

**Notice of Funding Availability & Request for Proposals**  
**Program Year 46**  
**Year One of Five Year Plan**  
**(July 1, 2020 – June 30, 2021)**

**CITY OF NORWALK, CONNECTICUT**  
*The Norwalk Redevelopment Agency*

---






COMMUNITY DEVELOPMENT BLOCK GRANT APPLICATION

*Past applicants should note that the Redevelopment Agency has revised the process for submitting an application in order to streamline and simplify the process for all involved. Applicants are encouraged to avail themselves of technical assistance offered through the Norwalk Redevelopment Agency.*

**Norwalk Redevelopment Agency Contact Information:**

Lori Elyn Guttman, Director of Community Development Planning  
Norwalk Redevelopment Agency  
3 Belden Avenue, 2<sup>nd</sup> Floor  
Norwalk, CT 06850  
(203)854-7810 ext 46781  
[lguttman@norwalkct.org](mailto:lguttman@norwalkct.org)  
<http://www.norwalkct.org/1412/Community-Development-Block-Grant>

The English language version of this document is the official, legal, controlling document. If translation is needed please contact the number below.

-  Llame al (203) 854-7810 x46781 o visite nuestra oficina para solicitar un versión traducida de este documento.
-  Παρακαλούμε καλέστε (203) 854-7810 x46781 ή επισκεφθείτε το γραφείο μας για να ζητήσετε μεταφρασμένη έκδοση αυτού του εγγράφου.
-  Chiama lo (203) 854-7810 x46781 o visita i nostri uffici per richiedere una versione tradotta di questo documento.
-  Veuillez composer le (203) 854-7810 x46781 ou visitez notre bureau pour demander une version traduite de ce document.
-  Silvouplèrele (203) 854-7810 x46781 oswavizitebiwonoupoufèdemann yon vèsyondokimansa-akitradwi.

## INDEX

- APPLICATION SUBMISSION PROCESS ..... 4
- ANTICIPATED SCHEDULE OF PUBLIC MEETINGS AND HEARINGS..... 5
- CONSOLIDATED PLAN FUNDING CRITERIA AND PRIORITIES ..... 6
  - Funding Criteria..... 6
  - Consolidated Plan (ConPlan) Priority Needs and Goals..... 6
- SUMMARY OF QUALIFYING CRITERIA FOR CDBG FUNDING..... 7
  - Program Overview and National Objectives..... 7
  - Qualifying Criteria ..... 8
  - Eligible Subrecipients ..... 8
  - Eligible Activities ..... 9
  - Ineligible Activities ..... 9
  - Funding Restrictions and Targeting of Resources ..... 10
  - Eligible Income Limits ..... 10
  - Eligible Target Areas for Assistance ..... 11
  - Census Tract Map..... 11
  - Public Service Projects ..... 11
  - Housing Activities..... 12
  - Non-Housing Community Development and Public Facility Improvements ..... 12
  - Timely Expenditure of Funds ..... 13
  - Monitoring Requirements of Funded Organizations ..... 13
- EVALUATION CRITERIA..... 14
  - Conflict of Interest ..... 14
- RESOURCES AND GLOSSARY OF TERMS ..... 15

## Notice of Funding Availability and Request for Proposals

As administrator of the City of Norwalk's Community Development Block Grant (CDBG) program, the Norwalk Redevelopment Agency is pleased to release this Notice of Funding Availability (NOFA) for the upcoming CDBG program year (PY46), the first year of the five year plan, which commences on July 1, 2020 and ends on June 30, 2021. Proposals will be accepted from organizations providing assistance to low and moderate income households residing within the City of Norwalk that meet a Priority Need identified by the City's Consolidated Plan.

The full NOFA/RFP will be available for review on the City's website at <http://www.norwalkct.org/1412/Community-Development-Block-Grant> and available for viewing at the following locations: the Norwalk Redevelopment Agency, the Main and South Norwalk branches of the Norwalk Public Library, the South Norwalk Community Center and the main offices of the Norwalk Housing Authority. Persons needing language assistance are encouraged to contact the Norwalk Redevelopment Agency for assistance.

The City and Redevelopment Agency invite all interested parties to submit PY46 CDBG sub-award applications to the Redevelopment Agency **by 12:00 (noon) on Wednesday, January 22, 2020.**

The City of Norwalk's actual CDBG entitlement amount is not yet available and is subject to Congressional budget appropriation. The actual amount is anticipated to be announced in early 2020. All figures in the following chart are **estimates** and subject to change.

