



# Community Planning Grant Application Guidelines, Grant Administration, and Application

## COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

[commerce.mt.gov/Infrastructure-Planning](https://commerce.mt.gov/Infrastructure-Planning)

[July 2025](#)

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## I. Application Guidelines

### Introduction

The Montana Department of Commerce (~~Commerce~~) Community Development ~~MT~~ Division (~~CDD~~) will set aside up to \$~~6~~500,000 of Community Development Block Grant (~~CDBG~~) funds, supported by funding from the U.S. Department of Housing and Urban Development (~~HUD~~), for Community Planning (~~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, non-profit 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, local food bank, hospital, 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 (1) 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 (2) Planning grants per funding cycle and may have up to two (2) Planning grants open at any given time.

If you have additional questions involving eligibility, please contact ~~CDD staff~~Community MT at Commerce directly at 406-841-2770 or [doccdd@mt.gov](mailto: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.

~~Please contact CDD staff directly if you have any questions about whether the proposed planning project is an eligible activity under HUD regulations.~~

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

- ~~1.~~1. Growth Policies;
- ~~2.~~2. 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. Including ADA Self-Assessment Plans, (and related studies, policy development and regulation to promote accessibility);
- ~~3.~~3. Comprehensive Economic Development Strategy Plans;
- ~~4.~~4. 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;
- ~~5.~~5. Historic and Architectural Preservation Plans, Studies, and Analyses;



- 6.● 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;
- 7.● Planning activities associated with the preparation and adoption of an Urban Renewal District (~~URD~~) or Targeted Economic Development District (~~TEDD~~);
- 8.● Adaptive Re-Use or Redevelopment Plans;
- 9.● Preliminary Architectural Reports (~~PAR~~) for housing, public facilities, school facilities and economic development projects;
- 10.● Site-specific Development Plans;
- 11.● Development of Business Plans, Feasibility Studies, and Market Analyses;
- 12.● School Facility Condition Assessments, School Facility Energy Audits and Comprehensive School Facility Master Plans;
- 13. Infrastructure related planning activities including:
  - 14.● Preliminary Engineering Reports (~~PERs~~) for drinking water, wastewater, stormwater or solid waste facilities (or other public facilities), and economic development projects, and
  - 15.● Comprehensive Capital Improvements Plans (~~CIP~~); and
  - 16.● Preparation of grant applications for CDBG Housing, Public Facilities or Economic Development projects, in conjunction with a planning project listed above.
  - 17.● A planning project other than those listed above, recognized and agreed to by Commerce (~~please contact CDD staff prior to submitting an application for additional guidance~~).

CDBG planning funds can be used for general community planning (e.g. a Growth Policy, CIP, 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 or architectural report~~ PER or PAR) 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 ~~low-to-moderate-income~~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;
- Comprehensive Capital improvement plans;
- Local analyses of impediments to fair housing choice;
- Historic preservation and environmental studies;
- ADA Self-Evaluation Inventory and Transition Plan;
- and 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 ~~low-and-moderate-income~~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 low-to-moderate-income~~LMI ~~(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 (PAR)~~ for housing, public facilities, school facilities and economic development projects;
- ~~Preliminary Engineering Reports (PERs)~~ for drinking water, wastewater, stormwater or solid waste facilities (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; and
- 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 ~~low-and-moderate-income~~ LMI persons, the applicant must provide documentation that at least 51% of the anticipated beneficiaries are comprised of ~~low-to-moderate-income (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. ~~(see list on p. 11). How to document the project meets this objective is further discussed in these guidelines and the National Objective Worksheet, Exhibit 4.~~

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 the project meets this objective is further discussed in these guidelines and the National Objective Worksheet, ~~Exhibit 4.~~





~~If you have any questions about whether your proposed planning activity should be considered a general community planning activity or if it will need to meet one of the national objectives, please contact the CDD staff.~~

### 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; or
- Any otherwise eligible planning project costs incurred prior to the date of announcement of grant award by ~~the Montana Department of~~ 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.~~

~~a~~Applicants must ~~provide match financial match on a 1:3 basis; in other words, an applicant must provide~~ 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 1:1 basis. Matching funds must be firmly committed by the time CDBG grants 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 ~~1/3~~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.

