

2025

Method of Distribution

Community Development Block Grant (CDBG)



The Wyoming Community Development Authority (WCDA) is dedicated to community development throughout the State of Wyoming. This is accomplished using Community Development Block Grant (CDBG) funds from the US Department of Housing and Urban Development (HUD). In Title I of the Housing and Community Development Act of 1974, the CDBG program's primary goal is to develop viable communities by providing decent housing and suitable living environments and expanding economic opportunities, principally for persons of low and moderate incomes. The rules and regulations of the CDBG Program are regulated by the U.S. Department of Housing and Urban Development (HUD).

The Method of Distribution (MOD) is the guidance WCDA uses to allocate CDBG funds in support of community and neighborhood development projects in Wyoming communities. CDBG Application, Forms, Recipient Agreements, and Restrictive Deeds may be amended from time to time as guidelines and regulations are issued under 24 CFR Part 570, or as WCDA deems necessary. Unless otherwise stated, WCDA is entitled to the full discretion allowed by federal regulations and laws in making all such decisions and interpretations. WCDA may amend, disregard, modify, or withdraw any section of the MOD, including selection criteria with proper public notice.

WCDA distributes funds annually through a competitive statewide application process. All Wyoming non-entitlement units of general local government (UGLG) are eligible to apply for CDBG funding. This includes any city, county, town, or other general-purpose political subdivision of the State of Wyoming. Cheyenne is the only entitlement community in the State of Wyoming and cannot apply for State CDBG funding. Applications are scored and ranked against one another. Any funds remaining after the initial application process may be awarded through an additional competitive period once a formal announcement of funding availability has been made or will roll into the next annual funding cycle.

States participating in the CDBG Program have four major responsibilities that include:

- For the purpose of the program, WCDA is acting as HUD in its capacity
- Decide how to distribute funds among communities in non-entitlement areas
- Formulate community development objectives
- Ensure that recipients (local units of government) comply with state and federal laws and requirements

UGLG's Participating in the CDBG Program has five major responsibilities that include:

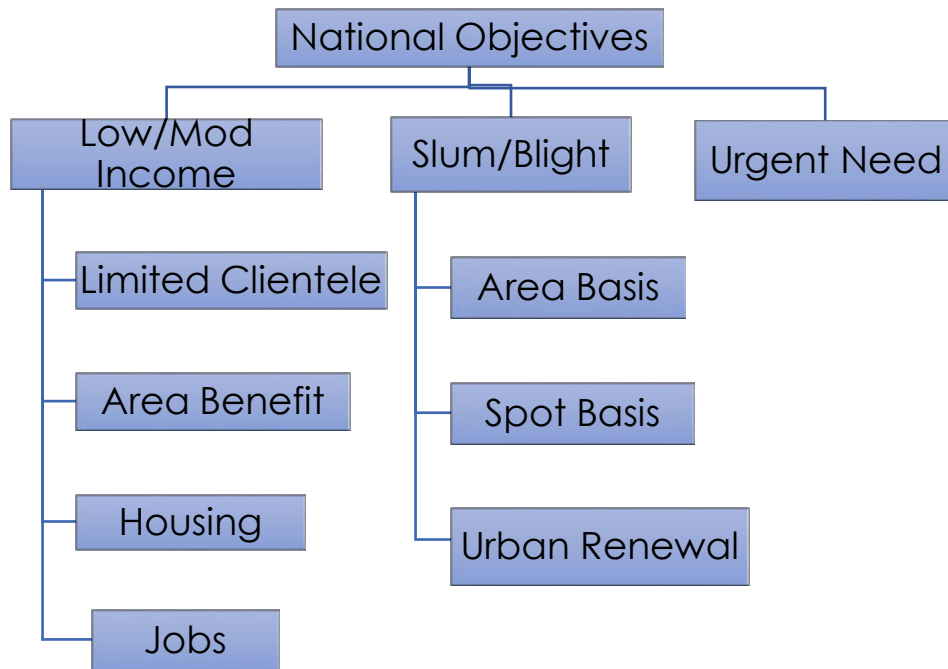
- Evaluate environmental risk and act responsibly
- Consider the greatest community needs
- Prepare grant applications for submission to the State (WCDA)
- Carry out the funded community development activities
- Assume all risk as the Responsible Entity taking on the project

WCDA certifies that it will not refuse to distribute funds under this Method of Distribution to an applicant solely on the basis of a CDBG-eligible activity selected by the applicant for funding. However, WCDA has established a scoring system that may prioritize some activities over others.

