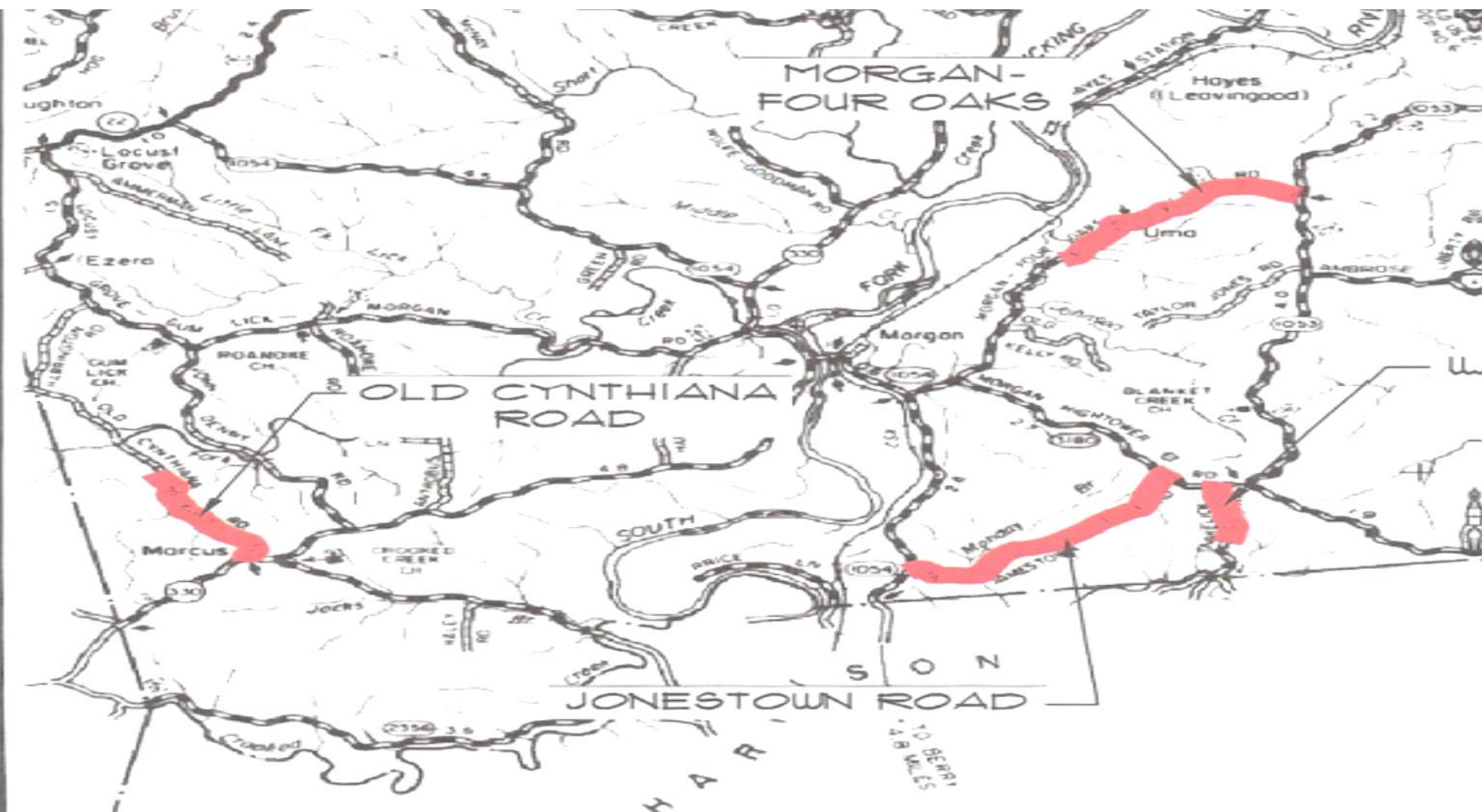
# Local Surveys and Census

## Three Ways to Determine **LMI**:

1. HUD LMI Data  
(Based on ACS)
2. Surveys
3. Combination

# Local Surveys and Census

## Non-Continuous Survey

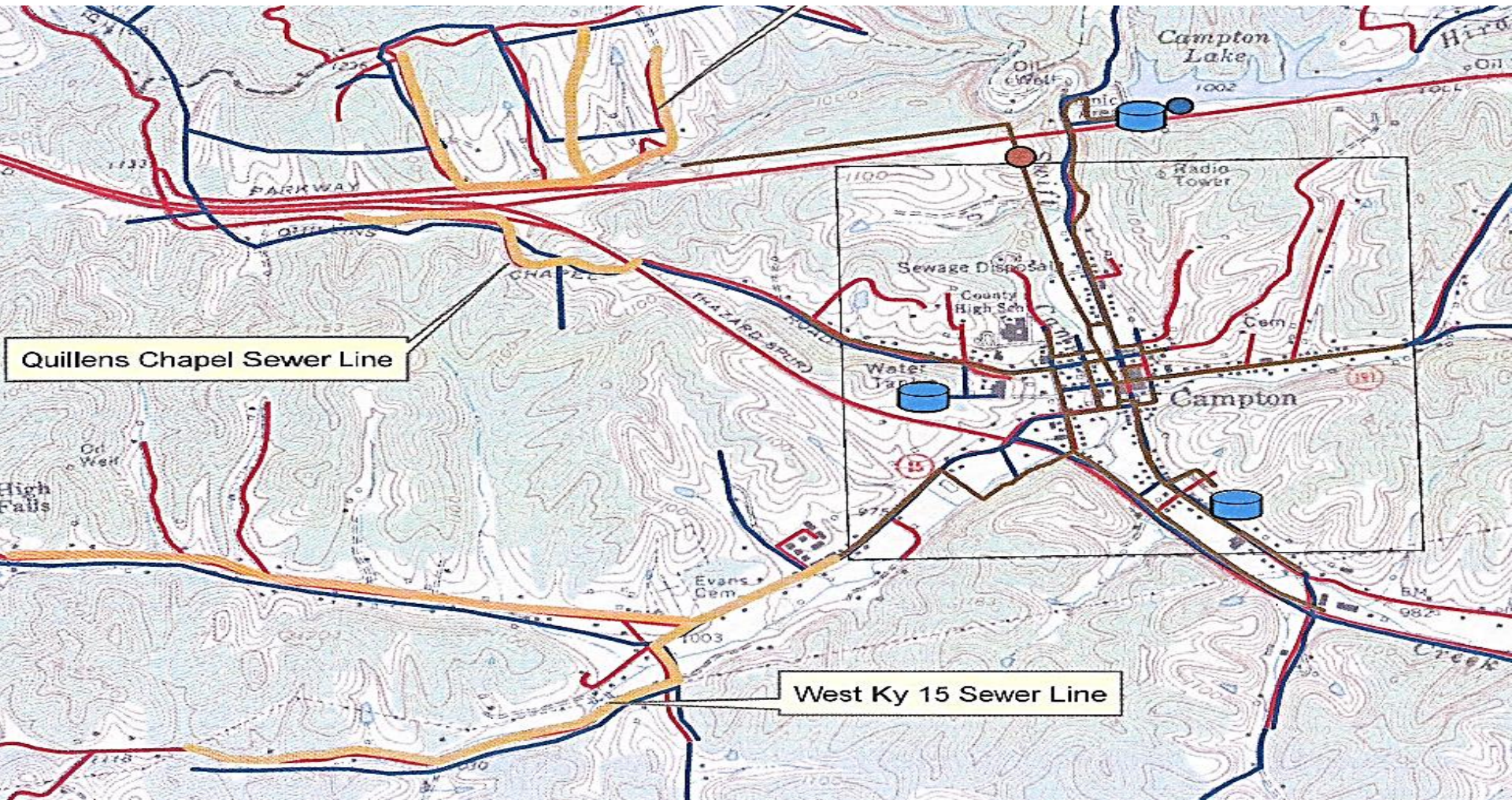


# Local Surveys and Census

## Continuous Survey



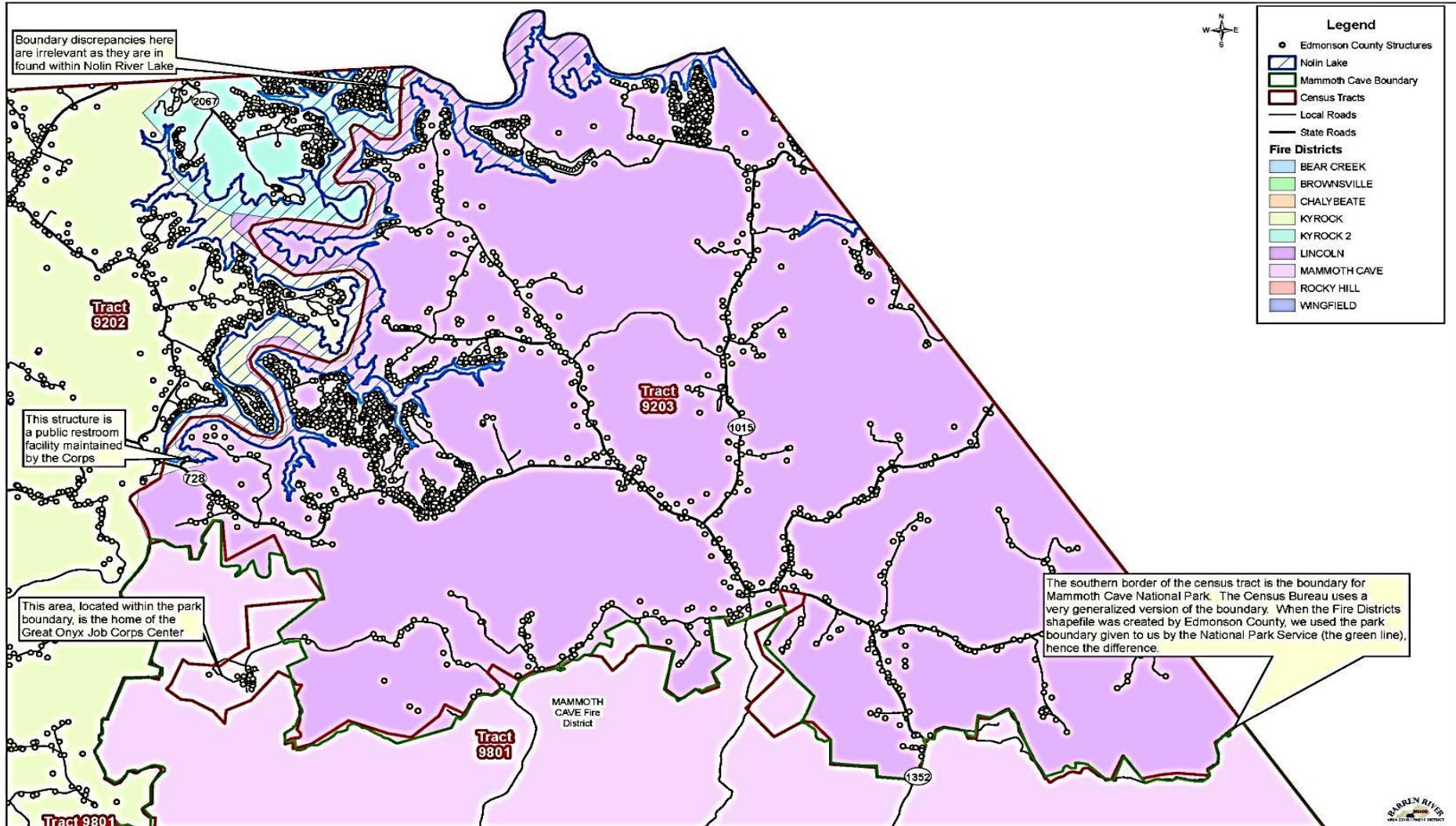
# Local Surveys and Census Combination Survey



# Local Surveys and Census

2010 U.S. Census Tracts with Local Fire Districts

Edmonson County, Kentucky





# Local Surveys and Census

## **STEP 1 – Select the Type of Survey**

- Note: ED projects will survey new hires on the back-end of the project. However, please include a letter from the company agreeing to hire 51% low- and moderate-income individuals.





