

Small Cities Community Development Block Grant Program

Allocation Plan - Federal Fiscal Year 2016



DEPARTMENT OF HOUSING

MARCH 2016

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I. OVERVIEW OF SMALL CITIES COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

A. Purpose

The primary statutory objective of the Community Development Block Grant Program (CDBG) is to develop viable communities by providing decent housing, a suitable living environment, and by expanding economic opportunities for persons of low and moderate-income. To achieve these goals, the CDBG regulations outline eligible activities and national objectives that each activity must meet.

The CDBG Program is administered by the United States Department of Housing and Urban Development (HUD). The Connecticut Department of Housing (DOH) is designated as the principal state agency for the allocation and administration of “Small Cities” CDBG funds within the State of Connecticut.

In 1981, Congress amended the Housing and Community Development Act of 1974 (“HCD”) to give each state the opportunity to administer CDBG funds for “non-entitlement areas.” Non-entitlement areas include those units of general local government that do not receive CDBG funds directly from HUD as part of the entitlement program. Non-entitlement areas in Connecticut are either cities or towns with a population of less than 50,000 or a central city of an area as designated by the Office of Management and Budget. States participating in the Small Cities CDBG Program have three major responsibilities: formulating community development objectives, deciding how to distribute funds among communities in non-entitlement areas, and ensuring that recipient communities comply with applicable state and federal laws and requirements.

Entitlement communities receive annual grants directly from HUD as part of the CDBG program. Listed below are Connecticut municipalities that are entitlement communities and therefore are ineligible for state administered Small Cities CDBG funds.

CDBG ENTITLEMENT COMMUNITIES		
(Municipalities <u>not eligible</u> for state administered Small Cities CDBG funds)		
Bridgeport	Hartford	New London
Bristol	Manchester	Norwalk
Danbury	Meriden	Norwich
East Hartford	Middletown	Stamford
Fairfield	Milford (Town)	Stratford
Greenwich	New Britain	Waterbury
Hamden (Town)	New Haven	West Hartford
		West Haven

All other Connecticut municipalities are eligible for the state administered Small Cities CDBG funds.

B. Major Use of Funds

Except for a limited amount of funds for its own CDBG-related administrative expenses, each state must distribute the Small Cities CDBG funds to units of local governments in non-entitlement areas. States must also ensure that at least 70% of its Small Cities CDBG grant funds are used for activities that benefit low- and moderate-income persons over a one, two, or three year time period selected by the state. The 70% applies to each state's Small Cities CDBG Program as a whole and does not apply to each individual grant that states make to units of general local government.

All activities must meet one of the following national objectives for the program: benefit low- and moderate-income persons; prevention or elimination of slums or blight; and community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community. A need is considered urgent if it is sudden and unexpected, has arisen in the past 18 months and no other funding is available to address it.

Activities that can be funded with Small Cities CDBG dollars include: acquisition of real property; acquisition and construction of public works and facilities; code enforcement; relocation assistance; reconstruction and rehabilitation of residential and nonresidential

properties; American Disability Act (ADA) improvements; provision of public services including, but not limited to, those services concerned with employment, crime prevention, child care, health, drug abuse, education and fair housing counseling; provision of special economic development assistance; and assistance to Community-Based Development Organizations (CBDO's) for neighborhood revitalization, community economic development, energy conservation projects, homeownership assistance, fair housing, planning, and administrative costs, including actions to meet the grantee's certification to affirmatively further fair housing. Broad program categories for Small Cities CDBG eligible activities include: Housing, Public Services, Public Facilities, Economic Development, and Planning.

Any activity not listed in the Housing and Community Development Act is ineligible to be assisted with Small Cities CDBG funds. For example, the following activities may not be assisted with Small Cities CDBG funds: buildings for the general conduct of government (i.e. city hall), except for ADA improvements; general government expenses; political activities; new housing construction except under certain conditions or when carried out by a CBDO; and income payments.

Applications are selected based on their consistency with the state's most recently approved Consolidated Plan and the evaluation criteria outlined in the Action Plan, as detailed in the Part IV Rating and Ranking Criteria. However, the state has discretion to choose not to fund an application that is determined to be infeasible.

C. Federal Allotment Process

A state's allotment is based on one of two formulas, whichever gives a larger allotment. Allocations are made on the basis of a two formula analysis that takes into account the following factors: population, poverty, overcrowded housing, age of housing, and growth lag.

Formula A - The average of the ratios between:

- The population of the non-entitlement areas in that state and the population of the non-entitlement areas of all states;
- The extent of poverty in the non-entitlement areas in that state and the extent of poverty in the non-entitlement areas of all states; and

- The extent of housing overcrowding in the non-entitlement areas in that state and the extent of housing overcrowding in the non-entitlement areas of all states.

Formula B - The average of the ratios between:

- The age of housing in the non-entitlement areas in that state and the age of housing in the non-entitlement areas of all states;
- The extent of poverty in the non-entitlement areas in that state and the extent of poverty in the non-entitlement areas of all states; and
- The population of the non-entitlement areas in that state and the population of the non-entitlement areas of all states.

In determining the average of the ratios referenced in Formula A above, the ratio involving the extent of poverty shall be counted twice and each of the other ratios shall be counted once. In determining the average of the ratios referenced in Formula B above; the ratio involving the age of housing shall be counted two and one-half times, the ratio involving the extent of poverty shall be counted one and one-half times, and the ratio involving population shall be counted once. The (HUD) Secretary shall, in order to compensate for the discrepancy between the total of the amounts to be allocated under 42 CFR 5306 and the total of the amounts available under 42 CFR 5306, make a pro rata reduction of each amount allocated to the non-entitlement areas in each state so that the non-entitlement areas in each state will receive an amount which represents the same percentage of the total amount available as the percentage which the non-entitlement areas of the same state would have received if the total amount available had equaled the total amount which was allocated.

