

**CDBG NOFA Questions**  
**Affordable Housing Development and Non-Capital Improvement**  
December 2021

1. What is the term of the grant (both the deadline to expend the funds and the point after which compliance/contract ends?)
  - a. Deadline to expend funds is within 24 months after grant execution
  - b. Contract deadline depends on the project. The affordability period for most projects will be 15 to 20 years.
2. In terms of rehabilitation, can grants funds be used to lease a building, or only to purchase?
  - a. Grant funds cannot be used to lease a building for rehabilitation purposes.
3. Is affordable housing for seniors an eligible project for the new construction HOME funds, even though it is not one of the targeted "Special Needs Categories"?
  - a. For ARP eligibility, the persons must be homeless.
  - b. Not less than 70 percent of the total number of rental units assisted with HOME-ARP funds must be restricted for occupancy by households that are qualifying households at the time of the household's initial occupancy; and, 2. Not more than 30 percent of the total number of rental units assisted with HOME-ARP funds may be restricted to low-income households. These rental units do not have to be restricted for occupancy by qualifying households, however rental units restricted to low-income households are only permitted in projects that include HOME-ARP units for qualifying households. For permanent housing development, qualifying households will be prioritized based on the Lee County CoC's Coordinated Entry System. Housing that is developed through HOME funds must be rented to persons who are homeless, as defined in 24 CFR 91.5 (1), (2), or (3), and those who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault stalking or human trafficking as defined by HUD
4. The proposed project would increase the number of handicap accessible units at Palm City Gardens. There are 100 units for the very low income elderly at Palm City Garden apts, which was constructed in the 1980s with HUD funds. Over the years we have received SHIP funding to increase accessibility in the units. The number of elderly at Palm City Garden Apts receiving SSI or SSDI continues to increase. Currently nearly half the residents receive SSI or SSDI funds -- which are an indicator that the tenant is a person with special needs?

Would the description above fit in with your program?

- a. The rehabilitation of affordable housing units is eligible under CDBG funds. Because this property is located within the City of Fort Myers there may be additional considerations, as funds are intended to primarily benefit residences of unincorporated Lee County.
5. Could you elaborate on what it means that the proposed project adheres to evidence-based program models? Additionally, would you be able to clarify what design with broadband in mind means: I saw this in project scoring sheet -- the fourth criteria "Alignment with Community

Goals and Needs: The project adheres to evidence-based program models, and includes green building and energy efficiency features and is designed with broadband in mind"

- a. Preservation of affordable housing units is an eligible activity that does not necessary require adherence to an evidence-based program design, however the co-location of supportive services is considered a best practice if possible.

Some examples of evidence-based program models include the following:

- Critical Time Intervention: <https://evidencebasedprograms.org/programs/critical-time-intervention/>
- Rapid Re-Housing Programs: <https://www.countyhealthrankings.org/take-action-to-improvehealth/what-works-for-health/strategies/rapid-re-housing-programs>
- Housing First: <https://www.countyhealthrankings.org/take-action-to-improve-health/what-works-forhealth/strategies/housing-first>
- Returning Home: <https://crimesolutions.ojp.gov/ratedprograms/557>
- Assertive Community Treatment: <https://store.samhsa.gov/product/Assertive-Community-TreatmentACT-Evidence-Based-Practices-EBP-KIT/SMA08-4344>
- Permanent Supportive Housing: <https://store.samhsa.gov/sites/default/files/d7/priv/howtouseebkitspsh.pdf>

Ideally, improvements to housing facilities would include ensuring the building is properly equipped with Broadband service so residents have access to the internet. See guidance below:

- <https://files.hudexchange.info/resources/documents/CDBG-CV-Broadband-Quick-Guide.pdf>
- <https://www.hud.gov/connecthomeusa>

Improvements should also include improvements to the energy efficiency of the building to reduce costs to the property manager and tenants:

<https://www.hud.gov/energy>

## 6. What are the Land Use Restrictions for this funding?

- a. If referring to only CDBG funds, there is a five year standard from **the closeout of the grant** from which assistance was provided, as referenced in 24 CFR 570.505 :  
“**§ 570.505 Use of real property.** The standards described in this section apply to real property within the recipient's control which was acquired or improved in whole or in part using CDBG funds in excess of \$25,000. These standards shall apply from the date CDBG funds are first spent for the property until five years after closeout of an entitlement recipient's participation in the entitlement CDBG program or, with respect to other recipients, until five years after the closeout of the grant from which the assistance to the property was provided.”

If you are also referring to the HOME funding available in this NOFA, there are variable affordability periods depending on the activity type and funding amount. I recommend looking at resources on the HUD Exchange to understand which fits your project's needs best.

7. How much funding would you recommend applying for?
  - a. As a rule of thumb, I always advise people to apply for what your project requires, taking into consideration leveraged funds. The ranking committee can always opt to partially fund a project they like.