

**FY2006 APPLICATION CHECKLIST  
INDIAN COMMUNITY DEVELOPMENT BLOCK GRANT**

Applicants responding to the FY2006 ICDBG Notice of Funding Availability (NOFA) are encouraged to use this checklist to ensure they include all the proper forms and respond to the applicable thresholds and rating factors.

**Forms – Unless otherwise noted, these forms are required.**

1. \_\_\_\_\_ Application for Federal Assistance (SF-424).
  - The Catalog of Federal Domestic Assistance Number and the Funding Opportunity Number are located on the first page of the NOFA, under Overview Information.
  - There is a new SF-424 for FY2006 applications. Do not use previous versions since the new form requests information not included on previous forms.
  - In Section 19, check the box 19c. Program is not covered by E.O. 12372.
  
2. \_\_\_\_\_ Applicant/Recipient Disclosure/Update Report (HUD-2880). This form is required and must be submitted by all applicants to comply with Section 102 of the HUD Reform Act (Public Law 101-235). Please note the following:
  - If the amount of assistance requested from HUD, states, and units of local governments for the project in your application is less than \$200,000 (in total), you are only required to complete Part I, (1) and (2) of the form.
  - If the \$200,000 threshold is met or exceeded, Part II must list all other Federal, state or local funds requested (or to be provided to the project), regardless of the amount.
  - References in the form instructions to HUD housing projects do not apply to ICDBG housing activities. The applicant should check the “No” box under Part I (2) and sign where indicated.
  - Interested parties (as defined in the instructions to the form) must only be listed in Part III if their monetary interest in the project will exceed \$50,000 or 10 percent of the assistance requested, whichever is less. However, these dollar or percentage thresholds do not apply to consultants who have assisted in the preparation of the application. They must be listed regardless of the dollar amount of their contract with the applicant.
  - For Part V – Report on Sources and Uses of Funds – please note that if information on sources and uses of all funds has been provided elsewhere in

the application (such as the Cost Summary, HUD-4123), it is not necessary to repeat the information in Part V. You must, however, indicate on Form 2880, where the information is located in the application.

3. \_\_\_\_\_ Logic Model (HUD 96010). This form is not required but recommended for use when responding to Factors 1, 2 and 5.
4. \_\_\_\_\_ Survey on Ensuring Equal Opportunity for Applicants, (SF-424 Supplement).
5. \_\_\_\_\_ Concurring resolution from the Tribe(s) if a “Tribal Organization” is preparing the application for one or more eligible applicants. These resolutions are required from an otherwise eligible applicant if a tribal organization applies on its behalf. See ICDBG NOFA, Section III A.
6. \_\_\_\_\_ Community Development Statement that includes:
  - 6a. \_\_\_\_\_ Components addressing relevant threshold requirements and rating factors. Be specific in addressing all aspects of each relevant criterion and threshold. It is critical that these items be addressed as completely as possible since applicants may not submit supplemental information after the application is submitted. If there are questions regarding what project specific thresholds apply or what rating factors apply to your project, please contact the Area ONAP that serves your community for clarification prior to the submission of the application. See threshold and rating factor portion of this checklist.
  - 6b. \_\_\_\_\_ Cost Summary (HUD 4123). This form is required.
    - You must include cost information by project, including specific activity costs, administration, planning, and technical assistance (if any), other funds to be included in the project, and total HUD share. Please make sure that detailed cost estimates provided in the application component that provides the description of the project are accurately reflected in this Cost Summary.
    - An estimate of indirect costs may be included on the Cost Summary, but only if the indirect cost negotiation agreement is submitted with the application. Since the cost of an OMB Circular A-133 audit is an indirect cost item, if an amount is entered on the cost summary for indirect cost, a separate amount for audit should not be included. As indicated above, the total of administrative costs (direct and indirect) and planning costs cannot exceed 20% of the total grant award. In addition, the amount provided for technical assistance activities cannot exceed ten percent of the grant award.
  - 6c. \_\_\_\_\_ Implementation Schedule, (HUD-4125). This form is required.
    - This component should demonstrate that the project can be completed in a timely manner. Note that a project is defined as the item proposed for funding,

e.g., the construction of a community building. In addition, for each project (except planning and technical assistance), there will be at least three component activities: 1) preparation and completion of an environmental review; 2) construction (or rehabilitation) activities; and 3) project administration. Each of these component activities will have milestones that will be projected and tracked. If funds have been requested for technical assistance or a planning project, these activities should be treated as separate projects.

