

City of Colorado Springs Community Development Division 2023 CDBG Public Services and Emergency Solutions Grant Application Guide





The Community Development Division manages the City of Colorado Springs entitlement funds from the U.S. Department of Housing and Urban Development (HUD). Our mission is to create strong, sustainable, inclusive communities and quality affordable homes for all people in Colorado Springs.

The Community Development Division receives these funds via three core programs:

CDBG

Community Development Block Grant (CDBG) funds are used to improve local communities by providing decent housing, improved infrastructure, public facilities and services, and improved economic opportunities for lowand moderate-income residents. These funds may also be used for activities that help prevent or eliminate slums or blight or for projects that meet urgent community needs.

There are many activities under the CDBG umbrella; these guidelines cover the Public Services activity.

ESG

Emergency Solutions Grant (ESG) funding assists individuals and families quickly regain stability into permanent housing after experiencing a housing crisis or homelessness.

These guidelines cover all five components of the ESG program.

HOME

The HOME Investment Partnerships (HOME) program funds a wide range of activities including building, buying and/or rehabilitating affordable housing

for rent or homeownership. Funds can also be used to provide direct rental assistance to low-income residents. HOME is the largest federal block grant to state and local governments designed exclusively to create affordable housing for low-income households.

The HOME program is not covered in this document. For more information on how the City uses and awards these funds, visit <u>https://coloradosprings.gov/housing-development</u>.

City of Colorado Springs Community Development Division

Eligibility and Funding

Faith-Based Organizations



Charitable organizations or nonprofit organizations affiliated with a religious group and/or inspired by a religious belief are eligible and to apply for HUD funded grant programs.

Does a faith-based organization need to mask its religious identity in order to receive HUD funds?

No. Faith-based organizations that receive federal assistance may keep their religious name; continue to carry out religious activities; keep and display religious signs and symbols inside and outside their facilities; continue to use religion as a basis to select their board members (including members of the clergy); and otherwise govern themselves on a religious basis.

Can we conduct religious activities for our HUD funded recipients?

Organizations that receive direct HUD funds may not engage in inherently religious activities, such as worship, religious instruction, or proselytizing, as a part of the program or services funded by HUD. Inherently religious activities must be offered separately, in time or location, from the programs, activities, or services supported by direct HUD funds.

Most importantly, participation in religious activities *must be voluntary* for your HUD-funded service beneficiaries. They should have no feeling or sense that their participation in inherently religious activities that are separate in time and/or place from HUD-funded activities, or even participation in something like prayer before a meal, is somehow required for them in order to receive HUD-funded services.

Will our organization receive equal treatment in the application process?

Yes! Your organization will not be discriminated against because it is or is not a faith-based organization. Your organization will not be favored because it is, or is not, a faith-based organization. Lastly, each nonprofit, regardless of its size, competes on an equal footing with all organizations seeking HUD funding.

For more information please visit HUD's Center for Faith-Based Partnerships.

Eligibility and Funding

Nonprofits & Public agencies



Nonprofits

Organizations that qualify for tax exempt status by the IRS because of its mission and purpose to further a social cause that provides a public benefit, are eligible to apply for HUD funded grant programs.

Public Agencies

Organizations whom are city, special district, or a joint powers authority are eligible to apply for HUD funded grant programs. These organizations are typically divisions of government.

A few things to note:

How do I prove my nonprofit status?

Applicants will be asked to submit their most recent IRS form 990 to show proof of their tax exempt status. For more information on charities and non profits options through the IRS Please visit the <u>IRS</u> <u>Charities and nonprofits</u> information webpage.

Are nonprofit agencies allowed to apply jointly?

Yes. Organizations who are collaborating on a project/program for which they are requesting HUD grant funding, may indeed jointly apply. In that case, both agencies, regardless of who is the lead agency, would still need to be eligible under HUD grant guidelines, and both agencies would be subject to HUD funded grant requirements.

2023 Available Funding

The Community Development Division is making the following amounts available:

2023 Community Development Block Grant Public Services*

\$125,000

*Application minimum and maximum is \$25,000. Up to five (5) grants available.

2023 Emergency Solutions Grant**

\$100,000

**Seeking applications for rapid rehousing and homelessness prevention only. No emergency shelter, street outreach, or HMIS applications.

Organizations may submit more than one application.

All awarded applicants will have until March 31st, 2024 to fully expend their awarded funds.

CDBG Public Services: Funding Priorities

This year, this City will be awarding five (5) \$25,000 CDBG Public Services grants to organizations who are creating or expanding innovative programs. Our goal is to help launch pilot projects or support expansions of proven programs that serve lowmoderate income persons in Colorado Springs. Priority will be given to applications that can demonstrate the following elements.

