



LEWISTOWN



Community Planning Grant Application Guidelines, Grant Administration and Application

Community Development Block Grant Program

commerce.mt.gov/infrastructure-planning

July 2025

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The Montana Department of Commerce will provide alternative accessible formats of this document upon request. If you need this document in an alternative format such as large print, Braille, audiotape or computer diskette, please contact Commerce.

doccdd@mt.gov

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I. Application Guidelines

Introduction

The Montana Department of Commerce Community MT Division will set aside up to \$600,000 of Community Development Block Grant funds, supported by funding from the U.S. Department of Housing and Urban Development, for Community Planning Grants that support long-term, sustainability planning for housing, public infrastructure, community facilities and economic development.

A. Eligible Applicants

CDBG Planning Grants are available to eligible counties, cities and towns. Local governments may apply on behalf of special purpose districts such as water or sewer districts; unincorporated areas; public school districts; and nonprofit or for-profit organizations such as a human resource development council, an economic development agency, an area agency on aging, a local domestic violence shelter, a Boys and Girls Club, a local food bank, a hospital, a nursing home, etc. Counties may also apply for Planning Grants on behalf of tribal utility authorities or in those cases where tribal members would be assisted like any other county residents.

Local governments may apply for one CDBG Planning Grant per funding cycle. Local governments with an open CDBG Planning Grant from a previous funding cycle are ineligible to apply for an additional Planning Grant until their current planning project is completed and closed out, except in special circumstances, with prior approval of Commerce.

As consolidated local governments, Butte-Silver Bow and Anaconda-Deer Lodge may apply for two Planning Grants per funding cycle and may have up to two Planning Grants open at any given time.

If you have additional questions involving eligibility, please contact Community MT directly at 406-841-2770 or doccdd@mt.gov.

B. Eligible Planning Projects and Costs

CDBG Planning Grant funds awarded through the current grant cycle may be used for the creation or update of plans, studies, training or research in any of the areas listed below. Special emphasis will be placed on those proposals that address major community development needs, concerns and issues and demonstrate an ability to achieve significant community impacts. Commerce strongly recommends planning documents include, as applicable, consideration of visit-ability and accessibility features.

CDBG Planning Grant funds can be used to pay for the following activities:

- Growth policies, including ADA self-assessment plans and related studies, policy development and regulation to promote accessibility
- The growth policy should include a detailed description of the community development needs of particular groups of persons who generally fall within the low- and moderate-income category, such as the elderly, single heads of households, people that are homeless or at-risk of homelessness or abused or neglected children.
- Comprehensive economic development strategy plans
- Downtown/neighborhood revitalization or master plans, to include comprehensive market studies; urban renewal plans; identification of affordable housing, infrastructure, job retention and creation and façade renovation needs; research and analyses of fair housing availability; the development of supporting policy; and related environmental studies
- Historic and architectural preservation plans, studies and analyses

- Housing plans, to include housing needs assessments; housing condition surveys; housing affordability and market feasibility studies; or the development of local or regional housing assistance programs
- Planning activities associated with the preparation and adoption of an urban renewal district or targeted economic development district
- Adaptive re-use or redevelopment plans
- Preliminary architectural reports for housing, public facilities, school facilities and economic development projects
- Site-specific development plans
- Development of business plans, feasibility studies and market analyses
- School facility condition assessments, school facility energy audits and comprehensive school facility master plans

CDBG Planning Grant funds can be used to pay for infrastructure-related planning activities, including:

- Preliminary engineering reports for drinking water, wastewater, stormwater, solid waste or other public facilities and economic development projects.
- Capital improvements plans.
- Preparation of grant applications for CDBG housing, public facilities or economic development projects, in conjunction with a planning project listed above.
- A planning project other than those listed above, recognized and agreed to by Commerce.

CDBG Planning funds can be used for general community planning, e.g., a growth policy, capital improvements plan or a potential community-wide development activity such as a comprehensive, town-wide parks improvements plan or city-wide transportation plan. They can also be used for site-specific planning activities, e.g., a preliminary engineering report or preliminary architectural report, if those activities address a national objective as specified in Title I of the Housing and Community

Development Act of 1974 and identified by HUD. These national objectives include benefiting LMI persons or preventing or eliminating the presence of slums and blight. To determine whether your proposed planning activity is considered eligible as general community planning or whether it will need to meet one of the national objectives, consider the following:

1. If the CDBG Planning funds are being used for general community planning, these plans do not need to meet a specific national objective. Types of general community plans include, but are not limited to:
 - Comprehensive community plans such as the preparation of a growth policy.
 - Feasibility studies or market studies.
 - Community development plans.
 - Capital improvement plans.
 - Local analyses of impediments to fair housing choice.
 - Historic preservation and environmental studies.
 - ADA self-evaluation inventory and transition plan.
 - Functional plans such as housing, land use, energy conservation or economic development.

Any general community planning activity funded by CDBG funds should consider, to the greatest extent possible, how the activity will benefit LMI persons and, where applicable, how the planning activity can prevent or eliminate the presence of slums and blight.