D. Federal Funding

HUD funding for Connecticut's non-entitlement Small Cities CDBG Program for Federal Fiscal Year (FFY) 2016, which is first available for expenditure by the State on July 1, 2016 (i.e. State Fiscal Year (SFY) 2017) was recently announced; \$12,162,864, which is slightly higher than the prior year allocation. However, all funding awards are subject to subsequent congressional action, which could affect an increase, reduction or elimination of funding in the amount noted. Any changes in Connecticut's non-entitlement Small Cities CDBG Program funding allocations are a direct result of funding modifications to the program nationally.

E. Estimated Committed Funds and Proposed Allocations

FFY 15 (SFY 16) Refer to Table A, Column 2

- The federal Small Cities CDBG allocation for FFY 15 (SFY 16) was \$11,990,905;
- Administrative costs are anticipated to total \$459,727;
- The amount of carry forward funds from FFY 14 (SFY 15) to FFY 15 (SFY 16) was \$ 0;
- The total amount of Small Cites CDBG funds available to fund projects in FFY 15 (SFY 16) was \$11,994,526, (FFY 15 (SFY 16) allocation of \$11,990,905 minus administrative costs of \$459,727 plus the carried forward and reprogrammed funds from the previous year(s) of \$463,348).

FFY 16 (SFY 17) Refer to Table A, Column 3

- HUD's annual Small Cites CDBG allocation to Connecticut for FFY 16 (SFY 17) is anticipated to be \$12,162,864;
- Administrative costs subtracted from the allocation are anticipated to be \$464,895;
- "Uncommitted balance carried forward" are funds from any previous fiscal years that were not committed are anticipated to be zero;
- The amount of recaptured funds available for reprogramming for FFY16 (SFY 17) is anticipated to be approximately \$200,000. "Recaptured funds" are funds that are returned to DOH from grantees such as: Small Cities CDBG funds returned to DOH by a non-performing grantee or a grantee that completed a project under budget, or program income generated by grantees. Program income is gross income received by a grantee that has been directly generated from the use of Small Cities CDBG funds (i.e. a grantee that sets up a revolving loan fund and receives payments of principal and interest on the loans made using CDBG funds). Recaptured funds may also be reallocated during the program year based on demand and/or emergency situations;
- The total funds available to fund projects in FFY 16 (SFY17), is anticipated to be \$11,897,969 (FFY 16 allocation of \$12,162,864 minus administrative costs of \$464,895 plus the reallocation estimate of \$200,000); and
- The amount to be carried forward to FFY 16 (SFY 17) is estimated to be \$0 as all funds available during the year were committed.

F. Proposed Allocation Changes From Last Year

There are no substantial allocation changes proposed for FFY 16 (SFY 17). After allowable administration costs, including those for technical assistance, are deducted the remainder of the Small Cities CDBG funding will be available for projects/activities. Specific priorities as expressed through Rating and Ranking can be found in Section IV of this Plan.

Pursuant to state law, a legislative hearing on this Allocation Plan is required prior to the submission of our Action Plan to HUD. HUD then has 45 days to review and approve it. This Allocation Plan, either as approved or modified by the legislative hearing, will be incorporated into the 2016-17 Action Plan prior to submission to HUD.

G. Contingency Plan

This Allocation Plan has been prepared to reflect the federal Small Cities CDBG allocation for Connecticut FFY 16 (SFY 17) being funded at \$12,162,864. The formula allocations were recently published by HUD, and although we do not currently anticipate any changes, any increase or decrease in funding will be distributed in accordance with the 2016-17 Action Plan guidelines in effect as of the date of the allocation.

H. State Allocation Planning Process

DOH solicited public input in the development of this Allocation Plan, as well as the draft 2016-17 Action Plan. Citizen participation, including input from our State Agency partners, housing advocates and other concerned organizations, was solicited at two public hearings conducted by DOH: 1) December 21, 2015 at The Lyceum, 272 Lawrence Street, Hartford; and 2) December 16, 2015 at the Department of Housing, 505 Hudson Street, Hartford. In addition, the public and our agency partners were encouraged to submit written comments with respect to the drafting of these Plans. A legal notice announcing the public hearing and request for public comment was published in three newspapers, including one in Spanish. The legal notice, excerpts of past Action Plans, and related documents were made available at the public hearings, as well as on the DOH website.

The chief elected officials of all 169 municipalities in the state received a Department Notice informing them of the public hearings and comment period. DOH also forwarded copies of the legal notices to its Community Partners. DOH submitted, via e-mail, a copy of this Allocation Plan to the members of the State Legislature's Appropriations Committee, Commerce Committee, Planning and Development Committee, and the Chairs of the Housing Committee. In accordance with Connecticut General Statutes Section 4-28b, the Joint Standing Committees of Connecticut's General Assembly, are afforded the opportunity to meet to review and approve the Small Cities Community Development Block Grant Allocation Plan.

I. Grant Provisions

The Small Cities CDBG Program requires the state to certify that:

- It is following a detailed citizen participation plan and that each funded unit of general local government is following a detailed citizen participation plan;
- It has consulted with affected units of general local government in the non-entitled areas in determining the method of distribution of funding, it engages or will engage in planning for community development activities, it will provide assistance to units of general local government, it will not refuse to distribute funds to any unit of general local government based on the particular eligible activity chosen by the unit of general local government, except that a state is not prevented from establishing priorities based on the activities selected;
- It has a ConPlan that identifies community development and housing needs and short-term and long-term community development objectives;
- It will conduct its program in accordance with the Civil Rights Act of 1964 and the Fair Housing Act of 1988 and will affirmatively further fair housing;
- It will set forth a method of distribution that ensures that each of the funded activities will meet one or more of the three broad national objectives described in the "Major Use of Funds" section of this plan and at least 70% of the amount expended for activities over a period of one, two, or three consecutive program years will benefit low-and moderate-income families;

- It will require units of general local government to certify that they are adapting and enforcing laws to prohibit the use of excessive force against nonviolent civil rights demonstrations, and they will enforce laws against barring entrance and exit from facilities that are the targets of nonviolent civil rights demonstrations in their jurisdiction; and
- It will comply with Title I of the HCD Act and all other applicable laws.

