

Community Development Block Grant (CDBG)

For
Entitlement Communities

2013 IACC Conference - Wenatchee

1



CDBG

2013 IACC Conference - Wenatchee

2

Local CDBG (Entitlement) and State CDBG Programs



<p>Non-Entitlement Counties</p> <p>These counties and the cities/towns in these counties, except the 11 cities indicated in the legend, are served by the state CDBG program.</p>	<p>Entitlement Counties</p> <p>These 11 counties and the cities/towns in these counties, are not served by the state CDBG program, except Puyallup, Lakemore, and Pierce County.</p>	<p>Entitlement cities not served by the state CDBG program, but in non-entitlement counties:</p> <ul style="list-style-type: none"> • Anacortes • Bellingham • Longview • Mount Vernon • Olympia • Portland Place • Rainier Beach • Rainier, East • Tacoma
--	---	--

2013 IACC Conference - Wenatchee

3



A few of the... Federal Requirements

- NEPA vs. SEPA
- Procurement (Section 3)
- Davis-Bacon Labor Standards per HUD Rules

2013 IACC Conference - Wenatchee

5

- Civil Rights compliance (Fair Housing, ADA, EEO)
- Uniform Relocation Act
- Audits and Contract Monitoring

2013 IACC Conference - Wenatchee

6

CDBG Ineligible Activities



2013 IACC Conference - Wenatchee

Community Facilities



2013 IACC Conference - Wenatchee

Community Centers



2013 IACC Conference - Wenatchee

Infrastructure – Sidewalk Improvements



2013 IACC Conference - Wenatchee

Traffic Calming Approaches



2013 IACC Conference - Wenatchee

Sewer Main Extensions



2013 IACC Conference - Wenatchee

Community Parks



2013 IACC Conference - Wenatchee 13

Park Improvements



2013 IACC Conference - Wenatchee 14

Economic Development

- Infrastructure for affordable housing
- Microenterprise for small business development



2013 IACC Conference - Wenatchee 15

Water Facility Improvements



2013 IACC Conference - Wenatchee 16

Major and Minor Home Repair Programs



2013 IACC Conference - Wenatchee 17

- Planning & Administration (20% cap of HUD Grant to Entitlement)
- Public Services (15% cap of HUD Grant to Entitlement)

Web link for guidebook:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/comm_planning/communitydevelopment/library/deskguid
 (google Guide To National Objectives)enatchee

18

Preparation



2013 IACC Conference - Wenatchee 19

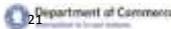
Sample 2014 King County CDBG Funding Cycles

JAN 2013	FEB 2013	MAR 2013	APR 2013	MAY 2013	JUN 2013	JUL 2013	AUG 2013	SEP 2013	OCT 2013	NOV 2013	DEC 2013	JAN 2014
Allocation Process March - May - Application materials available June 1 st - Applications are due												
Contracts Commence upon receipt of HUD Grant Agreement and completion of Environmental Review												
Project Implementation Must be completed by November of following year												
Human Service and Microenterprise Grants underway.												

2013 IACC Conference - Wenatchee 20

Tips for Grant Applications from an Evaluator

2013 IACC Conference - Wenatchee 21




2013 IACC Conference - Wenatchee 22



2013 IACC Conference - Wenatchee 23



2013 IACC Conference - Wenatchee 24



CDBG Construction Specifics

{ Under CDBG Entitlement Programs

1

- ↳ Advertising requirements
- ↳ Debarment
- ↳ EEO
- ↳ HUD Specialties
- ↳ Section 3
- ↳ Davis-Bacon and Force Account
- ↳ Resources

Overview

2



Advertising

3

- ↳ This project is financed through the Community Development Block Grant Program with funds obtained from the U.S. Department of Housing and Urban Development. The contract will be subject to regulations of the U.S. Departments of Labor and Housing, and Urban Development (HUD).
- ↳ Attention is called to federal provisions for Equal Employment Opportunity, HUD Section 3 requirements, and the minimum wages as set forth in the contract documents.

Let them know

4



No debarred contractors!

5

- ↳ Executive Order 11246
- ↳ <http://www.dol.gov/compliance/laws/comp-eeo.htm>

Equal Employment Opportunity

6



Section 3

7

"The **Section 3** program requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods."

- ⌘ Try to hire low income people locally for new positions
- ⌘ Over \$200K/100K
- ⌘ Document those efforts
- ⌘ Report them to HUD

Basics

8



Davis-Bacon

9



- ⌘ State Prevailing Wage
- ⌘ Davis-Bacon and Related Acts



Prevailing Wage Laws

Chocolate/FHA DBRA



HUD DBRA... a rockier road



Similar, but different

⌘ FHA: Transportation



⌘ HUD: Housing & Community Development



Why?

