



# WILL COUNTY LAND USE DEPARTMENT COMMUNITY DEVELOPMENT DIVISION

## **Community Development Block Grant (CDBG)**

### Policies and Procedures Public Facilities and Public Service Projects

*Will County Land Use Department  
Community Development Division  
58 E. Clinton Street, Suite 500  
Joliet, Illinois 60432  
Phone: (815) 774-7890*

Effective February 19, 2015



**2015 COMMUNITY DEVELOPMENT BLOCK GRANT  
And HOME APPLICATION SCHEDULE**

February 23, 2015	Applications available for municipalities/agencies
February 24, 2015-May 7, 2015	Communities to hold public hearings and complete application-Review with CDD staff as needed
March 11, 2015	Application Workshop
May 8, 2015	<b>APPLICATION DUE DATE</b> (by 4:00 p.m. at CDD office) 58 E. Clinton Street, Suite 500, Joliet, Illinois
May 11, 2015-June 1, 2015	CDD to review applications and conduct project site visits-Application recap/summaries mailed to Advisory Board for review
May 15, 2015	Publish Public Hearing Notice
May 28, 2015 1pm-3pm	Public Hearing CDBG Advisory Board Meeting
June 12, 2015 1pm-3pm	CDBG Advisory Board meeting to prepare final recommendations and review project funding for the Executive Committee
June 14, 2015-July 15, 2015	2015-2019 Consolidated Plan/ 2015 Action Plan Display Period
July 19, 2015	Executive Committee Meeting
July 16, 2015	County Board Meeting
October 1, 2015	Beginning of CDBG Program Year

## Will County Board 2015-2016

### **DISTRICT #1**

HOWARD, ROBERT  
OGALLA, JUDY

### **DISTRICT #2**

MOUSTIS, JIM  
SINGER, CORY

### **DISTRICT #3**

MORAN, DONALD A.  
RICE, BETH

### **DISTRICT #4**

HARRIS, KENNETH E.  
TRAYNERE, JACQUELINE

### **DISTRICT #5**

BENNEFIELD, DARREN  
FRITZ, GRETCHEN

### **DISTRICT #6**

FREITAG, RAGAN  
GOULD, DON

### **DISTRICT #7**

BALICH, STEVE  
FRICILONE, MIKE

### **DISTRICT #8**

BROOKS, JR., HERBERT\*\*  
WINFREY, DENISE E.

### **DISTRICT #9**

PARKER, ANNETTE  
STALEY-FERRY, LAUREN

### **DISTRICT #10**

BABICH, JOSEPH M.  
WILHELMI, STEPHEN M.

### **DISTRICT #11**

HART, SUZANNE  
MAHER, CHARLES E. (CHUCK) \*

### **DISTRICT #12**

McDERMED, MARGO  
WEIGEL, TOM

### **DISTRICT #13**

COLLINS, LIZ  
FERRY, MARK

\* Republican Caucus Chair

\*\* Democratic Caucus Chair

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# WILL COUNTY COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

## INTRODUCTION

The purpose of this Policies & Procedures Manual is to provide local applicants in the Community Development Block Grant (CDBG) program with a basic knowledge of the regulations, policies, and procedures that guide the program. As such, it can be viewed as a reference to be used by applicants when developing applications. Because it also outlines the responsibilities of grantees, it can also be a useful reference for persons or agencies already engaged in the implementation of CDBG projects. **This handbook cannot, however, be viewed as a comprehensive description of all regulations and laws applicable to the CDBG program.** Therefore, as the handbook suggests in many places, the Will County Community Development Division should be contacted for additional information or clarification regarding specific issues.

Will County anticipates receiving Community Development Block Grant (CDBG) funds from the U.S. Department of Housing and Urban Development (HUD) for the period of October 1, 2015 – September 30, 2016 (PY 2015) and is presently accepting proposals. The allocation amount for the upcoming program year is unknown, however. Will County may not receive final notification of the annual CDBG award amount from the Department of Housing and Urban Development until April or May 2015. The County will reserve the right to award more or less than previous funding levels as the allocation is dependent on the final entitlement amount authorized by Congress and the Department of Housing and Urban Development.

The County will utilize these funds to create decent, affordable housing; provide a suitable living environment; and expand economic opportunities for low- and moderate-income residents of Will County.

The handbook is divided into the following four (4) parts and includes appendices.

- Part 1. Provides general background information about the CDBG program discussing the national emphasis of the program as well as the local structure;
- Part 2. Deals with Federal Objectives and County Program Goals, Priorities and Focus;
- Part 3. Deals with eligibility and funding and will be of particular interest if the reader is to be submitting an application to the Will County Community Development Division.
- Part 4. Provides information necessary to complete the application form and outlines the procedure for selection of projects.

Finally, the organization of this manual is such that each topic is divided into many subcategories. The reader should be able to locate answers to most questions by reviewing the subcategories in the table of contents. However, any questions or need for clarification may be referred to the Will County Community Development Division at (815) 774-7890.

## APPLICATION SELECTION/FUNDING POLICY

Will County's ability to qualify for and receive federal CDBG funds is dependent on a number of federal requirements, including the timely completion of projects. Projects not completed within

the federally established timelines jeopardize the County's ability to continue to receive funding. In order to minimize this risk, the Will County Board has adopted a Reallocation Policy enabling the County to enforce a more flexible and accelerated implementation schedule as required to remain within the timeliness regulations.

As a condition of participation in the County's CDBG program, grantees must agree to adhere to individual project performance requirements (as set forth in section 4.3 of this Manual). The County reserves the right to accelerate pre-selected projects (anticipated for implementation in future years) for immediate implementation by shifting a current year grant from a non-performing or delayed project to a future grantee. The non-performing or delayed project will be taken off of the current year's budget and will have to be resubmitted as a new application for funding the following year. Projects will be approved for acceleration by the County Board, as needed, based on project priority and size.

For additional information regarding the reallocation policy, please contact Will County Community Development at 815-774-7890.

## **Part 1. FEDERAL AND LOCAL OVERVIEW OF THE CDBG PROGRAM**

### **1.1 Background of the CDBG program**

The Community Development Block Grant (CDBG) is an annual grant from the U.S. Department of Housing and Urban Development (HUD) provided to states and local governments on a formula basis. The main purpose of these funds is to develop viable urban communities by providing decent housing and a suitable living environment, as well as to expand economic opportunities for low- and moderate-income persons.

The CDBG program became effective on January 1, 1975 as authorized by Title I of the Community Development Act of 1974. The purpose of this act was to replace eight specific programs, which provided categorical grants or loans, with a system of "block grants" designed to address similar needs as the eight programs it replaced. The CDBG program is a more flexible way of meeting needs in urban renewal, neighborhood development, open space, urban beautification, historic preservation, public and neighborhood facilities, and the Model Cities supplemental grant program.