1. If the CDBG Planning funds are being used for a site-specific project, the applicant must demonstrate that the proposed planning activities will either benefit LMI persons in the service area where a majority of residents (51% or greater) are LMI or will result in the prevention or elimination of the presence of slums and blight. Types of planning activities that may have to meet one of these national objectives include, but are not limited to:

- Historic and architectural preservation plans, studies and analyses.
- Adaptive re-use or redevelopment plans.
- Preliminary architectural reports for housing, public facilities, school facilities and economic development projects.
- Preliminary engineering reports for drinking water, wastewater, stormwater, solid waste or other public facilities and economic development projects.
- Development of business plans, feasibility studies and market analyses.
- School facility condition assessments, school facility energy audits and comprehensive school facility master plans.
- Preparation of grant applications for CDBG housing, public and community facilities or economic development projects, in conjunction with a planning project listed above.

To meet the national objective of benefitting LMI persons, the applicant must provide documentation that at least 51% of the anticipated beneficiaries are comprised of LMI persons and households. Documentation can include census and HUD LMI data of the area to be served by the planning activity, an income survey of the households residing within the area to be served or documentation the planning activity will serve a qualifying limited clientele.

To meet the national objective of preventing or eliminating the presence of slums or blight, the applicant must provide documentation demonstrating the existence of slums or blight or conditions that will lead to slums or blight within the planning service area. How to document that the project meets this objective is further discussed in these guidelines and the National Objective Worksheet.

C. Ineligible Planning Projects and Costs

CDBG Planning Grant funds cannot be used to pay for the following activities:

- Operation and maintenance costs or expenses
- Purchase of furnishings, fixtures, equipment or real property
- Non-planning documents such as final design or construction drawings
- Construction or any other non-professional services
- Grant administration and management expenses, with the exception of postage costs, in-state mileage costs and copy and printing costs associated with the administration of eligible Planning Grant activities
- Researching other grant opportunities
- Financial expenses, including but not limited to interest expense, bond issuance costs or any other debt-related costs or expenses
- Any otherwise eligible planning project costs incurred prior to the date of announcement of grant award by Commerce

D. Award Amounts and Required Match

CDBG Planning Grants are available in amounts up to \$50,000. With the exception of Planning Grant funds requested for special economic development activities, applicants must match a minimum of 25% of the amount of CDBG Planning Grant funds requested. Planning Grant funds requested for economic development activities on behalf of a private entity for site-specific projects will require the applicant provide match on a 1-to-1 basis. Matching funds must be firmly committed by the time CDBG Grant funds are released.

The amount of CDBG funds requested, and matching funds to be committed, must be described in the proposed budget as part of the application materials. See Exhibit 2 for the required budget format and instructions.

Firm loan commitments, such as funds borrowed from the Montana Board of Investments Intercap Program or local cash reserves, are acceptable forms of match. Grants or cash contributions from other local, state or federal agencies and programs or

private organizations are also acceptable forms of match for CDBG Planning Grant awards. However, at least 25% of the required matching funds must be committed from local sources, i.e., not from state or federal grants.

Grant applicants cannot substitute in-kind services provided by local governments, such as regular salaried staff time, for cash match. In-kind match is difficult to document; therefore, CDBG will only accept cash, grants or loans as a match.

Below are guidelines for documenting firm commitment of matching funds:

- Includes the funding amount;
- Includes a brief description of the project use of funds; and
- Documented on official letterhead.

Examples include, but are not limited to:

- A letter of commitment from the agency or organization on official letterhead.
- A copy of an award letter from other agency or organization.
- A budget resolution from the local government.

Reduction or Waiver of Match

Commerce may reduce or entirely waive the match requirement, if specifically requested by the applicant, in limited and extreme hardship cases only. Applicants requesting a reduction of the match or a waiver may experience a longer review time. Applicants seeking to reduce or waive the match requirement must formally request a reduction of the match or a waiver at the time of application. An applicant requesting match reduction or a match waiver must include documentation in the application materials which:

1. Clearly demonstrates that higher financial participation is not possible; and

2. Provides written evidence that the need for the planning project relates to an immediate need to protect public health or safety or would respond to a serious need principally impacting LMI persons or households.

E. Application Submission

CDBG Planning Grant applications are due to Commerce on the date of the deadline for the grant cycle in which the applicant is applying posted on [Commerce's Grants and Loans portal](#). Applications for the preparation of capital improvements plans or preliminary engineering reports for water, wastewater or stormwater systems that are not directly tied to economic development through job creation and job retention will be accepted at the same time but may be considered secondary to other planning priorities for funding due to the availability of other state and federal program funds. Applications for the preparation of short-term economic development-related planning projects, such as the development of business plans, feasibility studies and market analyses, will be accepted at the same time but may be considered secondary to other planning priorities for funding due to the availability of other state and federal program funds.

If you have questions how to access the Grants and Loans Portal, please contact the Community MT Division at doccdd@mt.gov or 406-841-2770 for assistance.

