



Western Arizona Council Of Governments

Community Development Block Grant (CDBG) FY 2008 Method Of Distribution (MOD)

Western Arizona Council of Governments (WACOG) was founded in 1971. The organization is a governmental non-profit that is dedicated to serving its local jurisdictions, income challenged households, and vulnerable populations in La Paz, Mohave, and Yuma, Counties.

WACOG works on a broad range of issues and programs including: the Community Development Block Grant (CDBG), Community Services Block Grant (CSBG), Early Childhood Education, Health, Low-Income Home Energy Assistance (LIHEAP), Nutrition, Services for Older Americans, Homelessness Prevention, Social Service Block Grant (SSBG), Transit and Transportation, Tax and Income Policies, Weatherization Assistance, and Housing Issues.

WACOG Executive Board Approval Date: December 6, 2007

Prepared: November 11, 2007



The Community Development Block Grant (CDBG) funds originated with the passage of the Housing and Community Development Act of 1974. The Arizona Department of Housing has been designated by the United States Department of Housing and Urban Development (HUD) to administer the small cities funding under the CDBG Program in Arizona. The regional account system is a method of equitably distributing CDBG funds to address local needs while having the local governments play an important role in the grant solicitation process. Western Arizona Council of Governments' (WACOG) Method of Distribution (MOD) recognizes that role by using County allocations as its basis for localizing these decisions.

WACOG's Method of Distribution is formulated with the understanding that all applicable regulations, State or Federal, included in the FY 2003 CDBG Application Handbook updates and adopted as the FY 2008 regulations, produced by the Arizona Department of Housing, are incorporated - as they apply - into the WACOG Funding Strategy.

All potential regional applicants will be notified of the MOD, by mail, fax or hand delivery, at least 90 days prior to the deadline of 5 P.M. ON FRIDAY, MAY 25, 2008 for the submittal of regional projects for 2008. Records of how that notice was provided will be kept by WACOG.

A. TYPE OF METHOD OF DISTRIBUTION

The WACOG MOD is primarily an entitlement system. The communities entitled to receive funds in a rotating yearly manner and the percent of the total county allocation each will receive are determined by the WACOG Executive Board. **The entitlement component results in each County being allocated funds calculated on a weighted formula of 70% persons in poverty (based on the 2000 Census) and 30% population (using the most recent Arizona Population Technical Advisory Committee [POPTAC] estimates), excluding the Indian population living on reservations and the City of Yuma, which is an entitlement entity. The WACOG Executive Board may adjust the percentages to reflect the local need.**



**REGION IV: CDBG
WEIGHTED AVERAGE DISTRIBUTION
FY-08**

Step # 1:

	La Paz County:	Mohave County:	Yuma County:	Region IV
Population as per DoC:	13,699	177,895	94,339	285,933
% of Total Region Pop.	4.8%	62.2%	33.0%	100.0%
Poverty as per DoC*:	2,208	20,582	18,396	41,186
% of Total Region Pov.	5.36%	49.97%	44.67%	100.00%

*City of Yuma poverty statistics are taken out of this figure (10,910).

Step # 2:

	La Paz County:	Mohave County:	Yuma County:	REGION IV
% of Total Region Population	5%	62%	33%	100%
30% Weight	30%	30%	30%	
Population % weighted @ 30%:	1.50%	18.60%	9.90%	30.00%

Step # 3:

	La Paz County:	Mohave County:	Yuma County:	REGION IV
% of Total Region Poverty	5%	50%	45%	100%
70% Weight	70%	70%	70%	
Poverty Weighted @ 70%	3.75%	34.98%	31.27%	70.00%

Step #4:

	La Paz County:	Mohave County:	Yuma County:	REGION IV
Population % weighted @ 30%:	1.50%	18.60%	9.90%	30.00%
Poverty Weighted @ 70%	3.75%	34.98%	31.27%	70.00%
Weighted Averages:	5.25%	53.58%	41.17%	100.00%