**PY46 City of Norwalk Community Development Block Grant (CDBG) Program**  
**Estimated Sources and Uses for Year Ending June 2021**

**Sources of Funds**

<b>PY46 Entitlement (estimated)</b>	<b>\$760,520.70</b>
<b>PY46 Program Income (estimated)</b>	<b>\$164,057.82</b>
Non-revolving CDBG Program Income at 6/30/19	\$ 16,265.04
Revolving Loan CDBG Program Income at 6/30/19	\$147,792.78

**Anticipated Total Funds Available for PY46 CDBG Grant Program \$924,578.52**

**Uses of Funds\* (estimated)**

\*Per HUD's statutory caps on use of CDBG funds for these activities

Maximum available for public service (15%)	\$116,518
Maximum available for planning and administration (20%)	\$184,916
Walk Bridge Business Mitigation Program	\$100,000
Available for uses other than public service and planning and administration	\$623,145
**Funding available to all other applicants for use in addressing priority needs of the City as identified in the ConPlan	\$167,952
Funds available to City Neighborhoods for use in addressing priority needs of the City as identified in the ConPlan	\$355,193

Minimum restricted to expenditure on LMI activities	\$647,205
Maximum available for slum/blight or urgent need activities	\$277,374

\*\*\$100,000 for the Walk Bridge Mitigation Program has been removed per the approval of the reservation of funds by the Norwalk Common Council in 2017

**Application Submission Process**

Interested applicants must complete and submit applications and required attachments through the WebGrants website at <http://norwalk.dullestech.net> **no later than 12:00pm (noon) on Wednesday, January 22, 2020.** Application instructions and a link to this website are available via the City's website (<http://www.norwalkct.org/1412/Community-Development-Block-Grant>). Organizations interested in submitting an application should read the NOFA and application instructions carefully and avail themselves of technical assistance offered through the Norwalk Redevelopment Agency. Language assistance is available by contacting the Redevelopment Agency.

## **Anticipated Schedule of Public Meetings and Hearings**

The following schedule is anticipated; however meetings may be rescheduled due to poor weather conditions. Applicants will be notified directly of any changes to the schedule and a notice will be placed on the Redevelopment Agency's website. All locations are accessible to persons with disabilities. Those needing to request an oral or sign language interpreter should contact the Redevelopment Agency at least 48 hours in advance of the meeting or hearing.

- **Wednesday, January 22, 2020 by 12noon** – Completed PY46 applications must be submitted through WebGrants to the Redevelopment Agency
- **February 6, 2020** – PY46 Applicants Present their applications to the Planning Committee
  - 6:30pm in City Hall (125 East Avenue, Norwalk), room A330
  - Brief presentations will occur during the public comment period of the regularly scheduled Planning Committee meeting.
- **March 5, 2020** – Planning Committee Recommends Projects / Programs for Funding
  - Recommended project / programs will be incorporated into the draft Annual Action Plan
- **March 23 – April 21, 2020** – 30-day Public Comment Period on Draft Annual Action Plan and Draft 2020-2024 Consolidated Plan
  - March 20 and March 23, 2019 – Notice of upcoming availability made via legal notice and email to applicant organizations
  - March 23, 2020 – Draft AAP is posted to Agency's website and distributed in hard copy to Main and South Norwalk branch libraries, Norwalk Housing Authority, South Norwalk Community Center and Norwalk Redevelopment Agency.
- **April 2, 2020** – Planning Committee holds a Public Hearing on Draft Annual Action Plan and Draft Consolidated Plan
  - 7:370pm in City Hall (125 East Avenue, Norwalk), room 231
- **May 7, 2020** – Planning Committee Advances the Draft Annual Action Plan and Draft Consolidated Plan to the Common Council for Approval (anticipated)
- **May 11, 2020** – Common Council Approves Mayoral Signing of Annual Action Plan for Submission to HUD (anticipated)
- **May 15, 2020** – PY46 Annual Action Plan and 2020-2024 Consolidated Plan are due to HUD
  - A final version of the document will be posted to the Agency's website in both English and Spanish
- **June 19, 2020** – PY46 Orientation for Sub-Grantees (anticipated)
  - Details will be made available to awarded organizations closer to the date.

