Promise Zones

Responses to Questions on Third Round Selection Process Received During Public Comment Period

November24, 2015

RURAL/TRIBAL

1. Can an applicant apply as a Rural Promise Zone and include tribal populations? Or apply as a Tribal

Promise Zone and include rural communities?

A Rural Promise Zone applicant can include some tribal populations and a Tribal Promise Zone applicant can include some rural communities (Ex: Choctaw Nation). An applicant can only submit one application and the application can only be submitted in one category. The application should provide data that is most representational for the populations. The applicant can consider providing additional data for the rural communities and data for the tribe separately, describing how partnership/coordination will occur, and how partnership/coordination may fulfill the goals of the Promise Zone. The applicant should consider population demographics as it is not advisable to apply as a Rural Promise Zone with a dominant Tribal population or a Tribal Promise Zone with a dominant non-Tribal population.

2. How does the selection process account for geographic and social isolation?

USDA has acknowledged that geographic isolation is an important consideration and should be included in Section IV- Part 1: Needs and Assets Assessment. The total points for this section have been increased from 10 to 15 points total. This section identifies issues associated with geographic and social isolation, including but not limited to: lack of proximity to interstate highways, limited natural resource base, and proximity to an important tourist destination (e.g. national park, forest or monument).

3. What are the population minimums and maximums for Tribal Applicants?

The rural population minimum is 10,000, and no more than 200,000 residents for rural and tribal. Tribal Promise Zone applicants, however, are exempt from the 10,000 minimum population eligibility criteria.

If a Tribe has been successfully designated as a Promise Zone, and they are applying for funding from another federal program, the Tribe must comply with the eligibility requirements of the federal

Note: Topics that were not raised by commenters during the public comment period are marked with *. HUD believes that it will be helpful for applicants to have some general information included in this Questions and Answers document. Notwithstanding information contained herein, the Application Guide is the controlling document for the Third round Promise Zone selection process.

1	program to which they are applying. For instance, USDA's Rural Development programs have
2	varying definitions of rural, and rural in character requirements, as mandated by each program's
3	statutory authority and regulation.
4 5	4. What is the page limit on "additional materials" for rural/tribal applicants?
6	For rural/tribal applicants, the "Additional Materials" page limit has decreased from 35 to 20. Letters
7	of support will not be counted towards the total. Please see the Rural/Tribal Promise Zone
8	Application Guide for details. Urban application page limits remain unchanged, as detailed in the
9	Urban Promise Zone Application Guide.
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11	5. What if data is unavailable for crime in our proposed Rural/Tribal Promise Zone? Are narratives
12	accepted?
13	The selection criteria request a narrative describing the nature and scope of crime in the proposed
14	Promise Zone. Data are not required; however, data are still encouraged where available.
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16	6. Is there a page limit to the documentation/letters required to demonstrate commitment from my
17	unit of local government or Tribe?
18	Letters or documentation is required to demonstrate commitment from a Unit of General Local
19	Government (UGLG) or Tribe. For rural/tribal applicants, the additional materials page limit has
20	decreased from 35 to 20 pages. Letters of support will not be counted towards the total.
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22	7. Are there any Rural/Tribal changes from round 2? Where can they be found?
23	All changes from Bound 2 are identified on the first page of the Bural/Tribal application guide
24 25	All changes from Round 2 are identified on the first page of the Rural/Tribal application guide.
26	<u>OVERVIEW</u>
27 28	8. What are Promise Zones and what do they aim to achieve?*
29	Promise Zones are high poverty communities where the federal government will partner with and
30	invest in high-poverty urban, rural, and tribal communities to create jobs, increase economic
31	activity, improve educational opportunities, leverage private investment, and reduce violent crime.
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33 34	9. How many designations will be made in this final round of designations?*
35	HUD intends to designate five more urban communities as Promise Zones, for a total of 14. Six rural
36	and tribal Promise Zones will complete the total of 20 designations. A total of 20 Promise Zone
37	designations will be made by the end of calendar year 2016. HUD will coordinate urban Promise
38	Zone efforts and activities. USDA will coordinate rural and tribal Promise Zone efforts and activities.
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On January 9, 2014, President Obama announced the first urban, rural, and tribal Promise Zones in a

Philadelphia (West Philadelphia), Los Angeles (Neighborhoods of Pico Union, Westlake, Koreatown,

ceremony at the White House. They are located in: San Antonio (Eastside Neighborhood),

10. What communities are designated Promise Zones?*

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1	Hollywood, and East Hollywood), Southeastern Kentucky (Kentucky Highlands), and the Choctaw
2	Nation of Oklahoma.
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4	On April 28, 2015, eight more Promise Zones were designated as part of the second round Promise

On April 28, 2015, eight more Promise Zones were designated as part of the second round Promise Zone selection process, which are located in: Camden, New Jersey; Hartford Connecticut; Indianapolis, Indiana; Minneapolis, Minnesota; Sacramento, California; St. Louis, Missouri; South Carolina Low Country; and Pine Ridge Indian Reservation of the Oglala Sioux Tribe, South Dakota.

11. How many public comments did HUD receive regarding the proposed selection process and criteria for the third round?*

 The public comment period closed on September 28, 2015. HUD received 21 public comments. Comments were submitted by members of Congress, mayors, nonprofit organizations and the general public. Responses to public comments are available at: https://www.hud.gov/promisezones/.

12. Can a new applicant view the winning applications of the five previous Promise Zone designees?*

There are designee fact sheets that provide summaries of each designees' partners and strategies. Applications will not be shared or posted.

BENEFITS

13. How long will Promise Zones designations last?*

The Promise Zone designation will have a term of ten years and may be extended as necessary to capture the full term of availability of the Promise Zone tax incentives, if enacted by Congress.

14. What benefits do Promise Zones receive? *

The Promise Zones designation commits the Federal government to an intensive partnership with local leaders who are addressing multiple community revitalization challenges in a collaborative way and have demonstrated a commitment to invest in what works and make themselves accountable for clear goals and results. Promise Zone Designees will receive:

- Opportunity to engage Five AmeriCorps Vista members in the Promise Zone
- A federal liaison assigned to assist with navigating federal programs
- Preferences for certain competitive federal programs and technical assistance from participating agencies.
- Promise Zone tax incentives if enacted by Congress.

