

# Demonstrating Strategy and Feasibility in Narratives

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# Scoring

Categories	Max Points
<b>Program Feasibility</b>	<b>50</b>
<b>Program Strategy</b>	<b>50</b>
Program Need	125
Program Impact	
<ul style="list-style-type: none"> <li>• Cost Per Person</li> </ul>	30
<ul style="list-style-type: none"> <li>• Demographic Need - absolute number in poverty</li> </ul>	15
<ul style="list-style-type: none"> <li>• Demographic Need - percent of poverty persons</li> </ul>	15
<ul style="list-style-type: none"> <li>• Demographic Need - median household income</li> </ul>	15
Leverage of Additional Resources	20
Bonus points for Revitalization Area Activities	20
Bonus points for State Priority Projects	10
Bonus points for Regional Cooperation	20
Bonus points for Robust Citizen Participation Activities	10
Bonus points for Readiness to Proceed	5
Bonus points for Return of RLF Funds	5
Point Reduction for Missing Elements	Up to -25 Pts.
<b>Maximum Total Points</b>	<b>390</b>

	2022 Annual Competition	2023 Annual Competition
Strategy Average	40.37 points	36.09 points
Strategy Range	14.50 points – 50 points	13 points – 50 points
Feasibility Average	44.44 points	43.24 points
Feasibility Range	14 points - 50 points	16 points – 50 points

# Strategy

- The purpose of the Strategy criterion is to establish a clear description of the needs addressed by the project and the relationship of the project to the needs described and the broader community development initiatives being undertaken by the applicant

# Strategy Criteria

- 1) Analysis of Jurisdiction's Community Development Needs
- 2) Analysis of Alternative Target Areas
- 3) Analysis of Target Area's Community Development Needs
- 4) Analysis of Alternative
- 5) Analysis of Proposed Solution
- 6) Previous Efforts
- 7) Maps

# Strategy Criteria

## Analysis of Jurisdiction's & Target Area's Community Development Needs

- Strategies for meeting unmet needs in the target area/jurisdiction
- demographic data and population trends
- current unemployment
- Assessment of housing conditions, infrastructure (water and sewer, roads and drainage), and public buildings.
  - Number of units, vacant, occupied, standard, substandard, dilapidated

## Analysis of Alternative Target Areas

- Alternative target areas considered based on community/target area outreach, the needs described, **and DCA's Concentration Maps**
  - Housing Deficiency
  - Low-to-Moderate Income
  - Minority
- Provide rationale for selection if target area does not appear in concentration map.

# Strategy Criteria

## Strategic alternatives and associated costs considered.

- Reasonable impact
- Reasonable costs
- Alternative funding sources

## Proposed solution matches the identified project needs

- Proposed activities address the needs as described and documented
- Evidence proposed activities are consistent with the applicant's plan (Comprehensive, SDS, RAS, GICH etc.)
  - **Insufficient:** water and sewer improvements in the county
  - **Better:** increase water pressure in the northwestern quadrant of the city in order to provide fire protection to all residential and commercial structures in the area

## Previous efforts

- copies of these local practices, programs, policies or ordinances
- Plans to maintain project over time
  - Policies and procedures with identified tasks to carryout with an established timeline.

# Scoring Criteria

- Maps – Instructions DCA - 12
  - Project activity locations with boundaries & structures identified.
    - Existing land use information
      - Lot lines, Housing, Commercial, Industrial, Owner/Renter Occupied, Major Structures (Sheds)
      - More detailed maps requirements for Applications with Housing component
  - Concentration Maps – Housing, LMI, Minority
    - Show entire jurisdiction and target area
  - USGS topographic map from the 7.5 minute, 1:24,000-scale quadrangle series
  - Floodplain & Wetlands Map



# Strategy Reminders

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- Clarity of the needs described, and the relationship of the needs described to the proposed project and the beneficiaries
- Needs related to the specific project being proposed
  - Quality of narrative description of needs
  - Quality of strategies to meet unmet needs in target area (phased, code enforcement, other funds)
- Detailed project description
  - Quality of narrative description of project
  - Quality of proposed target area/proposed conditions map

Because of water quality concerns and possible contamination, the Health Services has issued x number of boil advisories over the past 2 years.