## **Consolidated Plan Funding Criteria and Priorities**

### **Funding Criteria**

To promote efficacy and the impartial award of CDBG funds to subrecipients, the following criteria have been established.

- The proposed project / program is considered by HUD to be an eligible activity
- The proposed project / program addresses a HUD National Objective and has an identified CDBG Objective Measurement and CDBG Outcome Measurement
- The proposed project / program falls within the City's Priority Needs and Goals matrix as identified in the five-year Consolidated Plan
- The proposal identifies performance measures which are evaluated on specific outcomes
- The applicant organization has the capacity and willingness to comply with the monitoring requirements of the grant administrator
- The applicant organization employs professional staff to administer the grant and project
- The applicant organization or its staff members have experience in the proposed activity
- There is a proven impact for the proposed activity
- The applicant organization has the ability to carry out the project / program within the 12 month program year (July to June)

The City is committed to awarding grants to organizations which propose a high level of impact for the amount of funds awarded. This is analyzed via two methods:

- The amount of funding requested per proposed beneficiary (dollar per beneficiary)
- The matching funds made available by the applicant organization to support the proposed project / program. It is recommended that Public Service programs provide a \$2.00 to \$1.00 match while all other projects provide a \$1.00 to \$1.00 match.

Preference will be given for those projects / programs which:

- Request a minimum of \$20,000 for public service programs and \$50,000 in grant funds for all other projects
- Direct services towards one or more of the City's LMI census tracts
- Address a Consolidated Plan Priority Needs and/or Goal

### **Consolidated Plan (ConPlan) Priority Needs and Goals**

The City's ConPlan establishes the following Priority Needs for the 2020-2024 CDBG programs:

- Housing – Increase high quality and affordable housing opportunities
- Economic Development – Expand economic opportunities
- Public Facilities and Infrastructure – Modernize public facilities and infrastructure
- Public Services – Increase available social services

Each Priority Need has at least one Goal associated with it which is defined by one or more CDBG Matrix Codes (listed in parenthesis). Specific descriptions of each Goal Matrix Code are available in the document titled "Appendix A – Matrix Codes" available on the Redevelopment Agency's website. The 2020-2024 Consolidated Plan Priority Needs and Goals are as follows:

Priority Needs	Goals (Matrix Codes)	Goal Matrix Code Definition	Code
Increase High Quality and Affordable Housing Opportunities (Housing)	Residential Rehabilitation (14A, 14B, 14C, 14G, 14H) High Priority	Rehab: Single-unit residential	14A
		Rehab: Multi-unit residential	14B
		Rehab: Public housing modernization	14C
		Rehab: Acquisition	14G
		Rehab: Administration	14H
	Code enforcement (15)	Code enforcement (creating a program)	15
Expand Economic Opportunities (Econ. Dev'l)	Economic Development: Technical Assistance (18B) High Priority	Economic Development: Technical assistance	18B
Modernize Public Facilities and Infrastructure (Public Facilities and Infrastructure)	Public Facility Rehabilitation (03A, 03B, 03C, 03D, 03E, 03F, 03O, 03S) High Priority	Senior centers	03A
		Handicapped centers	03B
		Homeless facilities (not operating costs)	03C
		Youth centers	03D
		Neighborhood facilities	03E
		Parks and recreational facilities	03F
		Fire stations/equipment	03O
		Facilities for AIDS patients (not operating costs)	03S
	Public Infrastructure Modernization & Safety Improvements (03K, 03L) High Priority	Street improvements	03K
		Sidewalks	03L
Community Cleanups (04A, 05V) High Priority	Cleanup of contaminated sites	04A	
	Neighborhood cleanups	05V	
Increase Available Social Services (Public Services)	Basic Services (05A, 05D, 05L) High Priority	Senior services	05A
		Youth services	05D
		Child care services	05L
	Health & Mental Health Services (05F, 05G, 05N, 05O) High Priority	Substance abuse services	05F
		Services for battered and abused spouses	05G
		Services for abused and neglected children	05N
		Mental health services	05O
	Employment training (05H)	Employment training	05H
	Housing Services (03T, 05J, 05Q, 05R, 05T) High Priority	Operating costs of Homeless and HIV/AIDS patients programs	03T
		Fair housing activiites	05J
		Subsistence payments	05Q
		Security deposits	05T
		Housing counseling	05U

