

# Community Development Block Grant Program



## 2024 Quarter 4 Planning Grant Program

Indiana Office of Community and Rural Affairs  
CDBG Program  
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Indianapolis, IN 46204

## Planning Grant Information and Application Instructions

The Indiana Office of Community and Rural Affairs (OCRA) seeks applications from local units of government for Planning Grants funded through the state Community Development Block Grant (CDBG) program. Eligible local units of government are counties, cities, or incorporated towns not located within an entitlement community. Unincorporated areas must apply through the county in which they are located.

### General Planning Grant Information

The goal of the program is to encourage communities to plan for long-term community development. Communities interested in planning for projects relating to such issues as infrastructure, downtown revitalization, and community facilities are encouraged to apply. To be considered, projects must demonstrate the following:

- They meet a National Objective of the Housing and Community Development Act of 1974, as amended.
- The planning project addresses established long-term community priorities.
- The funds granted will have a significant impact on the overall project.
- The community has demonstrated a strong commitment to the project and its sustainability.
- The project is ready to proceed upon grant award and will be completed within 12 months after grant award.

### Application Requirements

To be eligible for Planning Grant assistance, projects must meet the following minimum requirements:

- The lead applicant must be a non-entitlement city, county or incorporated town that possesses the legal capacity to carry out the proposed program.
- The proposed project must meet a national objective and be an eligible activity under Section 105 (a) of the Housing and Community Development Act of 1974. In general, the project must either:
  - benefit an area or clientele whose population is at least 51% low- and moderate-income
  - aid in prevention or elimination of slums or blight (This national objective is only applicable to Downtown Revitalization Plans.)
- If the applicant has previously received any CDBG funds through OCRA or the Indiana Housing and Community Development Authority (IHCDA) the applicant must **NOT** have:
  - any unresolved monitoring/audit findings
  - any overdue grant reports or closeout documents
- More than three (3) CDBG grants that are open or pending award (Indiana cities and incorporated towns), or four (4) CDBG grants that are open or pending award (Indiana counties) from OCRA;
  - For those applicants with an open MSRP, WDW, PFP, SIP or BCP a “Notice of Release of Funds and Authorization to Incur Costs” must have been issued for the construction activities under the open MSRP, WDW, PFP, SIP or BCP contract, and a contract for construction of the principal (largest funding amount) construction line item (activity) must have been executed prior to the deadline established by OCRA for receipt of applications for funding.
  - For those applicants who have open Planning Fund grants, the community must have the final plan approved by the Office of Community and Rural Affairs prior to submission of MSRP, SIP, WDW, PFP, or BCP application for the project.
- CDBG Program Income collected above \$35,000 must be returned to OCRA before another CDBG grant will be approved. Please contact [CDBG@ocra.in.gov](mailto:CDBG@ocra.in.gov) for additional information regarding Program Income.
- The cost per beneficiary ratio for the proposed project cannot exceed \$5,000 (grant funds only).
- Local match must be provided by the applicant or third-party. Other state, federal or local grants can count toward the local match requirement. The local match must be in the minimum amount of 10% of the total project cost, not the grant amount being requested.
- Procurement of professional services for the planning study must be completed prior to the submission of the planning grant application in eGMS. The applicant must use the Qualification Based Selection (QBS) or Request

for Qualifications (RFQ) procurement process. All documentation of the process must be attached to the application.

- Grant Administrators used for CDBG Planning projects must have a Grant Administrator Certification issued by OCRA. A list of certified grant administrators is available [here](#).
- All maps and photographic documentation included in the application must be in full color and accompanied by captions with dates or clearly defined legends.