Responsive

The applicant must demonstrate a clear understanding and description of the community need the proposed project intends to address. The desired outcomes should be relevant, measurable, feasible, and impactful.

Connected to adopted plans

Successful projects will show how the proposed project will implement the vision captured in adopted or ongoing public plans such as:

•Applicant organization's current strategic plan;

•Citywide or regional plan (PlanCOS, HomeCOS, Age Friendly Colorado Springs, etc.); or •Neighborhood plan (Mill Street Neighborhood Plan, Southeast Strong, etc.)

Targeted

Applicants must make clear who their target beneficiaries are and how they publicize their services to clients. Organizations that serve underserved populations should demonstrate their ability to create accessible space and services based on their client demographics.

Innovative

Applicants should be able to clearly show how their program or project stands out from similar programs offered in the area.

Adaptable

If applying for a project that currently exists, applicants must demonstrate how the proposed project is a clear and a **unique** expansion or pivot.

Collaborative

Applicants are encouraged to collaborate with peer agencies. How and whom might the organization collaborate with for the proposed project?

It is important that applicants provide <u>elaborative</u>, <u>clear</u>, <u>concise</u>, <u>and informative</u> answers to how their proposed project meet the City's outlined priorities.

The grant funds primarily benefit low- and moderate-income persons (80% AMI or below). Applicants must show how their projects

CDBG Public Services: Eligibility Basics

The Community Development Block Grant Program (CDBG) was authorized under Title I of the Housing and Community Development Act of 1974. The program was established to provide annual grants on a formula basis to entitlement communities and cities and was designed to help develop viable urban communities, provide suitable and decent housing, and expand economic opportunities to principally low- and moderate-income communities.

By law, CDBG Public Services activities are capped at 15% of a jurisdiction's total CDBG budget.

Basic Requirements for Subrecipients

Public Services funds generally support the service delivery costs for organizations serving low- and moderate-income populations. Here are a few eligibility basics that applicants will want to consider if applying for funding:

- CDBG is a reimbursement grant program, which means that organizations must be able to properly document that all the services and reimbursements associated expenses have been completed PRIOR to receiving payment.
- CDBG Public Service grants must be used to expand existing services or create new services to serve low- and moderate-income populations.
- In general, organizations that provide social services and/or other types of direct assistance to individuals and/or households are eligible to apply for funds.
- Services must be based in Colorado Springs and serve Colorado Springs residents.

Eligible activities for CDBG Public Service funds can be broken into two categories: *Service Delivery Costs* and *Program types.*

Service Delivery Costs

General service Delivery costs can include items such as: Salary and benefits Supplies Transportation/Mileage Overhead (maintenance, utilities, etc.) Eligible Program Types General program types may include, but are not limited to: Housing navigation Family services Child services Health and education Senior services Etc.

What is not eligible under the CDBG Public Services Grant Program?

Political or religious activities General government activities Direct income payments (e.g., direct cash payments to clients) New housing construction General maintenance or operational costs not related to the proposed project

For more information, please visit the HUD CDBG Public Services basic information overview.

CDBG Public Services: Documenting Eligible Activities

Providing detailed accurate documentation to support any request for an CDBG eligible activity is critical. Every activity must be tied to eligible beneficiaries. In other words, how does this work directly enable your organization to serve its clients? As this is the case, lets look at a few examples.

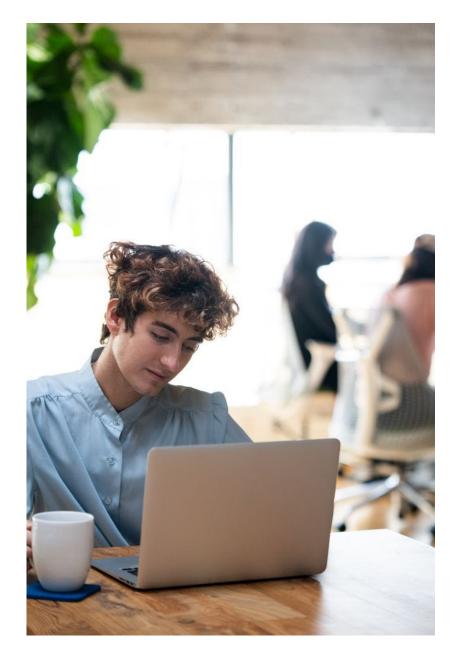
Example 1:

ABC Housing Unlimited

Application Request: Salary and benefits for their newly hired employee Luza.