# Local Surveys and Census

## **STEP 2 – Develop the Questionnaire**

- Sample surveys on DLG's website
- 2018 Income Limits

# Local Surveys and Census

## Survey Examples

### SAMPLE HOUSING SURVEY

*For Official Use*  
 Over: \_\_\_\_\_  
 LMI: \_\_\_\_\_  
 VL: \_\_\_\_\_  
 XL: \_\_\_\_\_

Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Phone \_\_\_\_\_

Number of Persons in Household \_\_\_\_\_  
 Number of Household Members 62 or Older \_\_\_\_\_  
 Number of Disabled in Household \_\_\_\_\_

**Household Information --Total number of persons in household by:**

1. **Race** White \_\_\_\_\_ Black/African American \_\_\_\_\_ Asian \_\_\_\_\_ American Indian/Alaskan Native \_\_\_\_\_ Native Hawaiian/Other Pacific Islander \_\_\_\_\_ American Indian/Alaskan Native & Black/African American \_\_\_\_\_ American Indian/Alaskan Native & Other \_\_\_\_\_ Asian & White \_\_\_\_\_ Black/African American & White \_\_\_\_\_ Other Multi-Racial \_\_\_\_\_
2. **Ethnicity** Non-Hispanic \_\_\_\_\_ Hispanic \_\_\_\_\_
3. Total number of persons in household that are: United States Citizens \_\_\_\_\_ Nationalized Citizens \_\_\_\_\_  
 Lawfully Present Aliens \_\_\_\_\_
4. **Head of Household:** Male \_\_\_\_\_ Female \_\_\_\_\_
5. **Age of Head of Household** \_\_\_\_\_
6. Will your home require modifications to accommodate disabled occupant(s) in the household? Yes \_\_\_\_\_ No \_\_\_\_\_
7. What year was your home built? \_\_\_\_\_ If not sure, do you think it was built after 1978? Yes \_\_\_\_\_ No \_\_\_\_\_
8. Do you own or rent your home? Own \_\_\_\_\_ Rent \_\_\_\_\_
9. How much is your rent or mortgage payment per month? \$ \_\_\_\_\_
10. How many bedrooms does your home have? \_\_\_\_\_
11. Have you received federal assistance in the past for repairs to your home? Yes \_\_\_\_\_ No \_\_\_\_\_  
 If yes, please explain: \_\_\_\_\_
12. Is this property used for any purpose other than residential? Yes \_\_\_\_\_ No \_\_\_\_\_ If yes, please explain: \_\_\_\_\_
13. What type of sanitary waste disposal does your home use? Connection to a Sanitary Sewer \_\_\_\_\_ Septic Tank \_\_\_\_\_ Outdoor Toilet \_\_\_\_\_ Other: \_\_\_\_\_
14. Is your home tapped to a public water line? Yes \_\_\_\_\_ No \_\_\_\_\_ If no, do you receive drinking water from a Well \_\_\_\_\_ or a Cistern \_\_\_\_\_?
15. Has your home ever had flood damage? \_\_\_\_\_
16. Are any household members related to city/county employees or elected officials. Yes \_\_\_\_\_ No \_\_\_\_\_. If yes, please explain \_\_\_\_\_

**Voluntary Scattered Site Projects Only:**

17. How did you learn of this project? Newspaper \_\_\_\_\_ Radio/TV \_\_\_\_\_ Friend/Neighbor \_\_\_\_\_ Other \_\_\_\_\_

# Local Surveys and Census

## Survey Examples

### CHARLESTOWN PUBLIC FACILITIES SURVEY

*For Official Use*  
 Over: \_\_\_\_\_  
 LMI: \_\_\_\_\_  
 VL: \_\_\_\_\_  
 XL: \_\_\_\_\_

Name \_\_\_\_\_  
 Address \_\_\_\_\_  
 Phone \_\_\_\_\_

Number of Persons in Household \_\_\_\_\_  
 Number of Household Members 62 or Older \_\_\_\_\_  
 Number of Disabled in Household \_\_\_\_\_

**Household Information - Total number of persons in household by:**

1. Race
  - White \_\_\_\_\_
  - Black/African American \_\_\_\_\_
  - Asian \_\_\_\_\_
  - American Indian/Alaskan Native \_\_\_\_\_
  - Native Hawaiian/Other Pacific Islander \_\_\_\_\_
  - American Indian/Alaskan Native & Other \_\_\_\_\_
  - Asian & White \_\_\_\_\_
  - Black/African American & White \_\_\_\_\_
  - American Indian/Alaskan Native & Black/African American \_\_\_\_\_
  - Other Multi-Racial \_\_\_\_\_
2. Ethnicity Non-Hispanic \_\_\_\_\_ Hispanic \_\_\_\_\_
3. Head of Household: Male \_\_\_\_\_ Female \_\_\_\_\_
4. What type of sanitary waste disposal does your home use? Connection to a Sanitary Sewer \_\_\_\_\_  
 Septic Tank \_\_\_\_\_ Outdoor Toilet \_\_\_\_\_ Other: \_\_\_\_\_
5. Has your home ever had flood damage? \_\_\_\_\_
6. Are any household members related to city/county employees or elected officials. Yes \_\_\_\_\_ No \_\_\_\_\_.  
 If yes, please explain. \_\_\_\_\_
7. Do you receive drinking water from a Well \_\_\_\_\_ or a Cistem \_\_\_\_\_?
8. If the proposed public facility (water line, sewer line, etc.) is completed, will you use it? Yes \_\_\_\_\_ No \_\_\_\_\_

*NOTE: Other questions may be added*

**Total Gross Annual Household Income:** In the column showing the number of people in your household, circle (only one) income range that totals the gross annual household income.