Electronic submission is preferred, but you may also submit your application by first-class mail or hand delivery to:

Montana Department of Commerce
Community MT Division
Community Planning Program
301 S. Park Avenue
P.O. Box 200523
Helena, MT 59620-0523

Each application submitted must be complete, including all required contact information, and accompanied by all required supplemental materials. Applicants must complete the designation of an environmental certifying official and finding of exemption as provided in exhibits 3-A and 3-B. If an exempt determination cannot be made by the applicant, the applicant must contact Community MT for further assistance. Commerce reserves the right to reject ineligible, incomplete or otherwise improper applications.

Applicants are encouraged to contact Community MT with any questions they have concerning application submittal and requirements.

F. Application Review Process

Awards will be based on the overall merit of the application and its ability to meet established CDBG goals and objectives. Community MT will review CDBG Planning Grant applications and evaluate the extent to which each proposed planning project relates to the criteria below. The director of Commerce makes final decisions on grant awards.

Awards may be delayed due to fluctuation of the federal budget and state allocation.

Community MT will first review each application for completeness. During this review, the review team may contact an applicant to discuss any concerns or questions, or to request additional information or documentation. The review team may require additional information from the applicant to clarify information presented in the application; however, the applicant may only submit additional information after the initial application if and when specifically requested by the review team.

Applicants for CDBG Planning Grant funds will be evaluated as to how the proposed long-term planning project meets each of the application criteria and its consistency with

the overall goal of helping communities address their greatest needs, concerns and issues — especially whether it addresses the needs of LMI households and is likely to achieve substantial community impact. The Community MT review team will consider the overall quality of the application, including measurable project goals, tasks and activities; a well-developed work plan and budget; and easily identifiable deliverables, in making award decisions.

Priority will be given to planning projects that enhance the unique and resilient characteristics of all communities by (1) investing in healthy, safe, walkable downtowns and neighborhoods — rural, urban and suburban; (2) encouraging development and community revitalization that utilizes existing infrastructure and community services; and (3) aligning with the community’s long-range vision and goals.

Commerce will notify successful applicants of a CDBG Planning Grant award by sending a formal award letter electronically with a hard copy to follow. The completed application, including any written modifications resulting from the review of the application by the Community MT review team and approved by Commerce, will be incorporated into the grant contract between Commerce and the successful applicant. The grant contract must be executed by an authorized agent of the local government. See the “Administrative Procedures and Requirements” section for more information.

[Meeting a CDBG National Objective](#)

As described above, CDBG Planning funds can be used for general community planning or for site-specific planning activities. General community planning activities are assumed to meet a HUD CDBG national objective. If your proposed planning activity is site-specific, it may need to meet one of the CDBG Program’s national objectives of either benefiting LMI persons or for preventing or eliminating the presence of slums and blight. Section E of the application and the National Objective Identification Worksheet, found in Exhibit 4, describe the information and documentation communities

will need to provide specifically in the application, depending on whether the proposed planning activity can be categorized as a general community planning activity or is a site-specific activity that must meet a CDBG national objective.

II. Grant Administration

A. Administrative Procedures and Requirements

Successful CDBG Planning Grant applicants must comply with the below administrative procedures and requirements. All procedures and requirements that the award recipient must comply with will be set forth in the grantee's contract with Commerce. Forms and templates are available on the [Community MT section of Commerce's website](#).

1. Startup requirements: All CDBG Planning Grant recipients must satisfy the following requirements prior to contract execution with Commerce:
 - a. Submit an updated budget;
 - b. Submit an updated implementation schedule;
 - c. Document firm commitment of non-CDBG funds; and
 - d. Attend a startup call with Commerce.
2. Contract execution: Prior to contract execution, the Community MT planning specialist will confirm in writing the following signatories, titles and email addresses for:
 - a. Contract signer, typically the chief elected official;
 - b. Approver for form, typically an attorney; optional;
 - c. Attester; optional;
 - d. Contract liaison; and
 - e. Additional contact(s) — individual(s) who are included in the contract routing process but are not signers; optional.

Commerce utilizes DocuSign to route and execute all contracts. It is important for all grantees to provide accurate contact information in a timely manner to avoid delays in processing. If there is a change in personnel requiring an update to the signatory list, please notify the Community MT planning specialist right away.

3. Contract amendments: Commerce may approve and execute a contract amendment on a case-by-case basis.
4. Civil rights: HUD requires CDBG grantees to demonstrate compliance with the Civil Rights Act requirements provided in 24 CFR 570.904, prior to the first release of funds. These actions include:
 - a. Affirmatively furthering fair housing by passing a fair housing resolution, posting fair housing notices in local government buildings and publicizing fair housing right and responsibilities as appropriate.
 - b. Adopting a Hatch Act resolution.
 - c. Adopting an Equal Employment Opportunity policy resolution.
 - d. Conducting an ADA self-evaluation and developing an ADA transition plan.
 - e. Adopting a compliant procedures resolution to ensure compliance with Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.
5. Reimbursements: CDBG Planning Grant recipients must execute a contract with Commerce before any funds can be reimbursed. Payment for approved expenses under the grant contract will be on a reimbursement basis only. Commerce will typically disburse 50% of the Planning Grant award upon request for payment accompanied by proper documentation and submittal of draft project deliverables, when applicable. To request payment from the Commerce, grantees must submit a Request for Funds Form (see the CDBG Planning Program's toolkit) with supporting documentation, including a Signature Certification Form and all applicable invoices.