The specific benefits made available to Promise Zones will vary from year to year, and sometimes more often than annually, due to changes in an agency's policies and changes in appropriations and authorizations for relevant programs. All assistance provided to Promise Zones is subject to applicable regulations, statutes, and changes in Federal agency policies, appropriations, and authorizations for relevant programs.

15. Could you provide a list of the agencies and programs that are affiliated with the Promise Zones initiative? Is there funding associated with becoming a Promise Zone?*

- 1 Promise Zones will not receive grant funding. The Promise Zone designation creates an intensive
- 2 partnership among the Federal government and local leaders who are investing in what works to
- 3 address multiple community revitalization challenges in a collaborative way, and have demonstrated
- 4 accountability to clear goals and a commitment to results. Subject to the limitations described below,
- 5 Promise Zone Designees will receive:
 - Opportunity to engage Five AmeriCorps VISTA members in the Promise Zone
 - A federal liaison assigned to assist with navigating federal programs.
 - Preferences for certain competitive federal programs and technical assistance from participating agencies.
 - Promise Zone tax incentives if enacted by Congress.

Altogether, this package of assistance will help local leaders accelerate efforts to revitalize their communities. The Promise Zone designation will be for a term of 10 years, and may be extended as necessary to capture the full term of availability of the Promise Zones tax incentives, if enacted by Congress. During this term, the specific benefits made available to Promise Zones will vary from year to year, and sometimes more often than annually, due to changes in an agency's policies and changes in appropriations and authorizations for relevant programs. All assistance provided to Promise Zones is subject to applicable regulations, statutes, and changes in Federal agency policies, appropriations, and authorizations for relevant programs, including compliance with federal civil rights requirements. Subject to these limitations, the Promise Zone designation commits the Federal government to partner with local leaders who are addressing multiple community revitalization.

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The list of programs by Department affiliated with the Promise Zones initiative in FY 2015 includes:

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- Department of Agriculture: Community Facilities Direct Loan and Grant Program; Community
 Food Projects Competitive Grants Program; Farm To School Grants; Farmers Market Promotion
 Program; Food Distribution Program on Indian Reservations Nutrition Education Grant; Housing
 Preservation Grants; Local Food Promotion Program; Rural Community Development Initiative;
 Self-Help Section 523 Technical Assistance Grants; SNAP Process and Technology Grants
- **Department of Commerce**: Economic Development Assistance Program
- **Department of Education**: Charter Schools Program Replication and Expansion Grant; native Youth Community Projects; Performance Partnership
- Department of Health and Human Services: Assets for Independence; Community Economic Development Program; Community Economic Development Program – Healthy Food Financing Initiative Program; Community Services Block Grants; Health Centers Program; Teen Pregnancy Prevention Program
- Department of Housing and Urban Development: Choice Neighborhoods Implementation Grant; Choice Neighborhoods Planning Grant; Community Development Block Grant (ICDBG) Program for Indian Tribes and Alaska Native Villages
- Department of Justice: Byrne Criminal Justice Innovation Program; COPS Hiring Program
- **Department of Labor**: Face Forward Youth; Training to Work; YouthBuild
- Corporation for National and Community Service: AmeriCorps VISTA; Operation AmeriCorps
- Environmental Protection Agency: Local Food Local Places
- National Endowment for the Arts: Our Town
- Small Business Administration: Clusters Initiative; HUBZone; Office of Entrepreneurship
 Education; Office of Native American Affairs; Program for Investment in Micro-Entrepreneurs;
 Women's Business Centers
 - **U.S. Department of the Treasury**: New Markets Tax Credit Program

Please note that funding opportunities are open to all eligible communities. More information on each opportunity can be found at agency websites and www.grants.gov.

16. How would the proposed Promise Zones tax credits work? *

If Congress enacts the Obama Administration's Promise Zones tax incentive proposal, private businesses will receive tax incentives for employing and investing in Promise Zones, thereby attracting additional private investments. The tax incentives would be available to businesses employing Promise Zone residents or investing in a geographic area encompassing the Promise Zones as described in the Administration's FY15 revenue proposals

12 (http://www.treasury.gov/resource-center/tax-policy/Documents/General-Explanations-

FY2015.pdf). The maximum population of the area in which a Promise Zones tax incentive can be claimed is two hundred thousand. Under the Administration's proposal, the Promise Zones tax incentives will remain available to businesses for ten years

 17. Is the lead applicant the only entity that receives the benefits of Promise Zones designation, such as technical assistance and future application preference points to an array of grant programs?

Partners actively working in support of the strategic plan for which the Promise Zones was competitively selected are eligible to receive Promise Zone benefits. To qualify for this benefit, the lead organization of the Promise Zones will need to work with partners to provide documentation certifying involvement with the Promise Zones. Funding announcements and other information regarding federal benefits targeted to Promise Zones will provide more specific instructions regarding the documentation required to indicate that a partner has been certified by the lead organization (e.g., a letter of support or partnership agreement).

18. Will there be a Promise Zones finalist designation in this round? What benefits do finalists receive? *

The participating federal agencies may also choose to name some applicants as "Promise Zones Finalists" as a result of this selection process. The purpose of selecting Promise Zones Finalists will be to recognize communities whose applications reflect high-quality strategies under the criteria set forth in the *Application Guide*, but are not selected as Promise Zone designees. The participating federal agencies will seek to expand national knowledge about Promise Zones Finalist communities and their revitalization strategies by posting information submitted in the Finalists' applications on agency websites, and the participating federal agencies will communicate regularly with Finalists about opportunities for relevant funding or technical assistance that may become available, although no preference points, or other Promise Zone designation advantages will be awarded as a result of Finalist status. Promise Zones Finalists will not be precluded from applying for Promise Zones designation in a possible future round of the Promise Zones initiative.

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- a. Will Urban Promise Zones designees have an opportunity to determine and choose the level and types of support and/or technical assistance needed to address its specific project goals?
- b. Who will be the federal liaison responsible for supporting Promise Zone designees? How will the quality of support provided to Promise Zone designees be monitored?

 a. Will Urban Promise Zones designees have an opportunity to determine and choose the level and types of support and/or technical assistance needed to address its specific project goals?

b. Who will be the federal liaison responsible for supporting Promise Zone designees? How will the quality of support provided to Promise Zone designees be monitored?