1 Person	
0-	12,050
12,051 -	20,050
20,051 -	32,050
Above	32,050

2 People	
0 -	13,750
13,751 -	22,900
22,901 -	36,600
Above	36,600

3 People	
0 -	15,450
15,451 -	25,750
25,751 -	41,200
Above	41,200

4 People	
0 -	17,150
17,151 -	28,600
28,601 -	45,750
Above	45,750



# Local Surveys and Census

## STEP 3 – Determine Who to Survey

- Random Selection
  - [www.randomizer.org](http://www.randomizer.org)
  - Make sure that you have randomized enough households to establish a correct minimum survey amount.
- 100% Survey



# Local Surveys and Census

## **STEP 4 – Conduct the Survey**

- Must be door-to-door, in person
- No phone calls
- No mail surveys



# Local Surveys and Census

## **STEP 5 – Determine the Results**

- Complete Survey Data
  - Only use data from valid, completed surveys
  - Clarify any errors or omissions
- Complete LMI Worksheet

# Local Surveys and Census

## Sample LMI Worksheet

### Kentucky Community Development Block Grant LMI Worksheet

Applicant \_\_\_\_\_

App No. \_\_\_\_\_

Project \_\_\_\_\_

#### Part A Information Contained in Your Survey Responses

1.	Total number of households in the service areas	_____	
2.	Total number of households responding to the survey	_____	
3.	Response rate	<u>#DIV/0!</u>	#2 / #1
4.	Total number of low-and-moderate income households surveyed	_____	
5.	Total number of persons living in the low-and-moderate income households surveyed	_____	
6.	Total number of over-income households surveyed	_____	
7.	Total number of persons living in the over-income households surveyed	_____	
8.	Total number persons living in the households surveyed	<u>0</u>	#5 + #7

#### Part B Calculations

9.	Average size of the low-and-moderate income households	<u>#DIV/0!</u>	#5 / #4
10.	Average size of over-income households	<u>#DIV/0!</u>	#7 / #6
11.	Proportion of low-and-moderate households	<u>#DIV/0!</u>	#4 / #2
12.	Proportion of over-income households	<u>#DIV/0!</u>	#6 / #2
13.	Estimate of total number of LMI households in project area	<u>#DIV/0!</u>	#1 * #11
14.	Estimate of total number of over-income households in project area	<u>#DIV/0!</u>	#1 * #12



# Local Surveys and Census

## **STEP 6 – Document your Efforts**

*You may have to provide this information at any time!*

- Surveys
- LMI Worksheet
- Randomizer Results
- Correspondents from Survey Process
- Maps of the Service Area





# Local Surveys and Census

## Common Mistakes

- Mapping the Service Area
- Invalid Surveys
- Misrepresented LMI Worksheets

# Sample Income Limits

<b>Monroe County, KY</b>										
FY 2015 MFI:	36500	EXTR LOW INCOME	11770	15930	20090	22950	24800	26650	28500	30300
		VERY LOW INCOME	16100	18400	20700	22950	24800	26650	28500	30300
		LOW-INCOME	25700	29400	33050	36700	39650	42600	45550	48450
<b>Montgomery County, KY</b>										
FY 2015 MFI:	45100	EXTR LOW INCOME	11770	15930	20090	22950	24800	26650	28500	30300
		VERY LOW INCOME	16100	18400	20700	22950	24800	26650	28500	30300
		LOW-INCOME	25700	29400	33050	36700	39650	42600	45550	48450
<b>Morgan County, KY</b>										
FY 2015 MFI:	43200	EXTR LOW INCOME	11770	15930	20090	22950	24800	26650	28500	30300
		VERY LOW INCOME	16100	18400	20700	22950	24800	26650	28500	30300
		LOW-INCOME	25700	29400	33050	36700	39650	42600	45550	48450
<b>Muhlenberg County, KY</b>										
FY 2015 MFI:	48000	EXTR LOW INCOME	11770	15930	20090	24000	25950	27850	29800	31700
		VERY LOW INCOME	16800	19200	21600	24000	25950	27850	29800	31700
		LOW-INCOME	26900	30750	34600	38400	41500	44550	47650	50700
<b>Nicholas County, KY</b>										
FY 2015 MFI:	47800	EXTR LOW INCOME	11770	15930	20090	23550	25450	27350	29250	31100
		VERY LOW INCOME	16500	18850	21200	23550	25450	27350	29250	31100
		LOW-INCOME	26400	30200	33950	37700	40750	43750	46750	49800
<b>Ohio County, KY</b>										
FY 2015 MFI:	44800	EXTR LOW INCOME	11770	15930	20090	22950	24800	26650	28500	30300
		VERY LOW INCOME	16100	18400	20700	22950	24800	26650	28500	30300
		LOW-INCOME	25700	29400	33050	36700	39650	42600	45550	48450
<b>Owen County, KY</b>										
FY 2015 MFI:	62400	EXTR LOW INCOME	13100	15930	20090	24250	28410	32570	36730	40890
		VERY LOW INCOME	21850	25000	28100	31200	33700	36200	38700	41200
		LOW-INCOME	34950	39950	44950	49900	53900	57900	61900	65900
<b>Owsley County, KY</b>										
FY 2015 MFI:	29600	EXTR LOW INCOME	11770	15930	20090	22950	24800	26650	28500	30300
		VERY LOW INCOME	16100	18400	20700	22950	24800	26650	28500	30300
		LOW-INCOME	25700	29400	33050	36700	39650	42600	45550	48450