J. Matching Requirement

The state is required to pay from its own resources all administrative costs incurred by the state in carrying out its responsibilities under subpart 24 CFR 570.489(a)(1), except that the state may use Small Cities CDBG funds to pay such costs in an amount not to exceed \$100,000 plus 50% of such costs in excess of \$100,000. States are, therefore, required to match such costs in excess of \$100,000 on a dollar for dollar basis. The amount of Small Cities CDBG funds used to pay such costs in excess of \$100,000 shall not exceed 2% of the aggregate of the state's annual grant.

See Table A for details on the anticipated breakdown of this requirement, but the total administrative costs for FFY 16 (SFY 17) from all sources will not exceed \$625,662.

K. Program Fund Limitations or Caps

The Small Cities CDBG regulations limit the amount of funding that can be used for public service activities. The limit is based on expenditures for a given year's allocation of money not to exceed 15%, plus program income. States and local governments cannot spend more than 20% of their Small Cities CDBG grant (including the allocation for the subject period as well as program income received and funds reallocated during the subject period) on planning and administration activity. The 20% limit applies to the state Small Cities CDBG Program as a whole and does not apply to each individual grant that states make to units of general local government.

States may use up to 1% of their annual allocation to provide technical assistance to local governments and nonprofit organizations, either directly or through contractors, to assist them in carrying out community development activities.

L. Federal Requirements

The following federal requirements also apply to the Small Cities CDBG program; Davis Bacon, National Environmental Policies Act (including 24 CFR Part 58 Environmental Review Procedures), Relocation Act, and Administrative Requirements of 2 CFR Part 200.

M. Application and Planning Requirement

The state's application process to HUD for Small Cities CDBG funding includes the submission of an annual Action Plan. The Action Plan updates the ConPlan, a five-year planning document for Housing and Community Development that governs the state's administration of four formula-distribution federal grant programs; Small Cities CDBG, HOME, ESG, and HOPWA. In addition, pending guidance from HUD, the Action Plan must address the State's anticipated method of distribution of any funds it may receive under the National Housing Trust Fund. The Action Plan must contain an allocation plan by which the state will distribute its Small Cities CDBG funds. Following this legislative hearing, DOH will finalize the draft Action Plan which will be put out for additional public comment and input. Once this process has been completed, and any necessary revisions made, the final Action Plan will be submitted to HUD as part of the Department's application package. HUD's approval of the Action Plan is provided when the state receives its Funding Approval/Agreements (HUD Forms 7082) for the programs, which is anticipated within 45 days of submission to HUD, but not before July 1, 2016.

N. Administration of Program

For FFY 16 (SFY 17), DOH intends to continue to administer the Small Cities CDBG Program through a competitive application funding round for all activities except Urgent Need and Section 108. In the case of Urgent Need and Section 108, DOH will accept applications on a "first come first serve" basis.

Adequate advance notice of fund availability has been provided and DOH reserves the right to cease accepting applications at any time that all available funds have been committed. Based on funding availability and other considerations, DOH may limit the number of applications that can be submitted by a municipality in a funding round.

O. Small Cities Application Process

For Federal Fiscal Year 2016, the Small Cities Program has established a Competitive Round Application Process. Applications are due April 11, 2016 by 2:00 PM and will be rated and ranked according to DOH policy. The application steps are outlined below:

1. Attend the Application Workshop
 - a. Grantees attend application workshop
 - b. Receive Application forms
2. Hold Public Hearing
 - a. Notice to be published at least twice (on different days) in a daily newspaper of general circulation in the municipality.
 - b. The first notice must be published at least 14 days prior to the date of the public hearing.
 - c. Submit copies of notices along with newspaper Affidavit of Publication.
 - d. Submit copies of minutes of meeting.
3. Conduct an Environmental Review
 - a. Establish Environmental Review Record
 - b. Determine type of Activity and environmental impact
 - c. Publish Request for Release of Funds
 - d. Request Release from DOH
4. Write Application
 - a. Select eligible activity
 - b. Determine National Objective
 - c. Prepare application
 - d. Submit to DOH
5. Rate and Rank (DOH)
 - a. DOH receives and reviews applications
 - b. Rate applications
 - c. Rank applications
6. Award (DOH)
 - a. Submit rating to Commissioner for award announcements by Governor
7. Contract Documents (DOH)
 - a. DOH prepares contract documents
 - b. Submits to awarded towns
 - c. Towns sign and return to DOH
 - d. Commissioner signs contract documents
 - e. AG office reviews signed contract documents
8. Construction Period
 - a. Grantees begin construction phase

9. Closeout
a. DOH conducts monitoring and closeout

DOH has established the following program eligibility and threshold requirement standards for applicants. These program eligibility and threshold requirement standards are applicable to all applicants and activities unless otherwise noted:

- Eligible Applicants - As defined by HUD program regulations;
- Eligible Activity - Only “activities”, as defined by HUD program regulations;
- National Objective - Each proposed activity must meet at least one national objective and must be fully supported within the application;
- Citizen Participation - Applicant must provide certification of compliance with citizen participation criteria;
- Consistency with the ConPlan - Applicant must identify how the project is consistent with the goals and strategies of the ConPlan;
- Fair Housing and Equal Opportunity Compliance - Applicant must submit a Fair Housing Action Plan that complies with DOH’s guidelines/policies;
- Statement of Compliance - Applicant must be in compliance with all existing department assistance agreements and cannot be in default under any CHFA or HUD-administered program; and
- Expenditure Rates – 2015 grants must be 10% expended, although requests for exemption will be reviewed on a case-by-case basis. 2014 grants must be 50% expended. 2013 grants must be 100% expended. Grants older than 2012 must have been closed out with a certificate by February 29, 2016.
- No more than 3 open grants are allowed per grantee.
- Open, unresolved monitoring findings will be considered as part of application review.
- Grantees will not be awarded funds if a grant was “terminated for cause” in the last 5 years.