### Eligible Planning Activities

The following list identifies the general types of eligible activities for the planning grant program. The list is not all-inclusive. **Applicants should contact their Community Liaison to determine if their project is eligible for funding.** Eligible planning activities consist of all costs associated with data gathering, study, analysis, and preparation of plans and the identification of actions to implement such plans, including:

- Community development, redevelopment and functional plans in areas such as:
  - Broadband Readiness Plans
  - Comprehensive Plans
  - Downtown Revitalization Plans
  - Economic Development Plans
  - Economic Recovery Plans
  - Historic Preservation Plans
  - Environmental Assessments
  - Public Facilities Feasibility Studies
  - Water Infrastructure Plans—OCRA does not fund more than one phase or component of a single project type. This applies to all project types, although it is particularly relevant to utility projects. Even if a community does not intentionally phase a project, OCRA will consider previously awarded projects for the same project type during evaluation.

**NOTE:** If an applicant is applying for a grant to fund a plan type that they have already completed within the last five years, a letter of justification explaining why the plan needs to be redone must be included with the application.

### Meeting a National Objective of the Federal Act

Title I of the Housing and Community Development Act of 1974, as amended, identifies the national objectives of the CDBG program. Planning grants must meet the national objective of Benefit to Low- and Moderate-Income on an Area Wide Basis. The only exception is for Downtown Revitalization Plans, which may meet the Prevention or Elimination of Slums and Blight National Objective. The community will need to demonstrate that it meets the required objective by providing all required documentation and answering all relevant questions:

#### Benefit to Low- and Moderate-Income Persons – Area Basis

To show that a project benefits an area of low- and moderate-income people, the following questions must be clearly answered in the application on the National Objective Identification page:

1. What are the boundaries of the service area?
2. How do the boundaries correspond to the project's intended beneficiaries?
3. Using HUD Census data or an approved income survey, what percentage of persons in the service area is of low- and moderate-income?
4. How were the income characteristics of the target population determined?
5. Is the proposed facility available to all service area residents?

The following documentation **must** be provided in the application **if using an income survey that was approved prior to OCRA's previous income survey policy (effective June 5, 2022):**

1. Detailed map(s) showing the location and boundaries of the service area, including street names.

2. HUD LMI Data Maps and Worksheet
3. The methodology of the income survey, the low-to-moderate income worksheet, and the sample survey instrument must be included.
4. Preapproval email to conduct an income survey from OCRA CDBG program staff.

**If using an income survey that was initiated under OCRA’s current policy (effective October 16, 2024):**

1. All completed income survey documentation for this planning round should be submitted for final approval in eGMS by **November 1, 2024**, to ensure OCRA has the full 10 days to complete its review. See [OCRA Income Survey Policy \(Effective 10/16/2024\)](#).
2. All income surveys submitted by the November 1, 2024, preapproval date must be approved by OCRA in eGMS ahead of the application due date of **November 15, 2024**.

**Amount of Grant Request and Local Match**

The following maximum grant awards have been established by OCRA for Planning Grant recipients:

- Water Utilities Infrastructure studies are limited as follows:
  - \$60,000 for a study on two utilities (water or wastewater, and stormwater)
  - \$90,000 for a master utility study (water, wastewater, and storm water)

*Note: All utilities controlled by or of interest to by the community must be covered by the study.*

- Comprehensive plans are limited as follows:
  - Populations over 10,000 are limited to \$60,000
  - Populations under 10,000 are limited to \$50,000
- Economic Recovery plans are limited to \$50,000
- Economic Development plans are limited to \$40,000
- Broadband Readiness plans are limited to \$50,000 for single community; \$70,000 for a region.
- Downtown Revitalization plans are limited as follows:
  - Populations over 2,000 are limited to \$40,000, and
  - Populations under 2,000 are limited to \$30,000
- Historic Preservation plans are limited to \$20,000
- Environmental Assessments are limited to \$20,000
- Public Facilities Feasibility studies are limited to \$20,000

**The maximum award is not intended to serve as a target figure** for requests for grant assistance. OCRA will review the level of grant assistance requested and will consider the appropriateness of the project’s scope, level of demonstrated need, and the financial resources of the applicant. **If OCRA determines that a lesser amount is appropriate**, it may be necessary to revise the application before it is considered for funding.