Unlike the categorical grant programs it replaced, the CDBG program does not require that a separate application be filed for each individual project undertaken by a community. Instead, communities with a population of 50,000 or more are considered "entitled" to an allocation of funds based on a formula established by the Department of Housing and Urban Development (HUD), and urban counties with populations of 200,000 or more are also so entitled. In Will County, the City of Joliet is a separate entitlement community receiving direct CDBG funds due to its population of more than 50,000. Urban counties (the category under which Will County qualifies as an entitlement community) are allocated CDBG funds based on data regarding population, poverty, housing overcrowding, age of housing, and extent of growth lag. To protect communities that were active under the old programs it replaced, special sections of the regulations make eligible the completion of programs and projects begun under the old program. The Will County Board entered the CDBG Program in 1982 after all municipalities and townships agreed to allow their respective populations to be included in order to achieve the status of an Urban County.

The primary objective of Title I of the Housing and Community Development Act of 1974, as amended, is the development of viable urban communities by providing decent housing and a

suitable living environment and expanding economic opportunities, principally for persons of low and moderate income. This objective reflects the intent of the categorical grant programs that the CDBG program was designed to replace. Consistent with this objective, the grantee community must certify that it has the legal authority to carry out a CDBG program; its governing body has authorized by resolution the application for funds; it has met citizen participation requirements; it will conduct its program in a nondiscriminatory manner in accordance with Title VI of the Civil Rights Act of 1964 and Title VIII of the Civil Rights Act of 1968; it will give maximum feasible priority to projects that benefit low and moderate income persons; and it is following a current, HUD-approved Consolidated Plan.

As included above, part of the responsibility of CDBG entitlement communities is the development and implementation of a Consolidated Plan (Con Plan). In the Will County Con Plan it is emphasized that CDBG priorities should be given to projects that solve or attempt to solve long standing Public Facilities problems, especially those projects dealing with Public Health and Sanitation. Such priority projects include improvements to Sanitary Sewer systems (public or private); improvements to Water Systems (public or private); and improvements to Storm Water management systems.

On the basis of these needs, the Con Plan details a strategy for meeting these Public Facilities and other needs from 2015 through 2019. Because the establishment of priorities, such as those Public Facilities priorities just mentioned are an integral part of the CDBG program, the Con Plan becomes an important statement of the County's CDBG policy. Therefore, HUD views this Policy Manual as written documentation of the County's effort to provide solutions to existing problems.

In summary, the CDBG program, as conceived in 1974 and revised by various amendments since that time, is designed to meet specific needs of neighborhoods, the community at large, and low and moderate-income persons in particular. This perspective is emphasized each year when the annual program for the County is developed, and it underlies the decisions made by staff, the CDBG Advisory Board, the County Board, CDBG participants, and HUD relative to this program.

## **1.2 Overview of CDBG Structure for Will County**

Once a year, municipal and township governments will be eligible to sponsor and submit an application and to compete for available CDBG funds. Projects are eligible based on both the project category and the project beneficiaries in accordance with the guidelines contained in this Manual.

The Will County CDBG Advisory Board makes recommendations to the Will County Board on all local policies and procedures; reviews all subgrantee applications; and recommends municipal and township projects for funding. The Will County Board makes the final determination on the use of grant funds. The Will County Executive is the officer held accountable by the Federal Government for operating and maintaining the program in compliance with all related Federal statutes, rules and regulations.

A system called the "opt-out" process helps assure that the municipalities and the County continue to work cooperatively. CDBG regulations state that an urban county must have a population of 200,000 or more including (a) its unincorporated areas and (b) municipalities that have allowed their population to be counted toward the County's CDBG program. Because the unincorporated areas of Will County do not contain a population of 200,000, the County must be able to include the population of its municipal areas in order to qualify as an entitlement community.

To establish the population of the County for CDBG purposes, Will County municipalities are given the opportunity to opt-in or opt-out of the County's CDBG program (i.e., to be counted as part of its CDBG population). When municipalities opt-out of the program, it reduces the total number of CDBG funds allocated to the County. Opt-out municipalities may not participate in the Community Development program nor apply for funds. However, municipalities that opt-in are able to participate in the program and apply for funds. The 'Opt-Out' process covers a three-year span, and the current cycle includes program years 2015 through 2017. Consult the Community Development Division for a current list of Communities in Will County that have opted out of Will County's program.

The County's CDBG Program is intended to supplement the efforts of localities in initiating and/or engaging in a community development process. The Will County CDBG Program grants are awarded for funding on a competitive basis. The staff of the Community Development Division verifies applicant eligibility; prepares project summary reports based on interviews with applicants; and prepares and presents recommendations for funding to the CDBG Advisory Board. The CDBG Advisory Board recommends project awards to the County Board. The County Board makes the final grant awards.

## **PART 2. FEDERAL OBJECTIVES AND COUNTY PROGRAM GOALS**

### **2.1 National Objectives**

In order to be eligible for funding, every CDBG-funded activity must qualify as meeting one of three national objectives of the program. Each activity must meet specific tests for one of the following three:

- **BENEFITING LOW AND MODERATE INCOME PERSONS (LMI)** Federal Guidelines require that a minimum of 70% of the County's total grant funds be allocated projects which primarily benefit low and moderate income persons. However, the regulations also state that "...the grantee shall appropriately ensure that activities that meet this standard *do not benefit moderate income persons to the exclusion of (very) low income persons.*" In order to ensure such an emphasis, priority is given to projects which address the needs of low and very low-income persons.
- **AIDING IN THE PREVENTION OR ELIMINATION OF SLUMS AND BLIGHT**  
The activities must meet the criteria of one of the three following categories:
  - Prevent or eliminate slum and blight on an area basis.  
*Examples include assistance to commercial or industrial businesses, public facilities or improvements, and code enforcement.*
  - Prevent or eliminate slum and blight on a spot basis. These are activities that eliminate specific conditions of blight or physical decay on a spot basis not located in a slum or blighted area.  
*Examples include elimination of faulty wiring, falling plaster, or conditions that are detrimental to all potential occupants; historic preservation of a public facility; and demolition of a vacant, deteriorated building.*
- **MEETING OTHER COMMUNITY DEVELOPMENT NEEDS HAVING A PARTICULAR URGENT NEED... (SOME DISASTER RELIEF)**  
Use of this category is extremely rare. It is designed only for activities that alleviate emergency conditions resulting from natural disasters or similar emergencies.



## 2.2 Local program goals & priorities

The County's general program goals are to assist in the development of viable urban communities by providing a portion of the funding needed to address the health and safety concerns of the residents, to assist in expanding economic opportunities for residents, especially for low and moderate income persons, and to eliminate costly flood/drainage damage caused by recurring flooding in local communities. This process involves the completion, submittal, and eligibility assessment of each community's application.

Will County's priorities, as approved by the Will County Board, are contained in the priorities summary as outlined in Section 1.1. Those priorities summarize both competitive (municipal) projects as well as set-aside projects (see Section 3.1).

## **PART 3. ELIGIBILITY AND FUNDING**

### 3.1 Basic Eligibility Requirements of the Program

#### A. Meeting National Objectives of the Program

In order to be considered eligible for CDBG funding, each project must meet one of the three national objectives of the program. These objectives are again restated as follows:

##### 1. Benefit to Low and Moderate Income Persons

The primary objective of the CDBG program is to benefit low and moderate-income persons. Therefore, the County has established the following policies:

All sources of CDBG funds, including new entitlement grants, program income generated from revolving funds, and reallocations from project cancellations or overfunding from other projects must collectively be used so that a minimum of 70% of total grant funds be allocated to activities that meet the low and moderate income benefit standards.