During the application evaluation process, DOH conducts due diligence and evaluates all eligible applications using the evaluation criteria described below. Depending on the nature of the proposed activity, site inspections may be conducted by DOH staff. An evaluation of the site’s feasibility is completed and considered as part of the application’s final review.

The following categories of eligible application evaluation criteria are considered: 1.) Project Need, 2.) Applicant/Sponsor Capacity, 3.) Construction/Environmental, and 4.) Fair Housing.

Applications are rated and ranked in accordance with published criteria, which were made available for public comment prior to the current application period. For your reference, the proposed Rating and Ranking criteria can be found in Part IV and attached as Exhibit 1.

Final application recommendations will be made to the Commissioner's Office, based on the overall quality of the application and compliance with threshold requirements and rating and ranking criteria. Applicants receive written notification after final decisions are made. On a case by case basis, applicants may be offered the option to have a debriefing meeting.

II. TABLES

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Table A: Summary of Appropriations and Committed Funds			
Small Cities CDBG	FFY 14 (SFY 15)	FFY 15 (SFY 16)	FFY 16 (SFY 17)
Program	Actual	Estimated	Proposed
Uncommitted Balance Carried Forward from the previous year	\$109,897	\$0	+\$-0-
Plus Recaptured Funds	\$841,853	\$463,348	<u>\$200,000</u>
Plus Reprogrammed 1% TA Funds from the previous year	\$400,000	\$0	+\$-0-
Reallocation Total	\$1,351,750	\$463,348	\$200,000
PLUS			
Annual Allocation	\$11,958,150	\$11,990,905	\$12,162,864
Minus Admin. (see Table B lines Annual Allocation for Admin and Technical Assistance)	(\$458,745)	(\$459,727)	(\$464,895)
Net Allocation	\$11,499,405	\$11,531,178	\$11,697,969
EQUALS			
Total CDBG funding available for projects	\$12,851,155	\$11,994,526	\$11,897,969
MINUS			
Committed Funds	\$12,851,155	\$11,994,526	0
EQUALS			
Uncommitted Balance to be Carried Forward to the following year	\$0	\$0	\$11,897,969

[\[1\] Estimated figure. Actual recapture dollars pending financial closeout.](#)

Source: DOH

Table A illustrates the following formulas:

- Reallocation Total + Net Allocation = Total CDBG funding available for projects;
- Total CDBG funding available for projects – Committed Funds = Uncommitted Balance to be Carried Forward; and
- Uncommitted Balance Carried Forward from the previous year: funding that was available in the previous fiscal year but not committed.

Descriptions for the information in Table A includes:

- Recaptured Funds: funding that was returned to DOH from grantees and available for reprogramming;
- Reallocation Total: total funding that is available for reallocation from uncommitted balance carried forward and recaptured funds;
- Net Allocation: annual allocation funding available after administrative cost subtracted;
- Total CDBG funding available for projects: amount of funding that can be made available for projects;

- Committed Funds: funds that are committed to projects and are out of the funding pool permanently; and
- Uncommitted Balance to be Carried Forward to the following year: funding that remains after funding committed to projects is subtracted.

Table A-1 is a list of the projects that have received Small Cities CDBG funds in the current year.

Table A-1: List of Committed Funds for FFY 15 (SFY 16)		
Municipality	Project Description	Investment
Ansonia	Housing Rehab Program	\$400,000
Jewett City	Ashland Manor Senior Housing Rehab	\$800,000
Bethel	Reynolds Ridge Senior Housing Rehab	\$800,000
East Haddam	Oak Grove Senior Housing Rehab	\$800,000
Stonington	Edythe K. Richmond Senior Housing Rehab	\$800,000
Essex	Essex Court Senior Housing Rehab	\$635,000
Hampton	Regional Housing Rehab Program	\$450,000
Killingly	Housing Rehab Program	\$400,000
Lebanon	Housing Rehab Program	\$400,000
Ledyard	Housing Rehab Program	\$400,000
Lisbon	Housing Rehab Program	\$400,000
Litchfield	Bantam Falls Senior Housing Renovations	\$800,000
Montville	Housing Rehab Program	\$400,000
Plainville	Housing Rehab Program	\$400,000
Simsbury	Dr. Owen L. Murphy Apartments & Virginia Connelly Senior Housing Rehab	\$775,580
Southbury	Housing Rehab Program	\$400,000
Southington	Housing Rehab Program	\$400,000
Thompson	Gladys Greene/Pineview Court Senior Housing Rehab	\$800,000
Torrington	Housing Rehab Program	\$400,000
Wethersfield	James Devlin Senior Housing Rehab	\$633,946
Wolcott	Housing Rehab Program	\$300,000
Woodstock	Housing Rehab Program	\$400,000
Total		\$11,994,526

Source: DOH

Table A-2 is a list of projects that received Small Cities CDBG funds in the prior year and are currently underway.