# Local Surveys and Census

## Sample Survey

For Official Use  
Over: \_\_\_\_\_  
LMI: \_\_\_\_\_  
VL: \_\_\_\_\_  
XL: \_\_\_\_\_

**COMMUNITY PROJECTS SURVEY**

Survey # \_\_\_\_\_  
Name \_\_\_\_\_  
Address \_\_\_\_\_

Number of Persons in Household \_\_\_\_\_  
Number of Household Members 62 or Older \_\_\_\_\_  
Number of Disabled in Household \_\_\_\_\_

**Household Information - Total number of persons in household by:**

1. Race    White \_\_\_\_\_  
            Black/African American \_\_\_\_\_  
            Asian \_\_\_\_\_  
            American Indian/Alaskan Native \_\_\_\_\_  
            Native Hawaiian/Other Pacific Islander \_\_\_\_\_  
            American Indian/Alaskan Native & Other \_\_\_\_\_  
            Asian & White \_\_\_\_\_  
            Black/African American & White \_\_\_\_\_  
            American Indian/Alaskan Native & Black/African American \_\_\_\_\_  
            Other Multi-Racial \_\_\_\_\_

2. Ethnicity    Non-Hispanic \_\_\_\_\_    Hispanic \_\_\_\_\_

3. Head of Household:    Male \_\_\_\_\_    Female \_\_\_\_\_

4. Are any household members related to a \_\_\_\_\_ employee or elected official.    Yes \_\_\_\_\_ No \_\_\_\_\_  
If yes, please explain: \_\_\_\_\_

**Total Gross Annual Household Income:** In the column showing the number of people in your household, check (only one) income range that totals the gross annual household income.

TOTAL GROSS ANNUAL FAMILY INCOME				
1 PERSON	___ Below \$11,770	___ \$11,771 - \$16,100	___ \$16,101 - \$25,700	___ Above \$25,701
2 PERSONS	___ Below \$15,930	___ \$15,931 - \$18,400	___ \$18,401 - \$29,400	___ Above \$29,401
3 PERSONS	___ Below \$20,090	___ \$20,091 - \$20,700	___ \$20,701 - \$33,050	___ Above \$33,051
4 PERSONS	___ Below \$22,950		___ \$22,951 - \$36,700	___ Above \$36,701
5 PERSONS	___ Below \$24,800		___ \$24,801 - \$39,650	___ Above \$39,651
6 PERSONS	___ Below \$26,650		___ \$26,651 - \$42,600	___ Above \$42,601
7 PERSONS	___ Below \$28,500		___ \$28,501 - \$45,550	___ Above \$45,551
8 PERSONS	___ Below \$30,300		___ \$30,301 - \$48,450	___ Above \$48,451