HUD received many comments reflecting interest in the types of technical assistance available, and opportunities to participate in peer exchange with other communities working on similar issues. HUD also received a comment suggesting that applicants be asked to propose the roles that federal staff might play in their Promise Zone Plan.

A federal liaison will be assigned to help each designated Promise Zone in navigating federal resources. HUD and USDA are tracking the use of federal programs and available preferences by Promise Zone designees. Current designees are also providing regular feedback to federal partners to ensure that community needs are addressed.

For designated communities, the federal government will partner to help the Promise Zones access the resources and expertise they need. The designee will determine the types and level of supports needed to revitalize their community, and the federal agencies will match those requests to appropriate resources available at the time of the request.

The Goals and Activities Template for the final Third Round Application Guide includes an optional section, which will not be used in scoring, that enables applicants to describe technical assistance needed for each activity listed in the Strategy. The applicant's response may a describe how federal staff could work with local partners on specific projects or deliverables, generally for less than one year, and the desired backgrounds of federal staff.

Provision of technical assistance and/or staffing to Promise Zones is not guaranteed. The provision of technical assistance is subject to changes in an agency's policies and changes in appropriations and authorizations for relevant programs. Technical assistance is subject to applicable regulations, statutes, and changes in Federal agency policies, appropriations, and authorizations for relevant programs.

20. Will there be grant funds for designees to support the costs of staffing Promise Zone operations?

Promise Zones will not receive grant funding.

21. Can HUD make local staff available for resident and community engagement?

Federal staff assigned to work with a Promise Zone may participate in resident and community engagement activities alongside the Promise Zone lead organization and partners, within appropriate ethical and legal bounds.

22. Can AmeriCorps VISTA members engage in resident and community engagement activities?

Promise Zone lead organizations and partners may assign some or all of their five AmeriCorps VISTA members to support resident and community engagement activities, so long as the activities are consistent with the approved AmeriCorps VISTA project application and individual AmeriCorps VISTA members' approved assignment descriptions, as well as applicable laws and regulations of the AmeriCorps VISTA program. Regarding the latter, for example, AmeriCorps VISTA members may not engage in certain prohibited religious, political, labor-related and other activities, and AmeriCorps VISTA sponsoring organizations and projects may not use funds or personnel in certain similar

1	instances. For additional information, see Chapter 14 of the AmeriCorps VISTA Member Handbook
2	at http://www.vistacampus.gov/chapter-14-basic-laws-federal-regulations-0
3 4	APPLICATION-RELATED QUESTIONS
5 6	23. What is the application deadline and where should applicants submit their applications? *
7	Electronic copies of application materials must be received by 5:00p.m. Eastern Standard Time on
8	XXX XX, 2016 via MAX Survey you must complete the letter of intent/request for application form t

access the application on MAX Survey. Once the form is submitted, the applicant will receive no later than by the next business day, an individualized link to their application file.

24. Where can I get information about the application process? *

The urban, rural, and tribal application guides are available at: https://www.hud.gov/promisezones/. Additional information regarding application webcasts and responses to public comment are also available on the website. To get the most current information, please join the Promise Zone mailing list at: https://www.hud.gov/promisezones/.

25. Which entities within a community are eligible to apply for an urban Promise Zone designation? *

Eligible Lead Applicant/Lead Organization for **Urban** Promise Zone designations are:

a) Units of Local Government (UGLG/Local Government);

 b) An office/department within local government or a county government on behalf of the local government under a local delegation of authority;

 c) Nonprofit organizations¹ applying with support of the UGLG; or

 d) Public Housing Agencies, Community Colleges, Local Education Agencies (LEAs), or Metropolitan Planning Organizations (MPO)² applying with the support of the UGLG

26. What is the eligibility criteria to apply for a Promise Zone designation? *

 i. Proposed Promise Zone must have one contiguous boundary and cannot include separate geographic areas; ³

 ii. The rate of overall poverty or Extremely Low Income rate (whichever is greater) of residents within the Promise Zone must be at or above 32.5%;⁴

 Promise Zone boundaries must encompass a population of at least 10,000 but no more than 200,000 residents;

 iv. The Promise Zone application must affirmatively demonstrate support from all mayors or chief executives of UGLGs that include any geographical area within the proposed Promise Zone boundary (see clarifications of UGLG support, below)

¹ Including Workforce Investment Boards (WIBS) and Community Action Agencies (CAA). Examples are illustrative and not exhaustive. See Definition of nonprofit on page 20 of the urban application guide.

^{4 &}lt;sup>2</sup> See Definitions of Public Housing Authority, LEAs and MPO on page 20 of the urban application guide.

^{5 &}lt;sup>3</sup> Applicants are required to use the Promise Zone mapping tool to show both the boundary and the poverty levels.

The mapping tool emails this information as a PDF to the applicant. This PDF must be included in the application.

See page 27 for more information on the mapping tool.

⁴ The reported poverty rate or Extremely Low Income rate will be rounded to the nearest .1%.

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2 27. Please clarify requirements for support from the chief executive(s) of UGLGs for Promise Zone Plans.