## Summary of Qualifying Criteria for CDBG Funding

### Program Overview and National Objectives

Funded under the Housing and Community Development Act (HCDA) of 1974 and as amended by the 1987 Act and Administered by U.S. Department of Housing and Urban Development (HUD), Community Development Block Grants (CDBG) are available to urban counties, entitlement cities (population of 50,000 or more) or small cities. The City of Norwalk is an entitlement city and receives an annual allocation of funds directly from HUD. The City has contracted with the Norwalk Redevelopment Agency to administer the CDBG grant program.

All CDBG-funded activities must meet one of the three National Objectives of the CDBG program:

- Benefit to Low- and Moderate-Income Residents: Area benefit activities (LMA), Limited clientele activities (LMC), Housing activities (LMH), Job creation/retention activities (LMJ)
- Prevention or Elimination of Slums or Blight: Area basis (SBA), Activity needed to complete urban renewal project (SBR), Spot basis (SBS)
- Urgent Need (URG): Meeting other community needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs; generally associated with disaster conditions

### **Qualifying Criteria**

In order to qualify for CDBG funding, all activities must principally benefit low and moderate income persons residing within the City of Norwalk. An activity will be considered to principally benefit low and moderate income (LMI) persons if it meets one of the following criteria:

- The activity has an income eligibility requirement that limits the benefits exclusively to LMI persons.
- The activity is designed to serve an area where at least 51% of the residents are LMI.
- The activity involves a facility which is designed for use by senior citizens, youth, persons with disabilities and other special needs populations. Presumed benefit populations include abused children, battered spouses, elderly persons, adults meeting the Bureau of the Census' Current Population Reports definition of "severely disabled," homeless persons, illiterate adults, persons living with AIDS and migrant farm workers.
- The activity has income eligibility restrictions to require that at least 70% of the users or beneficiaries are LMI.
- The activity is directed to the removal of architectural barriers, which restrict the mobility and accessibility of persons with disabilities.
- The activity is designed to create or retain permanent jobs for LMI persons.

Additionally, all qualified activities must address one of the proposed 2015-2019 ConPlan Priority Needs, as defined by the associated Goal(s).

### **Eligible Sub-recipients**

A sub-recipient is a public or private non-profit agency or organization receiving CDBG funds from a grantee (the City of Norwalk) or another sub-recipient to undertake eligible activities. Entities, including public and private for-profit organizations, providing assistance to microenterprises are considered subrecipients. Contractors are not considered subrecipients. Institutions of higher learning may be subrecipients if carrying out CDBG-eligible activities. There is no Federal requirement that an organization incorporate or operate as a nonprofit to obtain tax-exempt status under section 501(c)(3) in order to receive CDBG funds. Faith-based organizations are eligible for CDBG funding on an equal footing with any other organization; however CDBG funds may not be used to support inherently religious activities such as worship or religious instruction and must serve all eligible beneficiaries without regard to religion.

Before disbursing funds to any organization a written agreement must be executed and on file along with a statement of acceptance from the organization's Board of Directors.



## **Eligible Activities**

CDBG matrix codes for eligible activities are grouped by HUD into eight activity categories. Detailed information on the eligible activities within each of these categories is available on the Redevelopment Agency's website. The categories of eligible activities are:

- Acquisition, Disposition, Clearance, Relocation (of Real Property)
- Administration and Planning (including Fair Housing activities)
- Economic Development
- Housing
- Public Facilities and Infrastructure Improvements
- Public Services
- Repayment of Section 108 Loans
- Other

Each proposed project / program must address one of the 2020-2024 ConPlan Priority Needs via its associated Goal(s), as defined by the above CDBG matrix code.

A cash leveraging ratio of \$2.00 for each \$1.00 of CDBG resources sought for public service projects, and \$1.00 for each \$1.00 of CDBG resources sought for public facility, housing and economic development projects is expected to be detailed in the Application's budget form.

Public facility improvement or housing rehabilitation activities receiving CDBG funds must be "shovel-ready." Public service, economic development and other activities must be ready to move upon execution of their CDBG contract. Grantees having drawn less than 51% of their CDBG award by March 30 may not qualify for a contract extension.