Table A-2: List of Contracted Activities and Funds for FFY 14 (SFY 15)		
Town	Project Description	Amount Funded
Bethlehem	Town Wide Housing Rehabilitation Program	400,000.00
Branford	Parkside Villages 1 and 2 Senior Housing	448,500.00
Coventry	Multijurisdictional Housing Rehabilitation Program (Columbia)	500,000.00
Derby	Housing Rehabilitation	400,000.00
East Haddam	Oak Terrace Senior Housing Rehabilitation	791,210.00
Franklin	Housing Rehabilitation	400,000.00
Griswold	McCluggage Manor Senior Housing Rehabilitation	800,000.00
Groton	Pequot Village 1 Rehabilitation	800,000.00
Hampton	Hampton Regional Housing Rehabilitation	400,000.00
Killingly	Housing Rehabilitation VIII	400,000.00
Newington	Cedar Village Senior Housing Rehabilitation	800,000.00
North	Housing Rehabilitation	400,000.00
Oxford	Housing Rehabilitation Program	400,000.00
Preston	Lincoln Park Elderly Housing Rehabilitation	800,000.00
Salem	Housing Rehabilitation	400,000.00
Seymour	Housing Rehabilitation	400,000.00
Sprague	Street and Sidewalk First, Second and Third Avenues	500,000.00
Stafford	Housing Rehabilitation Program	400,000.00
Suffield	Suffield Housing Authority Project	800,000.00
Thomaston	Grove Manor Senior Housing Rehabilitation	611,445.00
Thompson	Gladys Green/Pineview Court Rehabilitation 3	800,000.00
Torrington	Housing Rehabilitation	400,000.00
Windham	Windham Housing Rehabilitation 5	400,000.00
Windsor	Housing Rehabilitation Program	400,000.00
	Total	\$12,851,155

Source: DOH

Table B: Program Expenditures for Administration			
Small Cities CDBG Program	FFY 14 (SFY15) Actual Expenditures	FFY 15 (SFY 16) Estimated Expenditures	FFY 16 (SFY 17) Proposed Expenditures
State Admin.	\$356,790	\$347,721	\$503,085
Technical Assistance	<u>+\$609,487</u>	<u>+286,622</u>	<u>+354,674</u>
Administrative Balance carried forward from the previous year	\$966,277	\$634,343	\$857,759
Annual Allocation Funding allowed for State Admin.	\$339,163	\$339,818	\$343,257 Note 2
General Fund Subsidy	\$239,163	\$239,818	\$243,257
Technical Assistance	\$119,582	\$119,909	\$121,628 Note 2
Total Available for Administrative Cost	\$1,664,185	\$1,333,888	\$1,565,901
Administrative Costs:			
Personnel	\$333,303	\$231,012 Note 1	\$347,341 Note 3
Personnel TA	\$25,721	\$24,721	\$0
Fringe Benefits	\$228,103	\$167,271 Note 1	\$240,531 Note 3
Fringe Benefits TA	\$16,136	\$16,136	\$0
Other Expenses	\$ 25,990	\$25,990	\$27,290
Other Expenses TA	\$ 590	\$10,000	\$10,500
Equipment	\$0	\$0	\$0
Total Administrative Cost/ Committed Funds	\$629,842	\$476,130	\$625,662
Administrative Balance to be carried forward to the following year	\$1,034,343	\$857,759	\$940,239

Source: DOH, OFA

Note 1: FFY 15 Personnel Costs based on staff (3.2 positions plus 1 vacant). Also, does not account for work distribution.

Note 2: FFY 16 allocation estimated @ \$11,990,905 (SFY 17).

Note 3: FFY 16 Personnel Costs based on 4.2 positions, with increases; does not account for work distribution

Table B illustrates the following formulas:

- Administrative Balance carried forward + Annual Allocation Funding allowed for State Admin. + General Fund Subsidy + Technical Assistance = Total Available for Administration Costs; and
- Total Available for Administration Cost - Total Administrative Cost/Committed Funds = Administrative Balance to be Carried Forward.

Descriptions for the information in Table B includes:

- Administrative Balance to be Carried Forward to the following year: administrative funding left over from previous year, which is carried forward;
- Annual Allocation Funding allowed for State Administration: includes \$100,000 plus 2% of the state's annual allocation;
- General Fund Subsidy: subsidy provided to the Small Cities CDBG Program;
- Technical Assistance: 1% of the state's annual allocation to be used for technical assistance;
- Total Available for Administrative Costs: all funding added together that is available for administrative costs;
- Total Administrative Costs/Committed Funds: amount of all costs associated with administering the program; and
- Admin. Balance to be carried forward to following year: balance of funding that remains after administrative cost/expenditures are subtracted from the total amount of funding available for administrative costs. These funds can only be carried forward for administrative costs.

III. ALLOCATIONS BY PROGRAM CATEGORY

CDBG National Objectives:

- *I Benefit low and moderate-income families*
- *II Prevent or eliminate slums or blight*
- *III Meet other urgent community development needs*

List of Block Grant Funded Programs – FFY14 and FFY 15 Estimated Expenditures		
Title of Major Program Category Small Cities CDBG Program	FFY 14 Estimated Expenditures	FFY 15 Proposed Expenditures (with carry over funds)
Benefit low and moderate-income families	\$12,851,155	\$11,994,526
Prevent or eliminate slums or blight	-	-
Meet other urgent community development needs	-	-
TOTAL	\$12,851,155	\$11,994,526

IV. EXHIBIT 1 – RATING AND RANKING CRITERIA

The draft rating and ranking criteria were made available via direct email to the chief elected officials of all eligible municipalities, as well as the consultant community, on August 21, 2015 to solicit comment in advance of the impending application period. All comments received were considered in the development of the attached Rating and Ranking criteria.

In addition, an application workshop was held for potential applicants on January 28, 2016, at which time additional comments and questions were solicited with regard to these criteria and other program related issues.

