Community Development Block Grant- Disaster Recovery (CDBG-DR) Workforce Development Program NOFA Webinar Frequently Asked Questions (FAQ)

CDBG-DR Workforce Development Program: Frequently Asked Questions:

1. **Will the slides be available?**

   HCD will release the webinar slides and recording of the DR-Workforce NOFA webinar on the [Disaster Recovery Workforce Development webpage](#) in approximately 10 business days. The NOFA slides and FAQ will also be emailed to all DR-Workforce contacts.

2. **Can we submit a proposal/application if we are based in Sacramento but supporting a college in Butte or Shasta?**

   Potentially. An essential eligibility criterion for this Program and CDBG-DR funds in general, is that Applicants must provide eligible public service activities within one of the Eligible Disaster Impacted Areas or that the eligible services will benefit one of the Eligible Disaster Impacted Areas of Butte, Lake, Shasta, Los Angeles, and Ventura. As a part of your application, you will be asked to justify how your proposed program will benefit the Eligible Disaster Impacted Areas.

3. **How will enrollee data be reported? Is there a system to use?**

   The DR-Workforce department uses Grants Network as its grant management system, Grants Network has a required Activity Report to be completed and submitted monthly to capture all reporting requirements. On a monthly basis you will be reporting the performance metrics met the previous month, (i.e., number of trainees that have applied to your program, number of LMI and non-LMI trainees enrolled, program milestones, etc.). HCD then reports this data to HUD. In addition to the activity report, Subrecipients must keep the source data in your project files. Program staff has provided sample beneficiary income forms that you can use or modify to collect and retain the data. Please view the NOFA solicitation files in Grants Network for sample documents and the Policies and Procedures Manual section *6.8 Reporting Requirements* for more information.

4. **If we are a post-secondary education training provider that is already an approved eligible training provider for Butte County, do we need to go through this NOFA application process to be approved to admit new students to our program?**

   Yes, to receive DR-Workforce grant funds, a completed application would need to be submitted to HCD for review to determine if the training program meets the eligibility and threshold requirements of the DR-18 Workforce Program. If your training program meets eligibility and threshold criteria, you will be awarded funds and sign a standard agreement for reimbursement costs. Please reach out to Butte County to determine if an application is already being submitted that includes your school as the training provider.

5. **Do you mean reach out to Butte County Administration to see if they are applying?**

Yes, there could also be nonprofits or local workforce boards that may be applying that are proposing training programs in Butte County. Please refer to the list of eligible applicants for some potential partners to reach out to.

6. **Is there a specific definition of a "Public Facility?"**

Public Facilities include all facilities that are either publicly owned or that are traditionally provided by the government, or owned by a nonprofit, and operated to be open to the general public. Eligible Public Facility activities for DR-Workforce are further defined in Section 4.1. Eligible Activities of the Policies and Procedures Manual.

7. **It appears income verification will be conducted for the household, including all adult members of the household, rather than just the individual receiving training or services, is that correct?**

Possibly. It depends if the household composition includes more than just "family" members. Income documentation will be collected from each adult family member in the training applicant's family**.** Family size and family annual income is collected to determine the training applicant's eligibility to obtain free workforce training.

Please refer to the *Beneficiary Self-Certification of Annual Income Form* located in the solicitation files for more information on capturing family income. "*Family*" is defined by HUD as one or more persons living in your household who are related by birth, marriage, or adoption. The number of persons in a family shall reflect all family members, including those temporarily away from the home (e.g., college students, persons on extended vacation, etc.).
   - "Family" is different than "household".
   - Two different families may live in the same household.
   - A single person can be a "family".

HUD requires CDBG-DR programs use "household" income to qualify recipients only in housing programs and "family" income in all other CDBG-DR programs unrelated to housing. Since the DR-Workforce Program is not a housing program, then we use family income.

8. **Can undocumented individuals be enrolled in the program?**

HUD/HCD requirements do not explicitly mention that services/benefits cannot benefit or be provided to undocumented individuals. The DR-Workforce Program does not have requirements (i.e., collecting SS #'s or citizen status) to collect this immigration status. The Program does ask for other demographic data. Thus, a project that serves undocumented would not be ineligible.

9. **How will LMI eligibility be determined? Is it required to collect income documentation?**

   DR-Workforce subrecipients are required to document how CDBG-DR awarded funds benefit LMI Clientele. Subrecipients will need to collect documentation on each training applicant's family size and income to determine income eligibility. It is recommended that subrecipients alert beneficiaries (enrollees) while they are self-certifying their income, that a select sample of self-certifications will be tested, and those beneficiaries will be expected to produce verifiable income documentation.