Potential documentation that could be requested and submitted for reimbursement:

- Timesheets
- Payroll Journal
- Mileage reimbursement documentation
- Benefits statement
- Job description
- Eligible beneficiaries served with demographic breakdown, both unduplicated and cumulative (year to date)
- Client intake forms



What questions should ABC Housing Unlimited consider before submitting and application for CDBG Public Service Funds?

- 1. How accurate and detailed is our record keeping in relation to Luza's documentable time?
- 2. Can we track beneficiaries and capture income and/or demographic information?
- 3. Do we have templates and/or software in place to be able to keep track of Luza's time accurately and in a timely manner?

NOTE: This example would be classified as an eligible service delivery cost.

CDBG Public Services: Documenting Eligible Activities

Providing detailed accurate documentation to support any request for an CDBG eligible activity is critical. Every activity must be tied to eligible beneficiaries. In other words, how does this work directly enable your organization to serve its clients? Let's look at a few examples.

Example 2:

Family Home Services

Application Request: Rental Assistance

Potential documentation that could be requested and submitted for reimbursement:

- Copy of payments to property owner
- Client intake forms with income verification
- Copy of lease and past payment history, etc.



What questions should Family Home Services consider before submitting and application for CDBG Public Service Funds?

- 1. Do we have a case management model that can gather all of the required documents and manage correspondence with the property owners?
- 2. How detailed are our client intake forms? Do they self certify their income or do we have a system in place to verify their income status?
- 3. How do we document that a case activity is specifically related to CDBG? How do we differentiate and document CDBG related case management from non-CDBG case management?

NOTE: This example would be classified as an eligible program type.

CDBG Public Services: Choosing a National Objective

The CDBG Programs entire mission is to serve low to moderate income communities. As such, all CDBG Public Services funding requests received by the City must met the overall objective of benefitting low to moderate income persons(LMI). There are different standards by which jurisdictions and their subrecipients can meet this, depending on the program and activity types.

Which national objective standard does your project meet?



Low to moderate income clientele benefit (LMC)

This can be defined as activities that benefit a specific group of LMI residents regardless of their address. At least 51% of the beneficiaries of the activity and/or program must be low to moderate income persons.

Examples of low to moderate clientele (LMC) benefit activities/programs can include:

- Food pantries
- Domestic violence shelters and services
- Rental assistance
- Most public services for vulnerable populations

How would my organization document this objective?

- Client intake forms that capture total income and household size
- Documentation that shows the organizations serves a population presumed to be LMI(Victims of domestic violence, homeless, developmentally disabled adults, elderly, migrant farm workers, etc.)

Low to moderate income area benefit (LMA)

This can be defined as activities or programs that benefit all residents in a defined geographic area(within city limits) that has a majority of low to moderate income residents. Low to moderate income activities/programs serve whole areas that are a majority(51% or more) low to moderate income.



Examples of low- to moderate-income area benefit activities/programs include:

- Community centers
- Park accessibility
- Neighborhood based transit service improvements

How would my organization document this objective?

- Surveys conducted within the designated service area
- Providing the address of service with current census tract income data.

Important:

Most CDBG Public Services programs/projects fall under the LMC national objective. It is **extremely rare** for a CDBG Public Services programs/projects to fall under the LMA national objective. Applicants who will be selecting this objective need to contact the Community Development Division **before** they submit their fully completed application.



The Emergency Solutions Grant (ESG) program was a result of the revised program from the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009. The ESG interim rule took effect on January 4, 2012 and reflected a change in the programs focus to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. The ESG program is broken into five components:

- 1. Emergency shelter
- 2. Street outreach
- 3. Homeless Management Information System (HMIS)
- 4. Rapid rehousing*
- 5. Homelessness prevention*

*Indicates Community Development's funding priorities for the 2023 program year

All ESG subrecipients with the Pikes Peak Continuum of Care (PPCoC) service must coordinate and integrate, to the maximum extent practicable, ESG funded activities with other programs targeted to people experiencing homelessness.

If awarded, subrecipients of ESG funds must comply with the following:

- Participation in Coordinated Entry
- Understanding and compliance with the City of Colorado Springs Written Standards
- Compliance with the ESG administrative requirements
- Establishing a staff member as a point of contact for other case managers and members of the PPCoC

For more information about how the Community Development Division addresses homelessness, please visit https://coloradosprings.gov/homelessness-prevention-and-response.

Emergency Solutions Grant: Eligibility Basics

Emergency Solutions Grant: Eligibility Basics

Emergency Solutions Grant (ESG) funds are provided by HUD in order to assist extremely low-income persons (30% AMI or below) individuals and families to quickly regain stability in housing after experiencing a housing crisis or homelessness. The beneficiaries of ESG programs must meet one of HUD's categories of homelessness.