National Objectives

Projects **must** meet at least one National Objective to be eligible for CDBG funding:

- Benefiting low and moderate-income persons primary national objective, no less than 70% of the total CDBG funds must be expended on projects that meet this objective.
- Preventing or eliminating slum or blight – Limited to addressing one or more conditions that contributed to the deterioration of a spot or area basis.
- Urgent Need (Applications can be accepted outside a competitive funding round).



Please note that CDBG defines moderate income as a household at or below 80% of Area Median Income (AMI), and low-income as at or below 50% of AMI. WCDA must show that at least seventy percent (70%) of its total CDBG funds, by activity, benefit low- to moderate-income persons. Therefore, applicants applying under the remaining two National Objectives may not be funded if the statewide 70% minimum is not met. Please reference the WCDA CDBG Policy and Procedure Manual for more information regarding national objectives.

State of Wyoming Objectives

- Encourage improvements and/or renovations of substandard housing for low- and moderate-income owner-occupants and renters.
- Provide support for the development of emergency shelters, transitional housing, and permanent housing for the homeless.
- Repurpose existing structures into affordable housing for low and moderate-income persons, including special population groups.
- Engage in the development and expansion of public infrastructure, with an emphasis on rural and underserved areas.

For technical assistance on any of the National or State Objectives please contact the WCDA CDBG staff.

Local Government Requirements: Citizen Participation

Every applicant and recipient of CDBG funds must comply with the citizen participation requirements provided in federal law and described in WCDA CDBG Policy & Procedure Manual.

Environmental Review

All HUD-assisted activities must have some level of environmental review completed. Compliance with 24 CFR Part 58 requirements is initiated with the submission of an application from the grantee for CDBG funds. Even exempt activities cannot be undertaken until a formal determination has been made. The environmental review aims to analyze the effect a proposed project will have on the people and the natural environment within a designated project area, and the effect the material and social environment may have on a project. Please refer to WCDA CDBG Policy & Procedure Manual for more information.

Application Requirements

- Completed Letter of Intent sent to neighborhooddev@wyomingcda.com on or before the submission deadline outlined in the respective Notice of Funding Availability (NOFA).
- Completed Application with checklist and supporting documents submitted to ProCoreM by the deadline.
 - Certification of Applicant
 - Proof of Publication for citizen participation
 - State Historic Preservation Office Consultation, Correspondence, and Response
 - Tribal Consultations, Correspondence, and Responses
 - All required Maps, Specified in the Application
 - Photos (minimum of 6 exterior, (if applicable minimum 6 interior)
 - Third Party Cost Estimates (Minimum 2)
 - Risk Analysis of sub-recipient (when sub-granting)
 - Construction projects applicable environmental studies e.g., Phase I ESA
 - Rehab of a building built prior to 1978, asbestos and Lead-Based Paint inspections.
 - Signed Environmental Review Record Agreement
 - City Planning Documents
 - Reviewed Financial Statements (Minimum of most recent year)
 - Proof of System of Award Management (SAM) registration
 - Debarment Checks
 - Award/Commitment Letters of other funding
 - Market Analysis is required for any type of acquisition
 - Local Resolution

WCDA does **not** have a funding cap, each UGLG is allowed to submit a maximum of **two** applications each funding cycle. WCDA will not consider an application if the UGLG has **two** open projects at the time of the application deadline. WCDA will consider a project closed for application purpose, once WCDA has issued a final close out letter.

An UGLG may apply on behalf of a sub-recipient, housing developer, or business if they choose to do so. The UGLG is responsible for ensuring the sub-recipient complies with all applicable federal, state, and local laws, regulations, and ordinances. The UGLG is expected to conduct a risk analysis. It is recommended, but not required, that the UGLG develop written policies & procedures for monitoring a sub-recipient if they were to be awarded CDBG funds. Applicants will not be allowed to use any grant funds for administrative costs.

Applicants must be compliant with WCDA on any current project before an application will be accepted. After the application is received, WCDA will conduct a site visit to evaluate the site's suitability for the proposed project. WCDA reserves the right to contact UGLG's with clarifying questions regarding their application.

WCDA staff will be responsible for scoring and ranking the applications submitted. The final review and award will be made by the WCDA Board of Directors. The award will be based on the project’s final ranking and the extent to which funds are available. It is possible that a project may rank and not receive funding. At the time of application, all projects must demonstrate that adequate funding is available to complete the project and the project is ready to proceed. All projects involving the use of real property must include a deed, lease of not less than 20 years, easement, or similar formal executed documentation. If the project includes acquisition, a recent market analysis is required for the application, and if awarded a non-biased third-party appraisal will be required prior to funding.