   Training participants that are not willing to verify income, in a manner consistent with federal or state regulations either by self-certification or a complete income verification review, may be enrolled in the program but will be presumed to be over the LMI threshold and will not count toward HUD's LMI requirement of 51 percent, or the Program minimum threshold of 85 percent. Moreover, participants that are not verified as LMI are not eligible for free workforce training services or Participant Support Services if those services are not already provided to every participant in the relevant Workforce Training Program.

   Please see the Policies and Procedures Manual for further information on collecting income data for eligibility.

10. **Does the applicant (potential student) have a separate application process? How does that work?**

    A "DR-Workforce Applicant" is the NOFA applicant applying for CDBG-DR Workforce Program funding such as local city or county governments (jurisdictions), non-profit organizations, post-secondary educational institutions, and local workforce development boards.

    The "DR-Workforce Beneficiaries" is the trainees/students that benefit from participation in a Workforce Program administered by a Subrecipient, what you are calling a potential student. The beneficiaries do not need to apply to HCD but would need to apply to the Subrecipient's training program and be reviewed for eligibility to participate, namely income. In the DR-Workforce application, we ask NOFA applicants to provide their program's application intake policies and procedures, (i.e., how you will enroll potential students). The application intake policies and procedures should include your process and requirements for trainees to participate in the program and how the sensitive information (i.e., family income and addresses) from trainees will be collected, tracked, and maintained to demonstrate compliance with the 85 percent LMI trainee participation requirement.

11. Are there any match requirements?

There are no match requirements, but the CDBG-DR funds may be used to match other federal resources and can also be used in combination with Department of Health and Human Services (HHS) and Social Services Block Grants (SSBGs). However, CDBG-DR funds may not supplant other federal, state, or local funds. The NOFA application must document that the CDBG-DR funds if awarded are above and beyond any annual appropriations that are provided for the same purpose. If you have an existing program or have expected funding, the DR-Workforce funds can be used to expand the program.

12. If we have already received NDWG for the 2018 California Megafires to do workforce development training and temporary jobs cleanup, would we still be able to apply?

If you already have an existing workforce program, we recommend reviewing the following information in the Policies and Procedures and NOFA:

1. Duplication of Benefits (DOB). You want to make sure that the awarded CDBG-DR funding will not cause a DOB. A DOB occurs when financial assistance is received from another source that is provided for the same purpose as the CDBG-DR funds.
2. Existing Workforce Programs. CDBG funds cannot supplant existing federal, state, or local funds. CDBG-DR funds are intended to fill a gap in an eligible Workforce Training Program budget that would not otherwise be filled by other sources.

This is an over the counter first come first serve opportunity, you may reach out to HCD for technical assistance to determine if you have a DOB or if it would be supplanting existing funding.

13. Would we also draw down funds through the Grants Network platform?

Yes. In addition to activity monthly reporting in Grants Network you will also be submitting monthly financial reports which are essentially invoices for reimbursement of eligible costs incurred under this Program.

14. About how long does the reimbursement process take?

HCD is committed to work with the State Controller's Office to remit payment within 30 days of the receipt of a compliant invoice. If a financial report does not require corrections, it can be done in a couple of weeks. Subrecipients are provided opportunities to work with the HCD team on a regular basis and are encouraged to ask questions for submitting accurate and eligible financial reports, correct financial reports that do not need revisions will be processed quicker. If you have concerns of carrying the costs while waiting for HCD reimbursement, let the DR-18 Workforce team know and we will work with you to try to reduce the amount of time and assist with understanding of what is required to submit a complete and accurate financial report.

15. **Are there specific requirements for the Scope of Work narrative? An outline with required elements?**

Yes, please refer to the NOFA for detailed scope of work threshold requirements. The scope of work narrative shall include at minimum:
- Clear description of the training program and services that will be provided and the areas the services will be provided in and/or benefit,
- Workforce Training course descriptions,
- Who will provide the Workforce training and services,
- Steps that must be completed to initiate the training program,
- Available training facilities and equipment, or mobile training methodology if applicable
- Clear statement that income eligible trainees will receive training services at no cost,
- Any other relevant program activity details.

16. **Will there be ongoing technical support for the reporting?**

Yes. Once you enter into a standard agreement you will be assigned a staff member that will provide support. HCD staff will have monthly meetings with you as a subrecipient to review reporting, check on progress, and provide additional technical assistance.

17. **How will we be notified if someone is awarded early?**

We will approve applications on a rolling basis as applications are submitted during the open NOFA period. All awards will be posted to the webpage after they have been awarded.

18. **Will awards be made after February?**

Yes, the deadline to submit applications is February 29, 2024, but awards will not happen immediately. All applications submitted will need to be reviewed for Program eligibility, cost reasonableness, and threshold criteria by HCD 's review committee. This can take some time; Program's goal is the make awards as close to the deadline as possible.

