

# **SOUTH CAROLINA CDBG-CV1 PROGRAM**

## **Public Services and Public Facilities Improvements**

### **2.16.21 Program Overview Session – Questions & Answers**

#### **Grant Program Administration Questions**

##### **1. WHAT IS THE ADMINISTRATIVE COST ALLOWANCE ATTACHED TO THE PROGRAM?**

The State has established an administrative cost cap for the funded units of local government of 10% and cannot be exceeded over the life of the grant, including closeout, monitoring, reporting, record retention, etc. Administrative funds must be necessary to program implementation and reasonable. Federal guidelines define a “reasonable cost” as one that does not exceed that which would be incurred by a **prudent person** under the circumstances prevailing at the time the decision was made to incur the cost. Further, these costs must not significantly deviate from an entity’s established practices and policies regarding the incurrence of costs.

##### **2. ARE COUNTIES WHICH ARE CURRENTLY DESIGNATED AS NON-ENTITLEMENT, BUT WILL BE DESIGNATED AS ENTITLEMENT IN THE COMING MONTHS, ABLE TO APPLY TO THE PROGRAM?**

Yes, current non-entitlement communities may apply to the South Carolina CDBG-CV1 program.

##### **3. IF A COUNCIL OF GOVERNMENT OR COUNTY ACTS AS A “LEAD” FOR A REGIONAL APPLICATION, WILL ALL INCLUDED COUNTIES NEED TO SUBMIT A NEEDS ASSESSMENT?**

Each local government included in a regional application will be required to submit a needs assessment that covers their area. An application with one County designated as the “lead”, is a regional approach to submitting a CDBG-CV1 application, where the Lead County or Regional Council of Government may complete and submit the needs assessment for all other local governments within the regional application (often smaller and more rural municipalities).

##### **4. ARE RESIDENTS OF AN ENTITLEMENT CITY WITHIN A NON-ENTITLEMENT COUNTY ELIGIBLE TO RECEIVE THE PUBLIC SERVICES FUNDED THROUGH THIS PROGRAM?**

No, the State CDBG-CV1 funds are being made available for non-entitlement units of local government only.

##### **5. CAN AN ENTITLEMENT COMMUNITY ACT AS A LEAD OR ADMINISTERING ENTITY FOR A NON-ENTITLEMENT COMMUNITY?**

No, the State CDBG-CV1 funds are being made available for non-entitlement units of local government only.

## **Project Eligibility Questions**

### **6. CAN COSTS RELATED TO EXPANDING A PUBLIC SERVICE PROGRAM IN RESPONSE TO COVID BE REIMBURSED?**

Yes, these expansions due to COVID are eligible, however all grant requirements for those services must have been met at the time the costs were incurred, such as documentation of national objective, procurement, environmental reviews, etc.).

For example, if HVAC and air filtration improvements to classrooms were made in August 2020, environmental reviews that are compliant with HUD CDBG requirements must have been completed prior to construction in order to receive CDBG-CV funding.

If you are considering requesting the reimbursement of costs related to an expansion of a public service, please contact [SCCDBG.CV1@sccommerce.com](mailto:SCCDBG.CV1@sccommerce.com) to discuss further.

### **7. CAN A PUBLIC SERVICE PROGRAM THAT HAS ALREADY BEEN EXPANDED IN RESPONSE TO COVID RECEIVE ADDITIONAL FUNDING UNDER CDBG-CV1?**

Maybe. CDBG-CV funds may only be used for those public service activities that are new or that represent a quantifiable increase above the level of an existing service that has been provided by or on behalf of the unit of general local government (through funds raised by the unit or received by the unit from the state in which it is located) in the 12 calendar months before the submission of the action plan (South Carolina submitted in November 2020). The public service must meet a national objective, comply with all grant requirements, must be needed to prevent, prepare for, or respond to coronavirus, and must not constitute a duplication of benefits.

### **8. THE PUBLIC FACILITIES AND IMPROVEMENTS PROGRAM PROVIDES PRIORITY FOR PROJECTS BENEFITING CERTAIN SCHOOL DISTRICTS, ARE PROJECTS TO IMPROVE PRISONS AND JAILS ELIGIBLE FOR PUBLIC FACILITIES AND IMPROVEMENTS FUNDING UNDER CDBG-CV1?**

Yes, prisons and jails are eligible for funding under both the Public Services and Public Facilities Improvement programs. However, applicants are encouraged to consider how each project will meet a national objective, the timeline of the proposed projects, and the application scoring criteria, and funding priorities of the State.

### **9. WILL ALL PUBLIC FACILITIES PROJECTS BE CONSIDERED FOR FUNDING, PARTICULARLY THOSE THAT DO NOT ADDRESS THE NEEDS OF PUBLIC SCHOOLS?**

All Public Facilities projects that are determined eligible will be considered for funding. Additional consideration is given to schools with more than 75% of students receiving SNAP or TANF benefits.

However, all eligible and fundable projects will be evaluated on the basis of need, impact, extent of other available resources, capacity of the recipient to successfully carry out the project and project timeframe.

## **10. ARE BROADBAND PROJECTS ELIGIBLE?**

Yes, some broadband projects may be eligible as either a public service or public facilities and improvements projects depending on the activities involved. As with all other projects, applicants are encouraged to consider how each project will meet a national objective, the timeline of the proposed projects, and the application scoring criteria, and funding priorities of the State. Additional consideration should be given to the environmental review requirements for some broadband projects, which may require a full review (and may even encounter wetlands) and the timeframes associated with those requirements.

## **Deadline Questions**

### **11. HOW WILL EXPENDED FUNDS BE DETERMINED? WILL PURCHASED ITEMS NEED TO BE IN-HAND BY END OF YEAR?**

Funds awarded must be expended by the end of year (December 31, 2021). While purchased items do not necessarily need to be in-hand, the program costs must be fully incurred (i.e., invoiced) and, ideally, paid with documentation ensuring timely delivery of the purchased goods/services.