- 4 HUD received many different comments asking for clarification regarding required support for
- 5 Promise Zone applications from cities or counties in which the proposed Promise Zones are located.
- 6 The following information revises and clarifies the eligibility requirement in Section II.iv of the Third
- 7 Round Urban Promise Zone Application Guide, under Community Eligibility Criteria:
- 8 <u>Counties and county equivalents (collectively "counties") 5</u>. The chief executive of a county must
- 9 demonstrate support for any Promise Zone Plan (Plan) that includes an area within the
- 10 unincorporated boundaries of the county. The chief executive of a county may support as many
- Plans as he or she wishes in incorporated areas within the county, but may only support one Plan
- that includes an area within the unincorporated boundaries of the county. If the chief executive of a
- 13 county supports multiple Plans, the chief executive must include an explanation of how the county
 - intends to work with multiple designees at the same time and sustain the necessary level of effort,
- resources, and support for each designee for the full term of each designation.
- 16 <u>UGLGs other than counties</u>. For UGLGs other than counties, the chief executive of an UGLG must
- 17 demonstrate support for a Plan that includes any area within the geographic boundaries of the
- 18 UGLG. The chief executive of UGLGs that are not counties may support only one Plan. If the chief
- 19 executive of an UGLG that is not a county supports more than one Plan, HUD will disqualify all
- 20 Promise Zone applications supported by that chief executive.
- 21 <u>Crossing Jurisdictions</u>. The Promise Zone application must demonstrate support for the Plan from all
- 22 chief executives of UGLGs included within the proposed Promise Zone boundary. The chief executive
- 23 of a county must demonstrate support for any Plan that includes area within the unincorporated
- boundaries of the county. For UGLGs other than counties, the chief executive of an UGLG must
- demonstrate support for a Plan that includes any area within the geographic boundaries of the
- 26 UGLG. For example, a Plan that includes areas in two cities requires the support of the chief
- executives from both cities. A Plan that includes area within the boundaries of a city and the
 - unincorporated boundaries of the county requires support from the chief executive of the city and
- 29 the chief executive of the county.
- 30 <u>UGLGS with Designated Promise Zones</u>. If a Promise Zone designated in Round 1 or 2 is located
- 31 within a UGLG in which a new application is being submitted, the applicant must include an
- 32 explanation of how, if a second Promise Zone designation is made, the UGLG plans to work with
- both of the Promise Zone designees at the same time and sustain the level of effort, resources and
- 34 support committed to each Promise Zone under its respective Promise Zone Plan for the full term of
- 35 each Promise Zone designation. This explanation must be evidenced by commitments from the
- 36 UGLG in materials submitted by the chief executive in support of the application.

Is support from	Is support of the	Is support of the
the chief	chief executive	chief executive of
executive of City	of City Y	County Z
X required?	required?	required?
	•	•

^{1 5} Note the reference to county includes all county equivalents, such as parishes.

The PZ Plan is for an area entirely within the boundaries of City X.	Yes. ¹	No.	No. ²
The PZ Plan is for an area entirely within the boundaries of City Y.	No.	Yes. ¹	No.²
The PZ Plan is for an area entirely within the boundaries of unincorporated area of County Z.	No.	No.	Yes. ³
The PZ Plan consists of area within City X and City Y.	Yes.¹	Yes. ¹	No.²
The PZ Plan consists of area within City Y and an area within the unincorporated boundaries of County Z.	No.	Yes. ¹	Yes. ³
The PZ Plan consists of area within City X, area within City Y, and area within the unincorporated boundaries of County Z.	Yes.¹	Yes. ¹	Yes. ³

¹ For UGLGs other than counties, the chief executive of an UGLG must demonstrate support for a Plan that includes any area within the geographic boundaries of the UGLG.

- 1 28. Given the requirement to submit an application in partnership with a UGLG, have the UGLGs
- 2 established processes to determine how that determination will be made? *
- Please reach out to your UGLG to determine if a process has been established, and whether support will be considered. This is a local decision and HUD or USDA will not be involved in the process.
- 5 29. Are state supported universities eligible to serve as the Lead applicant for the Promise Zone 6 initiative? *
- State supported universities are eligible lead applicants if they meet the definition of a nonprofit organization or an LEA, and apply in partnership with local government.
- 9 30. Are 501c4 nonprofit organizations eligible to apply? *
- Nonprofit organizations, applying in partnership with local governments, are eligible applicants for a
- 11 Promise Zones designation. Eligible entities are nonprofits and entities that are classified as such in
- 12 accordance with section 501(c) of the Federal Tax Code or have been designated as such by their
- 13 state government. This includes 501(c)(4) nonprofit organizations. However, 501(c)(4) nonprofits
- may be ineligible for many federal grant programs that would support the Promise Zone plan.

² However, the chief executive of a county may support as many Plans as he or she wishes in incorporated areas within the county.

³ The chief executive of a county must demonstrate support for any Promise Zone Plan (Plan) that includes area within the unincorporated boundaries of the county.

31. Please advise if there are any stipulations or criteria for businesses to apply for a Promise Zone designation? *

- For-profit businesses are not eligible lead applicants for a Promise Zones designation. Eligible Lead Applicant/Lead Organization for Promise Zone designations are:
 - i. Units of General Local government (UGLG)⁶;

- ii. An office/department of a local government submitting on behalf of the local government under a local delegation of authority;
- iii. Nonprofit organizations⁷ applying with the support of the UGLG; and
- iv. Public Housing Agencies, Community Colleges, Local Education Agencies (LEAs), or Metropolitan Planning Organizations (MPO) applying with the support of the UGLG.

However, for-profit entities may serve as implementation partner organizations or supporting partner organizations. There are no eligibility requirements for implementation partner organizations or supporting partner organizations.

32. Will Round three utilize the same mapping tool used in Round 2? The tool was difficult to use in defining subtle boundaries.

Yes, the same mapping tool will be used as in Round 2. For assistance, please take advantage of Mapping Tool tutorials and "office hours" during which applicants may call with technical questions about how to use the mapping tool and MAX.gov. The schedule for office hours will be posted on at www.hud.gov/promisezones.

33. In cities where there will be a change in leadership due to an election, will that impact HUD's decision to award a designation? *

If local elected executive leadership is in transition, the city manager or city council may submit a letter of support, pursuant to local laws respecting commitments during periods in which there is no sitting Chief Executive. Documentation respecting local procedures and delegations of authority in such a situation should be included in the application materials. A letter from the incoming local leader may also be included in application materials. The letters count toward the 35-page limit for additional documents.

34. Can a city government submit a PZ application in both the Rural and Urban categories, or is it one application per city? For communities that meet the census tract/poverty rate/leadership commitment requirements to be an Urban Promise Zone applicant, but could also meet the Rural Definition; should cities in this situation apply for Urban or Rural?

Rural Promise Zones many not include any incorporated municipalities or unincorporated areas with individual populations greater than 50,000. Proposed Promise Zones located in cities with a population less than 50,000 (and which include no territory within the bounds of a municipality or

^{1 6} Unit of general local government as defined in section 102(a)(1) of the Housing and Community Development Act

² of 1974 (42 U.S.C. 5302(a)(1)). See definition (a) (1) Unit of General Local Government.