Invoices must be detailed and include the following information: services furnished, total hours worked for each item, amount being billed for each item, description of

any other eligible reimbursable expenses incurred during the billing period and dates of work performed. Commerce does not accept lump-sum invoices.

Submission of documentation of the procurement process followed is required as part of the initial request for payment. See Section B, “Procurement of Professional Services” for details and guidance on the procurement process.

To receive final payment, the grantee must show proof of expenditure of all matching funds and provide an electronic copy of the final planning deliverables, e.g., growth policy, capital improvements plan, preliminary architectural report, etc. Commerce will determine whether supporting documents for a request for reimbursement are sufficient and meet the requirements of the program. If the grantee fails to obligate expenses on or before the termination date of the grant contract, Commerce cannot reimburse the grantee Planning Grant award funds. All documentation and requests for reimbursement must be received by the department within 60 calendar days of contract termination.

6. Reporting requirements and project monitoring: Grantees will be required to submit progress and expenditure reports in accordance with the requirements of the grant contract. Commerce reserves the right to perform site inspection(s) to monitor the grantee's compliance with the terms of grant contract, including but not limited to verification of planning services performed and monitoring of CDBG Planning Grant funds.
7. Public's right to know: Applications that are funded are subject to disclosure, in response to requests received under provisions of the Montana Constitution, Article II, Section 9. Information that could reasonably be considered proprietary, privileged or confidential in nature should be identified as such in the application.

8. Authority and approvals: The signature on the application is the applicant's or their authorized agent's certification that the local government has approved submittal of the application and has firmly committed the matching funds required.
9. Compliance with laws: The applicant must certify on the application that the proposed planning project complies with all state, federal and local laws, ordinances and regulations, including any necessary environmental review and procurement requirements.
10. Compliance with contract conditions: Commerce may require grantees adhere to technical guiding documents and templates based on the scope of the project, as applicable.

Commerce has guidance documents available for different Planning Grant deliverables. See the [Community Technical Assistance Program's Presentations, Publications and Model Documents website](#) for guidance and model documents.

11. Dissemination of information and technology transfer: Grantees will be contractually required to allow Commerce access to any facility or site associated with the planning project, and the ability to obtain, publish, disseminate or distribute any and all information obtained from the planning project (except any data or information identified as confidential or proprietary), without restriction and without payment or compensation by Commerce.
12. Grant duration and performance period: The reimbursement period will begin with the issuance of the Governor's Award Letter, be solidified with contract execution and terminate 60 calendar days after the reimbursement period ends. Commerce will consider contract extensions on a case-by-case basis that necessitates a longer contract period, provided the grantee has demonstrated a good faith effort to

complete the project on time and within the original budget. No requests for payment may be submitted for any costs or expenses obligated by the grantee for reimbursement before the Governor's Award Letter and after termination of the grant contract. All CDBG Planning projects that have been awarded must be completed within the time frame specified in the executed contract.

13. Return of funds: At Commerce's sole discretion, the grantee will be required to and agrees it shall return to Commerce any and all funds that are determined by Commerce to have been spent in violation of the terms and conditions of the grant contract.
14. Cost savings: In the event that expenses for a CDBG Planning Grant project are less than the projected costs and grant award, Commerce may, in its sole discretion, authorize additional related planning efforts for the same facility to enhance the overall project or reduce the grant award accordingly.
15. Uniform Relocation Act: Preliminary engineering reports and preliminary architectural reports funded with CDBG Planning Grants which consider, recommend or require the acquisition of real property are subject to the Uniform Relocation Act. Grantees are encouraged to contact Community MT staff anytime acquisition is considered as part of a Planning Grant application or project, to ensure all necessary and appropriate URA procedures are followed.

B. Procurement of Professional Services

To be eligible for reimbursement, professional architectural or engineering services must be procured in compliance with federal and state laws, including but not limited to, 2 CFR Part 200 and applicable sections of MCA 18-8-201 through 212. The grantee will be required to submit documentation demonstrating the procurement process, including the review and selection process, prior to requesting reimbursement. See Chapter 3 of

the CDBG Grant Administration Manual for guidance on procurement. To ensure that expenditures will be eligible for reimbursement, please contact Community MT directly for guidance **before** procuring professional services or incurring any costs for which the local government may later request reimbursement.

For procurement of planners, grant writers and consultants, CDBG recommends using the formal request for proposals process to increase the community's ability to hire the best qualified consultant. A planning request for proposals should be concise, contain all the important information needed for firms to respond in a factual manner and indicate the services the consultant would be expected to provide. It should also include information regarding the time frame, factors that will be used to evaluate the responses and a contact person. A sample request for proposals is in the Procurement toolkit of the CDBG Grant Administration Manual.

All grantees must comply with the CDBG requirements for disadvantaged-owned businesses, women-owned businesses and minority-owned businesses and Section 3 when procuring for professional services.

Disadvantaged Business Enterprise Requirements

Outreach to qualified DBE/MBE/WBE firms should be completed each time a procurement action is undertaken. For most projects, this would mean notifying DBE/MBE/WBE firms at the time of issuing a request for proposals or request for qualifications to hire an engineer, architect, land surveyor or planner. A sample Letter of Work Notification to DBE/MBE/WBE firms may be found in the CDBG Grant Administration Manual.