To participate in the Planning Grant program, **communities must commit at least ten percent (10%) of the total project cost** in matching funds toward the grant. For example, an applicant applying to fund a project costing a total of \$50,000 must commit at least \$5,000 or ten percent (10%) of this project cost. The grant request would then be for the amount of \$45,000.

**Consultants and Grant Administration**

The Community Development Block Grant (CDBG) program requires the Qualifications Based Selection (QBS) procurement method for architectural and engineering services. All other professional services must be procured using the Request for Proposals (RFP) method, if being paid with CDBG funds. More information on the QBS process can be found [here](#).

All grant administrators involved in CDBG projects must be fully accredited CDBG Grant Administrators. This certification must be current at the time of application. A list of certified grant administrators is available at

[www.in.gov/ocra/2536.htm](http://www.in.gov/ocra/2536.htm). Additional information on the CDBG Grant Administrator Certification Policy can be found on the OCRA website at: [www.in.gov/ocra/2897.htm](http://www.in.gov/ocra/2897.htm).

**NOTE:** Private firms or non-governmental entities that perform project development and administration activities for CDBG-assisted projects (project development, environmental review, grant application preparation, procurement assistance, grant administration) will NOT be allowed to perform architectural, engineering, planning, or other related services/activities for grantees or their non-profit sub-recipients on those projects.

**If paid from CDBG funds, Grant Administrators may charge up to 8% of the CDBG grant amount. If paid from non-CDBG-funds, any amount over the 8% grant administration cap is considered an ineligible cost.**

### Public Hearings and Citizen Participation

Two public hearings must be held at different stages of project development. One public hearing must be held prior to the submission of the application and the second must be held after OCRA approval of the planning study.

**Note: New public hearings must be held for each grant cycle, regardless of prior application(s).**

Public hearing notice must be posted at least 10 days prior to the hearing date. **Therefore, the public hearing cannot occur until the 11<sup>th</sup> day or after.** Applicants should be aware of local newspaper deadlines for submitting advertisements. Some smaller newspapers are published weekly and will require that the advertisement is placed well in advance of the public hearing. Other methods of advertising the public hearing is also encouraged. All public hearings must be accessible to handicapped persons. Public hearings should also be made convenient to the low- and moderate-income residents who will benefit from the project.

The public hearing notice and the publisher's affidavit documenting publication dates, the dated sign-in sheet and signed minutes **must be attached to the application for the first public hearing.** Documentation for the **second public hearing will be required upon submission of the final plan** to OCRA. The affidavit is the **only** application document accepted after the due date. **The affidavits must be received within 14 days of the due date.** OCRA is not responsible for reminding applicants to submit this document.

**Minutes must be signed and dated by the party that recorded them.** If a third party, such as a grant administrator, takes the minutes of the meeting, the applicant **must** include a document stating that the third party is acting as the applicant's representative. It is recommended that an audio tape of the public hearing be recorded and kept until the grant is closed out. OCRA may request transcripts of the public hearings.

- Place all documents from each public hearing together in the application. Do not separate by type of documentation.
- All public hearing ads submitted with the application must be of sufficient size to be readable upon review.
- Minutes should document the topics of discussion and not simply state "there was a discussion."
- Minutes are a great source of quotes showing residential impact.

All questions regarding Limited English Proficiency must be answered on the Citizen Participation page. Please attach the Four Factor Analysis and Language Access Plan as required.

For more information, please refer to the [CDBG Handbook](#).

### Build America Buy America Act

The Build America, Buy America Act requires any infrastructure project funded by any Federal Financial Assistance, such as CDBG, to apply a domestic procurement preference. This means that all iron, steel, manufactured products, and construction materials used in infrastructure projects must be produced in the United States, unless the U.S Department of Housing and Urban Development (HUD) has issued a waiver of the domestic procurement requirement also referred to as the "Buy America Preference" (BAP).

As required by HUD, record keeping should be maintained in accordance with applicable program requirements. To ensure record keeping compliance is fully maintained, the applicant must complete the [BABA-01: Determination Form](#). A completed form must be submitted as part of FEPS.