Four Categories of Homelessness (HUD)

1. Literally homeless

Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: Has a primary nighttime residence that is a public or private place not meant for human habitation; **or** Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); **or**

Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

2. Imminent Risk of Homelessness

An individual or family who will imminently lose their primary nighttime residence, provided that: Residence will be lost within 14 days of the date of application for homeless assistance;

No subsequent residence has been identified; and

The individual or family lacks the resources or support networks needed to obtain other permanent housing. *Note:* Includes individuals and families who are within 14 days of losing their housing, including housing they own, rent, are sharing with others, or are living in without paying rent.

3. Homeless under other Federal Statutes

4.Unaccompanied youth under 25 years of age, or families with Category 3 children and youth, who do not otherwise qualify as homeless under this definition, but who:

Are defined as homeless under the other listed federal statutes;

Have not had a lease, ownership interest in permanent housing during the 60 days prior to the homeless assistance application;

Have experienced persistent instability as measured by two moves or more during in the preceding 60 days;

and

Can be expected to continue in such status for an extended period of time due to special needs or barriers.

4. Fleeing or Attempting to Flee Domestic Violence:

Any individual or family who:

Is fleeing, or is attempting to flee, domestic violence;

Has no other residence; and

Lacks the resources or support networks to obtain other permanent housing

"Domestic Violence" includes dating violence, sexual assault, stalking, and other dangerous or lifethreatening conditions that relate to violence against the individual or family member that either takes place in, or him or her afraid to return to, their primary nighttime residence (including human trafficking).

For more information, please visit <u>HUD'S Four Categories of the Homeless Definition</u> resource page.

Emergency Solutions Grant: Eligibility Basics

Coordinated Entry

Coordinated entry is designed around placing clients who are currently experiencing homelessness into housing. All ESG award applicants will be responsible for demonstrating that they have clear policies and procedures for determining and documenting client eligibility. Service providers must be able to record their outcomes and have clear benchmarks they are working to achieve.

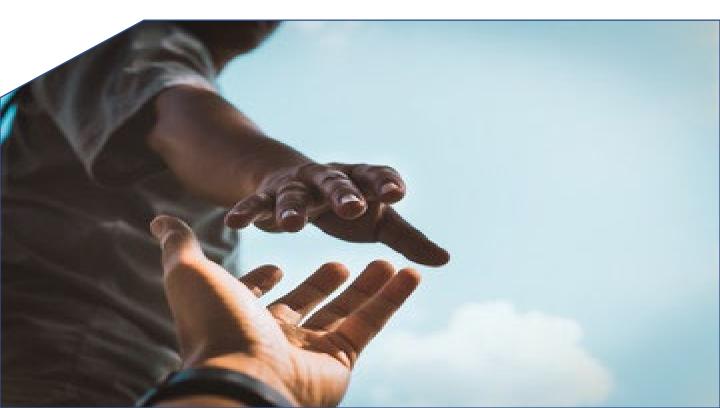
Within two weeks of working with a client, the expectation is that a service provider will close out a client's file by either serving that client, referring them, or notifying the client that they are not eligible for ESG funded assistance. Additionally, it is the expectation of the City that any service provider receiving ESG program funds cannot discriminate against a group of people presenting as a family (e.g., adults and children or just adults), the age of any members family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

What else do I need to know about the process of coordinated entry?

All awarded applicants will be expected to adhere to the HUD outlines requirements to administer ESG program funds. In addition the City will expect:

- Awarded applicants to be responsible for determining and clearly documenting client eligibility.
- That applicants understand that the City of Colorado Springs will not reimburse an agency for funds expended on clients that are found to be ineligible for ESG and;
- Awarded applicants will be expected to adhere to the reporting, performance, and outcome evaluations standards as outlined in the City of Colorado Springs Written Standards.

For more information please review the <u>City of</u> <u>Colorado Springs Written Standards</u> information page.



Emergency Solutions Grant: Eligible Components

Only two components will be considered for the 2023 round of applications: Rapid Re-housing and Homelessness Prevention



Street Outreach (Ineligible 2023 application component)

Activities that are designed to meet the minimum needs of the unsheltered homeless populations by connecting them with emergency shelter, housing, and/or other critical health services. **Eligible activities include:** Case management, transportation, emergency health services, services for special populations, and engagement.

Rapid Re-Housing (Eligible Application Component)



Housing relocation and stabilization services and/or short and medium terms rental assistance as necessary to help individuals or families living in shelters and/or in places not meant for human habitation move as quickly as possible into permanent housing to help achieve stability in that housing. Eligible activities include: Rental assistance (includes rental arrears), Financial assistance (rental application fees, security and utility deposits, utility payments, last months rent, and moving costs), and finally other general services related to housing stabilization(Housing search and placement, case management, landlord tenant mediation, tenant legal services, and credit repair).