Low and Moderate income persons are defined in the regulations as persons in households whose income does not exceed 80% of the median household income for the area.

**(The 2015 Income Limits will be updated by HUD before the application due date. Please use the link below AND contact us before the application due date for updated income limits!**

**Again, 2015 Income data is required. <http://www.huduser.org/portal/datasets/il.html>)**

**2014 Income Data is outdated and shall not be used.**

2014 Income Limits

MAX. INCOME FOR  
FOR LOW AND MODERATE  
INCOME HOUSEHOLDS

HOUSEHOLD SIZE

1	40,550
2	46,350
3	52,150
4	57,900
5	62,550
6	67,200
7	71,800

### 1a. Area Benefit Projects

These projects benefit an area, rather than specific households or individuals. Most public facility projects such as sanitary sewer, water, and drainage improvements are examples of area benefit projects. The first step in determining benefit to low and moderate income persons is to delineate the area that will be benefited by the project by establishing clear-cut boundaries to the area. This area should include all areas that will be substantially benefited by the project, but should not include areas where benefits will be indirect and relatively insignificant. A map showing the benefited area must be included with the application.

The second step is to determine the percent of persons in the delineated area that are low and moderate income. Census data may be used for this purpose. In many cases, however, this data is not available for the specific area delineated by the applicant. An unbiased income survey must be used in these cases to determine the percent of low and moderate-income persons in the delineated area. Will County CDD has guidance in on preparation of a Target Income Survey. A survey form, along with information on how to carry out a survey and how to achieve reliable results that will be acceptable to HUD is available.

After the percent of low and moderate-income persons in the area has been established, the final step is to determine if this percent meets the HUD standard for benefit to low and moderate income persons. Projects are considered to benefit low and moderate income persons if a majority (51% or more) of the persons in the area are low and moderate income.

In some cases, CDBG funds used for an area benefit project not only benefit a general area but such CDBG funds are used to also provide benefit directly to certain individuals or households. (For example, CDBG is used to pay for housing rehabilitation or sewer and water connection costs). The two basic types are those that require income qualification to receive that benefit provided by the CDBG-funded activity and those where benefit will be received only when the person or household chooses to take advantage of the CDBG-funded activity.

- Projects with Income Limits: An example of this type of area benefit project is where CDBG funds are used to pay assessments and/or required hookup fees for low and moderate income persons in order that they can hook up to sewer or water facilities. These activities require the beneficiaries to verify that their income does not exceed low and moderate-income limits. For these projects, 100% of those benefiting must be low and moderate-income persons. The Will County Community Development Division must be contacted for guidance on acceptable income verification procedures.
- Projects with Optional Participation: This type of project typically provides a service or facility to an area; however, taking advantage of these facilities (for example, hooking up to the sewer or water lines) is optional for those living in the area. For these projects to be considered as benefiting low and moderate income persons, both of the following standards must be met.

The population in the general area benefited by the project must be at least 51 % low and moderate income.

The project must be proposed in such a way to assure the Community Development Division that the persons actually benefiting from the project (for example, those hooking up to new sewer or water lines) include at least 51 % low and moderate income persons. The above assurance can be met if the local municipal codes mandate residential hook up and use of the facilities.

### 1b. Projects Benefitting a Population Group

Some projects are designed to benefit a specific segment of the population of which a majority are low and moderate-income persons, or are presumed to be low and moderate by HUD regulations. Providing public facilities for these population groups are considered to meet standards for benefit to low and moderate income persons. There are two types of situations that would fall into this category.

1. In the first scenario, HUD presumes that a majority of persons in a population group are low and moderate-income persons. HUD recognizes the groups listed below as presumed to be low and moderate income. Therefore, projects that serve these groups are presumed to meet required benefit standards.

If the project benefits exclusively a clientele who are presumed by HUD to be principally Low Mod persons, the activity may be deemed eligible. The following groups are currently presumed by HUD to be low mod:

- Abused children
- Elderly persons
- Battered spouses
- Homeless persons
- Disabled persons
- Illiterate adults
- Persons living with AIDS
- Migrant farm workers.

2. If a facility is designed for a specific group of persons not appearing on the above presumed low mod list, the applicant must in all cases demonstrate that 51% or more of the users will be low and moderate income. Follow-up after implementation must show that the 51 % standard has been met.

### 1c. Community-wide Benefit Projects

Some projects are designed to benefit the entire community. Special documentation must be gathered by the applicant and a Pre-Application review with the Will County CDD staff is required to utilize this category. Community-wide benefit projects will only be allowed if there is sufficient documentation that the design of the project does bring benefit to the entire community, and not just a specific area. Likewise, the population of the entire community must be such that it meets the low and moderate-income guidelines as established by HUD. Documentation from either the latest Census or community-wide Target Area Surveys will serve as documentation for this requirement.

## **2. Activities which aid in the Prevention or Elimination of Slums or Blight**

### 2a. Projects located in a slum or blighted area

Activities which address this objective may be located in a slum or blighted area, or they may be located outside such an area, addressing the objective on a “spot” basis. Projects located in a slum or blighted area must show that (a) the area meets HUD standards for a slum or blighted area, and (b) the project addresses a blighting influence in the area. Standards for projects located in a blighted area, as well as those that address blight on a spot basis, are described below. To be determined as a blighted area, the following two conditions must be present:

1. The area must meet the State definition of a blighted area.

Blighted areas are defined by State Statute under the Blighted Areas Redevelopment Act of 1947 (Chapter 67 1/2, para. 65) as:

*"...any area of not less in the aggregate than two (2) acres located within the territorial limits of a municipality where buildings or improvements, by reason of dilapidation, obsolescence, overcrowding, faulty arrangement or design, lack of ventilation, light and sanitary facilities, excessive land coverage, deleterious land use or layout or any combination of these factors, are detrimental to the public safety, health, morals or welfare."*

2. The area must have a substantial number of deteriorated or deteriorating structures or public improvements.

Documentation that the benefited area meets the above definition is required as part of the project application, including a map outlining the blighted area. It is also recommended that the blighted area be officially so designated by the governing body with jurisdiction over the area.

The second part of the standard for a slum or blighted area is "that a substantial number of deteriorated or deteriorating structures or public improvements must exist throughout the area". This number must be viewed in relation to all structures in the designated blighted area. This criterion will be considered to have been met if: (a) at a minimum, 25 % or more of the structures in the area show evidence that basic structural elements (foundation, walls, etc.) are suffering from significant deterioration (Will County CDD has methodology available to applicants that can help identify structural damage); or (b) the public improvements throughout the area are in a general state of deterioration. It is insufficient for only one type of public improvement such as the water system to be in a state of deterioration; the public improvements taken as a whole must exhibit signs of deterioration.

Location of a project in a slum or blighted area is not sufficient to show that the project addresses a factor that is causing the deteriorated condition in the area. The applicant must show that the activity is designed to address one or more of the conditions that qualify the area as blighted. For example, if the project is designed to reduce flooding in the blighted area, the applicant must show that flooding is a major cause of the blighting conditions in the area.

Finally, the documentation must be maintained on the boundaries of the area and the condition which qualified the area at the time of its designation.