As such, City residents have resorted to purchasing water for drinking, cooking, and sponge bathing infants, during boil advisories, resulting in unplanned purchases and a financial burden especially for LMI residents.

Resident letters (attached separately) detail many disruptions to their daily routines as a result. For example...



# Feasibility

- The Feasibility criterion is designed to test for items beyond the Threshold requirements that are critical in carrying out the project in a timely manner, within budget, in compliance with HUD's requirements, and that establish clear standards for project implementation, such as complete engineering and architectural reports and consistency across narratives, budgets, and cost estimates.



## Feasibility Criteria

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1) Reasonableness and Verified Costs

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2) Operational Needs & Acquisition

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3) Survey Methodology

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4) PER/PAR/ Housing Unit  
Documentation

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5) State & Federal Requirements

# Scoring Criteria

## Reasonable & Verified Costs

- Professional Fees Limits
  - Consistency across forms – DCA-5, DCA-8, Budget Template, PER/PAR
- Address all types of permits needed and indicate the time required to secure permits. (Railroad, DOT, etc.)
- Committed Match & Leverage
  - Firm written commitment, either a resolution or letter
  - Costs incurred prior to the submission of the application (and award) must be documented by invoices, cancelled checks or other acceptable documentation
  - Include project specific considerations, such as; non LMI hook ups paid by local funds or non-LMI households will purchase hook ups
  - Match/ leverage commitments above the threshold amounts – such as more than \$5,000 for grant prep and more than \$1,000 audits are not accepted.

## Operational Needs

- New Level of Service
- Evidence of Beneficiaries Willingness to Participate
- Who will operate and staff programs - Buildings

## Acquisition

- Detail Uniform Relocation Assistance (URA) compliance
- If a site is required, Purchase Agreement or an equivalent document or letter showing the owner's willingness to sell or donate should be included.
- Reasonable estimates of parcels needed and costs

# Scoring Criteria

- Survey Methodology DCA-6
  - # of households in the target area (geographic area of benefit)
  - # of households interviewed (vacant housing is not counted as households)
  - # of persons living in the households interviewed (minority vs. non-minority)
  - # of low- and moderate-income households interviewed
  - # of persons living in the low- and moderate-income households interviewed
  - # of households interviewed in which the income was above the low- and moderate-income levels
  - # of persons living in the households in which the income was above the low-and moderate-income levels
  - Description of how the sample (if any) was selected and how the total number of households in the target area was determined or at least 90% of face-to-face survey

# Scoring Criteria

- PER/PAR
- Contents Listed Pages 69 – 71 *Applicants' Manual*
- Commonly Missed Items
  - Certified Professional Stamp
  - Detailed Budget
    - Construction and material costs
    - Design and oversight fees
    - Grant Administration
    - Funding sources
    - Projected Operating Revenues and Expenses (if applicable)
  - Proposed/ Existing Conditions Map w/ Sufficient Detail

# Scoring Criteria

- Housing Unit Documentation
- Ownership & Occupancy Verified
- Detailed Work Write-ups
  - Work planned matches need described and documented
- Accurate & Complete Financial Plan
- Household Detail
  - Household size
  - Accessibility concerns
  - Circumstances specific to unit



Proposed Activity: Rehabilitation

Address: [REDACTED]

Type of Structure: Block unit

Age of Structure: 1950 (73 years)

Persons in Household: 1

Owner: [REDACTED]