CDBG awards are dispersed by the Redevelopment Agency on a reimbursement basis. Sub-recipients of these funds are required to submit evidence of expenses prior to receiving these reimbursements. Organizations which do not have the financial capacity to front the costs of their program until reimbursements are made (usually on a quarterly basis) are encouraged to partner with organizations that can assist with bridging this gap. Further, funding is released commensurate with the proportion of total promised beneficiaries served (a minimum of 51% of these beneficiaries, whether households or individuals, must be low and moderate income).

## **Ineligible Activities**

Generally ineligible uses of CDBG funds are:

- Equipment – The purchase of equipment with CDBG funds is generally ineligible. Equipment is defined by HUD (24 CFR part 85) as "tangible, nonexpendable, personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit."
- Operating and Maintenance Expenses – Costs associated with the repair, maintenance, or operation of public facilities and the maintenance of physical improvements are ineligible.
- Religious Structures – CDBG funds may not be used for the acquisition or physical improvement of buildings owned by religious entities and used by religious or other entities for religious purposes.
- Government Structures – CDBG funds may not be used for renovating buildings owned

by government and used to conduct legislative, judicial or administrative affairs of government (unless for the purposes of improving handicap accessibility in those buildings which are open to the public)

- New Construction – CDBG funds may not be used for constructing new housing units.
- Income Payments – CDBG funds may not be used for income payments (a series of subsistence-type payments to an individual or family for items such as food, clothing, housing or utilities)

**Funding Restrictions and Targeting of Resources**

Per HUD statutory caps on the usage of CDBG funds, funds may be used in the following manner:

- Public Service Programs – A maximum of 15% of the entitlement grant, 15% of the non-revolving program income and any funds available from the reprogramming of previous years’ public service programs shall be available to organizations seeking funding for public service programs
- Planning and Administration – A maximum of 20% of the entitlement grant and 20% of the total program income shall be available for community planning and administration of the CDBG program.
- Economic Development, Housing and Public Facilities – The amount remaining from the total funds available net of public services and planning and administration.
  - Applicants other than the Norwalk Redevelopment Agency – 43% of all economic development, housing and public facility funds available
  - Norwalk Redevelopment Agency – The Redevelopment Agency is tasked as the housing and community development entity for the City of Norwalk. As such, a minimum of 57% of funds available for economic development, housing and public facilities will be reserved to carry out the priority projects of the City by the Redevelopment Agency. Any realized program income will be added to the total funds available for the following program year.
  - Walk Bridge Business Mitigation Plan – The City of Norwalk is reserving \$100,000 to mitigate negative effects to businesses in the South Norwalk area as a result of the Walk Bridge project. The mitigation plan will help address the ConPlan priority need of economic development and matrix code 18A: Economic Development Assistance to For-Profits as well as business retention and low/moderate income job creation and retention.

**Eligible Income Limits**

The eligible income limits are updated annually by HUD and may vary at the beginning of the PY46 program year. LMI households are those earning less than 80% of the Area’s Median Income (AMI). At the time of this writing, the eligible income limits are as follows.

	1 Person	2 People	3 People	4 People	5 People	6 People	7 People	8 People
30%	\$30,300	\$34,650	\$38,950	\$43,300	\$46,750	\$50,250	\$53,700	\$57,150
50%	\$52,231	\$57,700	\$64,950	\$72,150	\$77,900	\$83,700	\$89,450	\$92,250
80%	\$80,800	\$92,350	\$103,900	\$115,450	\$124,700	\$133,900	\$143,150	\$152,400

The following groups of people are considered to be presumed beneficiaries and are not subject to income calculations, unless that information is available:

- Abused children
- Battered spouses
- Severely disabled adults
- Homeless persons
- Illiterate adults
- Persons with AIDS
- Migrant farm workers
- Elderly

**Eligible Target Areas for Assistance**

The City has 7 census tracts designed by HUD as “LMI”. Projects seeking to provide an area benefit may only provide services in one or more of these tracts.