7. \_\_\_\_\_ A map that shows the location of the project, if applicable.
  - For most types of projects, a map that identifies the location of the proposed project and its service area will aid in the review of your application.
8. \_\_\_\_\_ Displacement or temporary relocation information, if applicable.
  - If the proposed project will result in displacement or temporary relocation, you must submit a statement that identifies: 1) the number of persons (families, individuals, businesses and nonprofit organizations) occupying the property on the date of the submission; 2) the number to be displaced or temporarily relocated; 3) the estimated cost of the relocation payments and other services; 4) the source of funds for the relocation; and 5) the organization that will carry out the relocation activities. ICDBG funds may be used to pay for eligible costs related to temporary relocation or displacement (see § 1003.602 for a description of grantee responsibilities).
9. \_\_\_\_\_ Evidence of public disclosure (§1003.606, Conflict of Interest), if applicable. This is a required application component for housing rehabilitation or new housing construction if the proposed recipient of such assistance is a covered person as defined in §1003.606 (c).
10. \_\_\_\_\_ Survey and demographic data statement, if applicable. (see attached sample)
  - The primary objective of the ICDBG program is that not less than 70 percent of the funds of each single purpose grant must be used for activities that benefit low- and moderate-income persons. One way to meet the objective is to demonstrate that at least 51 percent of the persons who will benefit from the proposed project are of low- or moderate-income status. HUD will use the best available demographic data to determine compliance with the 51 percent requirement. Applicants can rely on published data or conduct their own survey if they believe that generally published data is substantially inaccurate or incomplete. Sometimes the applicant has no choice but to submit a survey. If this is the case, you must state in your application that the survey and demographic data is true and correct to the best of your knowledge. To do this, you may submit a signed copy of the sample Survey and Demographic Data Statement attached below, or you may submit an equivalent statement. You

may contact the Area ONAP that serves your community for low- and moderate-income limits by household size for your area.

- Identified below are common situations where you may want to use published data or when you might want to generate your own data. If you believe that your project does not fit one of these situations, please contact the Area ONAP that serves your community.
  - Use of Published Data. You may want to use already published data when the benefits accrued to your community from your project are area-wide. Area-wide activities are those such as a community center that would serve the entire village or reservation. Census Bureau data has been used by some applicants to determine the percentage of low- and moderate-income persons by geographic area. The Area ONAP that serves your community may be able to provide this information for your area.
  - Applicant Generated Data. There are circumstances under which an applicant **MUST** prepare and submit demographic data to meet the low- and moderate-income person benefit requirements. These cases include:
    - a. For activities with area-wide benefits, if the service area is one that is listed as having less than 51 percent low- and moderate-income persons, but the applicant feels that the published data is inaccurate, other demographic data can be submitted for review. If the reliability of this information can be verified, HUD will use it. In addition, there will often be situations in which census data is not available for the service area of an area-wide benefit activity.
    - b. For activities benefiting a small, discrete area of the community (such as a water/sewer extension), information must be provided to establish that at least 51 percent of the persons to be served are of low- and moderate-income status.
    - c. For housing rehabilitation projects, all single-family units to be rehabilitated must be occupied by low- or moderate-income households.
    - d. For new housing construction projects, all proposed beneficiary households must be of low- or moderate-income status.
- HUD will review and accept demographic data provided by an applicant, if it is determined that the generally available, published data are substantially inaccurate or incomplete, the data provided has been collected systematically, and, to the greatest extent feasible, the data is independently verifiable. If HUD does not accept the data provided, the best available data will be used.

- There are two special cases where the 70 percent objective can be demonstrated in alternative ways than listed above. The first case involves Economic Development projects. The 51 percent low- or moderate-income benefit requirement can be demonstrated in one of two ways:
  - You may determine how many of the total number of jobs being created or retained will be available to or are held by low- and moderate-income persons. Availability is determined by the type and degree of skills required to qualify for the jobs created, as well as actions to be taken to insure that low- and moderate-income persons receive first consideration for the jobs.
  - If the purpose of the project is to provide goods or services to an area in which at least 51 percent of the resident households are of low- or moderate-income status, the income characteristics of the service area must be documented as indicated above.
- The second case involves groups presumed to be principally of low- or moderate-income status. Certain groups are presumed by HUD to be composed principally but not entirely of low- or moderate-income persons (see §1003.208(b)(1)(i)). These groups are abused children, battered spouses, the elderly, handicapped persons, homeless persons, illiterate persons, and migrant farm workers. Proposed projects that would exclusively serve one of these groups automatically demonstrate the 51 percent low- or moderate-income benefit requirement.