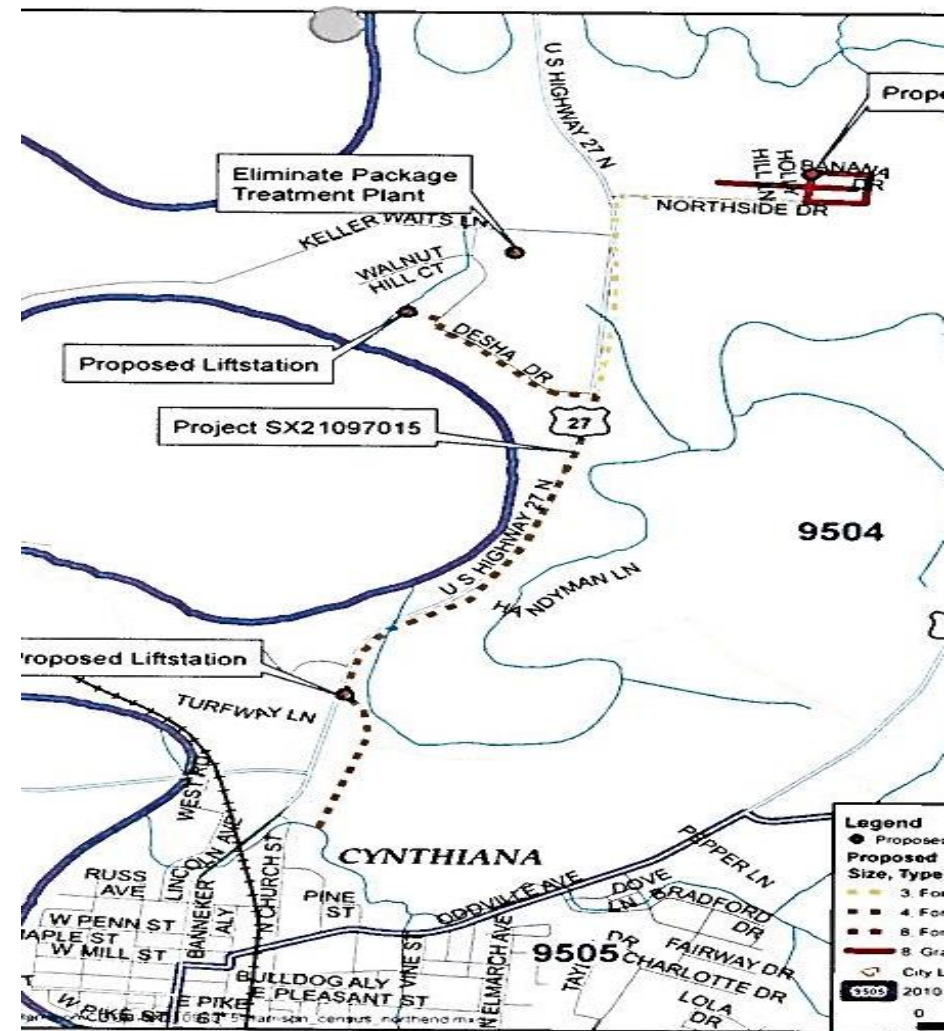
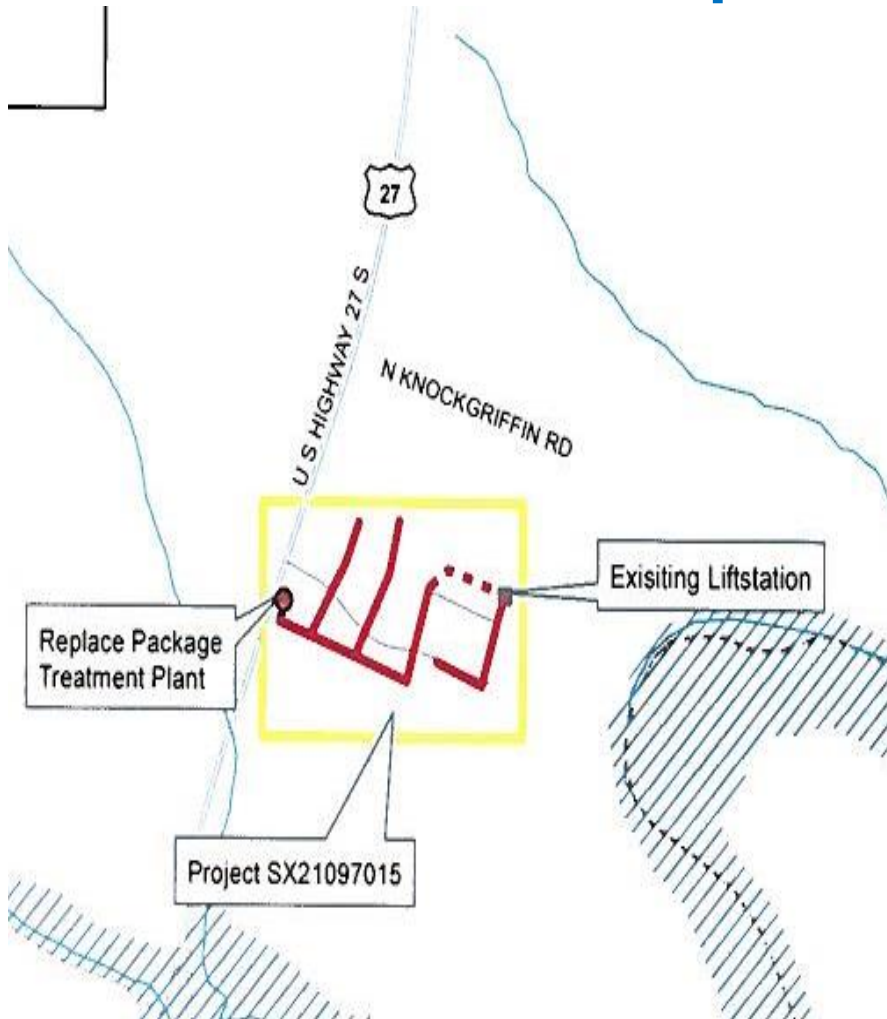
I hereby certify that the above information is true and accurate to the best of my knowledge and fully understand that this information is subject to verification by the city/county, the State or HUD upon their request. Falsifying this information will result in payback of CDBG funds.

