

COVID-19 RESPONSE PROGRAM

PROGRAM APPLICATION

The grant program will start with eligible applicants submitting a Letter of Need. In the Letter of Need the applicant outlines the impact of their community, identifies the eligible activity they are proposing, and outline how they will accomplish that activity. Once received by OCRA, each applicant will be assigned an OCRA staff member to guide them through the application process. The applicant will work with the assigned individual to complete the application and administer any award grant funds.

An eligible applicant may submit only one Letter of Need at a time. The Office of Community and Rural Affairs reserves the right to deny any request for grant funds if the applicant fails to provide items requested by OCRA, or does not meet the minimum federal requires and program criteria.

COVID-19 RESPONSE PROGRAM SELECTION CRITERIA

The Office of Community and Rural Affairs (OCRA) will consider the following general criteria when evaluating a project for the COVID-19 program.

A. General Criteria for COVID-19 Response Program

1. The applicant must be a legally constituted general purpose unit of local government and eligible to apply for the state program.
2. The applicant must possess the legal capacity to carry out the proposed program.
3. If the applicant has previously received funds under CDBG, they must have successfully carried out the program. An applicant must not have any overdue closeout reports, State Board of Accounts audit findings or unresolved OCRA/IHCDA monitoring findings (where the community is responsible for resolution.) Any determination of “overdue” is solely at the discretion of the Indiana Office of Community and Rural Affairs.
4. An applicant must not have any overdue CDBG semi-annual Grantee Performance Reports, subrecipient reports or other reporting requirements of the OCRA/IHCDA. Any determination of “overdue” is solely at the discretion of the Indiana Office of Community and Rural Affairs.
5. The applicant must clearly show the manner in which the proposed activity will meet one of the following CDBG National Objectives and meet the criteria set forth under 24 CFR 570.483:
 - a. Benefit to LOW- and Moderate-Income Persons or Households
 - i. Area Benefit – the proposed activity benefits all residents in a defined area in which at least 51% of the residents are LMI persons.
 - ii. Limited Clientele – the proposed activity benefits a defined group of persons and at least 51% of those person are LMI persons.
 - iii. Job Retention – the proposed activity retains permanent jobs of which at least 51% are held or would be made available to LMI persons.
6. The applicant must show that the proposed activity is one of the following eligible activities or an eligible activity under the Act:

- a. Public Facilities
 - i. Convert a public facility for use as a testing, diagnosis, or treatment facility
 - ii. Rehabilitate a facility to centralize patients undergoing treatment
 - b. Public Services (Supplies, Operating Cost, etc) (Subject to a 15% federal cap)
 - i. Provide testing, diagnosis, or other services at a fixed or mobile location
 - ii. Increase the capacity or availability of COVID-19 health services at an existing health facility
 - iii. Create a local delivery service for providing needed supplies (food, medicines, etc) to quarantined individuals that must maintain social distancing due to medical vulnerabilities or limitations
 - c. Economic Development
 - i. Provide grants to businesses as short-term working capital to retain jobs held by LMI persons and continue operations
 - ii. Provide loans to businesses as short-term working capital to retain jobs held by LMI persons and continue operations (Requires an existing Revolving Loan Fund or similar financial instrument)
7. The applicant must first encumber/expend all CDBG program income receipts before applying for additional grant funds from the Office of Community and Rural Affairs;
8. To be eligible to apply at the time of application submission, an applicant must not have:
- a. Any unresolved complaints filed against the applying party with the Indiana Civil Rights Commission or any other local human relations commission with jurisdiction (collectively "Commissions")²
 - i. A complaint during the investigation stage can be resolved for the purposes of this application if the applying party provides the response it submitted to the Commissions and provides verification that it is cooperating in the investigation.
 - ii. To resolve a complaint for the purposes of this application that has received a finding of Probable or Reasonable Cause, the complaint must be closed in a manner that includes the applying party taking a fair housing training and implementing a relevant policy to prevent future possible discriminatory incidents. The applying party need not take the training or implement the policy prior to the application being submitted if the applying party can provide proof that it intends to complete the training and implement the policy within a reasonable period of time. If a complaint has been closed and the closure did not include training or the implementation of a policy, then the applying party can elect to contact the Commissions to voluntarily complete training and have Commissions assist in the implementation of a relevant policy.
 - iii. To resolve a complaint that merits litigation, the applying party must submit evidence that the complaint cannot be settled (i.e. settlement ask too high etc.) and evidence that training and a policy are not the impediments to settlement. Possible evidence can include offer letters, statements of disputed legal questions, statements of disputed facts, statements on behalf of the Commissions that they are unwilling to settle the case, or any similar document that illustrates the case is not ripe for settlement.
 - b. An unresolved pattern of complaints filed against the applying party with the Indiana Civil Rights Commission or any other local human relations commission with jurisdiction (collectively "Commissions")

² If agreeable, it would be the Indiana Civil Rights Commissions obligation to provide timely responses as well as to provide data retrieved from other relevant local human relations commissions.

- i. A pattern for purposes of this application is defined as any more than an average of two complaints over a period of four years, regardless of outcome.
 - ii. To resolve a pattern of complaints for purposes of this application, the applying party must partner with the Commissions or other equivalent housing organization to fully review the applying party's current policies for best practices as well as for compliance with the Indiana Fair Housing Act and Indiana Civil Rights Law. Additionally, the applying party must show proof that the applying party intends to undergo annual fair housing training for all of its employees that regularly interact with tenants and biannual training for all supervising employees for at least one year.
- 12. The applicant may only submit one application at a time. Counties may submit either for their own project or an "on-behalf-of" application for projects of other eligible applicants within the county. However, no application will be invited from an applicant where the purpose is clearly to circumvent the "one application per round" requirement for other eligible applicants.