Census Tract #	434	437	440	441	442	444	445
----------------	-----	-----	-----	-----	-----	-----	-----

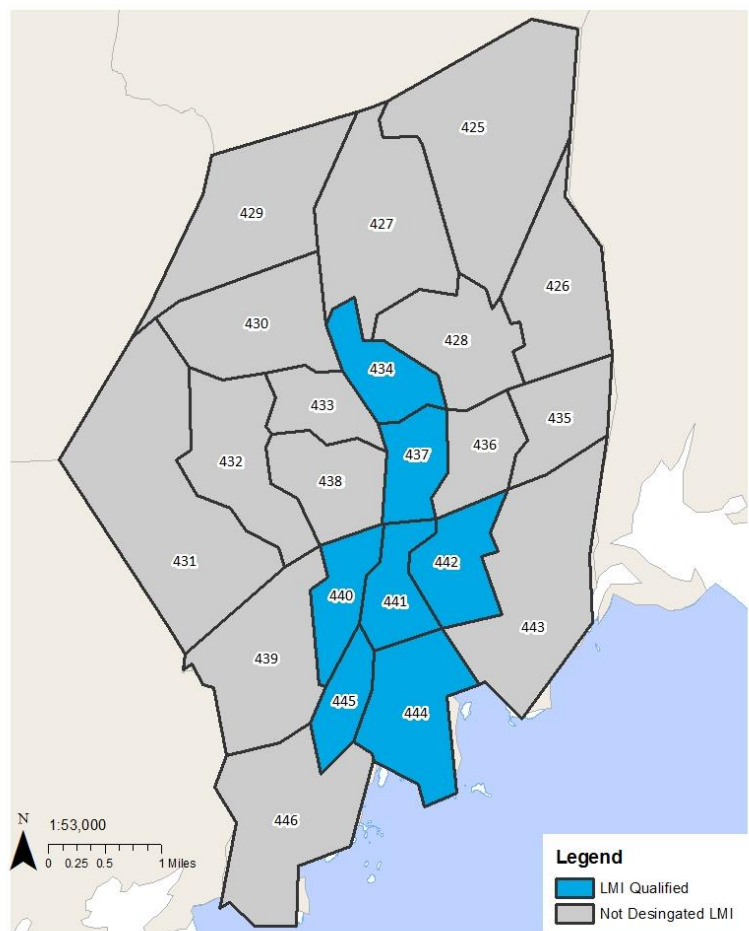
The “Choice Neighborhood” district is designated as a “Target Area” and is defined by Concord Street to the south, Dr. Martin Luther King, Jr. Drive to the west, Washington Street to the north and Water Street to the east.

**Census Tract Map**

The following map identifies the location of the City’s 7 LMI census tracts as well as the other census tracts. Activities may be provided to residents in other census tracts, but each applicant must qualify based on income eligibility.

*The 2018 Qualified Census Tracts (QCTs) are effective January 1, 2018. The 2018 designations use data from the 2010 Decennial census and three releases of 5-year tabulations from the American Community Survey (ACS): 2009-2013; 20010-2014; and 2011-2015.*

Census Tracts in Norwalk, CT



### **Public Service Projects**

Public Service projects are activities that provide a direct service to low and moderate income households. These activities (programs) are distinguished from other eligible activities by the requirement for LMI beneficiaries to make application for the service and be determined as income eligible through an income verification process. CDBG regulations limit the amount of funds the City can use to support Public Service activities to no more than 15% of its annual CDBG allocation to fund public service activities.

Public service activities include, but are not limited to, those concerned with employment, crime prevention, education, child care, health, and recreational needs. Public service projects must be new or propose a quantifiable increase in the level of service above which has been provided by or on behalf of the City during the previous program year.

### **Housing Activities**

Projects and activities funded with CDBG dollars must be planned in order to minimize the displacement of residents. In the event displacement occurs, the City will notify affected persons and provide assistance consistent with the provisions of the Federal Uniform Relocation Act and all other applicable government regulations. Cost of relocation will be the responsibility of the organization/sub-grantee.

Rehabilitation work will require the completion of a successful environmental review.

### **Non-Housing Community Development and Public Facility Improvements**

Activities that involve public facilities and improvements are eligible if they meet any one of the following criteria:

- Provide public facility improvements in an LMI census tract
- Provide services exclusively to a majority of low income and/or special needs populations.
- Provide facilities such as community and senior centers, recreation facilities, facilities for persons with disabilities and removal of architectural barriers where services are provided to a majority of low income persons.

A public facility is a structure that is owned or operated by a public or not-for-profit entity and used primarily as a site for the delivery of services to low- and moderate-income persons, persons with disabilities, or the elderly.