## 2b. Elimination of slums and blight on spot basis

CDBG regulations permit "...Acquisition, clearance, relocation, historic preservation and building rehabilitation activities which eliminate specific conditions of blight or physical decay on a spot basis not located in a slum or blighted area..." [570.208(b) (2)]. These kinds of activities are considered as consistent with this national CDBG objective. However, this regulation goes on to

state that "...Under this criterion, rehabilitation is limited to the extent necessary to eliminate specific conditions detrimental to public health and safety." These regulations were primarily designed to allow for rehabilitation programs that, by their nature, address substandard conditions on a scattered basis throughout the applicant's jurisdiction. If an activity results in demolition of occupied or occupiable housing units, then these units must be replaced. Documentation for this type of project must include (a) a description of the specific conditions of blight that the project will be addressing, and (b) a discussion of how the project will address these conditions. In addition, the six major components of the County's Residential Anti-displacement and Relocation Assistance Plan must be addressed.

### **3. Activities Designed to Meet Urgent Needs**

The County Executive has the power to designate a project as meeting this objective when in his judgment conditions are detrimental to the health and safety of the county's residents.

Regulations for meeting this CDBG National Objective are included in Sec. 570.208(c).

A project will meet this standard if the applicant certifies and provides evidence that the following conditions are met:

1. The activity is designed to alleviate existing conditions which pose a serious and immediate threat to the health or welfare of the community which conditions are of a recent origin or which recently became urgent. Conditions that developed or became critical within 18 months before certification by the applicant are considered of recent origin.
2. The applicant is unable to finance the activity and other sources of funding are not available.
3. Documentation of these projects must include the certification referenced above. Applicants considering a project that will address this national objective must discuss project eligibility in a Pre-Application Eligibility Determination meeting with Will County Community Development Division staff.

## **B. Eligible Applicants**

### **1. Types of Eligible Applicants**

There are many types of eligible applicants; however, some are limited as to the activities they may undertake. Also some may require sponsorship of a municipality to submit an application.

#### COUNTY DEPARTMENTS:

County Departments may apply for CDBG funds provided that the activity being undertaken is compatible with the activities normally carried out by the department. (A pre-application review with the Community Development staff is required)

#### MUNICIPALITIES AND TOWNSHIPS:

Municipalities and townships that have opted into the program during the latest triennial period (from program years 2015 to 2017), and who have achieved satisfactory performance standards on any prior grants may apply.

PUBLIC SERVICE AGENCIES: An agency or organization serving Will County is eligible to apply under this program for projects that provide a new service or a quantifiable increase in the level of a service of an activity.

## **2. Basic Requirements of Eligible Applicants**

In order for the "applicant" (i.e. a Municipality, Township or County Department) to be eligible for CDBG assistance, the following must be in effect:

1. Applicant must have "opted-in" their population for the latest triennial period.
2. The applicant must submit an eligible application in accordance with the application process as identified in this policy manual, on or before the application deadline.
3. The applicant must attain the appropriate program progress standards as identified in this manual.
4. The applicant must be in compliance with all Certifications and adhering to HUD Regulations.

### **C. Eligible Activities**

The following is a listing of eligible activities under the Federal CDBG program. The applicant should note that this listing is not a complete list of possible eligible activities, nor does it directly reflect the established County program goals currently in effect (see Part 2 for listing of goals and priorities). Applications will be prioritized for funding awards based on established Will County objectives (see Part 2).

#### **1. Housing Projects**

##### Homeowner Rehabilitation

CDBG funds may be used to assist existing homeowners with repair, rehabilitation or reconstruction of owner-occupied units. Rehabilitation can include improvements to energy efficiency, handicapped accessibility, emergency repair, or weatherization. Homeowner counseling programs for LMI persons may be funded by CDBG. Overall, homeowner rehabilitation eligible costs include labor and materials, replacement of principal fixtures and components of existing structure, water and sewer connections, installation of security devices including smoke detectors and conservation costs for water and energy efficiency.

##### Other Housing Activities

CDBG is flexible in allowing services to be provided to LMI persons and households. CDBG funds may be used to pay costs in support of activities eligible for funding under the HOME program, as well as numerous other housing-related programs. Some of those other activities include home purchase activities, rental housing activities, housing new construction for ownership or rental, or housing counseling. If an applicant is interested in pursuing funding for any of these Housing projects, they are encouraged to meet with Community Development staff to review the complex requirements of this area of the CDBG program.

#### **2. Public Facilities**

This category includes the reconstruction, rehabilitation, or installation of sanitary sewer and water system improvements. Specifically, eligible activities would include acquisition for easement and right-of-way, construction, reconstruction, rehabilitation and installation. Hook-up to individual homes is also eligible.

Under this category, communities can also make improvements (construction or installation) of streets, curbs and sidewalks, including handicapped accessibility improvements. (NOTE: maintenance and repair of public facilities is generally ineligible). Keep in mind, a national objective must be met with Public Facilities projects, so applicants are strongly encouraged to consider the area to be served and the incomes of the residents there. Census data should be consulted or a Target Area Survey may be required. See the CDBG application package for guidance or consult CDD staff.

### **3. Public Services**

The amount of CDBG funds obligated within a program year to support public service activities under this category may not exceed 15% of the total grant awarded to the grantee for that year plus 15% of the total program income it received in the preceding program year.

#### **Public service eligible activities:**

To determine if the activity meets a national objective, please refer to the CDBG Guide to National Objectives and Eligible Activities. The *Public Service* must be either:

- A new service; or
- A quantifiable increase in the level of a service.

Eligible Activities under this category include and may not be limited to:

- Employment services
- Crime prevention and public safety
- Child care
- Health services
- Substance abuse services
- Fair housing counseling
- Education programs
- Energy conservation
- Services for senior citizens
- Services for homeless persons
- Welfare services (excluding income payments)
- Down payment assistance
- Recreation services

CDBG funds may not be used to replace funding from a unit of government for any of these services if it is already in place. There are special provisions for continued funding of an activity under the Public Services category. Consult with CDD staff for guidance with applications relative to existing programs.

### **4. Economic Development**

Creating jobs is the primary objective of economic development projects. The project must result in 51% of the new jobs benefiting persons who were low to moderate income at the time of their hiring. All activities that propose the use of CDBG funds for job creation must first get clearance from the County Community Development Division.

### **5. Other Activities**

Neighborhood facility: designed to provide health, social, recreational or similar community services, primarily for residents of the neighborhood.

Publicly owned solid waste disposal facilities: include final collections and equipment and appurtenances used in the initial collection of solid waste.

Street reconstruction: where the public health and safety is at risk due to deterioration of the street or roadway. Also as part of another activity, such as sewer and water projects.

Disposition: eligible closing costs associated with the sale, lease, donation, or otherwise, of any real property acquired with block grant funds.

Payment of nonfederal share: required in connection with a federal grant-in-aid, provided that the activities are otherwise eligible.

Projects that Benefit a Specific Population Group:

Nonresidential service centers: senior citizen or disabled citizen service centers.

Removal of architectural barriers: which restrict the mobility and accessibility of elderly or handicapped persons, to publicly or privately owned buildings.