Condition of Unit: **DETERIORATED – OWNER OCCUPIED - POVERTY INCOME**

Condition of Unit: [REDACTED] lives here by himself. He is handicapped and in a wheelchair. He got bitten by a yellow fly and he got very sick and can't walk. His sister has her name on the house but she is going to deed it to him. She has stated that she will deed him the house if the grant is funded. She did this with her mother's house that is in the 2022 CDBG target area as well. This house needs a lot of repairs. He had done some work on it before he got sick but none of it is done very well. The ceilings have been sprayed with texture and the residue is on everything. It's a mess. The roof isn't leaking but it is old and needs to be replaced. The windows and doors need to be replaced. The fascia, soffit gables need a lot of repair. The electrical needs to be upgraded. HVAC is needed. Handicap accessibility is needed in the bathroom and a ramp is needed for him to easily come and go. At the moment he has no income. His family is helping him out. He is working on getting disability and hopes to have it approved soon. He will be required to pay \$500 towards the repairs.



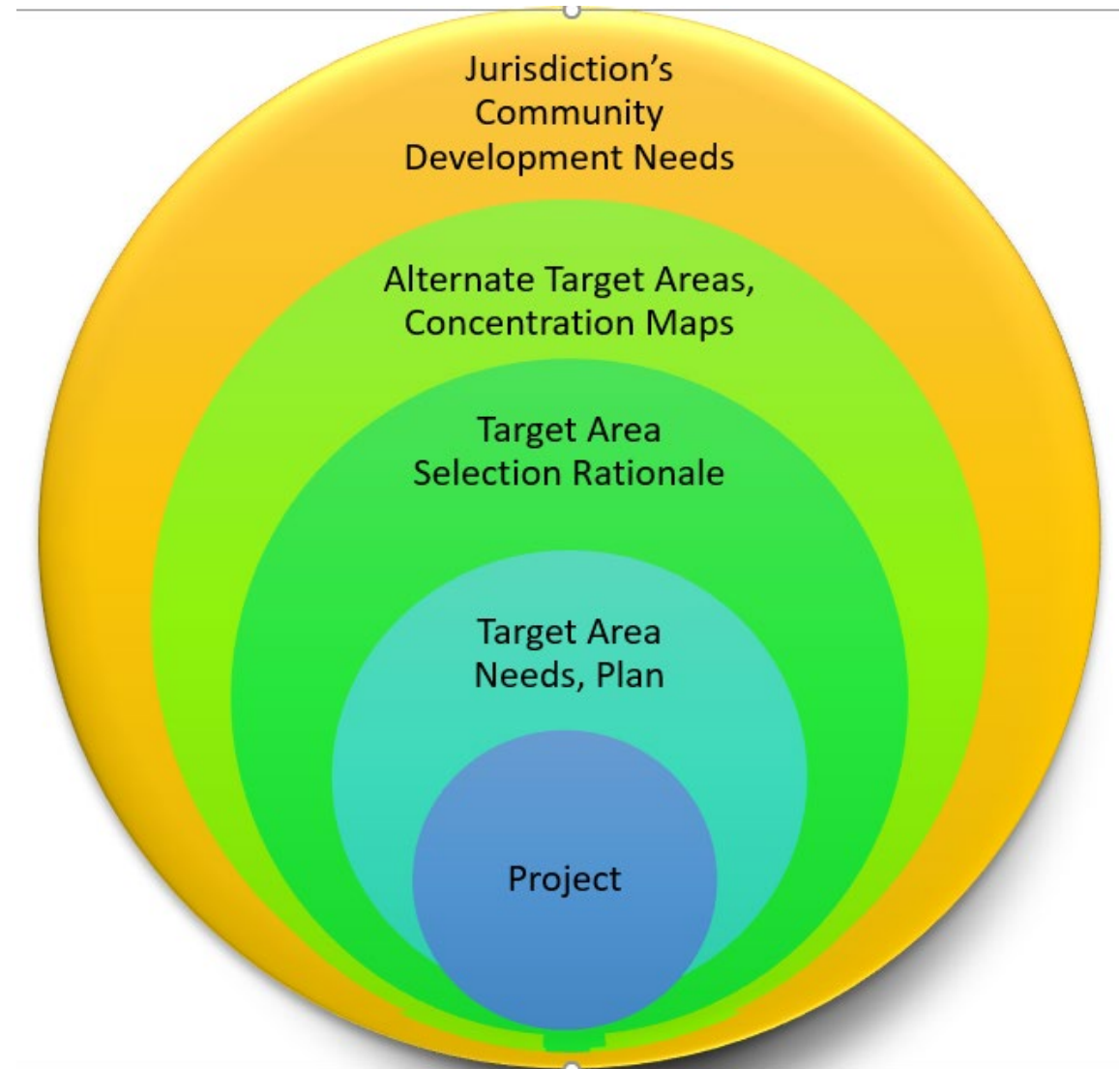
# Addressing Compliance Requirements

A brief statement (approximately one paragraph) on each of the major compliance areas on DCA 5 (Description of Activities) should convey to reviewers the applicant's intent to comply with the applicable laws and regulations and should also convey a basic understanding of the requirements.

- Uniform Relocation Assistance and Real Property Acquisition Act of 1970 (URA)
- Property Acquisition
- Relocation Assistance
- Section 104(d) of the Housing and Community Development Act
- National Environmental Policies Act (NEPA) and Floodplain and Wetland Protection
- Historic Preservation Compliance
- Compliance with Lead-Based Paint regulations (for housing activities or Child Occupied Facilities).
- Labor Standards
- Civil Rights/Fair Housing and Equal Opportunity (FHEO)
- Section 3
- Affirmatively Furthering Fair Housing
- Limited English Proficiency (when applicable)

# Documenting Strategy & Feasibility in the Application

- Community Development Needs Assessment (CDNA)