### Application Process and Deadlines

The application must be submitted via the Indiana Electronic Grants Management System (INeGMS) by a certified Grant Administrator. The system is accessed via the CDBG webpage or at <https://in-ig.my.site.com/Grants/s/>. Community members can also access the system but are not able to submit.

All completed income survey documentation for this planning round should be submitted for final approval in eGMS by **November 1, 2024**, to ensure OCRA has the full 10 days to complete its review. See [OCRA Income Survey Policy \(Effective 06/05/22\)](#).

All other items needing pre-approval (bonus point requests, overdue documents, etc.) for this planning round are due on **November 1, 2024**.

**The application MUST be submitted by 11:59 PM ET on Friday, November 15, 2024.** Failure to comply with submission requirements could render an application ineligible.

The below process must be followed:

1. **Communication with Community Liaison (CL):**

The applicant must contact their CL to notify OCRA of their intention to submit an application and is encouraged to collaborate on technical assistance with developing the application and advice on the planning process. A map of community liaison districts can be found [here](#).

2. **Planning Grant Application:**

Planning grant applications will be reviewed during quarterly funding cycles. **The application deadline is November 15, 2024, at 11:59pm EST.**

**Please answer all questions completely.** Be sure to reference the page number of each piece of supporting documentation that has been attached, and do not include attachments that are not discussed and referenced in the narrative unless federal or state policy requires those attachments.

**NOTE:** Applicants that do not receive funding but choose to reapply will need to hold one additional public hearing to discuss the revisions that were made to the original application before resubmission.

**NOTE:** In the event of an incomplete application, the application will be returned and can be resubmitted once complete. Any additional information needed to complete the application must be submitted within two weeks of request. Date of receipt of application will be based on the date of receipt of all required documentation.

**NOTE:** If an application is returned because it is incomplete, no additional public hearing is required as long as the scope and budget for the project does not change substantially (by at least 10%). If an application is returned because it did not meet the minimum score requirement to be awarded, then another hearing will be required.

3. **Procurement:**

The applicant must use Qualifications Based Selection (QBS) or Request for Qualifications (RFQ) process for architectural/engineering services, as laid out in the CDBG Handbook.

4. **Review of Draft Planning Study:**

Upon completion of the draft planning study contact your Community Liaison, Grant Services or CDBG Program staff to determine the current method of submission for draft plans. OCRA is currently working on accepting draft plans via eGMS, and it is expected that process will be in place for any awards from this quarter.

A minimum of sixty (60) days should be allowed for the initial review by OCRA. Please note, however, that the sixty days does not allow any time for revisions that may be necessary, as well as administrative close-out of the grant. Therefore, it is highly recommended that the plan be submitted as soon as possible prior to the deadline of the grant. Upon confirmation that OCRA's technical specifications for that plan type have been met and all necessary components were included, the plan will be formally approved by OCRA.

#### **5. Planning Project Completion:**

After approval by OCRA of the draft document, **a second public hearing must be held to solicit public comment on the draft document.** The draft must be made available to the public at the time of the hearing notice publication. At this second hearing, the lead applicant must approve the plan by resolution. A sample resolution can be found on the OCRA website (see Sample Local Resolution Approving Plan). This hearing must follow all of the same guidelines discussed above in the Public Hearings and Citizen Participation section of this application packet.

A copy of the second public hearing notice, the publisher(s) affidavit, sign-in sheet, minutes, and the resolution approving the plan at the local level shall be forwarded to the CDBG Program Director. Receipt of these documents and approval of the document must occur prior to the submission of the request for final draw down of funds, or the draw request will be denied.

**NOTE:** If a third party, such as a grant administrator, takes the minutes of the meeting, the applicant must include a document stating that the third party is acting as its representative.

## Grant Evaluation Criteria

700 POINTS TOTAL

Applications must achieve a minimum score of **450 points** to be eligible for award.

### **NATIONAL OBJECTIVE SCORE (100 POINTS):**

Depending on the National Objective to be met by the project, one of the following two mechanisms will be used to calculate the score for this category.