A list of Montana DBEs may be found by calling the Montana Department of Transportation at 406-444-6337 or visiting mdt.mt.gov.

The primary objective of this requirement is that grantees and any sub-grantees take all necessary affirmative steps to ensure that DBE/MBE/WBEs are used when possible in the procurement of goods and services for CDBG-funded activities. In order to accomplish this DBE/MBE/WBE-related objective, CDBG Planning grantees must take the following affirmative steps:

- Ensure that DBE/MBE/WBEs are solicited whenever they are potential sources of goods or services; and
- When economically feasible and consistent with state law, divide total requirements into smaller tasks or quantities to permit maximum participation by DBE/MBE/WBEs.

Grantees and sub-grantees are also encouraged to use firms located in labor surplus areas when possible. Visit the [U.S. Department of Labor's website](#) to view the currently designated labor surplus areas in Montana.

Section 3 Requirements

Section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u and 24 CFR Part 135) represents HUD's policy for providing preference for new employment, training and contracting opportunities. This guidance was created from the usage of covered HUD funds to residents in the community who earn at or below 80% AMI and the businesses that substantially employ these persons. Section 3 does not apply on a per project basis. Whenever any portion of HUD funding is invested into projects involving housing construction, demolition, rehabilitation or other public construction, the requirements of Section 3 apply. In other words, Section 3 applies to the entire covered project or activity regardless of whether the activity was fully or partially funded with covered assistance for all projects that will result in new employment, contracting and training opportunities.

While Section 3 is not required for CDBG Planning Grant projects, if a Planning Grant project will result in a covered (i.e., CDBG eligible construction) project, Commerce strongly encourages Section 3 to be followed during the Planning Grant project.

Community MT will work with all grantees to determine if Section 3 is applicable to their project and request the grantee to indicate if the planning project may result in an application to complete a project with other covered HUD-funded programs such as CDBG or HOME Investment Partnerships Program, or the Housing Trust Fund.

To follow the Section 3 requirements, a Section 3 Notice must be published at least once at the beginning of the project but can be published each time a major procurement action is undertaken on CDBG Public and Community Facilities, Housing and Economic Development Grant projects. For most projects, this would mean publishing the first Section 3 Notice at the time of issuing a request for proposals or request for qualifications to hire an engineer or architect as part of the request for proposals or request for qualifications. This notice is to ensure that interested parties and residents have a reasonable opportunity to learn about the potential Section 3 employment opportunities as a result of the CDBG project. The language containing the Section 3 requirements must be included in advertisements and any contracts awarded to contractors that benefit from CDBG funds.

A sample Section 3 public notice, Economic Opportunities for Low- and Moderate-Income Persons, is provided in the CDBG Grant Administration Manual's "Procurement" chapter, found on the [Community MT website](#). This notice or its equivalent must be published in order to inform the community of employment and business opportunities and to demonstrate compliance with Section 3 requirements. Community MT can also provide a sample request for proposals/request for qualifications language that includes the required language upon request.

Section 3 requires that to the greatest extent feasible, in CDBG, HOME and HTF projects, opportunities for training and employment must be given to:

- Residents at or below 80% AMI in areas;
- Residents of public and Indian housing;
- Businesses that are 51% or more owned by Section 3 residents; and
- Businesses where at least 30% of employees are Section 3 residents.
- Contracts for work in connection with such projects should be awarded to business concerns located in, or owned in substantial part by project area residents. See the CDBG Grant Administration Manual for additional information about required Section 3 reporting by CDBG grantees at the time of project closeout.

Section 3 activities must be reported to Community MT prior to CDBG Planning Grant funds being disbursed.

Limited Solicitation Procurement

At a minimum, local governments are required to conduct limited solicitation (HUD's Procurement by Small Purchase Procedures), which can be found in the CDBG Grant Administration Manual. Grantees must provide documentation that a minimum number of qualified firms were contacted in writing or via phone and provided formal quotes for consideration. Commerce recommends contacting three to five firms. The local government will be required to submit documentation of the review and selection process. Any representative hired by a local government to conduct the request for proposals solicitation or procurement process cannot be subsequently hired by the local government to perform the planning services.

Professional Services Agreements and Supplemental Conditions

Once the procurement process is complete and a consultant is hired, grantees may use the sample professional services contract found in the CDBG Grant Administration Manual which includes the standard language used in such contracts and the clauses required for CDBG-funded grant contracts. It is the grantee's responsibility to include provisions related to all applicable CDBG requirements in any contract or agreement through which CDBG funds are passed on to a contractor or subcontractor.

The CDBG Supplemental Conditions to Contracts, found in the CDBG Grant Administration Manual, must be included in contracts for professional services, even if a contractor prefers to use their existing contract format. In both sample formats, the required clauses have been noted with an asterisk.

III. CDBG Planning Grant Uniform Application

Montana Community Development Block Grant Program

Montana Department of Commerce – Community MT Division

Section A – Applicant Certification

The applicant hereby certifies that: It will comply with all applicable parts of Title 1 of the Federal Housing and Community Development Act of 1974, as amended, which have not been cited herein, as well as with other applicable federal laws and regulations.