Projects involving construction may be subject to a payment of prevailing wages under the Davis-Bacon Act. Once the Act is triggered, there can be no waiver of this requirement by the City to reduce project costs. Certain federal language and requirements must be included in the competitive bidding package for the scope of work to be performed.

### **Timely Expenditure of Funds**

All organizations will be expected to expend 100% of CDBG funds granted during the program year. Organizations which have not yet secured full financing for a project are encouraged to submit an application in the following program year, when the project is “shovel ready” or ready to begin programming. “Shovel ready” means that all funding has been secured or will be available within 90 days and the project will be “underway.” Specific examples of underway (ready to encumber funds and expend them in a timely manner during the program year) include:

- Design phase completed and ready to begin a bid process
- Bidding completed using relevant prevailing wages for labor costs and construction can proceed when funds are encumbered
- Purchase offer has been accepted or can be made as soon as funds can be encumbered

Sub-grantees having drawn less than 51% of their award by March 30 of the program year will not qualify for a contract extension. All funds allocated to projects and programs that are not expended by June 30 of the program year will be reprogrammed in future grant programs.

CDBG awards are dispersed on a reimbursement basis; sub-recipients of these funds are required to submit evidence of expenses prior to receiving these reimbursements. Organizations which do not have the financial capacity to front the costs of their program until reimbursements are made are encouraged to partner with organizations that can assist with bridging this gap. Further, funding is released commensurate with the proportion of total promised beneficiaries served (a minimum of 51% of these beneficiaries, whether households or individuals, must be low and moderate income).

### **Monitoring Requirements of Funded Organizations**

Organizations receiving funding must comply with the following monitoring requirements:

- Timely submission of requests for reimbursement of eligible program costs (with all required attachments) and updated project report data that includes, but not limited to detailed progress made, goals and beneficiaries served via the online WebGrants grant management system
- Timely response to all communication regarding the CDBG grant from Redevelopment Agency staff

For the purpose of this grant “timely” means: by the designated due date (agreed upon in the project / program contract), or within three business days of Agency communication.

Organizations which are not timely may face cancellation of their project / program. At minimum, a meeting will be scheduled between the organization and the Agency in order to identify obstacles to compliance and prevent future issues.

Site visits / in-person monitoring will be scheduled for all organizations having not received CDBG funding in at least one of the previous three (3) program years (PY43, PY44 or PY45). Site visits will be scheduled with any other organizations by request. Monitoring visits will be scheduled

with organizations exhibiting any of the following warning signs:

- Repeated (more than once) incomplete data submission
- Repeated (more than once) lack of responsiveness
- Public or media questions regarding the project / program
- Repeated (more than once) missed deadlines
- Discrepancy between data submitted and progress made
- Inadequate accomplishments per funds spent

### **Evaluation Criteria**

Applications will be reviewed by Redevelopment Agency staff for completeness and eligibility following the “ConPlan funding criteria” detailed previously. Funding recommendations will be made by the Planning Committee of Norwalk’s Common Council, made available for public comment and ultimately approved by the City’s Common Council prior to submission to HUD for approval.

### **Conflict of Interest**

Pursuant to Title 24, §570.611 of the Code of Federal Regulations, no persons who exercise any functions or responsibilities with respect to HUD-funded activities, or who are in a position to participate in the decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a HUD-funded activity, or have a financial interest, including compensation, in any contract, subcontract or agreement with respect to a HUD-funded activity, or with respect to the proceeds of a HUD-funded activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year after. HUD defines “family ties” as the spouse, parent (including stepparent), child (including stepchild), brother, sister (including stepbrother or stepsister), grandparent, grandchild, and in-laws of a covered person, regardless of whether the relation is by blood, marriage or adoption.

Conflicts of Interest are identified in two ways: applicant identification in the application and self-disclosure by an elected official on the Public Disclosure Form.

Conflicts of Interest may jeopardize the organization’s ability to receive funding. Elected officials with a conflict of interest, but having received an “exception” from HUD (request for an exception must be submitted in advance and in writing to HUD), must withdraw from the decision making process with respect to the organization. Exceptions may be requested on the basis of seven factors:

- Significant cost benefit or essential expertise to the project
- Opportunity for open competitive bidding or negotiation
- Person affected is a member of a low or moderate income class of persons intended to be beneficiaries of the assisted activity (exception will permit such person to receive the same benefits as the class).
- Person affected has withdrawn from his or her functions or responsibilities or the decision making process with respect to the assisted activity.

