

2025 CDBG Technical Assistance Workshop

May 2nd, 2024



Welcome!

- A recording of this meeting & slides will be available on our webpage
- This meeting is building off of our application release workshop (also available on our webpage)
- Feel free to ask questions throughout!
- We will focus on project-specific questions after we cover the next few slides

Eligibility

01

National Objective

All CDBG projects must meet a National Objective:

- 1) **Low/Mod** (Area Benefit, Limited Clientele, Housing, or Jobs)
- 2) **Slum/Blight** (Area Basis, Spot Basis, Urban Renewal)
- 3) **Urgent Need**

02

Eligible Activities

All CDBG projects must be a CDBG eligible activity. For example:

- Public Facilities Improvements
- Public Services
- Acquisition of Real Property
- Rehabilitation
- Special Economic Development
- Planning & Capacity Building
- Homeownership Assistance
- Clearance
- Disposition

03

Allowable Costs

A cost is allowable under the CDBG program if the expenditure is:

- Necessary, reasonable, and directly related to the grant
- Not prohibited under federal, state, or local laws or regulations
- Consistently treated
- Allocable to the CDBG program
- Authorized by the grantee

Construction Projects

01

Pre-Qualified Estimates

Estimates should be obtained from pre-qualified contractors with the City of Columbus.

Look up pre-qualified contractors here: [Contractor Search](#)

02

Procurement

Federal procurement requirements must be followed: [2 CFR Part 200, Subpart D, Procurement Standards](#)

Follow a competitive, sealed bid (formal advertisement, [2 CFR 200.320\(b\)\(1\)](#)) for construction services

03

Cross-Cutting Requirements

One drop of CDBG “federalizes” an entire project. Once CDBG is invested, the entire project must be brought up to compliance with federal laws and regulations.

- Davis-Bacon
- Section 3
- BABA

04

Timelines

If design is not already complete, we may want to consider a phased approach.

CDBG subrecipient agreements have a term of 1 year.

Construction Projects

Other things to consider:

- Will the project trigger a need for a variance or any re-zoning?
- If new construction or expansion is planned, it may trigger storm-water mitigation
- Will the facility need to be occupied during construction?

Public Service Projects

***Subject to
15% cap**

01

Direct vs. Indirect Costs

There is no universal rule for categorizing a cost as direct vs. indirect. If the cost is incurred while delivering the scope of the award, it is most likely direct. If it is an administrative cost, it is most likely indirect.

Most subrecipients who need to cover indirect costs use the 10% de minimis rate.

02

Staff salaries and wages

If charging staff time to CDBG, time worked on the CDBG project/program should be specifically tracked.

Documentation must be maintained to ensure there is no double billing and the hours charged to the grant were spent delivering the scope.

03

Documenting Beneficiaries

Depending on the National Objective, demographics may need to be collected on beneficiaries of the CDBG project/program. Intake forms may need to be adjusted in order to collect this information.

Procurement

01

Recordkeeping

Maintain documentation on:

- Purchasing procedures
- Cost/price analysis
- Method of selection
- Efforts to contract with local, small, minority and/or women-owned businesses
- All purchasing documents (purchase orders, invoices, contracts, receipts, etc.)

02

Micro-Purchase

- Purchase is less than \$10,000
- Supplies, services
- Must distribute purchases equitably among qualified suppliers

03

Small Purchase

- Purchase is under \$250,000
- Supplies, services
- Receive quotes from at least 3 qualified sources
- Update quotes annually

04

Competitive Procurement

- Construction services should be competitively bid
- At least 3 responsive bidders preferred
- Public bid opening

Professional services over \$250,000 should be contracted using RFP process.

Vendor Services & Unique Entity Identifier (UEI)

01

Vendor Services

- Must be registered in Vendor Services to do business with the City of Columbus

[City of Columbus Vendor Services](#)

02

UEI

- Obtained through Sam.gov
- Only need the UEI - Not a full entity registration

[How to Get a Unique Entity ID \(UEI\)](#)

Environmental Review Record (ERR)

01

Timeline

For public services, typical environmental review can be completed in a matter of weeks.

For construction, ERRs can take 3-4 months to be completed. At least 30-45 days of public comment or HUD review are required.

The City is responsible for completing the review, but a subrecipient that is well prepared and responsive can help shorten the time required.

02

Limitations

No “choice-limiting actions” can be taken prior to completion of an ERR.

Examples include:

- Signing a subrecipient agreement (commitment of funds)
- Expenditure of federal funds
- Starting work

Note: if work has already begun, it may need to be stopped once federal funds are proposed for use

03

Project Aggregation

Once federal funding is committed to a project, we must consider the full scope of work planned for project, even if it is not being funded with the federal dollars.

Example: A non-profit is building a playground on their property using CDBG funds, and renovating their youth center with a private loan. Because the projects are connected by geography and function, the ER must evaluate them together.

04

Common Issues

- Tree cutting
- Floodplain
- Historic preservation
- Soil testing
- Lead-based paint
- Radon (new)

What makes a good application?

01

Direct & Clear

Focus on a clear narrative of work planned specifically for CDBG, not broader impacts of programming

Be intentional about how specific costs being requested for coverage by CDBG are expanding your capacity

02

Detailed but Concise

For construction projects, explain what is proposed, but also allow attachments including As-Builts (plan drawing of site), photos, or cost estimates give the detail without an exhaustive narrative.

For public service projects, explain what will be accomplished and what is needed, but don't be exhaustive in explaining every possible benefit. Keep it focused on the primary outcome.

03

Project List Prioritized

In some cases, we may not be able to fund entire proposals, but we may offer a portion of project funding. This is easier to do and more likely to be successful if there are elements of your proposal that are prioritized.

This is easiest and most important for construction projects, but may be useful for public services as well.

04

Readiness & Experience

A project that is expanding an existing operation or renovating an existing building is likely to be easier to implement than a new acquisition, construction, or new program.

A team that has demonstrated capacity for similar projects and managing complex grants is more likely to succeed.

Budget Template Walkthrough

CONTACT US:

grantsmgmt@columbus.gov

<https://www.columbus.gov/Government/Departments/Finance-and-Management/Grants-Management>

Need additional help?