19. **Can the Subrecipient's for-profit Partner claim profit by meeting performance-based outcomes?**

No, Partners may be reimbursed for costs only. Moreover, if the Partner is receiving other sources of funding for the same service, the other grant amount would be deducted from the need and the Partner would be reimbursed for the remaining cost of providing the same service. Applicants and Partners will be asked to certify to the accuracy and transparency of their costs and other sources of funds.

For example, if a Subrecipient's Partner is providing childcare for beneficiaries while they are in a class and the same childcare provider has another grant to pay for a portion of every child from a low-income family, HCD is required to deduct the amount of the other grant that is covering a portion of the beneficiary's childcare costs prior to reimbursement.

20. **Can HCD elaborate on the definition of entities that qualify as an eligible Applicant?**

The following entities are considered eligible Applicants. The list below is the same list of eligible Applicants that are found in the NOFA, HCD has only added language to further clarify each entity type.
1. **Jurisdiction:** local city, town, or county governments.
2. **Nonprofit:** any entity incorporated under the Nonprofit Corporation Law (Division 2 (commencing with Section 5000) of Title 1 of the Corporations Code) or a Nonprofit Organization that qualifies for exempt status under Section 115 or 501(c) of the Internal Revenue Code and registered as a California business entity with the Secretary of State's Office. Any nonprofit (501(c)(3) or other tax-exempt organization, including private schools and private universities.
3. **Postsecondary educational institutions** (including career technical institutions): Public or Private nonprofit institutions of higher education.
4. **Local workforce development board:** The Local WDB is appointed by the chief elected official(s) in the local area in accordance with State criteria established under WIOA sec. 107(b), and is certified by the Governor every 2 years, in accordance with WIOA sec. 107(c)(2). Eligible LWDBs for this Program are those that provide services to any of the five disaster impacted areas AND are recognized by the California Workforce Development Board as one of the 45 LWDBs certified by the Governor. A list of all 45 LWDBs can be found at https://cwdb.ca.gov/local_boards/local_workforce_investment_associations/.

21. **Are for-profit educational institutions eligible to apply?**

For-profit educational institutions are not eligible Applicants, but they can be an eligible Partner. See the defined terms for eligible applicants as published in the NOFA and in these FAQs for further clarifying language. For additional guidance, please contact HCD if you plan to work with a for-profit Partner.

22. **We are a non-profit and want to purchase a building to use for providing workforce services, but we won't be able to finish acquisition and start the training until the end of 2024. If we use our entire award for the acquisition, thus completing expenditures by the deadline, are we still eligible for an award?**

Possibly. You must be able to start providing training by 12/31/24. If you start training any later you are at risk of the award being recaptured because you likely will not meet the national objective, serving low-moderate income persons with workforce training, by the

end of the period of performance. If you are only using the award for acquisition costs you must still demonstrate in your application and Standard Agreement a budget and the capacity to carry-out the workforce training, plus any supportive services offered, within the period of performance.

23. **What will HCD require from Subrecipients that are using at least one Partner to carry out the scope of work?**

If an application including one or more Partners is awarded, HCD will not execute a Standard Agreement with the Applicant until the Applicant meets the following four conditions:

- Provide documentation to HCD, including an organizational chart, that demonstrates that Applicant has capacity to administer the grant and comply with all terms and conditions for itself and all Partners listed in the application.
- Provide a written monitoring plan of the Partner(s). The monitoring plan must demonstrate that the Applicant has sufficient understanding of the Program requirements, the applicable federal and state regulations, and the capacity to monitor the work of its Partner(s).
- Provide a formal executed agreement between the Applicant and the Partner(s). The written partnership agreement must at minimum outline the role, compensation method, budget, scope of work, timelines, milestones, and goals that support the evidence of successful workforce training participation and/or job placement.
- For Applications with Tribal Entity Partners: in addition to conditions 1-3, the application must include the Authorizing Resolution for Tribal Governments, located in the solicitation files, must also be adopted, signed, and included with the Application to ensure Tribal consent has been given. The Tribal Entity's bylaws, or appropriate governing documents, must also be provided at the time of application. If the governing documents of the organization are not reflective of the current board makeup, the Applicant must provide an explanation of the discrepancy in the application.

Subrecipients, along with their Partners when applicable, must:

- Provide eligible public service activities as described in the NOFA which includes workforce training and supportive services within the Eligible Disaster Impacted Areas (EDIA) of Butte, Lake, Shasta, Ventura, or Los Angeles.
- Not be debarred or suspended or excluded from participation in Federal assistance programs.
- Demonstrate capacity and experience to carry out the eligible activities under the CDBG-DR Program.

Partners must meet the eligibility requirements and qualifications of a Partner acting as a training operator or participant supportive service provider.

24. **Who do I contact for more information?**

For more information regarding the DR-Workforce Program, email: DRWorkforce@hcd.ca.gov or visit the DR-Workforce webpage for updates and announcements.

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