

CDBG-CV Addressing Food Insecurity Program Guidelines

The COVID-19 pandemic has had several impacts across the country, and the State of Tennessee is no different. One the major impacts is inflation as result of supply and labor shortages. The Consumer Price Index for food in September 2022 was 11.2% higher than a year earlier. This level of inflation has resulted in household budgets tightening. According to the U.S. Bureau of Labor Statistics, in 2020 households in the lowest quintile of the Consumer Expenditure Survey spent 27% of household income on food, while also spending the least amount of total dollars. According to Feeding America, over 800,000 Tennesseans are food insecure, the U.S. Department of Agriculture shows that over 27% of Tennesseans are designated as low-income without close access to a supermarket (1 mile in urban areas and 10 miles in rural areas).

TNECD has granted \$15 million dollars to the five regional food banks that cover Tennessee for the purchase and distribution of food. The purpose of this program is to increase the capacity of participating partner agencies statewide through the purchase of necessary equipment and supplies.

Basic CDBG Requirements

All standard CDBG rules and requirements must be adhered to under the CDBG-CV Addressing Food Insecurity program. The CDBG Program Manual on the TNECD website will serve as the written policies and procedures for this program unless specifically stated otherwise below. The full CDBG Manual is available here: <https://www.tn.gov/e cd /community-development-block-grant/cdbg/cdbg-manual.html>. Below are some of the basic CDBG requirements that must be followed (this list is not exhaustive):

- National Objective
- Environmental Review
- Uniform Relocation Act
- Davis-Bacon Act and other wage-related requirements
- Section 3 – Construction projects over \$200,000
- Procurement standards as dictated by 2 CFR 200 and the Tenn. Code Ann.
- Recordkeeping and financial management requirements as dictated by 2 CFR 200 and 24 CFR 570
- Fair housing and equal opportunity

Grant Amounts

| | |
|--------------------------------|--------------|
| Total Amount of Grant Program: | \$10,000,000 |
| Maximum Allowable per County: | \$500,000 |
| Required Match: | \$0 |

Eligible Entities

Only local county governments are eligible to be direct recipients of these grant funds. TNECD anticipates that local governments will partner with their participating partner agencies to carry out this grant. Partner agencies and their needs will be identified in the application. Counties that are successfully awarded will purchase that requested equipment and supplies to be distributed to the participation partner agencies. Exceptions may be granted only by TNECD and prior to the submission of the application.

Public Meeting

As with all CDBG-funded activities, local governments intending to seek funding must hold a public meeting summarizing the funding program, the proposed activity, the amount of the funding being requested, and the amount of any leveraged funding proposed. The local government must allow for local input on the proposed activity and consider alternatives that may be presented at the meeting. Minutes providing an official record must be kept on file and submitted with the application for funding.

Two advertisements of the public meeting in a local newspaper are required. The first advertisement must be published at least 14 days prior to the public meeting. The second advertisement can be between 14 days and the date of the meeting. Additional actions to promote local participation in the public meeting are encouraged.

SAM Registration

All local governments and direct subrecipients of the CDBG-CV funds must have an active registration in SAM.gov. Contracts with local governments will not be fully executed unless the local government has an active registration.

Eligible Activities

This program is focused solely on purchasing equipment and supplies needed for partner agencies to increase their capacity to distribute food to low-income communities and populations. The following are example of grant eligible equipment, but it is not exhaustive:

- Refrigerators
- Freezers
- Ovens
- Shelving
- Coolers
- Freezer blankets
- Food preparation tables
- Food delivery vehicles
- Supplies for distribution of food (bags, boxes, packaging, etc.)

The following items are specifically ineligible under this program:

- Equipment that would be fixed and become part of the property
- Construction activities
- Costs associated with operations and management (Salaries, benefits, rent, utilities, etc.)
- Purchase of computers, laptops, notebooks, tablets, phones, etc.

Resolutions

Local governments must pass a resolution stating the intent to apply for CDBG-CV funding. If leverage funds are being committed to the proposed activity by the local government applicant, the public housing authority, or partner provider(s), the amount of leveraged funds and the source of the funding should be included.

National Objective

All CDBG-funded activities must meet a National Objective. For the Addressing Food Insecurity program, the National Objective to meet will be “to benefit low and moderate income (LMI) persons”. LMI persons is defined as persons living in a household that is at or below 80% of the area median family income (MFI). The area MFI is

generally considered to be at the county level, though in some cases the area may be defined as a larger metropolitan area of multiple counties. The LMI National Objective can be met as follows:

LMI Area Benefit – This type of activity provides the benefit to defined area where at least 51% of the residents benefitting from the project must be of LMI households. The service area of each included partner agency must be clearly defined and reasonable. Each service area can meet the 51% minimum threshold by using the data published by HUD at various levels of geography, or an income survey for beneficiaries in the service area can be conducted. If an income survey has been completed since January 2019 for the service area, that results of that survey may be used.

LMI Limited Clientele – This type of activity provides the benefit to a specific group of people where at least 51% of the residents benefitting from the project must be of LMI households. An example would be serving a senior living facility, public housing residents, daycares for low-income families, etc.

A summary of the beneficiary information must be included with the application using the CDBG-CV Addressing Food Insecurity Beneficiary Form.

Application Timeline and Scoring Criteria

Applications will initially be due by January 31, 2023. Applications will then move to a first-come, first-serve model until grant funds are fully allocated. Grant funds must be expended by June 30, 2023. Initial applications will be scored according to the following criteria:

- Project Need
 - o Narrative
 - o County unemployment rate compared to pre-pandemic
 - o County poverty rate
 - o County food insecurity rates as published by Feeding America
- Project Impact
 - o Narrative
 - o Percentage of county population to be served
 - o Readiness (how quickly can the activity begin after award)
 - o Leveraged resources
- Project Feasibility
 - o Narrative
 - o Timeline
 - o Sustainability
 - o Budget
 - o Organization capacity

Agreements

County applicants should include an executed "CDBG-CV Addressing Food Insecurity Grant Assistance Agreement" for each participating partner agency.

Recordkeeping

Generally, the recordkeeping requirements laid out in the CDBG Program Manual must be followed. The general rule of thumb is that all documentation related to the grant must be retained. This includes, but is not limited to:

- Public meeting documents
- Applications
- Contracts
- Agreements/MOUs
- Procurement documents and evaluations
- Environmental Review Record
- Bid documents and evaluations
- Reports
- Approvals from TNECD
- Invoices / Requests for Reimbursement
- LMI documentation

Reporting

Each grantee that is funded through this program must submit a quarterly report that addresses the following:

- Activities that occurred during the past quarter
- Activities expected to occur in the next quarter
- Issues or delays that have occurred or are anticipated
- Performance measure reporting

Each grantee must submit a final closeout report at the end of the grant which will describe how the project was proposed and how it was completed. The closeout report will also provide beneficiary details and how the LMI National Objective was met. Standardized reporting forms will be provided by TNECD.

Duplication of Benefits

All projects funded with CDBG-CV funds must verify there are no duplications of benefits. The program application asks about duplication of benefits, and the grantee contracts will contain a clause that the grantee confirm the grant funds will not create a duplication of benefits. If any portion of the funds are found to be duplicative, the amount that is determined to be duplicative must be repaid to TNECD. It is strongly recommended that each grantee develop a process to check for potential duplications of benefits by subrecipients.

Grant Administration

The cost of grant administration is an eligible expense under the CDBG-CV Addressing Food Insecurity Grant. The maximum allowable amount for grant administration is 6% of the grant. Due to tight timeline to expend funds, TNECD requires that applicants have someone administering the grant that has CDBG administration experience.