It will comply with all requirements established by the Montana Department of Commerce and applicable state laws, regulations and administrative procedures.

It accepts the terms, conditions, selection criteria and procedures established by the Montana Community Development Block Grant Program and expressly waives any statutory or common law right it may have to challenge the legitimacy and propriety of these terms, conditions, criteria and procedures in the event that it is not selected for an award of CDBG funds.

To the best of my knowledge and belief, the information provided in this application and in the attached documents is true and correct.

Name (printed): _____

Title (printed): _____

Signature: _____ Date: _____

Chief elected official or authorized representative



Section B – Applicant Information

1. Name of applicant: _____
2. Mailing address: _____

3. Type of entity: _____
4. Federal tax ID: _____
5. Type of project: _____
6. UEI number: _____



Section C – Contact Information Summary – All fields must be completed unless otherwise noted. Failure to complete all fields may result in a delay in processing your application.

Chief elected official/authorized representative

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email

Project engineer/architect, if applicable

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email

Legal counsel/attorney

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email

Primary contact person, if different from CEO/authorized representative

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email



COMMERCE

Grant/loan administrator, if applicable

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email

Clerk/contract attester

Name

Title

Street/P.O. Box

City

Zip

Telephone

Email

Section D – Required Documentation

To be submitted as attachments at the end of the application (as applicable):

- I. Project implementation schedule
Provide a project implementation schedule using Exhibit I, attached. Include a brief narrative to explain your proposed project schedule.
- II. Proposed project budget and budget justification narrative
Use Exhibit 2, attached, to list your project budget and to provide a detailed narrative that explains and justifies each line item of your proposed budget.
- III. Waiver of match requested?
If waiver of match is requested, provide supporting documentation and narrative justification as part of the budget narrative.
- IV. Letter(s) of commitment
For funds or resources to be provided by a nonprofit agency, water and sewer district or similar organization.
- V. Determination of environmental exemption
Provide a resolution or letter, signed by the chief elected official, documenting determination of environmental exemption. Use Exhibit 3-A and 3-B.
- VI. National objective identification worksheet
Using Exhibit 4, attached, determine which national objective your proposed planning activity meets or whether your proposed planning activity is a general community planning activity that does not need to meet a national objective. Use Exhibit 4 to submit required documentation as specified in the guidelines.
- VII. Letters expressing community support for the proposed planning project, if available

Section E – Planning Activity Proposal

Planning activities proposed to be funded by the CDBG Program must meet the national objectives of serving primarily LMI persons or preventing or eliminating the presence of slums and blight (see guidelines) and should align with the objectives outlined within Montana's Annual Action Plan, which include: supporting existing Montana communities; investing in vital public infrastructure; enhancing Montana's economic competitiveness; promoting equitable, affordable housing in Montana; and reducing homelessness in Montana. General community planning activities, e.g., growth policies, capital improvements plans, community needs assessments, etc., are assumed to meet a CDBG national objective. Community MT's review team will review all applications to determine that the proposed project meets these objectives.

Meeting a CDBG National Objective

Identify the type of planning activity you are proposing for CDBG funding. Check the appropriate box and follow the instructions for providing the required information and documentation. If you have any questions about what type of planning activity you are proposing, please contact the Community MT staff.

- General community planning activity
 - If you checked this box, please provide a map of the service area for the proposed planning activity and describe in the project description below how the activity will, to the greatest extent possible, benefit LMI persons and, if applicable, aid in the prevention or elimination of slums and blight.
- Site-specific and will meet the national objective of benefitting LMI persons
 - If you checked this box, use the National Objective Worksheet (Exhibit 4) to provide the required information and documentation.
- Site-specific and will prevent or eliminate slums and blight
 - If you checked this box, use the National Objective Worksheet (Exhibit 4) to provide the required information and documentation.

Past Planning Activities

Indicate what long-range planning projects the applicant has completed in the last 10 years. Check all that apply and indicate the year of most recent update:

Planning Project	Year
Growth Policy	
Capital Improvements Plan	
Downtown Master Plan	
Comprehensive Economic Development Strategy	
Community Needs Assessment	
Housing Needs Assessment	
Transportation Plan	
Trails/Parks Master Plan	
Other (describe)	

Project Description, Impact, Outcome, Next Steps and Capacity

Please address each of the questions below. Links to supplemental documents or community-specific data and related information are encouraged to help support or illustrate the planning activity that funding is being requested for.