The Wyoming Community Development Authority (WCDA) makes no representations herein as to compliance with the Housing and Community Development Act of 1974, 24 CFR Part 570, or any other laws or regulations governing the Community Development Block Grant (CDBG) Program. CDBG awards shall be made solely at the discretion of the WCDA Board of Directors, but in no way represents or warrants to any sponsor, investor, lender, or others that the project is, in fact, feasible or viable. No board member, agent, or employee of WCDA shall be personally liable concerning any matters arising out of, or in relation to, the allocation of CDBG funds.

Applications may be rejected for any of the reasons listed in the WCDA Policy & Procedure Manual.

Project Evaluation and Scoring

All applications that meet the threshold criteria will be rated and ranked competitively by a review committee composed of WCDA staff with final approval of funds being determined by WCDA Board of Directors. Applicants will be given an opportunity to respond to questions in a timely manner.

*As long as there is no plan to use CDBG funding for a project’s design/planning, this will not trigger a choice-limiting action. Grantees will not be allowed to request that pre-award costs be reimbursed for these design/planning costs. If you plan to apply for CDBG funding for planning/design costs please contact WCDA CDBG staff prior to entering any contracts.

Rating is based on a 150-point scale. Point ranges have been established for each criterion to gauge the extent to which the applicant meets the criterion. The following factors will be considered in determining the points assigned. Applicants will complete a self-scoring of the application as part of the application process.

RANKING FACTOR	MAXIMUM POINTS
PUBLIC PURPOSE Severity of Need (30) Community Support (5) Consistency (10)	45 Points
PROJECT IMPACT Affordability (0) or (5) Impact on Need (10) or (5) Benefit to LMI Households (10)	25 Points
PROJECT MANAGEMENT Readiness To Proceed (35) Accuracy of Costs (10) Administrative Capacity (10)	55 Points
LOCAL COMMITMENT / LEVERAGING Local Commitment (10) Leveraging (15)	25 Points
BONUS POINTS	15 Points

Public Purpose & Local Need (45 maximum points)

Severity of Need (30 maximum points). Based on the information in the application, the degree of distress and examples provided will determine the number of points awarded. Distress factors including the quality and quantity of existing facilities, including the need for rehabilitation or replacement, condition description, age, adequacy or absence of facilities, services, housing etc. Up to twenty (20) points are awarded based on the documented need for new services, facilities, infrastructure, or housing. Up to ten (10) points are awarded where existing physical health and safety conditions of buildings or infrastructure are documented. *Please note that documentation in support of the need is the key to receipt of points.*

Community Support and Involvement (5 maximum points). Points are awarded based on evidence and description of current community support and involvement in the project development and implementation. Letters of general support and participation may include local interest of neighborhood groups, local public or non-profit agencies and individuals that might directly benefit from the project. Applicants should describe the outreach conducted related to the public hearing and the efforts to obtain input from the public and those that might benefit directly from the project(s) included in the application. A minimum of 2 letters of support and detailed documentation of the outreach conducted in order to receive full points.

Consistency with Local Needs/Plans/Strategies (10 maximum points). Points are awarded based on the degree to which the project is specifically identified and is consistent with a locally developed revitalization strategy, capital improvements plan or comprehensive plan up to five (5) points. Relevant sections must be provided with the applications. Up to five (5) points may be awarded for proposed projects and activities that re-use existing buildings and infrastructure.

Project Impact (25 maximum points)

Impact on Need (10 maximum points). Points are awarded based on the extent to which the project will address the needs and alleviate the existing problems described by the applicant.

Benefit to Low and Moderate Income (LMI) Households (15 maximum points). Maximum points will be awarded to projects where there is a direct benefit to LMI households/persons. Five (5) points will be awarded to projects where there is an area wide benefit to LMI persons. No points will be given for slum/blight projects where there is no benefit to LMI persons, or where benefit cannot be determined. If there is more than one national objective, maximum points will be given for the activity that benefits more people.

Project Management (55 maximum points)

Readiness to Proceed (35 maximum points). Points may be awarded for the extent to which the project is ready to proceed and the implementation schedule is reasonable. The assessment is based on the relative progress of elements such as site control/easements, architectural design or preliminary or final engineering, commitment of other project financing or the development of rehabilitation guidelines. This category considers the project as a whole but will consider factors such as phases as long as each phase is able to meet a national objective.

