

## **CDBG-RHP Program Guidelines**

All standard CDBG rules and requirements must be adhere to under the CDBG-Recovery Housing Program. The CDBG Program Manual on the TNECD website will serve and the written policies and procedures for this program unless specifically stated otherwise below.

### **Basic Requirements**

- National Objective
- Environmental Review
- Uniform Relocation Act
- Davis-Bacon and other wage-related acts
- Section 3 – Construction projects over \$200,000
- Procurement standards as dictated by 2 CFR 200 and the Tenn. Code Ann.
- Recordkeeping and financial management requirements as dictated by 2 CFR 200 and 24 CFR 570
- Fair housing and equal opportunity

### **Public Meetings**

As with all CDBG-funded activities, local governments intending to seek funding must hold a public meeting summarizing the funding program, the proposed activity, the amount of the funding being requested, and the amount of any leveraged funding proposed. The local government must allow for local input on the proposed activity and consider alternatives that may be presented at the meeting. Minutes providing a and official record must be kept on file and submitted the application for funding.

Two advertisements of the public meeting in a local newspaper are required. The first advertisement must be published at least 14 days prior to the public meeting. Additional actions to promote local participation in the public meeting are encouraged.

### **Eligible Entities**

Only local city and county governments are eligible to be direct recipients of these grant funds. Local governments expected to partner organizations that have experience creating and/or developing housing solutions for persons in recovery from a substance use disorder. While in most cases local government will subgrant the funds to carry out the activity to the partner organization, the grant contract will be between the eligible local government and TNECD.

### **SAM Registration**

All local governments and direct subrecipients of the CDBG-RHP funds must have an active registration in SAM.gov. Contracts with local governments will not be fully executed unless the local government has an active registration. Subrecipient organizations will not be able to be reimbursed for funds unless they have an active registration.

### **Eligible Activities**

*Public Facility Improvements* - Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

*Acquisition of Real Property* - For the purpose of providing stable, temporary housing to persons in recovery from a substance use disorder.

*Lease, Rent & Utilities* - associated costs on behalf of an individual in recovery from a substance use disorder for the purpose of providing stable, temporary housing. Payments must be made to the provider, such as the landlord or utility provider. Payments must NOT be made directly to individuals.

- RHP cannot supplant funds that previously covered for an individual.
- New or Expanded Service that have been above and beyond the last 12 months.
- Assistance can be provided for up to 2 years or until the individual secures permanent housing, whichever is earlier.

*Rehabilitation and Reconstruction*

- Single Unit – publicly or privately owned residential building(s)
- Multi-Unit – publicly or privately owned residential building(s)
- Public Housing – owned or operated by a public housing authority.

*Disposition of Real Property Acquisition* - Disposition through sale, lease, or donation of otherwise of real property acquired with RHP funds for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder.

*Clearance and Demolition* - Clearance, demolition, and removal of buildings and improvements, including movement of structures to other sites for the purpose of providing stable, temporary housing for individuals in recovery from a substance use disorder. Eligibility limited to projects where RHP funds are used only for the clearance and demolition.

*New Construction* - Expansion of existing eligible activities to allow CDBG-RHP funds to be used for new construction of housing. New construction of housing is subject to the same requirements that apply to rehabilitation activities.

## **Agreements**

All local government applicants must have a written agreement in place with the partner organization that addresses the following minimum criteria:

- Length and term of the project
- Scope of the project
- Expenditure requirements
- Reporting requirements
  - How often
  - Types of data to report
  - Number of beneficiaries to assist
  - Number of housing units to create/improve
- Record retention requirements

## **National Objective**

All CDBG-funded activities must meet a National Objective. For the CDBG Recovery Housing Program the National Objective to meet will be “to benefit low and moderate income (LMI) persons”. HUD issued a waiver in in Federal Register Notice FR-6225-N-01 presuming that all beneficiaries of CDBG-RHP activities meet the LMI – Limited

Clientele National Objective. Notably, this waiver does not extend to other CDBG funds not authorized under the SUPPORT Act.

### **Recordkeeping**

Generally, the recordkeeping requirements laid out in the CDBG Program Manual must be followed. The general rule of thumb is that all documentation related to the grant must be retained. This includes, but is not limited to:

- Public meeting documents
- Applications
- Contracts
- Agreements
- Procurement documents and evaluations
- Environmental Review Record
- Architectural / Engineering documents
- Bid documents and evaluations
- Reports
- Approvals for TNECD
- Invoices / Requests for Reimbursement
- Beneficiary documentation

### **Reporting**

Each grantee that is funded through this program must submit a quarterly report that address the following:

- What has happened over the past quarter.
- What is expected to occur in the next quarter.
- Issues or delays that have occurred.
- Performance measure reporting

Each grantee must submit a final closeout report at the end of the grant which will describe how the project was proposed and how it was completed. The closeout report will also provide beneficiary details and how the LMI National Objective was met. Standardized reporting forms will be provided by TNECD.