³ Including Workforce Investment Boards (WIBS) and Community Action Agencies (CAA) Examples are illustrative

⁴ and not exhaustive. See Definition of nonprofit on Urban Application Guide page 24.

- unincorporated area with a population greater than 50,000) should apply for a rural designation.
- 2 Anytime a proposed Promise Zone can qualify for rural, then they are considered rural.
- 3 35. Please clarify the way that the requirement that applications score at least 75 points to move on to the next "stage" in the application. At what point geographic diversity is taken into account when selecting the promise zone. Can you please elaborate on this process, especially on the 75 point "minimum"?

After scoring all applications, the Secretary of Housing and Urban Development selects the designees in each subcategory from among applicants that scored 75 points or more based on the selection criteria. Unless there is an issue with geographic diversity or other disqualifying factors as set forth in the Third Round Application Guide, the top scoring applicants in each subcategory will be selected as set forth in the Guide. This process can be somewhat different with USDA's selection of Rural and Tribal PZs.

36. How does HUD define "contiguous" in assessing the eligibility of proposed Promise Zone boundaries? *

The Application Guide states that the Proposed Promise Zone must have one contiguous boundary and cannot include separate geographic areas. "Contiguous" means being in actual contact, touching along a boundary or at a point. One continuous boundary can be drawn around the entire area of the proposed Promise Zone.

37. Does the contiguous geography eligibility criterion include water? *

Yes. Promise Zone boundaries that are adjoined by water are considered contiguous.

38. Examples of geographical areas meeting the Promise Zone requirements for contiguous boundaries.

HUD received questions about geographical areas including Census tracts that touch at only one point, and situations in which nearby areas had been joined by a short corridor. Both situations meet the definition of having contiguous boundaries, touching at any point, in which one continuous boundary can be drawn around the entire area of the proposed Promise Zone.

39. Why is the upper limit on population in a proposed Promise Zone set at 200,000?

One commenter suggested that the upper limit on Promise Zone population is too large to allow sufficient focus for tangible outcomes in urban communities. Another said that the limit of 200,000 was too small for communities that intend to expand their Zones over time. Another suggested that it will be difficult for applicants to execute a plan that creates outcomes across a population this large. The population limits were set to provide for substantial use of the proposed Promise Zone tax incentives to attract and grow businesses that hire Zone residents and make capital investments in the Zones. Sufficient scale is necessary to enable the tax incentives to attract and retain employers, while concentration of effort is also required to increase economic activity within the Zones. The cap of 200,000 in total population strives to balance those goals.

42 Applicants are able to propose areas with smaller populations than 200,000 if that is necessary to develop a coherent and effective strategy for impact. Many applicants and some designees have

1	done so. One commenter suggested that applicants be encouraged to carefully determine
2	population size and boundaries so that they can have meaningful impact and that they be required
3	to demonstrate a clear rationale for how they will achieve impact their proposed Promise Zone.
4	HUD believes that this ability is present in the application submissions and selection criteria as they
5	stand, and appreciates the thoughtful discussion offered by the commenters on this question.

- 40. The guidelines suggest using "data points and analysis on information that is no more than 24 months old." Can you discuss how this requirement relates to the use of census data to describe demographic conditions? Is there a preferred data set, i.e., 2010 Census files, American Community Survey 5-year Average, 3-year Average or 1-Year Estimates?
- The requirement to use data that is no more than 24-months old is limited to Section IV-A: Needs and Assets Assessment. There is no preferred data set for Section III. Demographic information provided for Section III: Need may be based on older data.

41. What data is used to determine population levels, employment, and poverty?

The Promise Zones mapping tool (http://www.huduser.org/PZ/promisezone.html) overlays the locally defined neighborhood/community boundaries with data associated with that area and estimates the rates of certain indicators in that area using a proportional allocation methodology. For metropolitan areas, the tool uses Census block group (as defined for Census 2010) as the smallest statistical boundary for the available data. For non-metropolitan areas, the tool uses census tract data to account for less precision in low-population areas. This tool can clarify if a community meets the poverty and geographic requirements for a Promise Zones designation.

42. Can alternative data sources be used to meet the eligibility criteria?

If the Lead Applicant requests to use alternative data sources to meet the eligibility criteria or the Need application section, a one-page explanation noting the alternative data source must be submitted along with all pages of the Promise Zone mapping tool data sheet. It should be emailed to promisezones@hud.gov with the subject line "Alternative data source request" by XXX, XX, XXXX to be approved by the relevant designating agency (HUD or USDA).

43. What is the minimum poverty rate for a proposed urban Promise Zone to be eligible for designation?

The minimum poverty rate for a proposed urban Promise Zone is 32.5%. One comment suggested using an eligibility standard like the rural and tribal Zones, in which the overall poverty rate can be lower as long as one census tract has a minimum poverty rate. However the Promise Zones initiative seeks communities that have aligned capacities to address the issues of concentrated poverty. Many communities were able to identify focus areas meeting the eligibility criterion in the second round Promise Zone competition, and many applications described work in areas with higher poverty concentrations. Thus the Department does not find sufficient cause to change the eligibility standard.

44. How will poverty/Extremely Low Income rate be used to score applications in the Need section?

The Mapping Tool provides the higher of the poverty rate or Extremely Low Income (ELI) rate for the geographic area defined by the applicant. HUD received several comments suggesting alternative

- measures that would more accurately reflect the issues of particular populations, including FARMS, data on homeless populations, and data on family housing insecurity/mobility. These factors vary widely from community to community, with some dependent in part on local market conditions, may require data from local and state sources, and may not be universally available. For the "need" section, HUD must compare equivalent measures of need, and avoid using data that requires extraordinary data gathering or analysis capacity on the part of applicants. HUD anticipates that applicants wishing to provide more nuanced data and analysis will provide this in the Needs and Assets Assessment part of their Strategy submission.
- 9 HUD received comments suggesting that the score be "up or down", instead of scored based on the 10 level of poverty concentration; however the eligibility requirement for proposed Zones is "up or 11 down", and the selection factors based on need score for the relative severity of conditions among 12 applicant communities.
 - HUD also received a request that a rubric or set of thresholds for poverty rates at different levels be published with the final application guide. With applications coming from communities with a broad range of characteristics, HUD does not see sufficient rationale to set scoring thresholds for different poverty levels before reviewing the range represented by the applicant pool.