1. Problem and intended outcome: Describe the problem that the proposed planning activity will address and the intended outcome of the planning activity, e.g., preparation of a growth policy, preliminary architectural report, preliminary engineering report, capital improvements plan or other planning document.
2. Impact: Describe the impact of the proposed planning project in the community including (all that apply):
 - a. On economic development and preparing for or responding to changes in the economy. If possible, indicate potential numbers of jobs retained or created;
 - b. On addressing the needs of the community's most vulnerable;

- c. On preventing or eliminating the presence of slums and blight, if applicable;
 - d. On preparing for or responding to change in population. Provide population numbers from the U.S. Census Bureau to indicate change;
 - e. On community revitalization, including making use of existing infrastructure;
 - f. On making the community more walkable; and/or
 - g. On the community's ability to attract future investment and/or leverage additional grant funding to address changes/challenges the community faces.
- 3. Next steps: Describe the next steps the community will take following the conclusion of the planning activity, e.g., additional grant funds sought and sources, implementation, project construction, etc.
 - 4. Community support: Indicate the community's support for the planning project. Attach any copies of letters expressing community support for the proposed planning project at the end of the application.
 - 5. Need for financial assistance: Describe the need for financial assistance to complete the planning project.
 - 6. Capacity: Describe the fiscal capacity of the applicant to meet the grant conditions required by Commerce including, but not limited to, managing the planning project and using generally accepted accounting principles.

Exhibit I
CDBG Planning Grants
Project Implementation Schedule

Task	Month/Year
Project Start Up Preparation of Commerce contract	
Procurement of Professional Services Including professional engineers, architects, land surveyors and planning consultants, etc.	
Submit request for proposals to Commerce for review. Architectural and engineering services must be procured in compliance with Section 18-8-201, MCA.	
Publish request for proposals or request for qualifications/conduct limited solicitation.	
Select professional.	
Execute agreement with professional.	
Project Implementation	
Prepare draft plan/report.	
Submit interim Request for Funds and 50% draft of final product.	
Public review and comment.	
Finalize plan/report.	
Project Closeout	
Submit final product.	

Submit final Request for Funds and signed Projects Completion Report.	
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Exhibit 2
CDBG Community Planning Grants
Preliminary Project Budget and Budget Narrative

Applicant name: _____

CDBG Planning Grant funds requested: \$ _____

☐ Community benefit: 1-to-3 match required

☐ Site-specific/private entity benefit: 1-to-1 match required

Note: Required matching funds and amounts must be included in this preliminary budget.

	Source: CDBG planning grant	Source: Match (specify)	Source: (specify)	Total
Status of non- CDBG funds (pending or firm)				
Professional planning activities				
Professional architectural/ engineering services				
Other (describe)				
Total planning project	\$	\$	\$	\$

The budget justification narrative **must** thoroughly explain the rationale or basis for all proposed budget costs for each line item.

Quotes from qualified professionals may be requested by Commerce to justify the proposed budget; applicants are encouraged to provide estimates from qualified contractors as part of the application package, in support of the amount of funds requested.

The thoroughness of the budget justification will be a consideration in the review of the application.

The budget for the planning project must be accompanied by a detailed narrative that explains:

1. The justification for each budget line item for the CDBG funds requested;
2. Local matching funds; and
3. Other sources and amounts of local, state, federal or private funds to be involved.

Reminder: Planning Grants may not be used for reimbursement of activities undertaken or completed prior to the Governor's Award Letter.

Budget Justification Narrative Response (response below or attached):

Exhibit 3-A
CDBG Community Planning Grants
Designation of Environmental Certifying Official
Sample – to be completed on local government letterhead

Date

(Name of Community Planning Program liaison)

Montana Department of Commerce

Community MT Division

301 S. Park Ave.

P.O. Box 200523

Helena, MT 59620

Dear (name of Community Planning Program liaison):

This is to notify you that (name), (title), is designated as the environmental certifying official responsible for all activities associated with the environmental review process to be completed in conjunction with the 20(xx) CDBG Grant awarded to (name of grantee), Montana.

Sincerely,

Signature of chief elected official (mayor or chairperson of county commission)

Typed name and title

Exhibit 3-B
CDBG Community Planning Grants
Finding of Exempt Activities

Sample – to be completed on local government letterhead

(Date)

(Name of Community Planning Program liaison)

Montana Department of Commerce
Community MT Division
301 S. Park Ave.
P.O. Box 200523
Helena, MT 59620-0523

Dear (name of Community Planning Program liaison):

It is the finding of the (name of grantee: city, town or county of _____), Montana, that the following activities approved for funding under the Montana Community Development Block Grant Program are defined as exempt activities under 24 Part 58.34, and meet the conditions specified therein for such exemption, of the environmental review process for Title I Community Development Block Grant Programs, and that these activities are in compliance with the environmental requirements of related federal authorities. The activities and the statutory authority for exemption are listed below:

List applicable activities, descriptions and authority. For example:

- I. Planning activities to include preparation of a preliminary engineering report.

Authority — Section 58.34(a)(1): Environmental and other studies, resource identification and the development of plans and strategies.

Sincerely,

Signature of environmental certifying
official or chief elected official

Exhibit 4**National Objective Identification Worksheet**

The National Objectives Identification Worksheet is included to ensure that the project meets an objective of the federal CDBG Program. On this page, all applicants must indicate which national objective the proposed planning activity meets. If the proposed planning activity is “General Community Planning,” you do not need to complete this worksheet. See the “Application Guidelines” pages for an explanation of the national objectives and what is required to meet each. Documentation supporting this section may be added to your application as Appendix A. Please cite page number for reference within this section, e.g., A-00.