Low Mod Limited Clientele activities:

Projects which provide benefits to a specific group of persons, rather than everyone in an area generally. If the project benefits exclusively a clientele who are presumed by HUD to be principally Low Mod persons, the activity may be deemed eligible. The following groups are currently presumed by HUD to be low mod:

- Disabled persons
- Illiterate adults
- Persons living with AIDS
- Migrant farm workers
- Elderly persons.
- Battered spouses
- Abused children
- Homeless persons

## **6. Activities Requiring Pre-application Clearance from CDD**

The following activities must undergo a pre-application eligibility determination by the Will County Community Development Division

- Special Economic Development Activities Sec. 570.203
- Special Activities by sub recipients. Sec. 570.204
- Public Services Sec. 570.201(E)
- Fair Housing Activities Sec. 570.206 (C)
- Activities designed to meet Community Development needs having a particular urgency Sec. 570.208 (C)
- Clearance activities, demolition and removal of buildings and improvements, must be done in conjunction with another eligible CDBG activity. If done on a Spot Blight basis, or proposed in



a certified slum or blighted area, a review by the Will County Community Development staff would be required.

#### **D. Ineligible Activities**

Any activity not described or delineated in the previous section is considered ineligible. For questions on whether or not your project is eligible, contact the Will County Community Development Division staff.

#### **E. County Set-aside Projects**

The County is mandated to follow its HUD approved and County Board approved Consolidated Plan. The current 2010-2014 Consolidated Plan addresses certain needs within the County and the resulting methods of resolving those needs. As a direct result of this mandate, the County Board has established a Set-Aside policy whereby each year funds are allocated to meet the needs as discussed in the Con Plan. Such Set-Asides are examined each year, and funded based on availability of funds. The Set-Aside areas for the 2014 Program year are as follows:

- Vacant Structure Demolition
- Continuum of Care (Homeless)
- Fair Housing Activities

#### **F. Miscellaneous Issues**

The applicant should be aware of several other eligibility considerations that must be checked before a final determination of project eligibility can be made. Failure to meet regulations and guidelines regarding any one of the following issues could make a project ineligible for CDBG funding:

- Environmental Concerns: A project cannot be considered if it is not in compliance with HUD environmental regulations. Examples of projects that would clearly be in conflict with environmental regulations would include a drainage project that proposes to destroy a wetland area and wildlife habitat or a proposed housing project that will not be adequately protected from a major noise source or a hazardous waste area. In addition, projects that have already begun, before an environmental review has been conducted, will be ineligible for CDBG funding.
- Cost Principles: All projects must comply with the cost principles outlined in OMB Circulars A-87, 'Cost Principles Applicable to Grants and Contracts with State and Local Governments (Relocated to 2 CFR Part 225)'; 24 CFR Part 85 "Administrative Requirements for Grants to State, Local and Federally Recognized Indian Tribal Governments"; or A-122, 'Cost Principles for Nonprofit Organizations', as applicable. Most of these cost principles are incorporated within other CDBG regulations, but these documents describe guidelines for bidding cost 'reasonableness' and the eligibility of specific expenditures. Shortened versions of the OMB Circulars are available upon request at the Community Development Division.
- Acquisition and Relocation Guidelines and Construction Contract Requirements: These guidelines are available upon request from CDD staff. CDBG funding cannot be considered for projects where these guidelines are applicable and work has already progressed to the point where compliance cannot be assured. Any applicant that has

already advertised or negotiated and/or entered into a construction or purchase contract or in any way has begun the process of acquisition prior to submitting a CDBG application to the County must contact CDD regarding eligibility of the proposed application.

- Procurement of Professional Service Contracts with CDBG Funds: Will County Community Development will require a competitive negotiation process for the selection of professional services funded with CDBG funds. The process may be used if the cost of services is less than \$20,000. Under this process the community will solicit statements of qualifications from professional service firms, with at least 3 firms submitting statements for comparison. The community will evaluate all statements received and make their choice as to which firm is most qualified. The cost of services need not be included in the proposals. Upon selection of a firm, the community may then negotiate a price.

If the cost of services is expected to be greater than \$20,000 and to be funded with CDBG funds, a formal bidding process (sealed bids) must be used. Bids are publicly solicited and either a firm, fixed-price contract, or a unit-price contract is awarded to the responsible bidder whose bid, conforming to all the terms and conditions of the invitation for bids, is the lowest in price.

- Fair Housing: Any municipality, and or the County, applying for funds or sponsoring another agency's application, must Certify that it is affirmatively furthering fair housing laws. HUD has made an interpretation on this requirement and the County is following this interpretation by requiring all applicants to either have in place a Fair Housing Ordinance or Action Plan, or provide evidence to the County that the applicant is in process of developing such Ordinance or Action Plan. See Appendix D for Details of Fair Housing Action Plans.

## **Part 4. THE APPLICATION PROCESS**

### **General Requirements**

The Community Development Division will supply all eligible local governments with an application package. Interested applicants should complete the package and return the original and two (2) copies to the Community Development Division by the submittal deadline. Applications will be reviewed as to eligibility based on HUD and County guidelines as well as on the priorities set forth in the Will County Consolidated Plan 2010-2014. In order to submit an acceptable application, all of the following criteria must be met:

1. All subgrantee requests must be sponsored and submitted by an eligible township, municipality or department\*\* of County government. The Diamond, Lemont, Orland Park, Park Forest, Steger and Tinley Park have chosen to "opt out" of the Will County CDBG program for the current cycle and therefore are excluded from participation. Also excluded are the City of Joliet and the Cities of Aurora and Naperville as these municipalities receive their own CDBG funding directly as a result of their entitlement status.
2. Local public notices and citizen participation must be documented. (See citizen participation section of the Application Pack).
3. Each eligible municipality, township and County Department \*\* may submit a maximum of one application.
4. All requests must benefit at least 51% low to moderate-income persons, except for housing rehab projects in which 100% of the beneficiaries must be LMI.
5. All subgrantee projects, including housing rehab projects, will be operated on a grant basis. Exceptions to this status will be evaluated if the applicant demonstrates the capacity to administer a revolving loan or loan repayment type of program.
6. Each applicant shall be evaluated on the Basic Subgrantee Eligibility and program requirements contained in this Policy Manual.
7. The application must include a map showing the target area and the project area. This map must indicate the census tract or census block group number corresponding to the project location.
8. If an application is being submitted by two (2) or more governmental bodies, a prime sponsor must be designated and a Cooperation Agreement must be signed by all parties involved.
9. All applicants must comply with all applicable assurances and certifications, the environmental review process, and the requirements of the specific category of the application.
10. All Target Area Survey forms must be submitted as part of the application. Target Area Surveys shall be updated every THREE (3) years. Target area surveys older than 3 years shall not be accepted.

*\* \*County departments are limited to apply for assistance only if the project is related to the normal services they provide or if the project is consistent with their mission statement. Consultation with the Community Development Division is encouraged for clarification.*

#### **4.1 Requirements of the Specific Categories**

##### **A. Public Facilities Infrastructure (Non- Economic Development)**

1. There must be a community health or safety need documented by appropriate Federal, State or County public health or safety authority or local source based on documented prior conditions and certified by the chief elected official.
2. Detailed project cost summary is required including total linear feet; total project cost; cost per linear foot; cost breakdown for engineering, materials, labor and acquisition (easement, right-of-way).