~~In documenting a firm commitment of matching funds, the applicant must:~~

- ~~1. Specify the amount and use of the funds committed by the applicant as match; and~~
- ~~2. For funds to be provided by an entity other than the applicant, provide a letter of commitment from the agency or organization involved. The commitment of funds or resources may be made contingent on CDBG funds being awarded for the proposed planning project.~~

Below are guidelines for documenting firm commitment of matching funds:

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

Examples include:



- Letter of commitment from the agency or organization on official letterhead;
- Copy of award letter from other agency or organization; and
- 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 ~~low- or moderate-income~~ LMI persons or households.

## E. Application Submission

**CDBG Planning grant applications are due to Commerce ~~no later than 5:00 p.m.~~ on the date of the deadline for the grant cycle in which the applicant is applying posted on the ~~MDOC website, https://comdev.mt.gov/Programs-and-Boards/Community-Development-Block-Grant-Program/Planning-Activities~~ Commerce's Grants and Loans portal.** Applications for the preparation of ~~Comprehensive Capital Improvements Plans~~ CCIPs (CIPs) or ~~Preliminary Engineering Reports (PERs)~~ 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.

~~To apply for a CDBG Planning grant, eligible applicants must complete the application found on Commerce's website.~~

~~To submit your application electronically, please go to [www.transfer.mt.gov](http://www.transfer.mt.gov). Once there, you will be asked to log in or create an ePass account if you do not already have one. Once logged in, click on "Send a New File" and pull your application file(s) into the field and click "Continue." When prompted, click on "State Employee or ePass Montana Customer." On the "Recipients" page, select the "Find a State Group" tab. In the "Search" box, type "DOC CDD FTS" and hit "Search." Select the Existing Group found "DOC CDD FTS." To find the correct state distribution group, please use spaces between DOC and CDD and FTS. This step-by-step guide walks you through this process. If you have difficulties submitting your application electronically, please email [DOCCDD@mt.gov](mailto:DOCCDD@mt.gov) or call 406.841.2770 for assistance.~~

If you have questions how to access the Grants and Loans Portal, please contact CMT at [doccdd@mt.gov](mailto: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 ~~Development~~ 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 exhibit 3-A and 3-B. If an exempt determination cannot be made by the applicant, the applicant must contact ~~CDD-Community MT~~staff for further assistance. Commerce reserves the right to reject ineligible, incomplete, or otherwise improper applications.

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

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## **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. ~~CDD-Community MT~~ staff will review CDBG Planning grant applications and evaluate the extent to which each proposed planning project relates to the criteria below. The ~~Department of~~Director of Commerce ~~Director~~ makes final decisions on grant awards.

Awards may be delayed due to fluctuation of the Federal budget and State allocation.

~~CDD-Community MT staff~~ will first review each application for completeness. During this review, ~~staff~~ the review team may contact an applicant to discuss any concerns or questions, or to request additional information or documentation. ~~Staff~~ 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 ~~staff~~ 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, consistent with the overall goal of helping communities address their greatest needs, concerns and issues, and especially address the needs of ~~low-and-moderate-income~~ LMI households, combined with the likelihood to achieve substantial community impact. The Community MT review team ~~CDD-staff~~ 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) encourages development and community revitalization that utilizes existing infrastructure and community services; and 3) aligns 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 ~~CDD-the Community MT review team staff~~ and approved by the





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Department, 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 *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 ~~U.S. Department of Housing and Urban Development (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 ~~low-and moderate-income~~ 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 ~~(below)~~ 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 if it is a site-specific activity that must meet a CDBG national objective.

## II. Grant Administration

### B.A. Administrative Procedures and Requirements

~~Successful CDBG Planning grant applicants must comply with the below. The provisions below describe some of the more significant~~ administrative procedures and requirements. ~~successful CDBG Planning grant applicants must comply with.~~ 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 ~~CDD Community MT website at <http://comdev.mt.gov/>.~~

1. **Start-up Requirements:** All CDBG Planning grant recipients must submit the following documentation prior to contract execution with Commerce:

- a. Updated budget;
- b. Updated implementation schedule;
- c. Firm commitment of non-CDBG funds; and
- d. Attend a start-up call with Commerce.