By County	Weighted Distribution	%	FY 2008 CDBG Funds
La Paz County	5.25%		\$ 151,625
Mohave County	53.58%		\$ 1,546,669
Yuma County	41.17%		\$ 1,188,290
Region IV	100.00%		\$ 2,886,584
La Paz County			
	Town of Parker	100%	\$ 151,625
	Total La Paz County:	100%	\$ 151,625
Mohave County			
	City of Kingman	50%	\$ 773,334
	Mohave County	50%	\$ 773,335
	Total Mohave County:	100%	\$ 1,546,669
Yuma County			
	Wellton	50%	\$ 594,145
	Yuma County	50%	\$ 594,145
	Total Yuma County:	100%	\$ 1,188,290
REGION IV TOTAL =			\$ 2,886,584

**REGION IV: CDBG
REVISED WEIGHTED AVERAGE DISTRIBUTION
FY-08**

Step # 1:			
	Mohave County:	Yuma County:	Region IV
Population as per DoC:*	177,895	94,339	272,234
% of Total Region Pop.	65.35%	34.65%	100.0%
Poverty as per DoC:*	20,582	18,396	38,978
% of Total Region Pov.	52.80%	47.20%	100.00%
*City of Yuma poverty statistics are taken out of this figure (10,910).			
Step # 2:			
	Mohave County:	Yuma County:	REGION IV
% of Total Region Population	65.35%	34.65%	100%
30% Weight	30.00%	30.00%	
Population % weighted @ 30%:	19.604%	10.396%	30.00%
Step # 3:			
	Mohave County:	Yuma County:	REGION IV
% of Total Region Poverty	52.80%	47.20%	100%
70% Weight	70.00%	70.00%	
Poverty Weighted @ 70%	36.963%	33.037%	70.00%
Step #4:			
	Mohave County:	Yuma County:	REGION IV
Population % weighted @ 30%:	19.604%	10.396%	30.00%
Poverty Weighted @ 70%	36.963%	33.037%	70.00%
Weighted Averages:	56.57%	43.43%	100.00%
By County		* Adjusted Weighted Distribution	FY 2008 CDBG Funds
La Paz County	0.00%	\$	236,000
Mohave County	56.57%	\$	1,385,681
Yuma County	43.43%	\$	1,063,956
Region IV	100.00%	\$	2,685,637
By County		Adjusted Weighted Distribution	FY 2008 CDBG Funds
La Paz County	5.25%	\$	10,550
Mohave County	53.58%	\$	107,667
Yuma County	41.17%	\$	82,730
Region IV	100.00%	\$	200,947
By County		**Revised Weighted Distribution	FY 2008 CDBG Funds
La Paz County	8.54%	\$	246,550
Mohave County	51.73%	\$	1,493,349
Yuma County	39.72%	\$	1,146,685
Region IV	100.00%	\$	2,886,584

* Based on WACOG Executive Board decision to provide a base amount for La Paz County of \$236,000 on 2/13/2003..

** Revised Weighted Distribution based on La Paz County base amount, the 70/30 ratio applied to all counties to incorporate La Paz County into Regional increase for FY-05

FINAL FY-08 CDBG DISTRIBUTION:

Region IV: CDBG REVISED WEIGHTED AVERAGE DISTRIBUTION			
	By County	Distribution	CDBG Funds
La Paz County	Town of Parker	100.00%	\$ 246,550
	Total La Paz County	100.00%	\$ 246,550
Mohave County	City of Kingman	50.00%	\$ 746,675
	Mohave County	50.00%	\$ 746,675
	Total Mohave County	100.00%	\$ 1,493,349
Yuma County	By County	Distribution	CDBG Funds
	Town of Wellton	50.00%	\$ 573,343
	Yuma County	50.00%	\$ 573,343
Total Yuma County:	100.00%	\$ 1,146,685	
Region IV Total=			\$ 2,886,584

Application Cycle for FY2008 Funds: 100% \$2,886,584
Based on 70% Persons in Poverty (2000 Census) and 30% Population (most recent POPTAC).

Unless the Executive Board rules an entity's application ineligible no substitution will be allowed. In the event that an entity should chose not to apply, those funds would remain within that entity's county and distribution would be determined by that county's entities under a special vote.