##### **B. Public Facilities Infrastructure (Economic Development)**

1. Applicant must supply the same requirements as listed at A 2 above.
2. Firm private commitment:
  - a) Written letter from the Developer committing to the project.
  - b) Project financing source and schedule, including a written commitment from any financial institution to be used; written commitment from any other public sources (IRB's with clause, "if no CDBG funding, IRB's will not be sold"); statement of company's finances establishing solvency, including certified audits for the past three (3) years.
  - c) Specific documentation is required by HUD when job creation or retention is the basis of infrastructure or public facility projects. The appropriate regulations are cited at Sec. 570.506(4) and (5) of Subpart J.

##### **C. Housing Rehabilitation**

1. Define the geographic area in which the rehab program will take place.
2. Any single-family, owner-occupied rehabilitation must benefit low to moderate income households exclusively.
3. Minimum Property Standards – All CDBG-assisted units must meet local codes and standards. In the absence of local codes, housing should conform to the model codes identified in the program rule at 24 CFR Part 92.251

#### **4.2 Multi-Year Funding**

Multi-year phasing is advantageous to applicants proposing large-scale projects because it enables the applicant to evaluate projects of a larger scale which perhaps represent long-standing problems. However, CDBG expenditures on multi-year projects must begin within one year of receiving the grant award. Therefore, in order for large-scale projects to be completed in a timely manner, Will County will only give priority to those multi-year projects in which the applicant can demonstrate that the project can be structured in phases that could stand alone and begin quickly.

The application form has been designed for both single-year and multi-year projects. For multi-year projects, the following information is required.

1. The funding requested will only cover the current one-year period. However, the applicant must show that multi-year funding is desired and indicate which year of the multi-year project is to be funded by the current application.
2. Separate project summary forms are required for each year's activities. This includes future years as well as any previous year's activities, even if they were not funded by the CDBG program.
3. The application should describe the complete multi-year project. However, the description of the current year's activities should be the most detailed.
4. The implementation schedule must cover all phases of the project. However, implementation of the current year's activities should be described in the greatest detail.

#### **4.3. Meeting Program Progress Requirements**

In order to meet the program progress requirements:

1. Funds must be 100% committed within six months of receiving a fully executed Grant Agreement from the Community Development Division
2. Funds must be 100% expended within one year of receipt of the fully executed Grant Agreement.

If this minimum performance status is not achieved, the Advisory Board may recommend to the County Board that the existing grant award be reallocated and made available to other eligible applicants.

#### **4.4. Project Evaluation Criteria**

The following outline represents a typical analysis which each applicant should follow in developing the CDBG application package:

1. Review your community needs as they relate to Low and Moderate Income residents in the eligible funding categories found in this manual.
2. Conduct a feasibility study.
  - a. Is the project eligible? Does the project appear on the Will County Summary of Priorities and Strategies? (Check eligible projects list or call the Will County Community Development Division.)
  - b. Is the project area or are the project beneficiaries eligible?
  - c. What are the total estimated costs involved and how can the project be funded?
  - d. Can the project be completed in a timely manner from the planning phase to implementation?
3. Review your project with the Community Development Division.
4. Hold Public Hearing

5. Submit completed application by deadline.

#### **4.5. Application Review Procedures**

1. The original and a USB Drive containing the full application package which includes and may not be limited to: the application, all attachments, maps, publications, scans, surveys, etc. shall be delivered or mailed to:

Attention: Elizabeth Dunn  
Will County Community Development Division  
58 E. Clinton Street, Suite 500  
Joliet, IL 60432

If applications are hand delivered, they must be delivered to the above address between 8:30 a.m. and 4:30 p.m., Monday through Friday.

2. **Target area surveys shall be updated every 3 years. Target Area Surveys shall not be accepted AFTER the deadline.**
3. **APPLICATIONS RECEIVED AFTER THE DEADLINE SHALL BE REJECTED.**
  - a. **If any section of the full application is missing, that application shall be rejected.**
4. All originals must be signed.
5. Submit proposal by May 8, 2015 at 4:00 p.m. to the Will County Community Development Division, 58 E. Clinton St., Suite 500, Joliet, IL. Proposals may be mailed or hand delivered. Fax/Email submittals shall **not** be accepted.
6. The application will first be screened for completeness, determination of eligibility of activities and previous grant awards. If the applicant has omitted any part of the required documentation, they will be notified of the omission as soon as possible so that the additional information can be supplied before the May deadline. The County reserves the right to reject applications as incomplete if they remain deficient in terms of required contents, after initial notification of omission has been made. If it is determined that applicant has had an unacceptable performance or if the proposed activities are ineligible, the applicant will be notified in writing of these deficiencies.
7. The Community Development staff will review the application for low and moderate income benefit, Federal regulations and eligibility, and other appropriate factors.
8. Pre-award site visits will be scheduled in advance for all applications.
9. The Community Development staff will review projects and submit findings to the Advisory Board for recommendation to the County Board for award.
10. The Advisory Board will follow the established "Distribution of Funds" process as discussed in this Policy Manual.

#### **4. 6. Reallocation of Funds**

The County has established a Reallocation Policy to handle the immediate reallocation of funds occurring on projects which:

1. Have been determined to have not met the minimum progress requirements as established by this Policy Manual OR
2. Have residual (unencumbered) grant funds available after contract award. (i.e.. The bid for work came in lower than grant award).

##### 4.6.1 Reallocation Policy

1. In the case of inadequate program progress, the County shall notify the subgrantee in writing that the funds have been reallocated back to the County.
2. In the case of a subgrantee having residual funds available after contract award, the subgrantee (or engineer) shall immediately notify the Will County Community Development Division of this status.
3. Notification of the availability of excess funds shall be given by the County to those communities who have expressed (in writing) the need for additional grant funds or who had been unfunded from the prior year's application cycle (due to insufficient funds having been available).
4. Communities eligible to receive the reallocated funds must demonstrate the need for such funds by following the standard application process. Only those communities showing the ability to encumber and expend these funds immediately will be considered eligible.
5. Final distribution and award of reallocated funds (between grant cycles) will follow the established policy of Advisory Board approval and County Board award.

Requests for Reallocated/Residual funds can only be granted under the following circumstances:

- A. Existing project in need of additional funding in order to complete;
- B. Existing project requesting use of residual funds for same project/project area (i.e. continuation or expansion of existing area);
- C. Existing "set-aside" project requesting additional funds; or
- D. Existing project on Certified Eligible projects list.