2016 CDBG RATING AND RANKING

Date of Review _____

Town of _____

Project _____

Reviewer _____

Project Need	_____	<input type="text" value="0"/>
Capacity	_____	<input type="text" value="0"/>
Construction /Environmental	_____	<input type="text" value="0"/>
Fair Housing	_____	<input type="text" value="0"/>
Total Score	_____	<input type="text" value="0"/>

Project Need	30
Capacity	25
Construction/Environment	25
Fair Housing	20
Total Score all categories	100

Project Need /Impact - 30 Points

Number of housing units, jobs, or businesses to be assisted

For each of the evaluation areas below, an applicant will receive points only for the criterion that yields the highest number of tabled points.

1.2 - Bonus Points

If project is a housing development project

2.5

If housing project is in a very high or high opportunity area

2

If project is in the state-sponsored housing portfolio

3

1.5c - Income Levels Served

a)	Area Benefit	<80% LMI	3
b)	Direct Benefit Housing	<80% LMI	5
c)	Limited Clientele	<80% LMI	3
d)	Direct Benefit Jobs	<80% LMI	2

1.7 - Relocation

Permanent/temporary relocation is required, and there is no plan	-10
Permanent relocation is required, and there is a relocation plan	-5
Temporary relocation with a plan	0
There is no relocation required	2

2.1 - Source Documents

Waiting list updated within the last 6 months, on form provided, and 3 or more boxes checked	8
Waiting list updated within the last 6 months, on form provided, and 2 boxes checked	6
Waiting list updated within the last 6 months, on form provided, and 1 box checked	4
Waiting list not updated within the last 6 months and/or not on form provided	-8
Pictures & reports of severe deterioration of infrastructure, public facility, etc.	7
Project consistent with Capital Needs Assessment or inconsistent with a compelling reason	8
Project not consistent with Capital Needs Assessment with no compelling reason	-8

5.1b - Impact

Town meets the goals listed in its current local Plan of Conservation & Development

Yes, and there is a copy of the section of the approved Plan relevant to the project enclosed	2
No or copy of the section of the approved Plan relevant to the project is not enclosed	0

5.1d - Community Revitalization Strategy (CRS)

1	
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Town has a CRS designation, and this application is in support of the CRS

5.2 - Letters of Support 0.1 point/per letter up to 0.5 points total

0.5	
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Public Investment Community (PIC)

4	
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The towns eligible for PIC scores:

Ansonia, Ashford, Beacon Falls, Bloomfield, Brooklyn, Chaplin,
Derby, East Haven, East Windsor, Enfield, Griswold, Groton,
Killingly, Mansfield, Montville, Naugatuck, Plainfield, Plainville, Plymouth, Putnam
Scotland, Seymour, Sprague, Stafford, Sterling, Thomaston, Torrington, Vernon,
Voluntown, Winchester, Windham, Windsor

Total Score for Project Need

0

Capacity - 25 Points

3.1 - Staff Capacity

a) Experienced Town Staff with at least one person with responsibility for program administration having 3 or more years experience with CDBG program	3
b) Town staff with more than 12 months but less than 3 years experience with CDBG program	1
c) Consultant staff member directly responsible for advising applicant on program administration for the duration of the program with 5 or more years experience with CDBG program	1

3.2 - Number of Non-SC Projects Completed On Time & Within Budget

a) 1 - 5	0.5
b) 6 and more	1.5

3.3 - Completed Small Cities CDBG Grants

In the 4 years prior to 2015 (i.e., 2011, 2012, 2013, and 2014 awards), the number of grants completed within the original budget period.

a) None	-1
b) 1-2	1
c) 3 or more	2.5
d) Never received an award	0

3.3 - Number of Small Cities grants currently open

a) 1 or none	2.5
b) 2	1
c) 3	-1

3.4 - Subrecipient Agreement

A subrecipient agreement is required and was submitted with the application	1
No subrecipient agreement is required	1
A subrecipient agreement is required but was not submitted	-1

3.5/3.6 - Compliance

Is either the applicant or subrecipient entity named in any DOH monitoring finding or repeated concern related to housing, economic development, community development, fair housing, EEOC, etc., or is any such audit finding or concern pending or foreseeable?

a)	Yes	-2
b)	No	2

3.6 - Litigation

Is either the applicant or subrecipient entity named in any litigation related to housing, economic development, community development, fair housing, EEOC, etc., is any such litigation pending or foreseeable, or has there been an adverse decision in the last 4 years?

a)	Yes	-2
b)	No	2

3.6 - Citizen Complaints

Is either the applicant or subrecipient entity named in any citizen complaint related to housing, economic development, community development, fair housing, EEOC, etc., or is any such citizen complaint pending or foreseeable?

a)	Yes	-2
b)	No	2

3.7 - Returned Funds

Has the applicant returned Small Cities funds to DOH in the last 3 years?

a)	Yes	-2
b)	Yes, but reason was justifiable or pertained to a prior management team	0
c)	No	2

4.1 - Non-State Funds Leveraged

a)	At least 5%	0.5
b)	At least 10%	1
c)	At least 20 %	2
d)	At least 30%	3
e)	At least 40%	3.5

4.1 - Level of Commitment for 100% Leveraged Funds

a)	Firm	2
b)	Conditional	1
c)	Pending/No Commitment	0

4.2 - Program Income on hand as of March 31, 2016

a)	\$0 - \$25,000	1
b)	\$25,001 - \$50,000	-1
c)	\$50,001 and above	-5

Total Score for Capacity

4.4 Site & Bldg Report

	___Y(10)	___N(0)	<input type="text"/>
Completeness of Site & Bldg Report	___G(5)	___F(3)	___P (0)
	Good	Fair	Poor
			___O(0)
			Old

SITE & BUILDING REPORT SEC. 2 PROPERTY INFORMATION

Location Map	___Y(5)	___N(0)	<input type="text"/>
Street Map	___Y(5)	___N(0)	<input type="text"/>
Exist Zon'g Info (for additions only)	___Y(5)	___N(0)	___NA(5)