45. How is HUD using the employment rate to score applications in the Need section?

Some commenters pointed out that the employment rate does not capture the quality of jobs secured by the residents of proposed Promise Zones, especially where household members may need to work multiple jobs in order to support their families and/or lack access to safety net programs. Commenters also noted that in places with high concentrations of undocumented workers fully accurate employment information may not be available. The quality and character of available jobs varies with differences in metropolitan economic structures, and the other constraints or opportunities faced by particular populations of residents vary widely from community to community. In addition, measures reflecting such conditions may require data from local and state sources, and may not be universally available. For the "need" section, HUD must compare equivalent measures of need, and avoid using data that requires extraordinary data gathering or analysis capacity on the part of applicants. HUD anticipates that applicants wishing to provide more nuanced data and analysis will provide this in the Needs and Assets Assessment part of their Strategy submission.

46. How will long-term housing vacancy rates be used to score applications in the Need section?

HUD received several comments that long-term housing vacancy is not an appropriate indicator of need in metropolitan areas with stronger markets, where overcrowding is often a more prevalent issue. HUD removed long-term housing vacancy as a selection criterion in the draft third round Application Guide, and this factor will not be used in scoring for Need.

47. How will crime rates be used to score applications in the Need section?

HUD received questions regarding the number of pages allocated to narrative concerning crime rates, and whether this indicates a greater weight being put on crime rates versus other selection factors in the Need section. The way that crime statistics are kept varies somewhat from

1	community to community, as does the availability of data at the neighborhood level. However,
2	there is evidence that serious and violent crime is an important factor in community distress and
3	intergenerational economic security and mobility, making the crime rate in proposed Promise Zones
4	an important factor to capture when assessing community need. Therefore HUD is allowing a larger
5	space allocation to crime rates in order to give applicants a better opportunity to explain the crime
6	statistics they have assembled. The crime rate will be weighted equally with employment and
7	poverty/ELI rate in the scoring.

One commenter cited underreporting of crime by residents in distressed communities as an issue in providing accurate information for this factor. HUD anticipates that applicants may include such observations and any supporting information in the Needs and Assets section of their Strategy submission.

48. How is HUD scoring selection factors or sub-factors if specific points are not assigned in the Application Guide?

HUD received several questions regarding this. Points are assigned specifically to subfactors when they are scored individually. When specific points are not assigned, the subfactors generally affect one another, so that the overall quality of the application in that section needs to be scored as a whole. In the Need section, where subfactors are not interdependent, HUD has specified that each subfactor will receive the same weight.

49. In Section IV Part B ii, HUD requires applicants to discuss the alignment of activities of the Promise Zone Plan with other federal investments and activities. Why does HUD not require discussion of how the Promise Zone Plan integrates with local, state or privately funded activities?

HUD received a suggestion to call out substantial privately funded, community focused programs that could create significant collaboration opportunities for a proposed Promise Zone. Applicants are required to discuss coordination of efforts with other federal investments, which are available to communities nationwide. However the availability of state, local and private activities varies greatly from place to place, so response with respect to specific private initiatives is not required or scored. Applicants may capture locally available programs in their Strategy section.

50. What are best practices in the role of the federal Community Liaison working with Promise Zones, and could applicants be invited to articulate a proposed role for the federal liaison in their Promise Zone Plans?

The roles that HUD community liaisons are playing in the federal-local partnerships vary somewhat based on the style and organization structure of the local efforts. Community liaisons are federal staff, however, and have a set of responsibilities related to communicating with local partners, the delivery of timely information, progress tracking, problem solving to promote effective use of available federal resources and other matters.

51. Do applicants have the opportunity to identify barriers to progress that exist in federal programs, such as regulations or conflicting policies among programs that can hinder leveraging and impede innovation?

Applicants have the opportunity to submit information on specific federal barriers with respect to each activity entered into the Goals and Activities Template. HUD and the participating agencies review this information in considering technical assistance and other changes to facilitate effectiveness using federal resources.

52. The first and second round Promise Zones winners went to large urban communities that applied. Is there an advantage/preference for larger cities in awarding Promise Zones?

Large cities do not receive preference in the selection process. In Round 3, urban applications will be considered in two subcategories: large Metropolitan Core Based Statistical Area (Metro CBSA) with a total population of 500,000 or more or small/medium Metro CBSA with a total population of 499,000 or less. HUD intends to designate at least one applicant from the small/medium Metro CBSA sub-category if the highest scoring small/medium Metro CBSA application is comparable in quality to other urban designees (within 10 points of the lowest scoring designee and not otherwise disqualified in accordance with all other requirements contained within this application guide). If the number of eligible applications determined to be eligible for the small/medium Metro CBSA subcategory is fewer than the greater of 1) five total applications, or 2) ten percent of the total number of urban applications received, then the applications in the small/medium Metro CBSA subcategory will be included in the large Metro CBSA subcategory and ranked against those applications.

Please note Promise Zone boundaries must encompass a population of at least 10,000 but no more than 200,000 residents. Additional information regarding Metropolitan Core Based Statistical Areas can be found at http://www.whitehouse.gov/sites/default/files/omb/bulletins/2013/b13-01.pdf

53. Will HUD consider applications from smaller cities within large CBSAs as small/medium CBSA applications?

No. Large CBSAs generally have a broader base of assets and resources from which to draw in the metropolitan area, giving applications from lead applicants in large CBSAs a more diverse set of opportunities for partnership, in general, to lead applicants from small/medium CBSAs. This is true regardless of the nature of the lead applicant.

54. What levels of financial commitments are required in the application phase and are volunteering or in-kind contributions eligible?

No financial commitments are required at the application stage, although the soundness of the plan for financial feasibility and sustainability of effort taken into account in scoring the Strategy section. Volunteer and/or in-kind contributions should be described where appropriate in the overall strategy and are specifically called out for recognition in the Goals and Activities Template, for activities and projects represented in the Promise Zone Plan. They may also be represented in any letters documenting support from partner organizations.