**1. National Objective = Benefit to Low- and Moderate-Income Persons:** 100 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

$$\text{National Objective Score} = \% \text{ Low- and Moderate-Income Beneficiaries} \times 1$$

**2. National Objective = Prevention or Elimination of Slums or Blight:** 100 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

#### **National Objective Score = (Total of the points received in each category below)**

- Applicant has a Slum/Blight Resolution for project area (50 pts.)
- The project site is a brownfield\* (25 pts.)
- The building or district is listed on the Indiana or National Register of Historic Places\*\* (10 pts.)
- The building or district is eligible for listing on the Indiana or National Register of Historic Places\*\* (10 pts.)
- The building is on the Historic Landmarks Foundation of Indiana's "10 Most Endangered List" (15 pts.)

\*The State of Indiana defines a brownfield as an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redevelopment is complicated due to actual or perceived environmental contamination.

\*\*Project may either be listed on or eligible for listing on the Indiana or National Register of Historic Places. Both cannot be checked.

### **COMMUNITY DISTRESS FACTORS (175 POINTS):**

Various factors are used to determine the distress of a community. OCRA has partnered with Stats Indiana, an Indiana University entity to analyze and calculate the distress of Indiana's small cities, towns, counties and townships. Factors used to calculate the Community Distress points used for CDBG scoring include:

- Poverty Rate
- Median Household Income
- Unemployment Rate
- Non-seasonal Housing Vacancy Rate
- Housing Cost Burden
- Population Change (10-year % Change)

Local government scores, which are updated and published annually, can be found at: [www.stats.indiana.edu/](http://www.stats.indiana.edu/).

### **LOCAL MATCH CONTRIBUTION (75 POINTS):**

A maximum of 75 points based on the percentage of local funds devoted to the project. This total is determined as follows:

$$\text{Total Match Points} = \% \text{ Eligible Local Match} \times 1$$



The points total is capped at 75 points or 75% match, i.e., a project with 75% match or greater will receive 75 points. Below 75% match, the formula calculation will apply. Eligible local match can be local cash or debt sources. Federal, state, and local government grants are considered eligible match.

**PROJECT DESIGN FACTORS (300 POINTS):**

A maximum of 300 points awarded according to the evaluation in three areas:

**Project Description** – Is the project clearly defined as to determine eligibility? – 50 points

**Project Need** - Is the community need for this project documented and compelling? – 125 points

**Financial Impact** - Why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA Scoring Committee when evaluating the projects. **Applicants should refer to the application packet and address all questions present.** Applicants should work with their OCRA Community Liaison to identify ways to increase their project’s competitiveness in these areas.

**PROGRAM SPECIFIC POINTS (50 POINTS):**

**Planning Grants (PL)**

- **Community Input and Collaboration** – A maximum of 25 points are awarded for communities that document public input and collaboration efforts *beyond* Public Hearings, letters of support, and surveys.
- **Connection to Previous Planning Effort** – A maximum of 15 points are awarded for documentation that the plan that is being applied for connects to a previous planning effort done by the community.
- **Implementation of Previous Plan or First-time Plans** – A maximum of 10 points are awarded for communities that document the successful implementation of a previous planning grant plan or for communities that have never received a Planning Grant before.

**BONUS POINTS POLICY:**

It is OCRA’s policy to encourage and support regional coordination amongst rural communities. As such, a grant application that is included in a regional plan will be awarded 25 bonus points. To receive these bonus points requires verification of the regional plan from the CDBG Program Director approximately 2 weeks prior to application submission.

**Bonus Points for Regional Planning** – 25 points

**POINTS REDUCTION POLICY:**

It is the policy of OCRA not to fund more than one plan or component of a single plan type in different funding rounds. This applies to all plan types, although it is particularly relevant to utility plans. If a community needs to phase a plan in order to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn’t intentionally phase a plan, OCRA will take into account previously awarded plans for the same plan type. A community that has previously been awarded a grant for the same plan type will likely not be competitive and will be subject to the follow point reduction.