An applicant may receive thirty-five (35) points based on the following factors:

1. Construction Projects: Applicant has completed design and/or engineering, has completed acquisition or will complete if applicable within 90 days (does not include easement acquisition), can bid project within 90 days of executed agreement, and is able to start construction within 90 days of bid award.
2. Housing Rehabilitation Projects: Applicant has developed or updated all program materials, selected, and completed work write-ups for 30% of properties to be rehabilitated, and can bid work in 90 days of executed agreement.
3. Services/Non-Construction Projects: Applicant can demonstrate that program and/or activities can be implemented within 30 days of executed agreement.

An applicant may receive twenty (20) points based on the following factors:

1. Construction Projects: Applicant has completed design and/or engineering, has completed acquisition or will complete if applicable within 120 days (does not include easement acquisition, can bid project within 120 days of executed agreement, and is able to start construction within 120 days of bid award.
2. Housing Rehabilitation Projects: Applicant has developed or updated all program materials, selected, and completed work write-ups for 15% of properties to be rehabilitated, and can bid work in 90 days of executed agreement.
3. Services/Non-Construction Projects: Applicant can demonstrate that program and/or activities can be implemented within 60 days of executed agreement.

An applicant may receive ten (10) points based on the following factors:

1. Construction Projects: Applicant will complete design and/or engineering within 90 days of executed agreement, will complete acquisition if applicable, within 90 days, and will bid project within 120 days of executed agreement.
2. Housing Rehabilitation Projects: Applicant has developed or updated all program materials, selected, and completed work write-ups for 5% of properties to be rehabilitated, and can bid work in 120 days of executed agreement.
3. Services/Non-Construction Projects: Applicant can demonstrate that program and/or activities can be implemented within 75 days of executed agreement.

No points are awarded if the project is not ready to proceed based on the above criteria.

Accuracy of Costs (10 maximum points). Maximum points may be awarded to projects which best document that project costs have been carefully estimated. Estimates should reflect the applicability and impact of Davis-Bacon wage rates, acquisition requirements, relocation, or replacement housing requirements. Estimates should be current within six months. Preliminary professional studies, appraisals, tax assessments, wage rate determinations are some examples of acceptable documentation. No points will be awarded if documentation of costs is not submitted.

Administrative Capacity (10 maximum points). Points may be awarded for projects based on the past performance of the applicant or subrecipient with CDBG grants (5 points maximum). WCDA will consider previous general grant management, financial management and compliance with meeting a national objective. The adequacy of staff to implement the proposed project based on information in previous grant administration of the application will also be considered (5 points maximum).

Local Commitment and Leveraging (25 points maximum)

Local Commitment (10 maximum points). WCDA will consider the extent to which local funds will be contributed to the project. Maximum points (10) may be awarded to applicants whose local contribution equal to or exceeds 25% of the total project costs. Local contribution of 15%-24.99% of total project costs receives 8 points. Where there is some local contribution but less than 15% of the total project costs, 5 points are awarded. No points will be given where there is no local contribution. All funds must be adequately documented. Local funds include cash, debt service and any in-kind contributions which materially contribute to the project completion. In-kind contributions must be documented and may include the donation or long-term lease of land or buildings, appropriation of local revenues, site improvements or installed infrastructure, deferral of real estate taxes, abatement, or payment in lieu of taxes. The contribution may be provided by the local government or directly by subrecipient or business.

Leveraging (15 maximum points). WCDA will consider the extent to which local and CDBG funds are used to leverage other public and private funds (non-local). Points will be awarded based on the documented commitment of funds specifically identified to supplement CDBG funds. Maximum points fifteen (15) will be awarded for projects where 50% or more of the project costs are from sources other than local or CDBG. If 25% to 49.99% of the project costs are from sources of then local or CDBG ten (10) points will be awarded. If 15% to 24.99% of the project costs are from sources other than local or CDBG five (5) points will be awarded. If less than 15% of the project costs are from sources other than local or CDBG no points (0) will be awarded.