2. **Contract Execution:** Prior to contract execution, the Community MT planning specialist will confirm in writing the following signatories, titles, and e-mail addresses for:

- a. Contract signed (typically the Chief Elected Official);
- b. Approved for Form (typically an attorney; optional);
- c. Attest (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 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. Adopt a Hatch Act resolution;
- c. Adopt an Equal Employment Opportunity policy resolution;
- d. Conduct an ADA Self-Evaluation and develop an ADA Transition Plan; and
- e. Adopt 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. PaymentReimbursements:** 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 DepartmentCommerce, grantees must submit a Request for Funds form (see 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. ~~-detailing the project expenditures by activity, employee and showing hourly rate breakdowns (i.e. number of hours worked at a specified rate), along with a project progress report. Commerce does not accept lump-sum invoices.~~

Documentation of the procurement process followed will be required submitted 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 ~~include~~ provide an ~~one~~ electronic copy of the final planning deliverables (e.g. growth policy, CIP, PAR, etc.). Commerce will determine whether supporting documents for a request for reimbursement payment are sufficient and meet the requirements of the program ~~adequate to approve reimbursement~~. 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, ~~unless the grantee can demonstrate, to the satisfaction of Commerce, a reasonable basis for the delay in requesting reimbursement~~. All documentation and requests for reimbursement must be received by the department within 60 calendar days of contract termination, ~~of the grant contract~~.

**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) ~~in order~~ 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.

4.

**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 (Art. II, §9). Information that could reasonably be considered ~~to be~~ proprietary, privileged, or confidential in nature should be identified as such in the application.

2.

**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.

3.

**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.

4.

**10. Compliance with Contract Conditions:** Commerce may require grantees adhere to technical guiding documents and templates based on scope of project as applicable.

Commerce has guidance documents available for different planning grant deliverables. See the *Community Technical Assistance Presentations, Publications & Model Documents* website for guidance and model documents.

5.

**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.

6.

**12. Grant Duration and /Performance Period:** The reimbursement period grant term will begin with the issuance of the Governor's Award letter, be solidified with contract upon execution, and terminate 60 calendar days after the reimbursement period ends. ~~of the grant contract and will end one (1) year after the date of the Award Letter, or upon final reimbursement for costs and close-out of the planning activity by Commerce.~~ Commerce will consider contract extensions special circumstances, 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 ~~district~~ grantee for reimbursement before the Governor's Award letter and after termination of the grant contract. All CDBG Planning projects ~~for which a CDBG Planning Grant that have has~~ been awarded must be completed within the time frame specified in the executed contract. ~~Commerce, in its sole discretion, may grant an extension to this deadline if the planning project is near completion but will not be fully completed by the deadline, and the grant recipient can demonstrate a good faith effort to complete the project on time and within the original budget.~~

7.

**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.

8.



**14. Cost Savings:** In the event that expenses for a CDBG Planning grant projects 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.

9.

**10.15. Uniform Relocation Act:** PERs and PARs funded with CDBG Planning grants ~~funding the preparation of preliminary engineering (PER) or architectural (PAR) reports which that~~ consider, recommend or require the acquisition of real property are subject to the Uniform Relocation Act ~~(URA).~~ Grantees are encouraged to contact CDD-Community MT staff anytime acquisition is ~~being~~ considered as part of a planning grant application or ~~project award~~, 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 local government will be required to submit evidence documentation showing demonstrating the procurement process, ~~was followed and provide documentation including of~~ the review and selection process, prior to requesting reimbursement. See Chapter 3 of the CDBG Grant Administration Manual for guidance on procurement. ~~In order to~~ To ensure that expenditures will be eligible for reimbursement, please contact ~~a CDD-Community MT staff member~~ 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 RFP 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 also should include information

regarding the time frame, factors that will be used to evaluate the responses, and a contact person. [A sample RFP 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 ~~Disadvantaged Business Enterprise and Women-owned Business Enterprise and Minority-owned Business Enterprise (all referred to as 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 (RFP)~~ or Request for Qualifications (~~RFQ~~) 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 on the CDD website.](#)

A list of Montana ~~DBE Disadvantaged Business Enterprises created by the Montana Department of Transportation (MDT) Disadvantaged Business Enterprise Program~~ may be found by calling MDT at (406) 444-6337 or ~~downloaded from on~~ their [website](#).