Requests meeting the above criteria shall then be reviewed by Community Development Division Staff as follows:

1. Request for use of Reallocated or Residual funds shall be first reviewed for eligibility.
2. CDD staff "certifies" project as eligible and places project on Certified Eligible list.
3. CDD staff ranks requests based on ranking criteria.
4. CDD staff makes recommendation directly to either County Board or Advisory Board. \*

*\* The Will County Board will, from time to time, respond to requests for use of reallocated funds when such requests are above \$20,000.00. In all other cases, the CDBG/HOME Advisory Board will process requests for use of reallocated funds in accordance with the above reallocation policy.*

#### 4.6.2 Ranking System for Certified Eligible CDBG Projects

<u>Priority</u>	<u>Maximum Points</u>	<u>Points Awarded</u>
Project Impact	30	
Need	25	
Cost Estimates and Leveraging	20	
Percentage of LMI Persons	20	
Work Schedule	5	
<b>Total Points Available:</b>	<b>100</b>	

#### 4.6.3 Reallocation Process for Certified Eligible CDBG Projects

1. Project is placed on Certified Eligible Project report (i.e. “report”) as a result of applying for CDBG funds in current application cycle, but determined to not rank high enough on Consolidated Plan priority list in order to qualify for available funds;
2. Project is placed on report as a result of being a currently funded/and or active project and formally requesting additional funds (above grant allocation) in order to complete project;
3. Project is placed on report as a result of having residual funds on current active project, and formally requesting use of those residual funds for continuation of current project, or different project in same project area;
4. Set aside project requesting additional funding;
5. At least quarterly, the Community Development Division will report to the CDBG Advisory Board the total of residual funds available to be used by Certified Eligible projects;
6. Projects will be ranked by staff and results reported to the Advisory Board for recommendation to the full County Board;

#### 4.6.4 Ranking Point Criteria for Certified Eligible Projects

All eligible, complete proposals will be reviewed and ranked by the Community Development Division and the Advisory Board. Proposals will be reviewed and scored on a competitive basis relative to the evaluation criteria below. The maximum possible score is 100.

##### **A. PROJECT IMPACT (30 points)**

Proposer(s) will receive scores ranging from 0 to 30 points based upon their demonstration of proposed impact and future needs. Proposer must provide detailed explanation of the project plan. Other factors that will be considered include consistency with local planning needs and plans.

##### **B. NEED (20 points)**



Proposer(s) will receive scores ranging from 0 to 20 points based on their demonstration of project need and beneficiary impact.

**C. COST ESTIMATES and LEVERAGING (20 points)**

Proposer(s) will receive scores ranging from 0 to 20 points based on the impact of CDBG dollars and the community's use of other funds.

**D. PERCENTAGE OF LMI PERSONS SERVED (20 points)**

Proposer will receive score based on the percentage of LMI persons served. Census data may be used to determine the percent of persons in the delineated area that are low and moderate income. In many cases, however, this data is not available for the specific area delineated by the applicant. In the absence of Census Data, an unbiased income survey (Target Area Survey) must be used to determine the percent of low and moderate-income persons in the delineated area. Applicant **MUST** have the Target Area Survey (TAS) forms submitted for review by WCCDD along with application. **The forms MUST be signed by the responding resident and the interviewer.** Further details are in the Target Area Survey Instructional Packet, giving the details on how to conduct an appropriate Target Area Survey. Points will be awarded only if the TAS is completed accurately and shows the area is eligible. A TAS showing an ineligible area (under 51% Low Moderate Income) cannot be funded.

**E. WORK SCHEDULE (5 points)**

Proposer(s) will receive scores from 0-5 points on their demonstration of capacity to begin and complete the project in the established timelines of the program.

**F. MAJOR ENVIRONMENTAL ISSUES REVIEW**

Proposer(s) will provide information relative to the environmental impact of the project to determine overall eligibility of the project.

**4. 7. Distribution of Funds**

1. Eligibility of project and applicant is reviewed by the Will County Community Development Division using HUD and local guidelines;
2. Distribution of funds is made in accordance with the priorities as established in Will County's most recently approved Consolidated Plan.
3. No applicant is guaranteed funding.
4. The CDBG Advisory Board recommends project awards to the County Board who has final determination on the use of grant funds.

**2015 RFP TIMELINE**

March 11, 2015	Technical Assistance Workshop 2-3 pm CDBG; 3-4 pm HOME
May 8, 2015	Deadline for Proposals (4:00 p.m.)
TBA	CDBG/HOME Public Hearing
TBA	Advisory Board convenes to rank and further discuss the recommendations to be made to the Will County Board
June 11, 2015 – July 15, 2015	Annual Action Plan review period

July 9, 2015	Action Plan presented to the Will County Board for approval
July 16, 2015	Applicants notified of intent to award
August 15, 2015	Annual Action Plan submitted to HUD

## **ELIGIBLE APPLICANTS**

Eligible applicants include non-profit or for-profit organizations that have been operating in good standing with the State of Illinois. Any party on the Excluded Parties List System (<https://www.sam.gov/portal/SAM/#1>) is considered ineligible for funding.

## **TECHNICAL ASSISTANCE WORKSHOP**

Attendance at the Technical Assistance Workshop is optional for any organization submitting a proposal in response to this Request for Proposal (RFP). At this workshop, staff will provide an overview of application requirements, project eligibility, and will be available to answer any questions regarding program requirements. This workshop will be held:

**DATE:** March 11, 2015  
**TIME:** 2:00 p.m.  
**LOCATION:** Will County Land Use Department  
Community Development Division  
58 E. Clinton Street, 5<sup>TH</sup> Floor Conference Room  
Joliet, Illinois 60432

## **RFP REVIEW PROCESS**

All responses to this RFP will be reviewed by the Community Development Division of the Will County Land Use Department. The responses will then be heard and reviewed by the Will County CDBG/HOME Advisory Board at a public hearing schedule for **TBA**.

At the public hearing, applicants will be allowed to make a 3 to 5 minute presentation on the merits, goals, and projected outcome(s) of their project. The presentation will be followed by a question and answer session conducted by the Advisory Board and Community Development Division. These presentations will be open to attendance by the public and other applicants.

It is the responsibility of the Community Development Division to ensure that each Proposer's RFP contains all the information and documents required to verify that the proposal is appropriate for CDBG funding (i.e., it meets one of the National Objectives and is an eligible CDBG activity as determined by HUD guidelines).

## **CDBG/HOMEADVISORY BOARD REVIEW PROCESS**

This Advisory Board evaluates the content of the proposals and determines:

- Whether the proposed project appropriately addresses the identified needs;
- Whether the proposed project complies with existing state and county laws, ordinances, regulations and policies;
- Whether, if funded, implementation of the project would be delayed by the application for and processing of required discretionary permits, licenses, staff hiring, leveraged funding, etc.;
- Feasibility of timely implementation of the project; and
- Whether cost estimates appear to be accurate.

Additionally, prior to the public hearing (or after) the Community Development Division may visit the proposal sites, which may bear on the final points and ranking recommendation. If a proposal is determined to be ineligible, the Proposer is informed and the proposal is withdrawn from consideration. In cases where there is uncertainty as to the proposal's eligibility, the County's HUD representative will be consulted for a final decision.

The Advisory Board will evaluate proposals based on information provided in the original submission, but reserve the option of requesting additional information for clarification purposes.

The County reserves the right to:

- Withdraw the RFP at any time without prior notice. Furthermore, the County makes no representation that funding will be awarded to any Proposer responding to this RFP. Retain all proposals submitted. The proposals become property of Will County.
- Withdraw funding upon the county's determination that reasonable attempts to negotiate an agreement have failed. Prior to accepting the award, the Proposer must meet applicable administrative and regulatory rules to adhere to Federal and local requirements, codes, and other conditions. It is the Proposer's responsibility to be familiar with these requirements prior to accepting the award and commencing negotiations.
- Deny a funding recommendation to a Proposer with outstanding disallowed costs, defaulted loans, debarment actions or any other legal encumbrance, regardless of the merits of the proposal submitted.
- Reject any proposal from any Proposer that has defaulted on past loans or has unmet debt obligations with the County contrary to the terms set forth in the original agreement in any of the housing-related categories addressed in this RFP.
- Reject the proposal of any applicant that is not in a position to fulfill a resulting contractual obligation.