- Interest or benefit was present before affected person was in the “conflicting” position.
- Undue hardship to recipient or person affected when weighed against public interest served by avoiding the prohibited conflict.
- Any other relevant considerations.

### Resources and Glossary of Terms

The City of Norwalk’s CDBG program documents and selected reference documents are available on the Redevelopment Agency’s website: <http://www.norwalkct.org/1412/Community-Development-Block-Grant>.

Interested organizations may find aspects of the following HUD training document helpful, particularly in detailing eligible activities. The training is available via HUD: <https://www.hudexchange.info/resource/19/basically-cdbg-training-guidebook-and-slides/>.

The following “Guide to National Objectives and Eligible Activities...” organizes eligibility requirements in an accessible and understandable format, provides explanatory materials and provides guidance on the factors to be considered in selecting among alternative categories of eligible and national objectives. <https://www.hudexchange.info/resource/89/community-development-block-grant-program-cdbg-guide-to-national-objectives-and-eligible-activities-for-entitlement-communities/>

Understanding the following definitions and criteria may ease the application process:

- **Affirmatively Furthering Fair Housing.** The Fair Housing Act specifies that HUD, and by extension, CDBG funding recipients, must administer programs and activities in a manner that affirmatively furthers Fair Housing. Proposals for housing related activities will need to identify how the project furthers Fair Housing.
- **Area Benefit.** Activities providing benefits that are available to all the residents of a particular area, at least 51% of whom are LMI. An activity that serves an area that is not primarily residential in character shall not qualify under this criterion. Norwalk’s low/moderate-income census tracts are 0434, 0437, 0440, 0441, 0442, 0444 and 0445.
- **Household.** A household is defined as all persons who occupy a single housing unit.
- **Income.** Income is defined as any form of financial support received by a person or household including wages, salaries, tips, and commissions; self-employment including proprietorships and partnerships; interest, dividends, net rental income or income from estates and trusts; Social Security, pension, or other forms of public assistance; veterans payments; unemployment compensation; and alimony or child support.
- **Low and moderate income.** Low- and moderate-income persons are defined as persons residing in households with total gross household income at or below the HUD-established moderate income (80% of the area’s median income) threshold for a household of that size. A minimum of 51% of the funding for any single CDBG-funded activity must serve low and moderate income beneficiaries.

- **Non-Discrimination.** Federal laws prohibit discrimination on the basis of race, color, religion, gender, age, national origin, disability and familial status for any program or project receiving federal assistance; this includes CDBG funding.
- **Objective Measurements.** HUD has implemented a Performance Outcome Measurement System which requires grantees and sub-grantees to identify an Objective Measurement.
  - **Creating Suitable Living Environments** relates to activities that are designed to benefit communities, families, or individuals by addressing issues in their living environment. This objective relates to activities that are intended to address a wide range of issues faced by low- and moderate-income persons, from physical problems with their environment, such as poor quality infrastructure, to social issues such as crime prevention, literacy, or elderly health services.
  - **Providing Decent Affordable Housing** focuses on housing activities whose purpose is to meet individual family or community housing needs. It does not include programs where housing is an element of a larger effort to make community-wide improvements, since such programs would be more appropriately reported under Suitable Living Environments.
  - **Creating Economic Opportunities** applies to activities related to economic development, commercial revitalization, or job creation.
- **Outcome Measurements.** HUD's Performance Outcome Measurement System also requires grantees and sub-grantees to identify an Outcome Measurement.
  - **Availability/Accessibility** applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the basics of daily living available and accessible to low- and moderate-income people where they live.
  - **Affordability** applies to activities that provide affordability in a variety of ways to low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care. Affordability is an appropriate objective whenever an activity is lowering the cost, improving the quality, or increasing the affordability of a product or service to benefit a low-income household.
  - **Sustainability** applies to activities that are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.
- **Rehabilitation.** Rehabilitation is defined as physical improvements to existing housing structures. A minimum of 51% of the units within a CDBG-funded rehabilitation project must be occupied by LMI persons. Occupants of rental units must not have rental payments (inclusive of utilities) that exceed 33% of the household's adjusted gross income.