  - Jurisdiction/ Target Area Community Development Needs
    - Infrastructure, Buildings, Housing, Economic Development
  - Strategies to Address Community Development Needs
  - Rationale for Target Area Selection
  - Alternative Target Areas
  - Analysis of Concentration Maps
- DCA – 4 Description of Needs to be Addressed
  - CDNA is basis of narrative
  - Project needs to be addressed and unmet needs
    - Connect to the people
  - Citizen Participation Efforts



# Documenting Strategy & Feasibility in the Application

- DCA – 5 Description of Activities
- Describe how needs identified in DCA-4 will be addressed
- Description of Activities by line item
  - Identify each activity by name and activity number
- Evaluation of Alternatives
- Consistency with locally adopted plan
- Impact proposed activities will have upon the needs identified in the CDNA
  - CDBG Activities and other Local efforts
- State & Federal Compliance
  - Georgia Planning Act & Service Delivery Strategy
- Timeline to Initiate & Complete Activities

<u>Activity</u>	<u>Initiate</u>	<u>Completion date</u>
Award	N/A	October 2024
Clearance of all Grant Award conditions	November 2024	April 2025
Complete environmental, floodplain & historic assessment etc. and receive release of funds	November 2024	April 2025
Design water system	November 2024	July 2025
Acquisition titles & plats for easements	January 2024	October 2024
Design approvals	July 2024	September 2024
Bidding	November 2025	December 2025
Award and Construction	January 2026	June 2026
Housing rehabilitation policy	November 2024	January 2025
Applications and rehabilitation	February 2024	June 2025
Initiate & complete close-out	July 2026	October 2026

# Resources

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FY24 CDBG Applicants' Manual

- <https://www.dca.ga.gov/node/8230>
- **PER/ PAR Contents List**
  - Pages 69 - 71
- **Strategy & Feasibility Criterion**
- ***Part III: Making Your Application More Competitive***
  - Pages 71 – 77
- **DCA Form Instructions**
  - Pages 80 - 84



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State of Georgia  
Community Development  
Block Grant Program  
Applicants' Manual