Bonus Points (10 maximum points)

Applicants may receive up to 10 bonus points for meeting one or more of the following criteria if sufficiently discussed and/or documented within the application:

1. Project will use innovative materials or methods, include the replacement of utilities in existing buildings with energy saving materials and/or use green or energy efficient building materials and practices for new construction or renovation (2 Points);
 2. Project activities include the acquisition and reuse of foreclosed or condemned properties (2 Points);
 3. Project activities that benefit the homeless (2 Points).
 4. Project activities will provide benefit to those serving or have served in the U.S. armed forces (2 Points);
- or
5. Attend WCDA CDBG annual training (2)

Funding Recommendations

The highest ranked applications are recommended for funding until the available funding for the round are exhausted or the next highest ranked project requests more funds than are available and the project cannot be phased. In that case, the next highest scoring project may be funded. In case of a tie score, the application with the highest combined score on Public Purpose & Local Need and Project Management is funded first. As noted at the beginning of this section, WCDA may consider other factors when making awards. In these cases, the other factors will be documented in the WCDA records.

Performance Thresholds

There are performance thresholds related to previous CDBG grants that must be met by applicants. Applicants will be evaluated on their management of existing CDBG grants and must follow financial, reporting, monitoring, and performance requirements as established each year.

1. **Financial** - Lack of expenditures and compliance with the CDBG Procurement Manual will be considered when new applications are ranked.
2. **Reporting** – Applicants must be current with submission of any reports due to the program for existing grants.
3. **Monitoring** – Grantees that have grants with open monitoring issues will be reviewed on a case- by-case basis, taking into consideration the significance of the finding(s) or concern(s), the corrective action(s) taken by the grantee or subrecipient to resolve the issue(s), and the timeliness of the grantee in responding.
4. **Performance** – Grantees that have grants that have expended funds but have moved slowly or failed to perform in conformance with their project schedule. Grantees will be required to submit additional information related to reasons for delays and poor performance and a new timeline. WCDA reserves the right to determine if the response is sufficient.

In addition to the rating and evaluation criteria; WCDA staff and WCDA Board of Directors may consider other factors in making funding determinations, including:

- WCDA’s objectives and priorities;
- The availability of alternate or contributing funding sources for the total project or some of its components;
- A reasonable distribution of projects among eligible regions of the State;
- The ability to respond to a locality’s special needs;
- The degree of community commitment for the project;
- The previous CDBG investment in a community;
- The ability of applicant, subrecipient or business to borrow funds;
- The commitment and/or input from other funders;
- The cost per person based on the total project cost;
- The amount of CDBG funds awarded for other phases of a multi-phase project; and
- The availability of other resources and/or services in a community.
- Environmental issues that cannot be mitigated or project site is located in a flood zone or floodplain.

WCDA will provide final scores and general comments as to strengths and weaknesses of the UGLG application, if requested.

Available Project Funding	Amount
Community Development Block Grant (FY 24-25)	\$3,521,015
Community Development Block Grant (previous years)	\$4,444,599.21
Community Development Block Grant-CV	\$ 2,648,568.17
Public Services	15% Maximum
Urgent Need	12% Maximum
Low to Moderate Income Persons Benefit	75% Minimum
State Program Planning and State Administration	3% Maximum
Application Cycle Timeline 2024-2025	
Task	Deadline
Notice of Funding Availability	July 2024
Letter of Intent	August 30 th , 2024
Application Submittal	September 27 th , 2024
WCDA Board Funding Approval	January 2025

Community Development Block Grant Corona Virus Addendum

Community Development Block Grant was issued a one-time allocation of funding, Community Development Block Grant Corona Virus (CDBG-CV) under the Federal Government's Coronavirus Aid Relief and Economic Security Act (CARES Act) for grants that will prevent, prepare, or respond to coronavirus. This funding is to support communities throughout Wyoming as they respond to the impacts of the pandemic. CDBG-CV funding is subject to following all federal CDBG regulations. WCDA's focus is prioritizing CDBG-CV. There is no cap on funding amount requests, it is possible an applicant can be awarded for less than requested due to funding availability and WCDA can use their discretion as deemed necessary. Eligible applicants include counties, cities, towns, and non-profits.

WCDA focus for CDBG-CV is to fund activities that:

- Improve Public Facilities
- Reduce Homelessness
- Increase vital public services
- Reduce Food Insecurities
- Address added cost caused by pandemic which was not reimbursed by another government entity.

Applications must be complete and submitted prior to the deadline. Projects for CDBG-CV need to follow all requirements and application guidelines.

Additional Requirements:

- Demonstrate that the project will prevent, prepare, or respond to coronavirus.
- Project is ready to start at application submission.
- 100% of grant funds and completion for projects cannot exceed **20 months**.
- Application must include clear plan to avoid duplication of benefits.