SITE & BUILDING REPORT SEC. 3 PROPERTY/SITE ASSESSMENT

I. Site Conditions

FEMA FIRM Map	___Y(15)	___N(0)	<input type="text"/>
Is the project in a Flood Plain?	___Y 500	___Y 100	___Y FWay
			___N
Flood Plain Approval/Certification Needed			
___Yes(-25)	___Yes(-15)	___Yes (-10)	___No (0)
Not started process	Started major issue	Started minor issue	<input type="text"/>

II. Unusual Site Conditions

	___Y(0)	___N(5)	<input type="text"/>
Utilities Expansion	___Y(-5)	___N(0)	<input type="text"/>

III. Environmental Site Conditions

	___0 (10)	___1-2 (5)	___3≥(0)	<input type="text"/>
Phase I submitted	___Y(10)	___N(0)	<input type="text"/>	
Ph II submitted Per Ph I	___Y(5)	___N(0)	___NA(5)	

IV. Environmental Bldg. Conditions

	___NA (10)	___0(10)	___1-2 (5)	___3≥ (0)	<input type="text"/>
HazMats Rpts submt'd	___Y(5)	___N(0)	___NA(5)	<input type="text"/>	
Closure Reports	___Y(5)	___N(0)	___NA(5)	<input type="text"/>	
Notification Materials Submitted to DOH?	___Y(0)	___N(-5)	___NA(0)	<input type="text"/>	

SITE & BUILDING REPORT SEC. 4 BUILDING INFORMATION

SHPO notification letter	___Y(5)	___N(0)	___NA(5)	<input type="text"/>
SHPO response letter	___Y(5)	___Pend(3)	___NA(5)	<input type="text"/>

SITE & BUILDING REPORT SEC. 5 BLDG ASSESSMENT

Interior Photos	___Y(0)	___N(5)	___NA(5)	<input type="text"/>
Exterior Photos	___Y(0)	___N(5)	___NA(5)	<input type="text"/>
Capital Needs Assessment (Housing Authorities only)	___Y(5)	___N(0)	___NA(5)	<input type="text"/>

COMMENTS:

Standard Project SHEET 1 SCORE:

120 Possible pts.

4.7A. Procurement Process	___Y(10) ___N(0)	<input type="text"/>
Town's Procurement Policy	___Y(10) ___N(0)	<input type="text"/>
4.7B. Building/Site Evaluation Process	___Y(10) ___N(0)	<input type="text"/>
Initial Inspection Form	___Y(10) ___N(0)	<input type="text"/>
4.7C-1. Hazardous Material Notification Process	___Y(10) ___N(0)	<input type="text"/>
HazMat Notification Letter	___Y(10) ___N(0)	<input type="text"/>
4.7D. Construction Monitoring Process	___Y(10) ___N(0)	<input type="text"/>
Progress Insp Form	___Y(10) ___N(0)	<input type="text"/>
4.7E. Approvals/Permitting Process	___Y(10) ___N(0)	<input type="text"/>
4.7F. Typical Project Schedule	___Y(10) ___N(0)	<input type="text"/>
	___G(10) ___F(5) ___P(0) Good Fair Poor	<input type="text"/>
4.7G. 75% Rule/Walk Away Compliance	___Y(20) ___N(0)	<input type="text"/>
4.7H Rehab Stand/Lead/Asbestos Compliance	___Y(20) ___N(0)	<input type="text"/>
4.7J Program Development Budget	___Y(10) ___N(0)	<input type="text"/>
Budget Completeness	___G(10) ___F(5) ___P(0) Good Fair Poor	<input type="text"/>
Cost Estimating Form	___Y(10) ___N(0)	<input type="text"/>
4.7K Pre-Construction Meeting Form	___Y(15) ___N(0)	<input type="text"/>
4.7L Municipal Walk Away Policy	___Y(20) ___N(0)	<input type="text"/>
4.7M Energy Star/Sustainable/Green/Eco-Friendly Products, Recycling/Salvage		
1. Energy Star	___0(0) ___3/4(5) ___5/6(10) ___≥7(15) ___NA(15)	<input type="text"/>
2. Sustainable/Green	___0(0) ___1(5) ___2+(10)	<input type="text"/>
3. Recycling/Salvage	___0(0) ___1(5) ___2+(10)	<input type="text"/>

PROGRAM TOTAL POINTS

0.1
250 max pts

0

COMMENTS:

4.4.A INFRASTRUCTURE

1. Environmental Remediation Needed	___Y(0) ___N(5)	<input type="text"/>
2. Adjacent to environmental risk?	___Y(0) ___N(5)	<input type="text"/>
3. Age of property/work item(s)	___<5yr(0)___5-10(5)___10+(10)___NA(10)	<input type="text"/>
4. Last Repairs/work	___<5yr(0)___5-10(5)___10+(10)___NA(10)	<input type="text"/>
5. Unusual Site Conditions	___Y(0) ___N(10) ___NA(10)	<input type="text"/>
Supporting Data	___Y(5) ___N(0) ___NA(5)	<input type="text"/>
6. FEMA FIRM	___Y(15) ___N(0)	<input type="text"/>
Any proposed work in a Flood Plain?	___Y500 ___Y100 ___YFWAY ___N	
Application/evaluation process begun?	___Y(0) ___N(-10) ___NA(0)	<input type="text"/>
7. Pictures	___Y(10) ___N(0)	<input type="text"/>
8. Utilities expansion	___Y(0) ___N(15) ___NA(15)	<input type="text"/>

4.4.B APPROVALS/PERMIT COORDINATION

I. # of Approvals/Permits Needed	___0(15) ___1(10) ___2(5) ___≥3(0)	<input type="text"/>
II. Supporting Documentation	___Y(5) ___N(0) ___NA(5)	<input type="text"/>