Homelessness Prevention (Eligible Application Component)

Housing relocation and stabilization services and short/medium term rental assistance as necessary to prevent an individual or family from moving to an emergency shelter and/or a place not meant for human habitation. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or achieving stability in other permanent housing.



Emergency Shelter (Ineligible 2023 application component)

This priority/component funds operations for low barrier emergency shelters facing extra operational costs. **Eligible activities include:** Essential services(such as patient health services), case management, insurance, food, supplies, maintenance, motel vouchers(ONLY with documentation that shelter system cannot safely accommodate families), renovations(such as rehab or conversion), and operations(utilities/janitorial).



Homeless Management Information System (Ineligible 2023 component) ESG Funding may be used to pay for the cost of contributing data to the HMIS lead designated by the Pikes Peak Continuum of Care. Only the HMIS lead is eligible to apply for this program component.

For more information please visit <u>HUD's Emergency Solutions Grant program</u> information page.

Emergency Solutions Grant: Funding Priorities



This year the City has provided direct awards for Emergency Shelter and Street Outreach, which are subject to program caps. The remainder of the 2023 ESG funds, or \$100,000, shall be designated for the remaining service components:

1. Homelessness Prevention (HP)

Beneficiary audience: Imminent Risk of Homelessness (Category 2)

Housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter or place not meant for human habitation.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include:

Rental Assistance: rental assistance and rental arrears

Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs

Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

2. Rapid Re-Housing (RRH)

Beneficiary audience: Literally homelessness or fleeing domestic violence (Categories 1 or 4) Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Note: Beneficiaries who meet the criteria under category 4 of the "homeless" definition (fleeing domestic violence) must reside in an <u>emergency shelter</u> or other place described in HUD's Category 1 homelessness definition.

All HP and RRH applicants <u>must show</u> how they incorporate duplication of benefits checks into their process to ensure Emergency Rental Assistance Program (ERAP) funds, housing vouchers, or other forms of rental assistance are exhausted first to be awarded.

What is Match?

Per the City of Colorado Springs written standards awarded subrecipients are required to make a matching contribution in the amount that equals (100%) of the amount of ESG funds allocated by the City.

If awarded, subrecipients must establish and maintain sufficient records to enable the City and HUD to determine whether ESG requirements are being met. Documentation must show that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities. In addition, subrecipients must maintain all case file records including records for persons seeking assistance determined to be ineligible.

What can be used as a match source?

Matching contributions can be obtained from any source including any federal (non-ESG) source, as well as state, local, and private sources. Possible sources of match include:

- Cash
- The value or fair value of any donated material or building
- The value of any lease on a building
- Any salary paid to staff to carry out the program of the recipient
- The value of the time and services contributed by volunteers

IMPORTANT: Federal sources are not prohibited from being used as an ESG matching contribution so long as that source is not and has not been previously used as a matching fund. It is important that if awarded, subrecipients ensure the laws governing any of those federally funded sources used as a match does not prohibit their use as a matching fund.

Match Requirements

A matching funding source:

- Must be a 1 to 1 match
- Must be for the same time period and same project
- Can be made up of a variety of sources and;
- Funds **must be** used for ESG eligible clients and/or activities

Double Dipping: If ESG funds are used to satisfy requirements of another federal program, funding from that program cannot be used to satisfy the matching requirements of ESG. Contributions that have been or will be counted as satisfying a match requirement of other federally funded programs may not be used as a match for ESG funding.

Additional Information

All matching funds must be expended by the end of the program year (March 31, 2023). It is important that applicants who intend to apply for ESG funds fully understand the compliance requirement of matching funds for the program. For additional information please visit the <u>City of Colorado Springs written standards information page</u>.

Emergency Solutions Grant: Administrative Requirements

In addition to basic eligibility requirements, all awarded applicants will be required to adhere to and implement a series of administrative requirements in the management of ESG program funds.

Habitability standards

Per the City of Colorado Springs written standards awarded subrecipients are required to ensure that shelter facilities meet minimum habitability standards as outlined in 24 CFR part 576.403(b).

If awarded, subrecipients must establish that the property of which the shelter is located has been inspected and certified through form J.1. Shelter standards of the City of Colorado springs written standards. For information on the standard requirements applicants may access the form <u>here</u>.

Lead Based Paint

The Consumer Product Safety Commission banned the use of lead in house paint in 1978. Prior to 1978, lead based paid (LBP) was commonly used in homes; the older the home the higher concentration of lead in the paint. Title X, the Residential Lead Based Paint Hazard Reduction Act, was passed in 1992 requiring several federal agencies and the Environmental Protection Agency(EPA) to cerate regulations designed in part to protect people especially children living in pre-1978 homes where LBP may have been used.

Any time federal funds are used for housing assistance and the living space or unit was built prior to 1978 LBP requirement are triggered. If awarded, shelter providers and/or those providing housing assistance must adhere to the compliance requirement of LBP outlines in <u>HUD'S guidance on Lead-Based Paint</u> requirements.

Environmental Review

An environmental review considers the potential impact a proposed project could have on the surrounding area, and the impact the surrounding area could have on a project.

If awarded, subrecipients and their contractors **<u>shall not</u>** rehabilitate, convert, or renovate a shelter or prospective shelter until the City has performed an environmental review. Once the review is complete an approval and/or denial will be provided for a subrecipient to continue with activities.

Additional Information

If your organization is looking to perform a construction/renovation project, please contact the Community Development Division **before** submitting an application. Most facilities and infrastructure projects should fall within the CDBG Public Facilities and Infrastructure funding program.

Emergency Solutions Grant: Administrative Requirements

In addition to basic eligibility requirements, all awarded applicants will be required to adhere to and implement a series of administrative requirements in the management of ESG program funds.

Some additional requirements include:

Grant Compliance: Record Keeping

Recordkeeping and reporting your funded activities are crucial to the success of an organization's HUD-funded projects.

An inability to adhere to good recordkeeping and reporting standards may lead to findings within a HUDfunded program. Resolving those findings is always more difficult than the front-end compliance. organizations will need to know:

- What information an organization needs to collect and why
- When information needs to be collected (and how often)
- How information is reported
- How information is acquired, and
- The required retention period for records.

Recordkeeping Requirements

The City of Colorado Springs may ask at any time to review any and all documents related to the administration of the HUD funded grant. As such, applicants should be aware that the City's expectation are as follows in regards to maintaining records:

- Records kept have been reviewed for accuracy
- Records are legible(Ex. Documents are not blurry or hard to decipher visually. Faint photo copies, cell phone pictures, dark scans, etc. would be just a few examples of documents that are illegible).
- Records are complete and;
- Records provide detailed information

If requested, Community Development Division staff should be able to determine with ease if requested records and/or backup documentation is eligible, accurate, concise, and complete upon submission. It is important to note that all records must be maintained in its entirety for the duration of the awarded grant plus an additional 6 years.



HUD requires that the City of Colorado Springs keep records on file that are accurate, complete, and orderly. Similarly, awarded organizations are responsible for maintaining their records in the same accurate, complete, and orderly fashion.

Subrecipients are responsible for maintaining records in at least 3 major categories:

Financial Records Project/Case File Records Administrative Records

In addition to program goals and project eligibility, applicants should evaluate with their organization staff some of the following:

- How are records maintained? Electronic vs. Manual?
- Are our records easily accessible?
- How do we maintain and provide our back up documentation for grant reimbursement?
- How do we keep our records secure?
- Does more than one grant administrative staff member in our office have access to our records?
- Would our records/backup documentation be clear, concise, and easy to decipher for audit purposes?
- Would we be able to provide backup documentation for beneficiary data (depending on the program) to support our requests for grant reimbursement?

For more information on record and reporting please see <u>Chapter 5 of HUD's Playing by the</u> <u>Rules</u> guide.

Grant Compliance: Reporting

Regardless of the HUD funded program recordkeeping and reporting your funded activities is crucial to the success of an organizations CDBG/ESG projects.

An inability to adhere to good recordkeeping and reporting standards may lead to findings within a HUD funded program. Resolving those findings is always more difficult than doing the front-end compliance. To document activities adequately, organizations will need to know:

- What information an organization needs to collect and why
- When information needs to be collected (and how often)
- How information is reported
- How information is acquired
- The required retention period for records

Reporting Requirements

In addition to maintaining recordkeeping requirements, subrecipients will be expected to report on programmatic outcomes. These reports can be monthly, quarterly, or upon request by the City. Applicants should consider the following:

- Do we have staff with more than 1 year of grant management experience? If not, are we open to providing our grant management staff with the training and skills needed to properly manage a federal award?
- How well does our grant management staff communicate with our program staff? Would it be effortless for our program, financial, and grant administrative staff to work together to gather data and meet monthly/quarterly reporting requirements in a timely manner?

Reporting periods

For CDBG awarded subrecipients will be required to report on a monthly basis. The close of the reporting period is the end of each month with the report being due the 15th of the following month after the period close.