55. What should the required preliminary MOU contain?

The Application Guide requires submission of a preliminary Memorandum of Understanding (MOU) to be finalized upon designation. The lead organization and all implementation partners should sign

the MOU. The MOU should clearly state the role and responsibilities of each partner, and note the commitment to data tracking and sharing. This submission requirement relates to Section V Part A: Partnership Structure and Commitment, under which reviewers will consider "the strength of accountability mechanisms for ensuring effective partnerships, including oversight processes and contractual measures and remedies for non-performance" and "the strength/extent of commitment to coordinate work and investments to achieve outcomes within the Promise Zone (that is not contingent upon receipt of a Promise Zone designation)."

Because reviewers will use the MOU to assess the strength and specificity of commitments to local collaboration, those activities should not be contingent upon receiving the Promise Zone designation. Activities that should be considered preliminary and contingent upon designation are those which would change with the designation of the community as a Promise Zone. Such contingent activities and commitments relate primarily to communicating, sharing data and reporting among the lead organization and its partners, and between the lead organization and HUD, to enable effective collaboration among the local and federal partners for the benefit of a designated Promise Zone.

An overview of draft communications and reporting framework for Promise Zones, and the draft data sharing framework, are posted on www.hud.gov/promisezones. Applicants are encouraged to review these documents to become familiar with the types of communication and coordination that would come with the Promise Zone designation. Please note that these framework documents are drafts under discussion with the designated communities, and are likely to be modified based on their feedback. They have been posted to give applicants a general sense of the types of information exchange that may be required, for planning purposes.

Other commitments demonstrating the strength and effectiveness of the partnership among the lead organization and implementing partners do not require interaction with federal agencies in a Promise Zone context, and would not be affected by a designation. For that reason, the application will receive more points under Section V Part A if such local-only commitments are expressed as *not* being contingent upon a Promise Zone designation in the MOU.

56. If a community has declared bankruptcy would that preclude a community from being considered for a Promise Zone designation?

A community may be designated if it has declared bankruptcy. However, in Section V Part B the applicant must address the financial stability of the lead organization and discussion of any issues that could affect its ability to play the lead organization role in the Promise Zone Plan.

57. Section V Part B, on page 19 (footnote 12) of the Application Guide, it says "To the extent that the Lead Applicant or any of the partner organizations listed in the applications has experienced a recapture of funds, disallowance of costs, monitoring finding, Inspector General finding, or failure to expend funds in within the performance period under a federal grant in conjunction with a failure to complete the project within the performance period, the applicant must disclose the incident(s)", and that "failure to disclose such issues may be grounds for disqualification". Does that mean that a community cannot be designated unless there are no outstanding performance and compliance issues for any federal grant awarded to any of the partner organizations in the Promise Zone Plan?

A community may be designated if a partner or partners has unresolved performance or compliance issues of the types listed. However, the application requirement is that the narrative must address these issues and how the proposed Promise Zone will avoid such issues in future grants that may be made with Promise Zone preferences. Failure to disclose past performance issues may result in disqualification of the application depending upon the importance of the role that the organization with performance issues will play in the Promise Zone Plan as proposed, because reviewers will not be able to assess a significant capacity question without such disclosure.

58. How is building the capacity of neighborhood residents and organizations reflected in the scoring criteria?

Reviewers will score applications based in part on the degree of resident engagement evidenced in the formulation of the Promise Zone Plan and the proposal for maintaining sustained, informed, inclusive, and substantive resident participation in its continued development, implementation and oversight (Section IV. D). The application must clearly identify the organization responsible for organizing resident engagement, and reviewers will score the application in part on the capacity of the identified organization to carry out this function (Section V.E). HUD received a comment that these factors should be weighted more highly; however taken together they carry up to 10 points, which is equal to all of the factors in the Need section taken together. HUD considers this to be sufficient weight, and agrees that meaningful and continuous resident involvement is an important element of successful community revitalization work.

59. How detailed should the financial information be for each activity in the Promise Zone Plan?

In the Promise Zone plan, HUD is requesting specific details for financial activities, where they are available, for two reasons. The first is that detail on financial arrangements provides some insight into progress that each community is making toward its Promise Zone goals, and how the relative timing of projects may work together to accomplish those goals. HUD asked for much of the same information in the Second Round Urban Application Guide, but did not break up the individual inputs into the check-boxes in the proposed online survey format for the third round. If a particular level of detail has not yet been determined for a specific project or activity, the applicant is not required to check those boxes or fill out the descriptive section of the survey. In general HUD anticipates that the check-boxes are easier to complete than the descriptive information was for second round applicants.

The second reason for the level of detail requested in the survey input is that, with the applicants' permission, HUD is sharing project level information with the public. The level of detail on financial structures supporting projects makes this information more useful for foundations, community development financial institutions, social investors and others seeking potential grant, investment or partnership opportunities.

60. Why has HUD added check boxes and a description of technical assistance needed for each activity in the Promise Zone plan?

Where applicants permit HUD to share the information in their application publicly, the federal agencies are starting to use information on local projects to identify useful technical assistance for

1 individual projects or cohorts of communities working on similar projects or challenges. Several 2 commenters strongly supported activities to make technical assistance and information available to 3 all applicant communities, not just designated Promise Zones and Finalists. Commenters also encouraged opportunities for peer exchange among communities as a means of improving local practice. Collecting information on specific types and questions for technical assistance purposes, by activity, will help HUD and the other participating agencies respond faster and more accurately to applicants' interests.

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61. Will an applicant's score be lower if it submits technical assistance requests?

Some applicants may be concerned that by asking for assistance, they will give reviewers the impression that they have lower capacity than other applicants. In fact, the ability to articulate what assistance is needed for a particular activity often characterizes high-capacity collaborations because it is a part of effective problem solving. However, due to the perception that asking for technical assistance might lower scores, technical assistance request information collected with the Promise Zone application will not be included with reviewer materials or scored; it will be used only to analyze technical assistance needs and trends and arrange responses outside the selection process.

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62. What are the page requirements for the application and supporting materials?