4.5 CONSTRUCTION DOCUMENTS:

A. Drawing Completion Level	___N(0) ___S(5) ___D(10) ___F(15) <small>None Schematic Develop Final</small>	<input type="text"/>
B. Specification Completion Level	___N(0) ___O(5) ___D(10) ___F(15) <small>None Outline Develop Final</small>	<input type="text"/>
F. Cost Estimate	___Y (10) ___*N (0) ___Y Non DOH(0) <small>*go to G</small>	<input type="text"/>
1. Cost Estimate Completeness	___G(10) ___F(5) ___P (0) <small>Good Fair Poor</small>	<input type="text"/>
2. Cost Reasonableness	___G(10) ___H or L(5) <small>Good High or Low</small>	<input type="text"/>
G. Construction Procurement	___Y(10) ___N(0)	<input type="text"/>
H. Dwgs & Spec's Compliance Certification	___Y(0) ___N(-25) ___NA(0)	<input type="text"/>
J. Project Development Budget	___Y(10) ___N(0)	<input type="text"/>
Budget Completeness	___G(10) ___F(5) ___P (0)	<input type="text"/>

4.5 II CONSTRUCTION TIME LINES

C. Completion of Dwgs and Specs	___0(15)___1-3m(10)___3-6m(5)___>6m(0)___not Submt'd(-10)	<input type="text"/>
D. Length of Construction Period	___≤6m(15)___6-9m(10)___9-12m(5)___12-15m(0)___>15m(-10)	<input type="text"/>
E. Length of Time to Obtain Permits/ Approvals/Clearances	___0m(15) ___1-3(10) ___3-6(5) ___>6(-10)	<input type="text"/>

4.6 SUSTAINABLE FEATURES & DESIGN

d. Storm Water Management:	___Y(5) ___N(0) ___NA(5)	<input type="text"/>
e. Other Sustainable/Green Features	___Y(5) ___N(0)	<input type="text"/>

If 4.5 C+D+E is 18 Mos or More or Flood Zone, Proj is Not Ready to PROCEED!

INFRASTRUCTURE TOTAL POINTS: 250 Possible Points

0.1

0

Fair Housing and Equal Opportunity - 20 Points

Score All Applications:

Total Possible Points = 5

6.1 Was the FHAP complete? Award points based on the following:

Response	Points
Incomplete or requires significant revision	0
Complete but needs minor revision	1
Complete	3

6.2 Was a Section 3 Plan submitted? Award points based on the following:

Response	Points
Not submitted	-2
Incomplete or requires significant revision	0
Complete but needs minor revision	1
Complete	2

Score Past Grantees Only:

Total Possible Points = 15

6.3 Identify Fair Housing Action Steps completed or in progress within the last three years.

Award points based on the # of steps or actions completed or in progress and back-up documentation including milestones for those items in progress. See Fair Housing Plan Schedule.

Actions Steps Set Number	# of Steps	Points Awarded
None	None	-2
Set #1	Steps 1, 2, 9, 10, 11, or 12	2 Points Each
Set #2	Steps 3, 4, 5, 6, 7, 8, 13, 14, or 15	1 Point Each
Maximum # of Steps 4		Maximum Score is 8 Pts.

6.4 Enter the number of awards documented by the applicant to Section 3 residents or contractors over the past 3 years. **Award points based on number of contracts awarded.**

Response	Points
0	0
1-3	1.5
>3	3

6.5 Enter the number of documented good faith efforts made by the applicant to reach Section 3 residents or contractors over the past 3 years.

Response	Points
3	0.5
4	1

6.6 Document the number of contractor and subcontractor awards made to certified small and minority firms and women's business enterprises over the past three years. Award points based on the number of contracts awarded & contracts/certifications.

Response	Points
0	0
2	1
3	2
4 or more	3

Score New Applicants Only:

Total Possible Points = 15

6.7 Is the applicant a new grantee? A new grantee is defined as an applicant that has not received a Small Cities grant within the past 3 consecutive years.

Award points based on if answer to question is yes or no.

Response	Points
No	0
Yes	1

6.8 Identify projects, initiatives, and/or actions that the municipality has taken or are in progress in the past 3 years to promote the principles of Fair Housing. Award points based on the # of actions completed and documentation of such actions. See Past Fair Housing Initiatives Schedule.

Actions Steps Set Number	# of Steps	Points Awarded
None	None	-2
Set #1	Steps 1, 2, 9, 10, 11, or 12	2 Points Each
Set #2	Steps 3, 4, 5, 6, 7, 8, 13, 14, or 15	1 Point Each

Maximum # of Steps 4

Maximum Score is 8 Pts.

6.9-1 Was an ADA Notice submitted? Award points based on the following:

Response	Points
Not submitted or incomplete	0
Complete but needs minor revisions	0.3
Complete	0.5

6.9-2 Was an ADA Grievance Procedure submitted? Award points based on the following:

Response	Points
Not submitted or incomplete	0
Complete but needs minor revisions	0.3
Complete	0.5

6.10-1 Has the municipality completed or updated a Section 504/ADA Self Evaluation for all of its facilities within the past 3 years? If submitted, award points based on the following:

Response	Points
No	-1
Needs Revisions	0.5
Met Requirements	1

6.10-2 Has the municipality completed or updated a Section 504/ADA Self Evaluation for all of its rules, policies and programs with the past 3 years? If submitted, award points based on the following:

Response	Points
No	-1
Needs Revisions	0
Met Requirements	1

6.10-3 Has the municipality completed or updated a Section 504/ADA Transition Plan for its facilities and its programs within the past 3 years. If submitted, award points based on the following:

Response	Points
No	-1
Needs Revisions	0
Met Requirements	3

Total Score for Fair Housing: