



BUCKS COUNTY 2019 COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) APPLICATION INSTRUCTIONS

The Bucks County Office of Community and Economic Development (CED) administers funding provided to Bucks County under the federal CDBG program which was created through Title I of the Housing and Community Development Act of 1974, as amended. The County anticipates receiving approximately \$2.066 million of CDBG funding in Fiscal Year (FY) 2018. Of the total amount anticipated, approximately \$1,652,800 will be awarded for public improvements, public services, housing and economic development related activities through the FY 2019 application process.

Program Year 2019 is the fifth year of the County's Five year Consolidated Plan. The one-year Action Plan for 2019 falls under the CDBG program and targets priority areas identified in the Consolidated Plan. Through a consideration of available resources in the community and the needs of County residents, priority targets can be identified for public improvements, public services, housing and economic development related expenditures. Within these areas of eligible activities, the following major priorities for funding have been identified:

- building inclusive and sustainable communities through investments in revitalization/infrastructure improvements in the County's areas of greatest need
- preservation and maintenance of quality housing stock for low-moderate income households, including those with special needs
- the availability of additional affordable rental and homeownership housing for low-moderate income households, including those with special needs
- service and delivery facilities/systems to address homelessness and the housing needs of persons experiencing housing crisis, including those with special needs

These targeted priorities fit with the County's intent to make the largest impact while streamlining the process for project implementation. However, proposed projects must identify a need or a problem which will be addressed relative to the target priorities identified. Historic preservation, road improvements, and sidewalk/curb projects are not likely to be considered as priority targets unless part of a major community revitalization project. The application must address the total scope of project improvements proposed and identify funding requested by year. Projects totaling less than \$50,000 will not be considered priority targets. Large projects requiring multiple years of funding that make a significant impact upon the community will be prioritized, as will projects that are shovel-ready. Please ensure all project budgets have projected figures that are accurate and current within the last 90 days.

Applications must meet the minimum threshold to be considered for funding including: application completeness, project eligibility, and project sustainability. Applicants will be required to complete a supplemental application form as determined by the project scope. Supplemental application forms are required for the following projects: Public Services, Housing Rehabilitation, Public Facility and Infrastructure Improvements, and Economic Development.

All projects or activities awarded funds that fail to complete the activity in a timely manner shall be subject to recapture of funds and/or contract termination. Timely is defined as one year with the exception of projects including construction which could allow up to two years to complete.



Priority rankings and assessments are subject to final approval at the discretion of the Bucks County Commissioners. Several factors will be considered when evaluating applications, including, but not limited to:

- Capacity – Addresses extent to which applicant has the organizational resources necessary to successfully implement proposed activities in a timely manner, consistent with program requirements and contractual agreements. Such resources include a staff of sufficient size, possessing knowledge and experience in the proposed activities. In cases where the applicant will utilize personnel not considered staff of the organization, the applicant may be asked to demonstrate timely and easy access to qualified experts and/or professionals. In cases where the applicant previously received funding, past experience will be evaluated in terms of the applicant’s ability to achieve measurable progress in implementing its most recent grant awards.
- Needs/Extent of the Problem – Refers to the extent to which proposed activities address a documented need in the community. Applicants should focus on demonstrating extent of the problem in the geographical area that will be targeted by the project or program. The need should be relevant to the intent of the proposed activities and documented using sound and reliable data wherever possible. Where firm statistical data is not available for the target area, other means of documenting need are acceptable. Wherever possible, applicants are required to link documentation of need to the needs and data identified in the County's Five-Year Consolidated Plan.
- Soundness of Approach – Addresses quality and appropriateness of the applicant’s proposed program. The exact criteria that will be considered in assessing this factor will vary by program.
- Leveraging Resources – Refers to the ability of applicants to secure resources beyond those provided by the specific program from which the applicant is seeking funds. Resources leveraged may include funding or in-kind contributions. Partners providing leveraged resources may include governmental entities, public or private nonprofit organizations, for-profit private organizations, individuals, or other entities willing to partner with applicant. This factor focuses on resources to be allocated to the specific activities being proposed by the applicant. Therefore, applicants should give special consideration to creating partnerships that are appropriate for designing and implementing the proposed activities, rather than simply including as many organizations as possible.
- Comprehensiveness and Coordination – Addresses whether or not the strategy proposed by the applicant is comprehensive and coordinated with related activities in the community. The purpose of this factor is to ensure that, wherever possible, applicants do not operate programs in isolation. Instead link the project to related activities and organizations to improve the overall effectiveness of all efforts being undertaken in that community.
- Project Schedule, Budget, Site Control, Zoning Clearances and Community Support – Addresses feasibility of the project and determines if the funding will be utilized within the project schedule. The CDBG Program requires the department to expend funds within a specific time schedule. Applicants should be clear in explaining when key milestones will be met. Please note that if the application is approved, the project budget becomes a binding part of the agreement between the applicant and the County, therefore the projected budget must be accurate and current within the last 90 days.

More comprehensive information may be required from applicants whose projects have been selected, such as agency information, maps, photos, property, and environmental information. Only applications that are complete and submitted on or before the due date will be considered for funding. **Completed applications must be submitted to the CED office no later than 4:00 P.M. on March 18, 2019.** Please direct all questions to 215-345-3845 or by email to cedhs@buckscounty.org. Please submit applications to:

County of Bucks
Office of Community & Economic Development
1260 Almshouse Road
Doylestown, PA 18901



CDBG Guide to Project Eligibility

All applications must that fall under an authorized category of basic eligibility. It is important to properly classify the activity and to provide adequate documentation of eligibility. Some of the basic eligible activities and regulations are outlined below. In order for an application to be considered for funding, a category for eligibility must be selected with a clear narrative explain how the proposed project is qualified. Applicants are strongly encouraged to refer to the CDBG Regulations defining the specific aspects of a project which would be considered as eligible.

These can be referenced at: <https://www.hudexchange.info/resources/documents/24-CFR-Part%20-570-CDBGs.pdf>

Basic Eligible Activities:

Eligible Housing Rehabilitation and Preservation Activities 570.202 Assistance to rehabilitate:

- Privately owned residential buildings and improvements;
- Low-income public housing and other publicly owned residential buildings and improvements;
- Manufactured housing, when considered part of a community's permanent housing stock.

Eligible Rehabilitation and Preservation Activities 570.202 Assistance to rehabilitate:

- Code enforcement in deteriorating or deteriorated areas where such enforcement, together with public or private improvements, rehabilitation, and services to be provided, may be expected to arrest the decline of such areas.
- Renovation of closed schools or other building for use as an eligible public facility or housing.
- Financial assistance through grants and loans to be provided for rehabilitation activities for buildings listed above.
- Improvements to the exterior of commercial or industrial building and the correction of code violations of buildings owned publicly and privately.

Historic Preservation 570.202(d) of sites or structures that are either listed on or determined to be eligible for the National Register of Historic Places, or designated as a State or local landmark or in a historic district by appropriate law or ordinance

Clearance and Remediation Activities 570.201(d) including removal of buildings and improvements, movement of structures to other sites and physical removal of environmental contaminants or treatment of such contaminants to render them harmless.

Acquisition/Disposition 570.201(a) of real property, except buildings for the general conduct of government and subject to certain limitations. Acquisition also includes rights-of-way and easements.

Public Services 570.201(e) (including labor, supplies and materials) such as those concerned with employment, crime prevention, child care, health care, education and job training, public safety, fair housing counseling, recreation senior citizens, homeless persons, drug abuse counseling and treatment, and energy conservation counseling and testing.

Public Facilities and Improvements 570.201(c) including construction, reconstruction, rehabilitation, removal of architectural barriers to accessibility, or installation of accessible improvements.

The CDBG program uses the terms "public facilities" and "public improvements" broadly to include all improvements and facilities that are either publicly owned, or owned by a nonprofit, and operated so as to be open to the general public. The regulations specify that facilities that are designed for use in providing shelter for persons having special needs are considered to be public facilities (and not permanent housing), including nursing homes, shelters for victims of domestic violence, shelters and transitional facilities/housing for the homeless, group homes for the developmentally disabled and thus are covered under this category of basic eligibility.

Site improvements made to property that is in public ownership are considered to be a "public improvement." However, this category *does not authorize expenditures for "buildings for the general conduct of government."*

Public Facilities and Improvements

Eligible Public Facility and Improvement	CDBG Conditions
Sewer and Water Facilities Streets and Sidewalks Curbs and Gutters Parks and Playgrounds Senior Citizen Centers Parking Lots or Garages Utility Lines Recreation Center	These projects may be undertaken on an interim basis in areas exhibiting objectively determinable signs of physical deterioration where it was determined that immediate action is necessary to arrest the deterioration and that permanent improvements will be carried out as practicable to repair: <ul style="list-style-type: none"> • Publicly owned utilities; and • The execution of special garbage, trash, and debris removal, including neighborhood cleanup campaigns, but not regular curbside collection of garbage or trash in an area
Police or Fire Station in which services to the public are actually provided (as opposed to administrative offices)	Fire protection equipment including fire trucks, fire fighters’ protective clothing, “jaws of life,” and other life-saving equipment are eligible for CDBG funding under Public Facilities and Improvements as this equipment is integral to the fire protection facility.
Aesthetic amenities on public land such as (trees, sculptures, pools of water and fountains and other works of art).	These include all improvements and facilities that are either publicly owned or that are traditionally provided by government, or owned by a non-profit, and operated so as to be open to the general public.
Library	Public facilities that serve the entire jurisdiction of the grantee, a main library for example, may qualify under the LMI benefit national objective only if the percentage of LMI persons in the entire jurisdiction is sufficiently high to meet the “area benefit” test.
Special Assessments	Special Assessments are used to recover the capital costs of a public improvement through a fee levied or a lien filed against a parcel of real estate either as, 1) a direct result of a benefit derived from the installation of a public improvement or 2) a one-time charge made as a condition of access to an improvement. Sewer tap-in fees are an example of a special assessment.
Privately Owned Utilities- 570.201 (I)	CDBG funds may be used to acquire, construct, reconstruct, rehabilitate, or install the distribution lines and facilities for privately owned utilities. A privately-owned utility refers to service that is publicly regulated and is provided through the use of physical distribution lines to private properties. Examples of eligible utilities are electricity, telephone, water, sewer, natural gas and cable television
Other	Bucks County is willing to consider other public facility projects not listed above. It is highly recommended that applicants contact Bucks County to discuss new projects ideas prior to submitting a grant application.



CDBG Guide to National Objective Compliance

The primary objective of the CDBG Program is the development of viable communities by the provision of decent housing, a suitable living environment, and expanding economic opportunities, principally for persons of low- and moderate-income (LMI). This is achieved by ensuring that each funded activity meets one of the three named national objectives: benefiting LMI persons; preventing or eliminating slums or blight; or meeting an urgent need. The following is a summary of information found in the U.S. Department of Housing and Urban Development’s CDBG Guide to National Objectives & Eligible Activities for Entitlement Communities regarding requirements in meeting the national objectives.

National Objective	Conditions for Eligibility	Examples
Benefiting low- and moderate-income persons: Area Benefit (LMA) 570.208(a)(1)	A facility or improvement will be used for a purpose that benefits all residents in a defined area primarily residential in which at least 51% are LMI households. Paying all or part of a special assessment on behalf of LMI Households qualifies under this objective.	The Installation of paved streets, sidewalks, curbs and gutters in a predominantly LMI household neighborhood. CDBG funds pay the assessment made to Low-Mod Income household homeowners when a new water/sewer system is installed in their neighborhood.
Benefiting low- and moderate-income persons: Limited Clientele (LMC) 570.208(a)(2)	The majority of public service activities qualify under this national objective. Services provided to a specific group of people who are comprised of at least 51% LMI households.	Home ownership counseling provided to a group of LMI individuals. Renovation or expansion of a food pantry
Benefiting low- and moderate-income persons: Housing (LMH) 570.208(a)(3)	The facility or improvement exclusively benefits housing to be occupied by LMI households.	A parking lot and landscaping are improved on the site of a rental property with 51% LMI households paying affordable rents.
Benefiting low- and moderate-income persons: Jobs (LMJ) 570.208(a)(4)	Public improvement is for an economic development project that creates or retains permanent jobs. In order for a CDBG funded economic development activity to qualify as an activity that benefits low and moderate income persons, at least 51% of the jobs created or retained (full time equivalent basis) will be held by or made available to low and moderate	A new water tower will enable factory expansion and owners to commit to hiring at least 51% of new permanent jobs to LMI persons.
Preventing or eliminating slums or blight: Area 570.208(b)(1)	Public improvements are within a designated blighted area and activity addresses conditions that contribute to blight.	An outdated fire hall is rehabilitated and equipment is updated to prevent further loss of life and property due to fires.
Preventing or eliminating slums or blight: Spot 570.208(b)(2)	Public improvements is outside designated blighted area and activity is limited to eliminate specific conditions of blight or decay.	Historic library building not located within a designated area is rehabilitated.
Urgent Needs 570.208(c)	Acquisition, construction, or reconstruction of a public facility that is designated to alleviate recent serious and imminent threat to public health and safety and no other funds are available.	A storm sewer system is reconstructed after a severe flood damaged it. All other funding sources are unavailable or exhausted.

Information on benefiting low- and moderate-income persons: Area Benefit (LMA)

An area benefit activity is an activity *which is available to benefit all the residents of an area that is primarily residential*. In Bucks County, in order to qualify as addressing the national objective of benefitting LMI persons on an area basis, the activity must meet the identified needs of LMI persons residing in that area where at least 38 percent of the residents (based on 2010 Census Data) are LMI. The benefits of this type of activity are available to all residents in the area regardless of income. Thus all residents in the defined service area must be considered in the calculation of LMI percentage.

For the most part, activities qualifying under the basic eligibility category of Public Facilities and Improvements provide a benefit to all the residents of an area and thus would be subject to meeting the criteria described here in order to meet the LMA national objective.

Typical area benefit activities include:

- Street and sidewalk improvements
- Water and sewer line rehabilitation
- Neighborhood and recreational facility improvements

Determining the Service Area

Accurately determining the area served by the activity is critical to meeting a national objective. Generally speaking, it is reasonable to assume that certain kinds of facilities serve only very small areas. For example, sidewalks and streetlights on a residential street, and tot-lots and small playgrounds would usually benefit only the residents of the immediately adjacent area. Conversely, a park containing multiple amenities or a parking area for residents not close enough to walk could not reasonably be designed to serve only the block group it resides within. An activity located near the boundary of a block group(s) would be expected to include the neighboring block group(s). Regardless of the infrastructure/facility, it will be necessary for the applicant to determine, and the County to support, the service area before CDBG assistance may be provided. The factors considered in making determination of the area served for these purposes are:

- Nature and location of the activity;
- Accessibility issues; and
- Availability of comparable activities.

Nature of Activity

In determining the boundaries of the area served by a facility, its size and how it is equipped need to be considered. For example, a park that is expected to serve an entire neighborhood cannot be so small or have so little equipment (number of swings, slides, etc.) that it would only be able to serve a handful of persons at any one time. Conversely, a park that contains three ball fields, or a ball field with grandstands that can accommodate hundreds of spectators, could not reasonably be said to be designed to serve a single neighborhood. The same comparison would apply to the case of assisting a small, two-lane street in a residential neighborhood versus that of assisting an arterial four-lane street that may pass through the neighborhood but is clearly used primarily by persons passing through from other areas.

Location of Activity

Where an activity is located will also affect its capacity to serve particular areas, especially when the location of a comparable activity is considered. A library, for example, cannot reasonably be claimed to benefit an area that does not include the area in which it is located. When a facility is located near the boundary of a particular neighborhood, its service area would be expected to include portions of the adjacent neighborhood as well as the one in which it is located.

Accessibility

The accessibility of the activity also needs to be considered in defining the area served. For example, if a river or an arterial road forms a geographic barrier that separates persons residing in an area in a way that precludes them from taking advantage of a facility that is otherwise nearby, that area should not be included in determining the area served. Other limits to accessibility may apply to particular activities. For example, the amount of fees to be charged, the time or duration that an activity would be available, access to transportation and parking, and the distance to be traveled can all constitute barriers to the ability of persons to benefit. Language barriers might also constitute an accessibility issue in a particular circumstance.

Comparable Activities

The nature, location, and accessibility of comparable facilities and services must also be considered in defining a service area. In most cases, the service area for one activity should not overlap with that of a comparable activity (e.g., two community centers, two clinics, or two neighborhood housing counseling services).