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HUD received several comments suggesting a slightly increased page limit for the narrative portions of the application. HUD will increase the page limit for these portions of the application from 25 to 28 pages, which will not include material input through the Goals and Activities template. Any pages submitted beyond this limit, pursuant to the formatting requirements included in the Third Round Application Guide, will not be reviewed. HUD will not consider the information on any excess pages, and this exclusion may result in a lower score. Applicants wishing to submit fewer pages of material than the limit may do so.

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Additional, supporting materials that are not required submissions should not exceed 35 pages. These can include: Letters of Support, a preliminary MOU, and additional maps. Any pages beyond this will not be reviewed. HUD will not consider the information on any excess pages, and this exclusion may result in a lower score. Congressional letters of support do not need to be included in the 35-page allocation for additional supporting materials (see response to question 19 for further information).

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3563. Will HUD consider tables, figures diagrams and charts in which information is presented single-36 spaced?

37 HUD will consider such tables and charts, but will count each page as if it were two pages for 38 purposes of applying the page limits.

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4064. Are footnotes and hyperlinks in the application, appendices, and Goals and Activities section permitted? Should footnotes follow the formatting requirements spelled out in the application? 41

Applicants are encouraged to include citations when necessary, however all footnotes/appendices will count toward the 28 page narrative or the 35 page additional documentation, depending upon where the applicant chooses to include it. All elements of the narrative section must comply with the formatting requirements: 12-point Times New Roman font, double-spaced and one inch margins. Any additional information included via hyperlink will not be considered.

865. What is the protocol for congressional letters of support? Where should we send general letters of support?

Congressional letters of support should be submitted directly to the Secretary of the U.S. Department of Housing and Urban Development for urban applications. In addition, a copy of the Congressional letter of support should be emailed to: promisezones@hud.gov. Congressional letters should not be submitted with the application or included in the supplementary materials, which are limited to 35 pages.

66. What is the protocol for state, local or private entity letters of support?

Optional letters of support from partner organizations, including local and state elected officials and private entities, included with the application will count against the 35 page attachment limit and be considered in scoring. If a State or local elected official or a private entity is not acting in capacity of a partner, general letters of support should be submitted to the Secretary of the U.S. Department of Housing and Urban Development with a copy emailed to: promisezones@hud.gov. Such general letters of support will not contribute to scoring and will not count against application page limits.

2667. In the Goals and Activities Template, how specifically should I describe each goal/sub-goal? How extensive should the budgetary information be?

Complete the Goals and Activities Template within MAX Survey for each proposed goal in the Promise Zone. The applicant must complete at least one template for each applicable Promise Zone goal and may identify additional community goals if needed. The MAX Survey will allow the applicant to identify up to six goals each of which may include up to four activities. The applicant is required to select at least three of the Promise Zone Initiative goals and may select up to 3 additional identified community goals. See the Goals and Activities Template on page 29 for examples. The Goals and Activities Template will not count toward the narrative's 28 page limit.

Applicants should also indicate whether they HUD and USDA permission to share information included in the goals and activities template. Non-federal organizations including foundations, social investors, researchers, consultants, and networks of professionals and organizations have expressed interest in the work underway in communities applying for Promise Zone designations. Community stakeholders and other members of the public also occasionally request information related to Promise Zones applications. If you are willing to have HUD and USDA share the information you submit to the public, please check the box for each component of the template indicating that the information can be shared.

68. Will the Goals and Activities Template count towards the attachment allowance of 35 pages?

1 2 3 4 5	The Goals and Activities Template will not count toward the page limits. However, please note the MAX Survey will allow the applicant to identify up to six goals each of which may include up to four activities. The applicant is required to select at least three of the Promise Zone Initiative goals and may select up to 3 additional identified community goals. Character limits also apply to some fields in the goals and activities template.
	. Are there character limits? If they are required, will spaces count in the character limits?
9 10	Where character limits are noted, they are required. Spaces count toward character limits.
11 12	70. If we did not receive an email after completing an application request form on MAX Survey, should we resubmit the application request form?
13 14 15 16 17	To access the Second Round Promise Zone Application, you must submit an application request form through MAX Survey. The application request form is only accessible via the direct link found on the Promise Zones website. Within one business day of submitting the application request form, you will receive an email with an individualized link to begin your application. If you are experiencing technical difficulties, please contact PromiseZones@hud.gov .
18	71. Where can you find a PDF of all the questions in the application on Max Survey?
19 20	For a description of the questions included in the MAX.gov application, please review the last pages of the Third Round Application Guide.
21	72. Can applicants request to submit materials in a different way?
22 23 24 25 26 27	The Third Round Application Guide states on page 7 that "an applicant demonstrating good cause (such as an inability to access MAX Survey in a reliable way) may request a waiver from the requirement for electronic submission." Such requests must be submitted by email to Promsiezones@hud.gov at least 15 days prior to the application due date. The subject line must contain the name of the applicant and "Request for Waiver of Electronic Application for Promise Zones". Such requests will be considered on a case by case basis.
28 29	73. How can applicants receive assistance with MAX Survey or the Mapping Tool? *
30 31 32	HUD intends to schedule webinars on the use of the online tools, as well as "office hours" during the application response period in which applicants can call with technical issues related to the use of MAX Survey or the mapping tool. These dates will be posted to www.hud.gov/promisezones .
33	POST DESIGNATION CONSIDERATIONS
34 35	74. In the event a city has chosen a local non-profit organization as their "lead applicant," is the city required to receive certification from that local non-profit when they chose to apply for grants?
36 37 38 39 40	The Lead Applicant receiving the Promise Zone designation will be the only entity that can certify Promise Zone partners and confirm their eligibility for preference points, priority consideration and other Promise Zone benefits. After receiving a Promise Zone designation, the Lead Applicant will be referred to as the Lead Organization for the Promise Zone. (See the Promise Zone certification form and guidance [insert link] for more information.)

1 MISCELLANEOUS

2 75. How often will the Promise Zone FAQ be updated? *

- The Promise Zones FAQ will be updated periodically as questions arise. To receive an email
- 4 notification when the FAQ document is updated, please subscribe to our mailing list at:
- 5 https://www.hudexchange.info/mailinglist/.

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