The primary objective of this requirement is that grantees and any sub-grantees take all necessary affirmative steps to ensure that DBE/[MBE/WBE](#)s 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:



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- Ensure that ~~small and minority-owned businesses and women-owned business enterprises~~ DBE/MBE/WBEs are solicited whenever they are potential sources of goods or services; and
- Divide total requirements -- when economically feasible and consistent with state law -- into smaller tasks or quantities to permit maximum participation by DBE/MBE/WBEs ~~small and minority businesses and women's business enterprises~~.

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.](#) ~~has designated Big Horn County, Glacier County, Lincoln County, and Mineral County as 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 created from the usage of covered HUD funds to residents in the community who earn at or below 80% ~~of area median income~~ AMI and the businesses that substantially employ these persons. Section 3 does not apply on a "per project" basis. ~~W~~Whenver 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 specifically required for CDBG Planning grant projects, if a planning grant project will result in a "covered" ~~project~~ (i.e., CDBG eligible construction) project, Section 3 must be followed during the planning grant project. Community MT

~~CDD staff~~ will work with all grantees to determine if Section 3 ~~applies~~ 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 and request of the grantee to indicate if the planning grant 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 (RFP)~~ or ~~Request for Qualifications (RFQ)~~ to hire an engineer or architect as part of the RFP or RFQ. This notice is to ensure that interested parties and residents have a reasonable opportunity to ~~hear~~ 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/~~NSP~~ Grant Administration Manual, Procurement Chapter, found on the CDD-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. ~~CDD-Community MT~~ staff can also provide sample RFP/RFQ language that includes the required language upon request.

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



## COMMERCE

1. Residents at or below 80% ~~of area median income~~ AMI in areas;
2. Residents of Public and Indian Housing;
3. Businesses that are 51% or more owned by Section 3 residents; ~~and or~~
4. Businesses where at least 30% of employees are Section 3 residents.
5. 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/~~NSP~~ 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 ~~CDD-Community MT~~ staff prior to CDBG Planning grants 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 3-5 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 RFP 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/~~NSP~~ Grant Administration Manual*, ~~Procurement Chapter, exhibit 3-F (see website)~~ 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 *CDBG/NSP Grant Administration Manual*, ~~Procurement Chapter, exhibit 3-G (see website)~~ 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 ~~(CDBG)~~ 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. DUNS 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/PO Box

\_\_\_\_\_  
City

\_\_\_\_\_  
Zip

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Email

## Project Engineer/Architect (if applicable)

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Street/PO Box

\_\_\_\_\_  
City

\_\_\_\_\_  
Zip

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Email

## Legal Counsel/Attorney

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Street/PO Box

\_\_\_\_\_  
City

\_\_\_\_\_  
Zip

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Email

## Primary Contact Person (if different from CEO/Authorized Representative)

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Street/PO Box

\_\_\_\_\_  
City

\_\_\_\_\_  
Zip

\_\_\_\_\_  
Telephone

\_\_\_\_\_  
Email

**Grant/Loan Administrator (if applicable)**

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Name

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Title

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Street/PO Box

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City

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Zip

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Telephone

---

Email

**Clerk/Contract Attester**

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Name

---

Title

---

Street/PO Box

---

City

---

Zip

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Telephone

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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 ~~(See Guidelines, page 6).~~
- IV. **Letter(s) of Commitment**  
For funds or resources to be provided by a non- profit agency, water and sewer district, or similar organization. ~~(See Guidelines, page 5).~~
- 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 ~~pages 9-10.~~
- 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~~~~low-to-moderate-income~~ person or preventing or eliminating the presence of slums and blight (see Guidelines, ~~pages 9-10~~) 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, CIPs, Community Needs Assessments, etc.) are assumed to meet a CDBG national objective. Community MT's review team ~~Planning Staff~~ 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 CDD-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 ~~low-and moderate-income~~ 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 ~~low-and moderate-income~~ LMI persons (~~LMI~~)
  - 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 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

~~Using separate sheets, 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: ~~In 100 words or less, d~~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, PAR, PER, CIP, or other planning document);



2. Impact: ~~In 500 words or less, d~~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 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: ~~In 250 words or less, d~~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: ~~In 100 words or less, i~~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: ~~In 100 words or less, d~~Describe the need for financial assistance to complete the planning project.
6. Capacity: ~~In 100 words or less, d~~Describe the fiscal capacity of the applicant to meet the grant conditions required by ~~the Department~~Commerce including, but not limited to, managing the planning project and utilizing generally accepted accounting principles.