Entitlement applicants may chose to file a multi-jurisdictional application with another entitled or non-entitled applicant. An entitlement applicant may file a multi-jurisdictional application AND also file a second separate application, as long as the funds are within the total allocated amount. Entities within the same county may also agree between themselves to make up to a 10% adjustment in the funding amount to meet a local need (i.e., one entity agrees to reduce their request to satisfy a greater need of a neighboring applicant).

If an entitlement's regional account application is deemed non-fundable by WACOG staff, then that entitlement's backup application(s) will be given first preference to the funding.

If there is no backup application, then backup applications within the designated county will then be reviewed for funding. If there are no backup applications within the designated county, then backup applications within the WACOG region will then be reviewed for funding

In the event that there are no RA backup applications, the funds will then be evenly distributed to all other entitlements within the WACOG Region. If the funds exceed 35% of the initial amount, the entities must go through the Public Participation process and publish Public Notice #3.

All entities ARE URGED AND STRONGLY ENCOURAGED to submit backup projects.

B. SUBMITTAL OF APPLICATION

- I. All applications must be submitted to the **WACOG Executive Director, 224 S. 3rd Avenue, Yuma, Arizona, 85364; no later than: Five (5:00 p.m.), May 25, 2008.**
- II. All required application documentation must be submitted with the application no later than: Five (5:00 p.m.), **May 25, 2008.** Refer to the Arizona Community Development Block Grant Program FY 2003 Application Handbook, – Application Review Forms for a complete listing of all forms that must be submitted as applicable to each project, i.e. ERR forms.

C. MINIMUM OR MAXIMUM APPLICATION OR ACTIVITY AMOUNTS

WACOG has no set minimum-funding amount for an activity. Maximum funding amounts are based on the percent of the total FY 2008 allocation that will be provided to each County, and then the percent of that County's share to which an entity will be entitled. However, an entity may chose to identify several activities to receive funding as long as the combined total of the activities reach the maximum funding level.

D. ALLOCATION METHOD REDISTRIBUTED DE-OBLIGATED FUNDS

The Arizona Department of Housing may de-obligate funds to the same community from which it was de-obligated to an existing or new contract of the same funding year based on the following criteria: 1) performance of the contract from which the funds were de-obligated; and 2) ability to commit de-obligated funds to another project that can immediately use the funds provided the new funds can be committed through a contract within 60 days.

If ADOH cannot reallocate de-obligated funds according to the above criteria the de-obligated funds will be redistributed by ADOH to WACOG's Regional Account.

E. SLUM BLIGHT (SB)/URGENT NEED (UN)/PUBLIC SERVICES AND NON PROFIT ACTIVITES

PROCEDURES TO ENSURE A MAXIMUM OF 30% IS RECOMMENDED FOR ACTIVITIES JUSTIFIED ON THE BASIS OF EITHER THE SLUM BLIGHT (SB) OR /URGENT NEED (UN) NATIONAL OBJECTIVES

The Region IV MOD allows for recommendations of activities justified on either the SB or UN national objectives to a maximum of 30% of its RA allocations, utilizing a first-come, first-served basis for both types of activities to ensure that the 30% limitation is not exceeded.

Approval is based on a first come, first serve basis for either funding so as to ensure the 30% limitation is not exceeded.

In the event that an Urgent Need issue should arise after the May 12, 2008 deadline, WACOG would review the request with its Executive Board and the Arizona CDBG Program on a case-by-case basis to determine how to proceed.

F. PROCEDURES TO IMPLEMENT THE MOD, INCLUDING ENSURING THAT NO APPLICANT EVALUATES ITS OWN APPLICATION, AND NOTIFICATION OF APPLICANTS

All potential regional applicants will be notified of the MOD, by mail, fax or hand delivery at least ninety (90) days prior to the deadline for submittal of regional projects for FY 2008 funding. Records of how that notice was provided will be kept by WACOG.