For ESG awarded subrecipients will be required to report on a quarterly basis with the report being due on the 15th of the next month after the period close. **IMPORTANT:** These reporting requirements are fixed requirements.

Reporting Data

Reporting Data for HUD funded Grants Typically Fall within two categories: Expense Data and Beneficiary Data. For each, applicants should consider they may need to provide the following in their reporting:

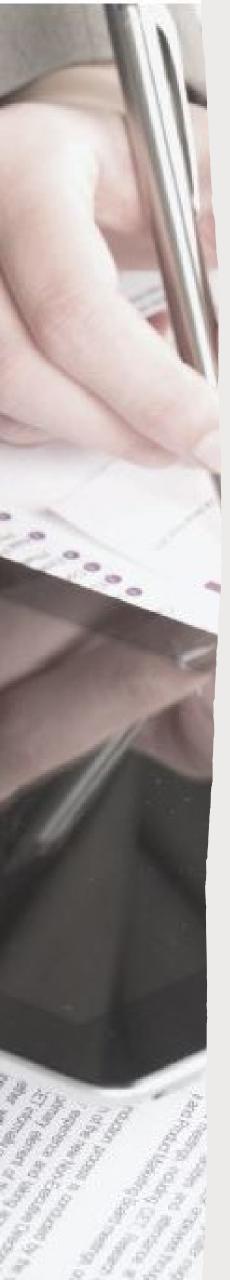
Expense Data:

- Payroll Registers/Paystubs/Timecards/Timesheets
- Copies of checks
- Invoice cata
- Receipts, etc.

Beneficiary Data

- Case management records
- Specific data on unduplicated race/ethnicity of served clients
- Head of household data
- Information on monthly performance issues and resolutions
- Information on client income broken down by AMI, etc.

For more information on record and reporting please see <u>Chapter 5 of HUD's</u> <u>Playing by the Rules guide</u>.



Grant Compliance: Overview for Grantees 2 CFR Part 200

All grant recipients/subrecipients are required to adhere to the code of federal regulations that specifically outline the uniform administrative requirements, cost principles, and audit requirements for receiving a federal award. This regulation is known as Overview for grantees and/or Uniform Guidance 2 CFR part 200.

These regulations cover the following areas for federal grant management:

Internal Controls Procurement Standards Conflicts of Interest Program income Direct and Indirect Costs Cost Principles Standards for Financial Management Audit Requirements

Applicants for grant funding will need to ensure they have reviewed these requirements with their grant/programmatic staff for compliance if awarded.

For more information please visit <u>HUD 2 CFR</u> <u>Part 200 Uniform Guidance Webcast Series.</u>



Organizations that receive grant funding from the City of Colorado Springs Community Development Division are expected to fulfill and uphold the following if awarded:

Notify the City of Colorado Springs of significant changes in any of the following: Outcomes, policies/programs delivery structure, facilities, and/or organization program. It is the expectation that any such changed will be discussed with the city of Colorado springs to resolve problems that may arise.

Accept and expend the grant funds provided by the City of Colorado Springs for the program year covered in their written agreement.

Provide monthly/quarterly/yearly reporting as outlined in the written agreement and/or as requested during the compliance monitoring by the City of Colorado Springs.

Establish and maintain a system for measuring client outcomes which will reflect the programs effectiveness as stated in its objective.

Achieve compliance and remain prepared for periodic on-site monitoring visits. Any City requests for documentation should be submitted by awarded subrecipients in a complete, accurate, and timely manner.

Maintain systems of organization and operate according to clear guidelines of responsibility and authority.

The organization is compliant with all state and federal laws and regulations and upholds 501(c) b tax exempt status (if applicable).

Keep complete and accurate records in accordance with the financial accounting standards board (FASB)

Ensure that services funded by these grant funds are provided to all persons without regard to age, gender, race, religion, national origin, disability, sexual orientation and/or any other barriers to participation.

For more information about grants requirements and how to locate and applying for grants please visit the <u>U.S. Department of Housing and Urban</u> <u>Development Grants information</u> page.

Submitting an Application: Things to Consider

Every year the City of Colorado springs aims to forge new collaborations and deepen existing partnerships with our organizations who are investing in our wonderful community and its citizens. Before moving forward with submitting an application we ask applicants to evaluate and consider the following?



Has our organization applied for funding in the past? If so, what were some of the challenges and triumphs in the administration of those funds?

Are we prepared internally to handle reporting, audit, fiscal, and monitoring requirements for utilizing federal funds? If we were to lose support staff, do we have a backup plan for staying compliant?