**Exhibit I**  
**CDBG Planning Grants**  
**Project Implementation Schedule**

Task	Month/Year
<b>Project Start Up</b>	
Preparation of <del>MT Dept of</del> Commerce Contract	
<b>Procurement of Professional Services</b>	
Including professional engineers, architects, <u>land surveyors</u> , and planning consultants, etc.	
Submit <del>Request for Proposals (RFP)</del> to <u>CommerceDOG</u> for review <i>(Architectural and engineering services must be procured in compliance with Section 18-8-201, MCA)</i>	
Publish RFP or RFQ/Conduct limited solicitation	
Select professional	
Execute agreement with professional	
<b>Project Implementation</b>	
Prepare draft plan/report	
Submit interim Request for Funds and 50% draft of final product <del>(digital copy)</del>	
Public review and comment	
Finalize plan/report	
<b>Project Closeout</b>	
Submit final product, <del>both in digital and printed formats.</del>	

Submit final Request for Funds and <u>signed</u> Projects Completion Report	
--	--

**Exhibit 2**  
**CDBG Community Planning Grants**  
**Preliminary Project Budget and Budget Narrative**

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

CDBG Planning Grant Funds Requested: \$ \_\_\_\_\_

☐ Community Benefit – 1:3 match required

☐ Site-Specific/Private Entity Benefit – 1:1 match required

*(Note: required matching funds and amounts must be included in this preliminary budget)*

	<b>Source: CDBG Planning Grant</b>	<b>Source: Match (<i>specify</i>)</b>	<b>Source: (<i>Specify</i>)</b>	<b>Total</b>
Status of non- CDBG funds ( <i>pending or firm</i> )				
<b>Professional Planning Activities</b>				
Professional Architectural / Engineering Services				
Other (Describe)				
<b>Total Planning Project</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>	<b>\$</b>

*Note: Because the amount of funding is limited, applicants will be expected to absorb most costs associated with the administration of the CDBG Planning Grant.*

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 MDOG-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 date of announcement of grant award by the Department of Commerce 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 ~~Development~~ MT Division

301 S. Park Ave.

PO 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 20XX CDBG grant awarded to \_\_\_\_\_ (*NAME OF GRANTEE*), Montana.

Sincerely,

\_\_\_\_\_  
Signature\*

\_\_\_\_\_  
Typed Name and Title

*\*The chief elected official should sign this letter (mayor or chairperson of county commissioner).*

**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 ~~Development~~ MT Division

301 S. Park Avenue

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 ~~4-5 and 9-10~~ 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 (ex. A-00).

**I. Identify which of the CDBG National Objectives your proposed planning activity will meet (only one):**

- ☐ Benefit to ~~Low- and Moderate-Income LMI~~ Persons (~~LMI~~)—you checked this box, proceed to II (do not complete section III).
- ☐ Prevention or Elimination of Slums or Blight – if you checked this box, proceed to III (do not complete section II).

**II. Indicate how you plan to determine the percentage of benefit of LMI persons to meet the national objective of serving LMI persons (check one):**

- ☐ Direct Benefit to LMI Households (~~“Direct Benefit”~~)—if you checked this box, proceed to II-A
- ☐ Area-wide Benefit to LMI Persons (~~“Area Basis”~~)—if you checked this box, proceed to II-B
- ☐ Limited Clientele Benefit (~~“Limited Clientele”~~)—If you checked this box, proceed to 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-Basis**—complete the following items. For detailed guidance about how to document benefitting LMI persons on an Area 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 Appendix A.
  2. ~~Low/Mod~~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 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 Bureau of the Census’ 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 CDD 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 ~~pages 4-5 and 9-10~~ 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.**