Duplication of Benefits

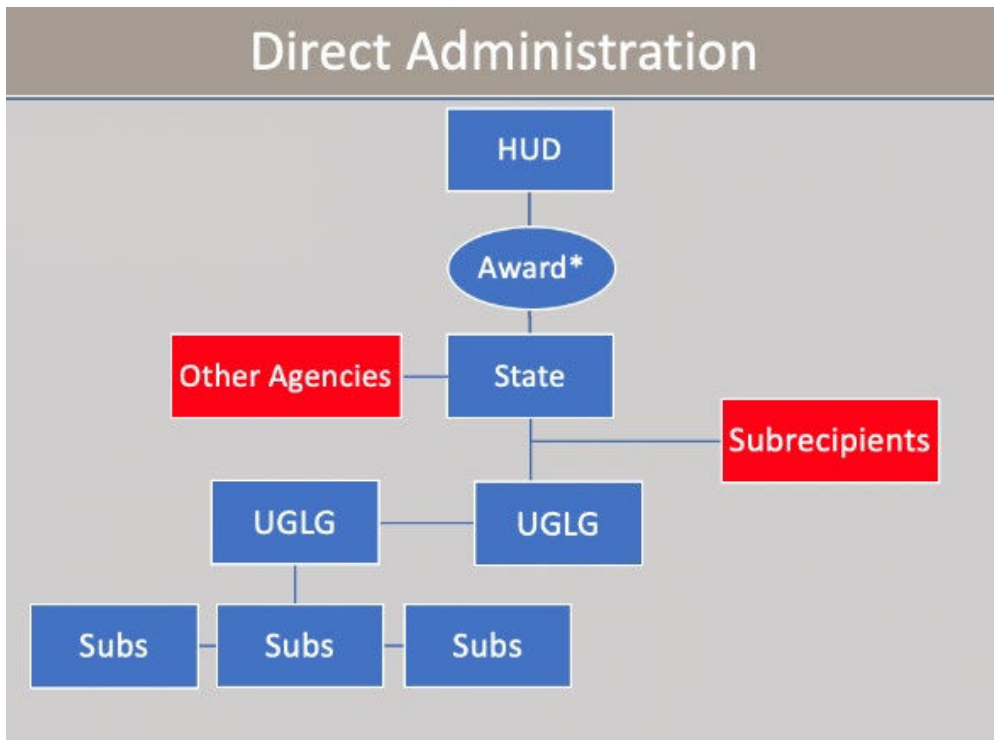
Recipients of CDBG-CV funds will need to comply with Duplication of Benefits requirements. The recipient will establish and follow policies and procedures to ensure that a duplication in benefits to their project does not occur. The process should effectively identify all funding sources for the project as well as expected planned costs. It is critical that the process define how the recipient will verify that funding is separated and tracked. Duplication of benefits will result in repayment of CDBG-CV funds.

Amendment to allow for Direct Administration of CDBG-CV funding:

In order to expedite the award of remaining CDBG-CV (Covid) funds, WCDA will be implementing the HUD CDBG-CV Notice (FR-6218-N-01 Section III.B.6. (b)(i) through III.B.6. (b)(iii)). This will allow direct administration through a competitive process, to non-profits without the requirement of an UGLG sponsor.

WCDA can directly administrate these funds should they choose to do so, in order to implement provisions in the CARES Act to reduce administrative costs and streamline the delivery of assistance for the remainder of Wyoming's CDBG-CV allocation. WCDA is responsible for ensuring that CDBG-CV funds are used in accordance with all program requirements. WCDA is responsible for determining the adequacy of the performance under sub-recipient agreements, and procurement contracts, and for taking appropriate action if performance issues arise. WCDA will still be ensuring compliance with civil rights, labor standards, and environmental

protection requirements, including conflict of interest provisions. Recipients must carry out activities consistent with applicable statutes, regulations, waivers and alternative requirements, and other Federal Requirements. Activities that are proposed to be directly administered will align with the four focus areas identified above. These activities will be carried out by subrecipients to implement activities statewide and is a variance from CDBG traditional funding as the model may occur without the involvement of UGLGs. A minimum of \$750,000.00 of current available funds, must be awarded to an UGLG. Until \$750,000.00 of CV funds are awarded through an UGLG, the flexibility for the non-profit competitive process cannot be finalized; this is required due to HUD guidance specifying that an amount of funding no less than an amount equal to the CV1 allocation is provided for non-entitlement local government use.



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