If awarded is our organization read to carry out our proposed work? Can we hit the ground running?

Is this financially feasible? Have we explored all our options for funding outside of HUD grant programs? If we are not approved for grant funding how will we fill the gap?

Is our board not only aware of this application but supportive? How involved will they be in the overall process?

Does our organizations services fit into the landscape of area service providers? How do we ensure we are not duplicating services?

Does any of our administrative and/or program staff have grant management experience?

Will we be able to gather the required documentation to not only meet application deadline, but also meet reporting deadline in the future?

IMPORTANT: The award of grant funds will be based, in part, upon some of the factors listed here. It is important applicants consider these factors along with eligibility and grant administrative requirements.

Submitting Your Application: Get Prepared

1. Complete your registration

- Neighborly: All applicants must register through the City's online grant application platform Neighborly Software. Please visit the neighborly software portal to register your online profile and the grant application. IMPORTANT: All grants submissions must be made through the Neighborly Software platform. No paper applications are accepted.
- Sam Registration: All applicants must be registered un the System for Award Management to do business with the U.S. government. Please visit <u>SAM.gov</u> to register and/or check your organizations status. IMPORTANT: If you are applying for federal funds for the first time it can take 6-8 weeks for your entity to be reviewed and approved in SAM.GOV. You cannot receive an award without an active SAM.gov registration.
- □ UEI#: All applicants must have a registered and active UEI number to be a grant awardee. Once you have completed and been approved through SAM.gov your organization will be eligible to apply.
- □ HMIS/VSPID: Please contact your HMIS administrator at Community Health Partnership to confirm your HMIS/VSIP # and/or for assistance obtaining one.

2. Review Additional Materials

- □ For ESG applicants, review a copy of the <u>City of Colorado Springs Written Standards</u>
- Review additional information on HUD funded grant programs and projects by visiting the <u>HUD grant</u> information page.
- □ For training information on HUD funded programs please visit the <u>HUD Exchange Training</u> <u>information page</u>.

3. Get prepared

- Review the 2023 Frequently Asked Questions and Documents Glossary
- □ Register for at least one digital workshop session
- Gather your administrative, programmatic, and/or finance staff and inform them of the application requirements

4. Submit your application

<u>Neighborly portal access</u> will begin on March 24th 2023 at 12:00am. All applications (both CDBG and ESG) for grant funding must be submitted by April 14th 2023 at 11:59pm MST. <u>NO EXCEPTIONS</u>. The Community Development Division will host 3 digital office hour sessions to answer application questions and offer technical assistance on the following dates:

Digital Workshop Session #1 : Tuesday April 4th 2023 9am-10am. <u>Click here to join the meeting</u> Meeting ID: 252 222 387 703 Passcode: N9qK9X <u>Download Teams</u> | <u>Join on the web</u> Or call in (audio only) <u>+1 720-617-3426,,894171777#</u> United States, Denver Phone Conference ID: 894 171 777# <u>Find a local number</u> | <u>Reset PIN</u>

Digital Workshop Session #2: Wednesday April 5th 1pm-2pm MST. <u>Click here to join the meeting</u> Meeting ID: 247 693 296 514 Passcode: RfxrNp <u>Download Teams</u> | Join on the web **Or call in (audio only)** <u>+1 720-617-3426,,687022625</u># United States, Denver Phone Conference ID: 687 022 625# <u>Find a local number</u> | <u>Reset PIN</u>

Digital Workshop Session #3: Friday April 7th 10:30am-11:30am MST. <u>Click here to join the meeting</u> Meeting ID: 254 545 452 409 Passcode: zsTivD <u>Download Teams</u> | <u>Join on the web</u>Or call in (audio only) <u>+1</u> <u>720-617-3426, 55692973#</u> United States, Denver Phone Conference ID: 556 929 73# <u>Find a local number</u> | <u>Reset</u> <u>PIN</u>

Please note: **<u>Before</u>** attending the digital office hours workshop please have the representative your organization plans to have attend review the application guide and associated materials **<u>before they choose a session</u>**. Time is limited and a full review of the guide **<u>will not</u>** be a part of the workshop.



Additional Information

Grant application review by internal city staff and external community volunteer reviewers will begin on March 24, 2023. This process will last approximately 6-8 weeks. After completion, grant applicants will be notified of their approval or denial status of their application.

Questions?

For grant application questions and information please contact <u>communitydevelopment@coloradosprings.gov</u>.

For general information about the Community Development Division and our current activities, please visit the <u>Community</u> <u>Development Division</u> webpage for more details. Look for the *Stay Informed* link to sign up for our newsletter to receive updates, funding opportunities, upcoming events, and community information.