The presumption of benefit will not affect point award under the “Need/Extent of the Problem” rating factor for public facilities and improvements and economic development. The award of points under these factors will be based on the provision in the application of beneficiary income information by household size.

11. \_\_\_\_\_ You are our Client, Grant Applicant Survey, (HUD-2994-A). This form is optional.
12. \_\_\_\_\_ Acknowledgement of Application Receipt, (HUD-2993). This form is required only for applicants who receive a waiver and submit a paper application. Applicants complete the top section of the form. Area ONAPs complete the bottom section.

**Thresholds and Other Required Submissions.** Applicants are cautioned to respond in full to any of the following thresholds or submissions that are applicable. You must address all parts of a threshold or your application may be disqualified. You must submit the following information for the type of project you are requesting:

Rehabilitation Projects

- \_\_\_\_ You must demonstrate that all households that will receive assistance under your rehabilitation project are of low- and moderate-income status.
- \_\_\_\_ Estimated rehabilitation costs (hard costs) per unit cannot exceed the Housing Rehabilitation Cost Limits listed in the ICDBG NOFA, Section III. C. 2. b.
- \_\_\_\_ You must have adopted rehabilitation standards and rehabilitation policies in accordance with tribal law or practice before you submit the application (you do not have to submit the policies with your application – only evidence to show they were adopted).
- \_\_\_\_ You must provide a statement in your application that project funds will be used to rehabilitate HUD-assisted houses only when the homebuyer’s payments are current or the homebuyer is current in a repayment agreement except in emergency situations. Exceptions must be approved by the Area ONAP Administrator on a case-by-case basis. For purposes of meeting this threshold, HUD-assisted houses are houses that are owned and managed by the tribe or tribally designated housing entity (including Mutual Help Homeownership units).

Land Acquisition to Support New Housing Projects

- \_\_\_\_ You must provide evidence of a financial commitment and an ability to construct at least 25 percent of the housing units on the land proposed for acquisition. The evidence must consist of one or more of the following:
  - a firm or conditional commitment to construct (or to finance the construction of) the units;
  - documentation that an approvable application for the construction of these units has been submitted to a funding source or entity; or
  - documentation that these units are specifically identified in the Indian Housing Plan (IHP) (One-year Financial Resources narrative; Table 2, Financial Resources, Part I., Line 1E; and Table 2, Financial Resources, Part II) submitted by or on behalf of the applicant as an affordable housing resource with a commensurate commitment of Indian Housing Block Grant (IHBG) resources. If the IHP for the IHBG program that coincides with the implementation of the ICDBG proposed project has not been submitted, you

must provide an assurance that the IHP will specifically reference the proposed project. The IHP submission must occur within three years from the date the land is acquired and ready for development.

### Health Care Facilities

\_\_\_\_\_ For facilities that will provide health care services funded by the Indian Health Service (IHS), you must provide an assurance that the facility meets all applicable IHS facility requirements. Tribes that have established other facility standards must provide an assurance that these standards at least compare to nationally accepted minimum standards.

### New Housing Construction

\_\_\_\_\_ New housing construction can only be implemented by a Community Based Development Organization (CBDO). You must provide documentation with your application that establishes that the entity implementing your new housing construction project qualifies as a CBDO, in accordance with 24 CFR 1003.204 (c).

\_\_\_\_\_ You must have a current tribal resolution (in effect) adopting and identifying construction standards.

\_\_\_\_\_ In accordance with §1003.302, you must also include in your application documentation supporting the following:

- all households to be assisted under a new housing construction project will be of low- or moderate-income status;
- no other housing is available in the immediate reservation area that is suitable for the households to be assisted;
- no other sources, including IHBG funds, can meet the needs of the household(s) to be served; and
- rehabilitation of the unit(s) occupied by the household(s) to be assisted is not economically feasible, or the household(s) to be housed is/are currently in an overcrowded house (more than one household per house), or the household(s) to be assisted has/have no current residence.

### Economic Development Projects

\_\_\_\_\_ Applicants must provide a financial analysis, in accordance with §1003.302. The analysis must demonstrate that:

- the project is financially feasible and has a reasonable chance of success;

- the public benefit is commensurate with the ICDBG assistance requested. The more funds you request, the greater the public benefit you must demonstrate;
- reasonable financial support will be committed (to the extent practicable) from non-federal sources prior to disbursement of federal funds;
- any grant amount provided will not substantially reduce the amount of non-federal financial support for the activity;
- not more than a reasonable rate of return on investment is provided to the owner; and
- grant funds used for the project will be disbursed on a pro-rata basis with amounts from other sources.