Signature \_\_\_\_\_ Date \_\_\_\_\_ Interviewer \_\_\_\_\_



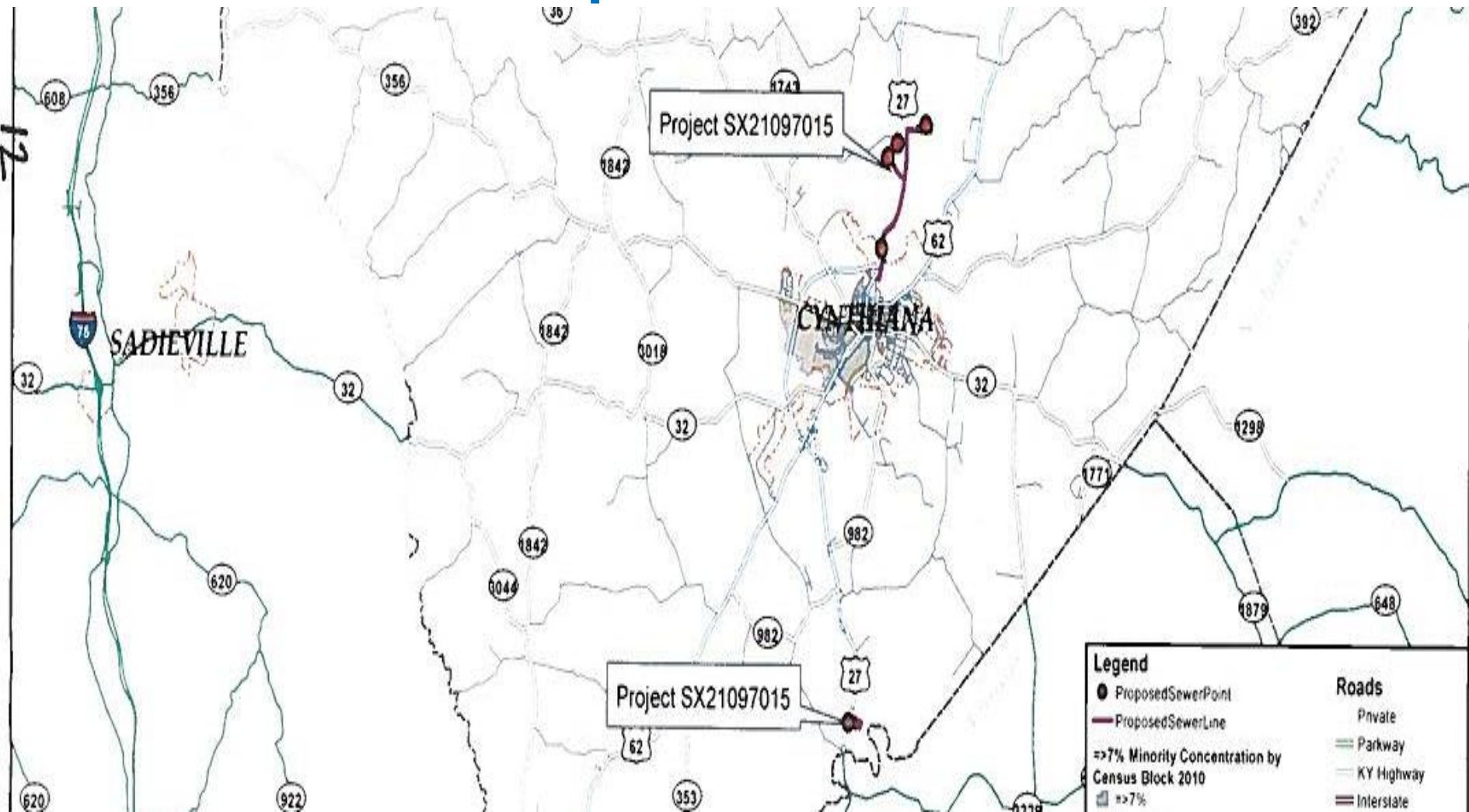
# Local Surveys and Census

## Sample Service Area



# Local Surveys and Census

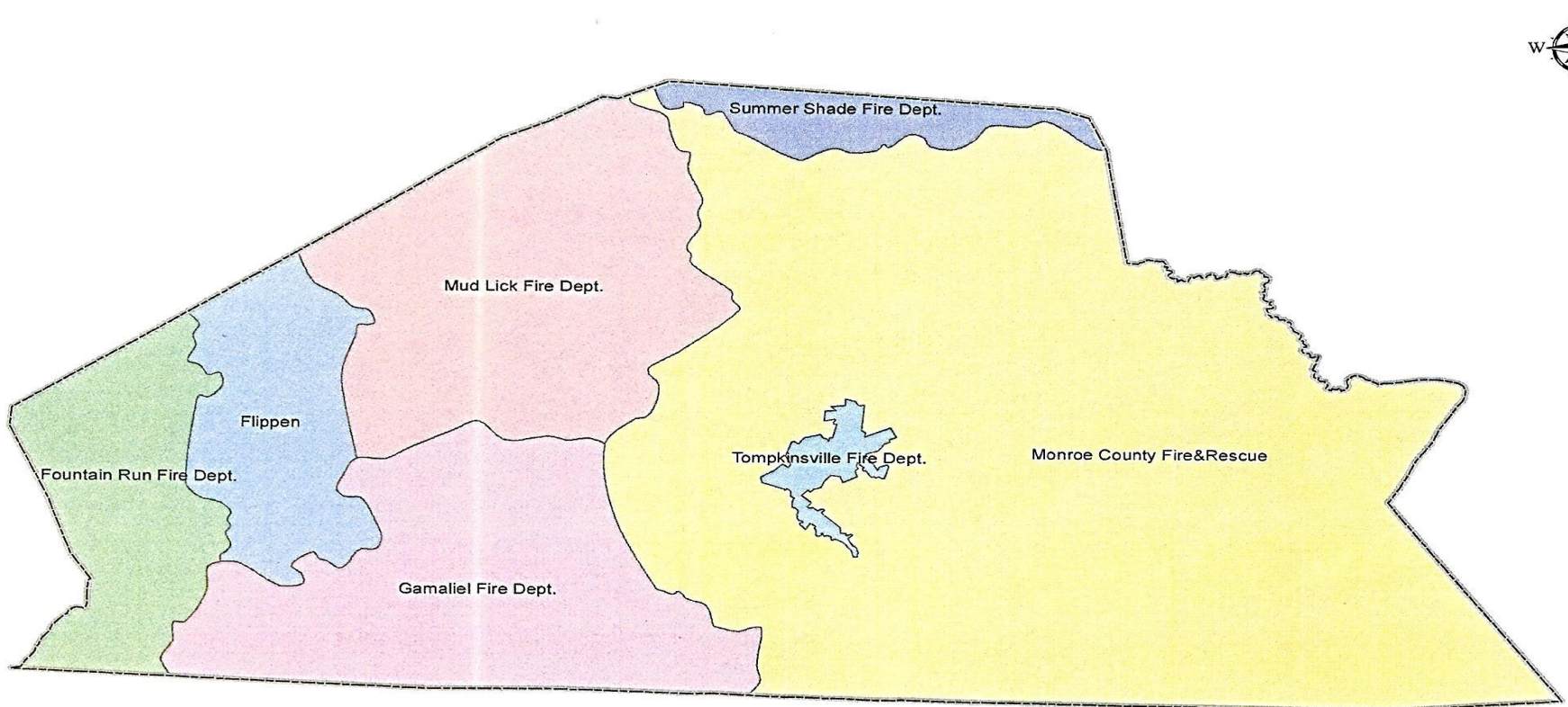
## Sample Service Area



# Local Surveys and Census

## Sample Service Area

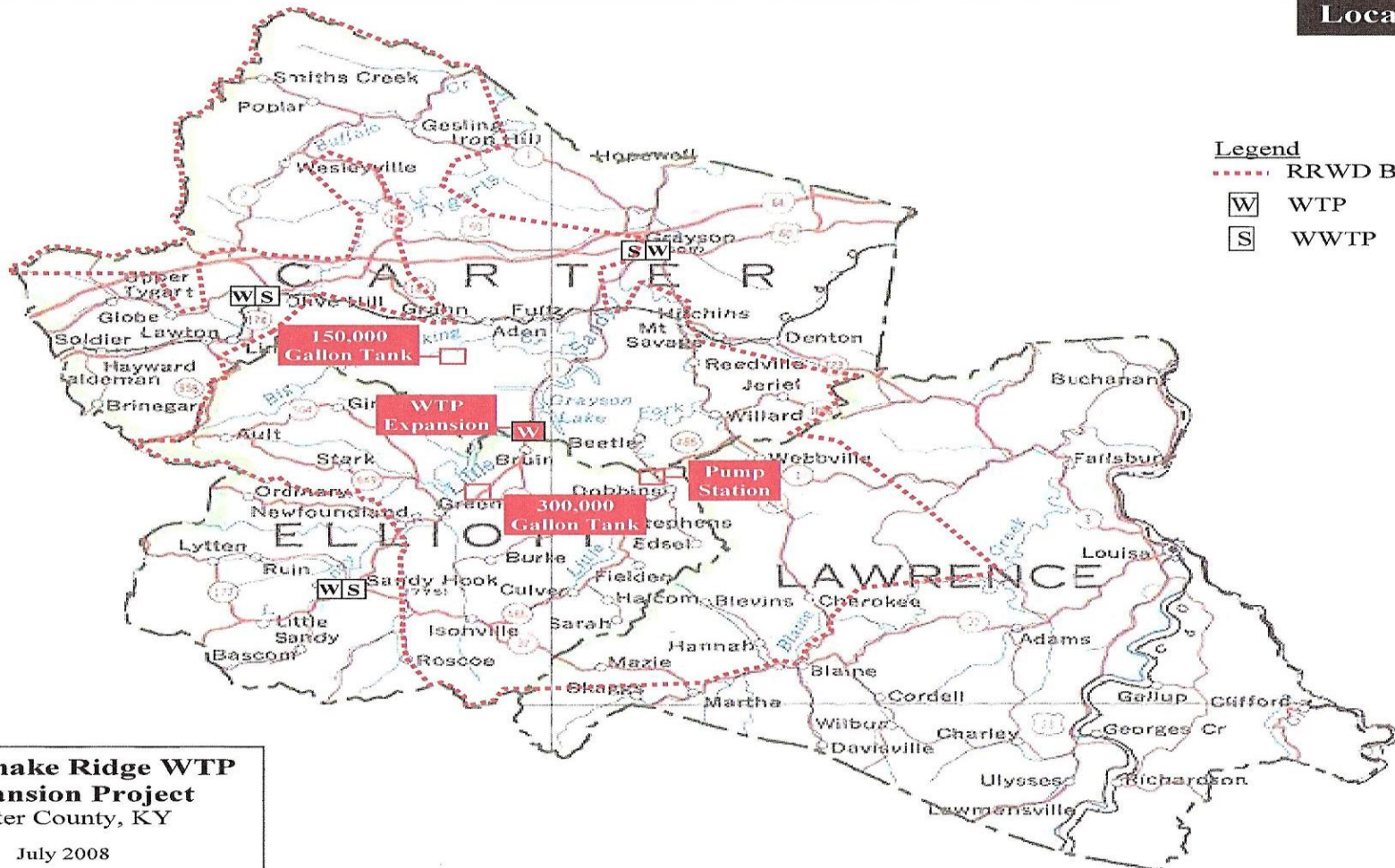
### Fire Districts in Monroe County, Kentucky



# Local Surveys and Census

## Sample Service Area

Location Map





## HUD LMI vs.

## Surveying for LMI

### HUD LMI

- Uses same Confidence Interval (90%) as U.S. Census Bureau
- Uses same MOE (10%) as U.S. Census Bureau
- As of 2018 had disallowed the ability to survey and challenge HUD LMI Survey

### Surveying

- Must be performed at a stricter Confidence Interval (minimum 95%) than U.S. Census Bureau
- Must be performed at a stricter MOE (minimum 5%)
- HUD non-LMI community must be within reasonable percentage of 51% LMI (typically within 5%).



# MOE and Confidence Interval

Geoname	STUSAB	LO	LOWMC	LMI	LOWMODUN	LOWMOD_P	MOE_LOWMODPC
Eminence city, Kentucky	KY	1,005	1,405	1,960	2,560	54.90%	+/-8.20%
Emlyn CDP, Kentucky	KY	25	75	265	590	12.70%	+/-17.10%