12

- ↳ Enforcement versus Complaint Driven
- ↳ Contracting Documents
- ↳ Federal forms and regulations
- ↳ Weekly Payrolls

Important Concepts

13

- ↳ Use a PreCon
- ↳ Be onsite
- ↳ Stay on top of subs



Success Factors

14

- ↳ *HUD Labor Forms:*
http://portal.hud.gov/hudportal/HUD?src=/program_offices/labor_relations/olrform
- ↳ *The HUD 4010 Federal Labor Standards Provisions (You need to have these in your contract!)*
http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12586.pdf
- ↳ *HUD 1344i The HUD Labor Handbook. This is what your Labor Relations monitor uses this resource when coming to you!*
http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/sech/1344i
- ↳ *Federal Payroll Form*
<http://www.dol.gov/whd/forms/wh347.pdf>
- ↳ *Making Davis-Bacon Work*
<http://portal.hud.gov/hudportal/documents/huddoc?id=makingdavisbaconwork001.pdf>

Forms and help

15



Don't let the subs do this to your Davis-Bacon file

16



Force Account

17

- ↳ Simpler process
- ↳ Less paperwork
- ↳ Keeps jobs in-house
- ↳ Cost savings on smaller projects



Advantages

18

- ⌘ Timing may not be as flexible
- ⌘ Still some paperwork
- ⌘ Not for maintenance
- ⌘ Capacity/Scale issues



Disadvantages

19

Thank you

20

Section 3

What is it?

“The **Section 3** program requires that recipients of certain HUD financial assistance, to the greatest extent possible, provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.”

How do I know if it applies?

Applicability of Section 3 to Housing and Community Development Assistance

The requirements of Section 3 apply to recipients of HUD Housing and Community Development funding exceeding \$200,000.

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 (i.e., roads, sewers, community centers, etc.), the requirements of Section 3 apply.

Further, contractors or subcontractors that receive contracts in excess of \$100,000 for Section 3 covered projects/activities are required to comply with the Section 3 regulations in the same manner as direct recipients.

*If the recipient agency receives Section 3 covered projects/activities, but no individual contract exceeds \$100,000, the requirements of Section 3 only apply to the recipient. Accordingly, the recipient must **attempt** to meet the Section 3 minimum numerical goals found at 24 CFR Part 135.30 by awarding 10 percent of the total dollar amount of all covered construction contracts to Section 3 businesses.*

What does this mean?

Bottom line: Section 3 requires you to document your best attempts to meet the criteria and report them. Going over that information is an entire breakout session unto itself just to cover some of the basics.

For more information, please visit:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/fair_housing_equal_opp/section3/section3

Equal Employment Opportunity

“The Executive Order 11246 (E.O 11246) prohibits federal contractors and subcontractors and federally-assisted construction contractors and subcontractors that generally have contracts that exceed \$10,000 from discriminating in employment decisions on the basis of race, color, religion, sex, or national origin. It also requires covered contractors to take affirmative action to ensure that equal opportunity is provided in all aspects of their employment.”

For more information, please visit the Department of Labor’s Website for Compliance Assistance

<http://www.dol.gov/compliance/laws/comp-eeo.htm>

Davis Bacon and Related Acts

Forms & Such

HUD Labor Forms:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/labor_relations/olrform

Repository of HUD's Labor Forms

The HUD 4010 Federal Labor Standards Provisions

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12586.pdf

You need to have these in your contract

HUD 1344i The HUD Labor Handbook.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/sch/1344i

Your Labor Relations monitor uses this resource when coming to you!

Federal Payroll Form

<http://www.dol.gov/whd/forms/wh347.pdf>

The Legend lives on: WH-347 (A DOL Form)

Making Davis-Bacon Work

<http://portal.hud.gov/hudportal/documents/huddoc?id=makingdavisbaconwork001.pdf>

Guide for Entitlements, Etc.

Bio

A thirteen year + veteran of King County, Dave Mecklenburg has over 5 years of experience implementing CDBG capital projects and also serves as the Labor Standards Compliance Officer with King County Housing and Community Development. He has handled numerous Davis-Bacon projects, from small scale \$25,000 bathroom remodels to \$30,000,000 housing developments, in addition to providing leadership and guidance to other Housing and Community projects managers.

**Dave Mecklenburg
King County Housing and Community Development
401 5th Avenue, Suite 510
Seattle, WA 98122
Dave.Mecklenburg@kingcounty.gov
206-263-9101**