I. Identify which of the CDBG national objectives your proposed planning activity will meet. Check only one.

- ☐ Benefit to LMI persons. If you checked this box, proceed to Section II. Do not complete Section III.
- ☐ Prevention or elimination of slums or blight. If you checked this box, proceed to Section III. Do not complete Section II.

II. Indicate how you plan to determine the percentage of benefit to LMI persons to meet the national objective of serving LMI persons. Check only one.

- ☐ Direct benefit to LMI households. If you checked this box, proceed to Section II-A.
- ☐ Area-wide benefit to LMI persons. If you checked this box, proceed to Section II-B.
- ☐ Limited clientele benefit: If you checked this box, proceed to Section II-C.

II.A. Direct benefit

Complete the following items. For detailed guidance about how to document benefitting LMI persons through direct benefit, see the Documenting Benefit to

Low and Moderate Income Persons handbook [here](#).

1. Does the project provide direct assistance to an income-eligible household, e.g., through planning for rehabilitation of housing occupied by LMI households or planning for a public facility project that will pay utility hookup charges or assessments for only LMI households? If so, provide documentation indicating the gross annual income of the household applicants that will be served.

II.B. Area-wide benefit to LMI persons

Complete the following items. For detailed guidance about how to document benefitting LMI persons on an area-wide basis, see the Documenting Benefit to Low and Moderate Income Persons handbook [here](#). Census data must be provided even if a certified income survey is used. Census information can be found through the HUD LMI mapping application [here](#). Supporting materials should be included in Appendix A as a narrative with data or a screenshot of information from the mapping application.

1. Percentage served by the project from HUD low/mod summary data (census): _____%
2. List the census tract number(s) that are included in the project area:

3. List the census tract block group(s) that are included in each of the census tracts listed in the previous question:

If a certified income survey was used, please complete the following items. For detailed guidance about how to conduct an income survey, see the Documenting Benefit to Low and Moderate Income Persons [handbook](#).

1. Include a letter from the authorized representative justifying why an income survey should be used over census data in Appendix A.
2. LMI percentage from that survey: _____%
3. Date the income survey was started: _____
Date the income survey was completed: _____
4. Describe the methodology that was used to conduct the income survey. Specifically, how was the data collected, who did the collection and how was the calculation completed?

II.C. Limited clientele benefit

Complete the following items. For detailed guidance about how to document benefitting LMI persons through limited clientele, see the Documenting Benefit to Low and Moderate Income Persons handbook [here](#).

To satisfy the LMI objective through limited clientele, the proposed planning activity meets one of the following tests. Check only one:

☐ Benefit a clientele group established by HUD to be principally LMI persons.

Check those that apply:

- ☐ Abused children
- ☐ Battered spouses
- ☐ Elderly persons
- ☐ Adults meeting the U.S. Census Bureau's Current Population Report's definition of "severely disabled"
- ☐ Homeless persons
- ☐ Illiterate adults

☐ Persons living with AIDS

☐ Migrant farm workers

☐ Benefit a clientele that it may be reasonably concluded to be primarily (greater than 51%) LMI persons. For example, a Head Start Center because Head Start's federal requirements mandate that at least 90% of the children served come from lower income families. If you check this box, provide any supporting documentation in Appendix A.

☐ Will result in the removal of material or architectural barriers that restrict the mobility and accessibility of elderly or disabled persons to publicly owned and privately owned nonresidential buildings, improvements and the common areas of residential structures containing more than one dwelling unit. If you check this box, provide any supporting documentation in Appendix A.

The following kinds of activities are unlikely to qualify under the limited clientele category. Confer with Commerce staff on a project-by-project basis:

- Activities where the benefits are available to all residents of an area;
- Activities involving the acquisition, construction or rehabilitation of property for housing; and
- Activities where the benefit to LMI persons is the creation or retention of jobs.

III. To meet the prevention or elimination of slums and blight national objective, complete the following items. Supporting materials should be included in Appendix A.

To meet the objective, the following are required:

- ☐ Applicant has a slum/blight resolution or designation for project area from the appropriate local government; and
- ☐ Photographic documentation with captions and dates of the slum or blighted conditions that prompted the local government resolution; and one of the two conditions below:
 - ☐ Public improvements or facilities throughout the area are in a general state of deterioration; or
 - ☐ At least 25% of the properties throughout the area exhibit one or more of the following:
 - Physical deterioration of buildings/improvements;
 - Abandonment of properties;
 - Chronic high occupancy turnover rates or chronic high vacancy rates in commercial or industrial buildings;
 - Significant declines in property values or abnormally low property values relative to other areas in the community; or
 - Known or suspected environmental contamination.

And:

- ☐ Applicant has documentation establishing the boundaries of the area and that the conditions that qualified the area as a slum or blight at the time of its designation by the appropriate local government and that designation (or re-designation) occurred within the past 10 years; and
- ☐ Planning activities assisted with CDBG funds will be limited to those that address one or more of the conditions that contributed to the decline of the area.

IV. In 250 words or less, explain why the national objective was selected and how this project meets the criteria of that objective. Refer to these guidelines for further guidance on the criteria and information that must be included. Specifically, make sure to address the questions listed here in Exhibit 4 for the chosen national objective.