**Other information or criteria that may impact the eligibility of an application**

\_\_\_\_\_ Any applicant who has an outstanding ICDBG obligation to HUD that is in arrears, or one that has not agreed to a repayment schedule, will be disqualified from the competition.

\_\_\_\_\_ DUNS Number. All applicants must include a Dun and Bradstreet Data Universal Numbering System (DUNS) Number in its application. See General Section, Section III. C. 2.

\_\_\_\_\_ Code of Conduct. All applicants must submit a Code of Conduct and describe the methods it will use to ensure that all officers, employees, and agents of its organization are aware of its code of conduct. Applicants who submitted a Code of Conduct with their FY2004 or FY2005 application will not be required to submit another copy if the applicant is listed on HUD's Web site at <http://www.hud.gov/offices/adm/grants/codeofconduct/cconduct.cfm>, and if the information has not been revised. See General Section, Section III. C. 2.

\_\_\_\_\_ Delinquent Federal Debt and Name Check Reviews. See General Section, Section III, C. 2.

- All applicants must indicate on the SF-424 whether they have a delinquent Federal debt. HUD is required to verify the status of all delinquent Federal debts prior to award.
- All applicants are subject to a name check review prior to award.

This list does not include all the requirements imposed by HUD. Please carefully review the General Section and the ICDBG NOFA to ensure that you are aware of all the requirements that will apply to the grant, if awarded.



**Rating Factors.** Applicants are encouraged to read carefully each rating factor to ensure that all required documentation is addressed fully. If you are modifying a prior year's unfunded application, be sure to read the rating factor language again since rating factor language and requirements often change from year to year. If you submit the same information submitted in prior years, it may not meet the rating factor requirements for FY2006. Look at the rating factor language for the following key words:

- Adopt – If a threshold or rating factor includes language that requests that you “adopt” policies, this means you must approve the action through a formal resolution (or other legal equivalent). A copy of the approved resolution must accompany the application, if requested. Points cannot be awarded for “draft” or resolutions waiting for approval.
- Assure – If the NOFA language asks the applicant to “assure” or “provide assurance”, the applicant must provide a written statement of commitment to comply with the specified NOFA requirement.
- Document – If the threshold or rating factor language asks the applicant to “submit documentation” or “document”, the applicant must provide supporting information or data that addresses the item.
- Outputs – Rating factor 5 asks for measurable outcomes and “outputs”. Outputs are the direct products of a program's activities, and should be clear enough to allow HUD to monitor and assess the proposed project, if funded. Outputs are usually measured in terms of the volume of work accomplished.
- Outcomes – Some of the rating factors may ask you to identify “outcomes”. Outcomes are the ultimate impact you hope to achieve with the proposed project. It should be quantifiable measures or indicators and identified in terms of the change in the community, lives, economic status, etc.

## SAMPLE SURVEY AND DEMOGRAPHIC DATA STATEMENT

Applicant: \_\_\_\_\_

Project:\* \_\_\_\_\_

The following demographic data is submitted for purposes of evaluating our application for the Indian Community Development Block Grant Program. By submitting this information with our application, we state we are in compliance with all of the following:

- ❖ Generally available, published data are substantially inaccurate or incomplete.
- ❖ Data provided have been collected systematically and are statistically reliable.
- ❖ Data provided are, to the greatest extent feasible, independently verifiable and differentiate between reservation and BIA service area populations, when applicable.

In accordance with Section IV.B. of the Program NOFA, we have also submitted the following:

- ❖ Total number of persons benefiting from your proposed project.

*(Include both native and non-native persons served)*

- ❖ Number of persons benefiting who are low- and moderate-income.
- ❖ A sample copy of a completed survey form (see attachment).
- ❖ An explanation of the methods used to collect the data (see attachment).
- ❖ A listing of incomes by household (see attachment).

\_\_\_\_\_  
(President) (Chairperson) (Title-Other)

\_\_\_\_\_  
(Secretary) (Clerk)

\* A separate survey and demographic data statement (or its equivalent) must be submitted for each project that includes applicant generated data unless the service area is the same for each of the different projects. In such instances, a separate statement need not be submitted.