Applicants are requested to send in separate applications, one for each of those activities, which are their entitlement activities. All WACOG entity applications must be submitted to the **WACOG Executive Director, 224 S. 3rd Avenue, Yuma, Arizona, 85364; no later than: 5:00 p.m., May 25, 2008.**

All applications will be DELIVERED TO WACOG in the following ADOH prescribed manner:

1. Original and one copy of completed application, top two-holed punched with metal clasp.
2. The application shall be split into activities with the first activity packet containing Activity #1 Admin AND Activity #2, the Disclosure Report and all the required certifications and public notice information placed after the backup documentation for Activity #2.
3. Each activity packet thereafter will have a Form 1 and a Form 3 (Activity Budget Page), then the applicable activity form (4,5,6,etc.) with maps and backup documentation, minus the certifications and public notice information which were placed with Activity #2 packet.
3. This will allow the State to issue a separate contract number for each activity to speed processing of funds and closeout, in an attempt to meet the federal requirement that the State spend it funds more readily.

G. ENSURING WACOG RECEIPT AND REVIEW OF ALL APPLICATIONS PRIOR TO JULY 1, 2007

Applicants are instructed to send in separate applications, one for each entitlement activity. All WACOG entity applications must be submitted to the **WACOG Executive Director, 224 S. 3rd Avenue, Yuma, Arizona, 85364; no later than: Five (5:00 p.m.), May 25, 2008.**

Applications that contain non-fundable activities (i.e., activities that are ineligible or that do not meet a national objective) or is substantially incomplete (e.g., has no evidence of prior approval by Arizona Department of Housing of a special survey, or has no documentation of public participation requirements being met) will NOT be recommended by WACOG staff to the WACOG Executive Board, through the WACOG Management Committee, for funding. WACOG will provide technical assistance

and application review for all potential applications on a request basis prior to the WACOG formal application review process, which begins May 28, 2008.

Applications will be delivered to the State on or before Monday, July 2, 2008. The State will make every effort to have contracts to the communities by September 30, 2008.

H. COG CHARGES FOR TECHNICAL ASSISTANCE AND APPLICATION PREPARATION (TAAP)

A TAAP Fee that covers all indirect, direct (application review and GIN response time hours), and any other activity furthering the contract between the entity and state and does not exceed \$3,750.00 or 50 hours per entity, based on a rate of \$75 per hour, will be charged each applicant. Each applicant will allocate the TAAP fee in the Administration budget of the grant application. WACOG will back up the costs with documented time and financial records kept by WACOG in conformance with OMB Circular A87 and other appropriate Federal Regulations. Copies of said documented time and financial records will be provided to entities upon request.

Indirect costs for which each applicant will be billed are based on its proportionate share of those funded, i.e. all WACOG/CDBG meetings, workshops, training sessions, etc. that the WACOG staff are obligated or instructed to attend by the state/federal agencies.

The Executive Board voted that all direct costs for technical assistance, except the application review hours, will be the direct responsibility of each entity to the COG and NOT included in the TAAP fees. These hours will also be billed at the rate of \$75.00 per hour.

I. SIGNED PARTNERSHIP AGREEMENT(S)

Based on Executive Board's decision, the CDBG Program understands that there will be no such agreement(s).

J. APPROVAL BY FORMAL ACTION OF THE REGIONAL COUNCIL PRIOR TO SUBMISSION OF THE APPLICATIONS TO THE CDBG PROGRAM

The Executive Board in February 15, 2008 to review and approve the MOD for submission to the Arizona Department of Housing using estimated funding amounts. A revised MOD will be sent to ADOH when true funding amounts are provided to WACOG for FY2008.

K. DISCLAIMER

For years beyond FY 2008, the MOD reflects only a tentative funding commitment contingent upon federal and state requirements that might impact on this funding schedule, to include - of course - the Consolidated Plan, public participation process and HUD's approval of the MOD. Examples of potential federal and state changes could include: revised federal requirements as to state MOD procedures, which entities are eligible to apply for CDBG funds, new entitlements, changes in the state RA process and allocation, and new incorporated entities.

- END OF MOD -