Erlanger city, Kentucky	KY	4,450	8,250	12,085	18,795	43.90%	+/-4.50%
Eubank city, Kentucky	KY	140	175	315	360	48.60%	+/-17.40%
Evarts city, Kentucky	KY	155	335	425	495	67.70%	+/-13.80%
Ewing city, Kentucky	KY	50	110	150	225	48.90%	+/-19.90%



What does surveying look like...

City of Ewing

Community Size: 225 persons

Use:

<https://www.surveymonkey.com/mp/sample-size-calculator/>

Confidence Interval: 90%

MOE: 10%

Sample Size: 225 persons

Minimum Surveys to be Performed: 53

Confidence Interval: 95%

MOE: 5%

Sample Size: 225 persons

Minimum Surveys to be Performed: 143



# Local Surveys and Census

## Internet Links

- American Community Survey
  - [www.census.gov/acs](http://www.census.gov/acs)
  - American Fact Finder 2
  - ACS
- LMI Data for the State of Kentucky
  - [www.hud.gov/offices/cpd/systems/census/ky/index.cfm](http://www.hud.gov/offices/cpd/systems/census/ky/index.cfm)



## Finding Census Tract Information

- [www.census.gov](http://www.census.gov)
- [www.ksdc.louisville.edu/1maps.htm](http://www.ksdc.louisville.edu/1maps.htm)

## Randomizer

- [www.randomizer.org](http://www.randomizer.org)