## **AWARD RECOMMENDATIONS**

Following the review of proposals, the Advisory Board will make a recommendation to the Will County Board which community development proposals be funded in Program Year 2013. The recommendation will describe eligible proposals recommended for funding, in accordance with general funding allocations included in the approved annual CDBG/HOME Action Plan.

## **CITIZEN PARTICIPATION:**

Citizen input on the Action Plan is obtained through the public hearing process and action plan display comment period. Notices are published in local newspapers, the County's website, and posted publicly in County Office buildings at least 10 days in advance of the Public Hearing. Notices for the Action Plan 30-day display period are published in local newspapers, the County's website, and posted publicly in County Office buildings. All community residents may attend and comment on the proposals presented.

Draft copies of the proposed Action Plan for the new funding year (including the overall proposed budget) are displayed for a 30-day citizen comment period. This Draft Action Plan is available on the County's website [www.willcountyillinois.com](http://www.willcountyillinois.com) and in paper-based format in the Community Development Division of the Will County Land Use Department.

If anyone has public comment to be read at the public hearing and are unable to attend, comments may be forward in writing to the Community Development Division **June 1, 2015:**

Will County Land Use Department  
Community Development Division  
Attn: Elizabeth Dunn  
58 E. Clinton Street, Suite 500  
Joliet, Illinois 60432

The Will County Board approves the Annual Action Plan by resolution following the citizen comment period. All comments will be included in the submission of the Action Plan. Each applicant will be notified in writing regarding their grant application status.

Final approval of the annual Action Plan is completed by the U.S. Department of Housing and Urban Development's Office of Community Planning and Development. The number of awards will be determined by the number of qualifying Proposers and the amounts requested by each. Award amounts may or may not be equal to the full amount requested in the proposal. If the County has committed funds to a project that can no longer proceed (i.e. other required funding is no longer available, site is not feasible due to environmental issues, etc.), the County reserves the right to redistribute funds. At the County's discretion, the funding commitment may be increased based on funding availability and need.

## **CONSOLIDATED PLAN PRIORITIES**

The Will County Consolidated Plan provides the recommended strategy and basis for the use of federal funds granted to Will County by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnership (HOME) for the period beginning October 1, 2015 and ending on September 30, 2019. This Consolidated Plan outlined the County's five-year funding priorities for the use of CDBG funds. The County identified high priorities for housing and non-housing activities.

## **PROPOSAL INSTRUCTIONS AND CONTENT**

- Please keep responses to questions as brief and concise as possible.
- All proposal documentation must be submitted in the order listed on the proposal checklists. All forms need to be submitted in a typed format.
- Each proposal should be submitted with one original (with original signatures) and two copies. The submittal will contain a cover letter.
- Each application must include a letter of transmittal as found in Exhibit A.
- Letters from collaborating agencies or other funding sources should clearly specify their role in the project or contribution (financial or in-kind) that they will make.
- The organization shall only submit one public service application for CDBG per year. Proposals should follow the established outline and instructions and will be compiled in the order provided on the proposal checklist.
- Please verify that all dates, numbers, and budgets are for the appropriate year and are accurate.
- Proposals will be evaluated based on information provided in the submitted application.
- Omitted information will not be accepted unless clarification is requested by the CDBG Advisory Board or Community Development Division staff.

## **CITIZEN PARTICIPATION VERIFICATION**

A record of citizen input is necessary to comply with the citizen participation requirements of Will County's CDBG Program. Each applicant community must have at least one public hearing to announce its intent to make application for project funds and to obtain local citizen concerns and input regarding the proposed project, and to provide the opportunity for public input on other projects that would be eligible for funding under the CDBG program. This hearing must be announced 10 calendar days in advance in the non-legal section of the newspaper of general circulation in the community. The Public Hearing can be held as a part of normally scheduled municipal or township meetings. The following documents should be included as evidence of citizen participation:

1. Record of the public hearing announcement of the local government's intent to apply for grant funds (a newspaper clipping is required)
2. A summary of comments (or copy of the minutes, if taken) made at the public hearing(s).
3. Letters of local support or opposition (if any are submitted).

NOTE: In communities not served by a general circulation newspaper, posting said notice in the local library and/or governmental buildings, offices, etc. as is the general practice of the local governmental unit may also meet this requirement. Special meetings are not mandated. The hearing can be an item covered in a regularly scheduled meeting, as long as notice is given 10 calendar days prior to the meeting.

## **CERTIFICATIONS TO BE EXECUTED**

The subrecipient hereby assures and certifies that it will comply with the regulations, policies, guidelines and requirements with respect to the acceptance and use of Federal funds for this federally-assisted program. All certifications and appendices must be executed by the chief executive officer, president, or owner.

- CERTIFICATIONS: Certifications
- APPENDIX 1: Conflict of Interest Provision
- APPENDIX 2: Drug free Workplace Requirements
- APPENDIX 3: Lobbying & Drug free Workplace requirements
- APPENDIX 4: Title VI of Civil Rights Act of 1964
- APPENDIX 5: Residential Anti-Displacement & Relocation Plan
- APPENDIX 6: Fair Housing

### **MONITORING PROCEDURES FOR SUCCESSFUL BIDDERS**

The Community Development Division will monitor all subrecipients to ensure program compliance. Monitoring is an ongoing process that assesses the quality of program performance over the duration of the contract.

Monitoring provides information for making informed judgment about program effectiveness and management efficiency, as well as identifies internal weaknesses that may contribute to fraud or abuse.

The procedures established are to ensure program compliance with the requirements of the County and other applicable laws and regulations.

- Desk Monitoring: Desk monitoring is the review of pertinent program/project documents submitted by the subrecipient or by internal departments.
- Internal & Onsite Monitoring: Internal and onsite monitoring may include, but is not limited to: 1.) Review of program and financial records, 2.) Project files to verify supporting documentation is available and maintained, and 3.) Internal policies and procedures as applicable to the program.
- Monthly Status Reports: Monthly reporting is a requirement of the contract agreement.
  - The information contained in the Monthly reports permits County staff to monitor program and financial performance of the subrecipient and allows early identification of potential compliance problems. The monthly reports are required to be submitted regardless of the level of activity or expenditure.

### **DISCLAIMER**

The County reserves the right to:

- 1) Accept or reject any or all proposals received;
- 2) Waive any non-substantive deficiency or irregularity;

- 3) Negotiate with any qualified Proposer;
- 4) Award a contract in what it believes to be the best interest of the County;
- 5) Cancel this request, in part or its entirety, if it is deemed to be in the best interest of the County;
- 6) Reject the Proposal of any Proposer who has previously failed to perform properly;
- 7) Reject the Proposal of any Proposer who has failed to complete a contract within the specified timeframe;
- 8) Reject the Proposal of any Proposer that is not in a position to fulfill a resulting contractual obligation.

This Request for Proposals (RFP) does not commit the County to award any contract, pay any pre-award expenses, or pay any costs incurred in the preparation of a Proposal.