**0 – 5 years since previous funding** – (-50 points)

**Example:** Community submits and receives a Planning grant in 2015 to conduct an environmental assessment for a particular site. When applying for a Planning grant in 2020 to do an environmental assessment for a different site, they would be subject to a point reduction of 50 pts. They would have no point reduction in 2021.

<b>2024 Scoring - Planning</b>	
<b>Minimum Score Needed: 450</b>	
<b>PROJECT DESCRIPTION:</b>	
<b>A detailed description, in non-technical terms, of the proposed project and desired outcomes at the conclusion of the grant period.</b>	<b>15</b>
Is there a detailed, easy-to-understand project description in non-technical terms?	10
Are there clear and measurable desired outcomes addressed by the planning project after completion?	5
<b>Scope of Work</b>	<b>20</b>
Is the scope of work clear and logical for the type of planning project? Are ineligible items noted?	10
Does the scope of work correlate with the detailed budget? Include per item costs.	10
<b>Project Support</b>	<b>15</b>
Is there documentation of a robust development process for the planning project?	10
Are there high-quality, color, clearly labeled maps that identify the expected area covered by the plan?	5
<b>Project Description TOTAL</b>	
<b>50</b>	
<b>PROJECT NEED (Consider main PDIs and PDIs listed by project type if applicable):</b>	
<b>Priority</b>	<b>45</b>
Is there documentation of a 3–5-year history of issues this plan would address?	10
Is frequency/prevalence of the issue(s) this plan would address compelling? Is adequate documentation included in the Appendix?	10
Is there a risk of the issue(s) this plan would address having a significant impact on residents? Is adequate documentation included in the Appendix? (Show the impact on residents' daily lives.)	10
Is this plan a community priority? Is adequate documentation included in the Appendix?	10
Are survey results and other data related to the issue(s) this plan would address included to adequately describe the need? (Photos are not considered data.)	5
<b>Current Conditions</b>	<b>15</b>
Are the current community/facility conditions well explained and documented?	10
Are high-quality color pictures showing conditions within the past 5 years included? Does every picture have a caption and date stamp? If no pictures, are reasons provided?	5
<b>Residential Impact</b>	<b>45</b>
Is the residential impact of the issues being addressed by the plan explained and documented? What are potential impacts on residents if planning is not completed?	25
Is residential support/need for the planning project outlined and documented?	20
<b>Health and Safety</b>	<b>20</b>
Are health and safety issue(s) this plan would address explained in detail? What are potential health risks if planning is not completed?	10
Are health and safety issue(s) this plan would address well documented? (Please provide citations.)	10
<b>Project Need TOTAL</b>	
<b>125</b>	

<b>FINANCIAL IMPACT:</b>	
<b>Previous Efforts</b>	<b>50</b>
Have there been previous efforts to address the issue(s) this plan would cover by the community?	<b>30</b>
Is supporting documentation included explaining past efforts, including partnerships, expenditures and labor hours?	<b>20</b>
<b>Sustainability</b>	<b>15</b>
Is there an adequate sustainability plan for this project? Does the community have a timeline to update the plan? (Provide Who, What, When, and How elements in the outlined strategy.)	<b>10</b>
Are there commitments to maintain the plan past the 5-year closeout window?	<b>5</b>
<b>Financial Options</b>	<b>25</b>
Were at least three (3) other financial options for the planning project investigated, besides CDBG?	<b>10</b>
Is there an explanation of why CDBG is the best option for the planning project? Why are other financial options not the best option?	<b>10</b>
If CDBG funds are not awarded, will the planning project move forward?	<b>5</b>
<b>Local Match</b>	<b>10</b>
Is the local match option well explained and documented?	<b>10</b>
<b>Fund Balances</b>	<b>25</b>
Are the fund balances and relevant documentation for the applicant and sub-recipient adequately explained?	<b>15</b>
Are all discretionary fund balances accounted for and explained?	<b>10</b>
<b>Financial Impact TOTAL</b>	<b>125</b>
<b>Project Design TOTAL</b>	<b>300</b>