



**TEXAS DEPARTMENT OF AGRICULTURE  
COMMISSIONER SID MILLER**

**Texas Community Development Block Grant Program**

*FAST Fund Program Webinar*

Good morning and thank you for joining us. This is Michelle Phares. This is the 2<sup>nd</sup> webinar in a series of webinars regarding the TxCDBG *FAST* Fund. The first webinar, "Identifying Beneficiary Data for Your *FAST* Service Area" took place on March 1, 2019. Slides and notes can be located on the TxCDBG training page. I will be providing a link to this page and other resources at the end of this presentation. If you haven't already, I strongly encourage you to review the previous webinar and contact me with any questions or verification requests.



## Agenda

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- ***FAST* Basic Program Requirements**
- ***FAST* Program Requirements – Business as Usual**
- ***FAST* Program Requirements – What’s New?**
- **I’m New to TxCDBG. Where Do I Start?**
- ***FAST* Resources**

As part of today’s webinar, I will review the basic program requirements for *FAST*, very briefly discuss some requirements that haven’t changed as part of this program (i.e. “business as usual”) and engage in a lengthier discussion of how *FAST* departs from other TxCDBG programs (in other words, “what’s new”). I will also provide a few “first steps” to help communities, that are new to TxCDBG, get started on *FAST* and a list of resources. This is a brand new program and there is a lot to unpack. However, we won’t have time to cover every aspect of the program today. I strongly encourage you to read the application guide so as to ensure that you comply with all program requirements.



## Overview

- **Program:**
  - 2019 Fire, Ambulance and Service Truck (*FAST*) Fund
    - Limit one application, per applicant, per *FAST* application cycle
- **Award Amounts:**
  - Minimum Award: \$50,000
  - Maximum Award: \$500,000
- **Grant Type:**
  - Reimbursement grant: after award, TDA reimburses applicants for eligible costs

The program is the Fire, Ambulance and Service Truck fund or “*FAST*” fund for short. This is a brand new program and the first of its kind for TxCDBG. We anticipate one application cycle in 2019 and applicants are limited to one application, per applicant, per cycle. There is a \$50,000 minimum, a \$500,000 maximum and we anticipate having at least \$8 million in funding available. Although I’m not able to provide a specific timeframe for awards, the funds set aside for this program are close to expiring and time is of the essence. We hope to make awards as soon as possible and expend each award fully without contract extensions. Like all TxCDBG grants, *FAST* is a reimbursement grant. This means that funding is provided on a reimbursement basis to grantees for eligible costs, after an award.

For those of you asking if the *FAST* fund will be accepting applications again next year, the decision has not been made. We are hoping the program receives a positive and enthusiastic response, so think big and send us your best and most impactful projects.



## Overview

- **Contract Term:**
  - 12 months
  - Note extended lead times in application
- **Vehicle/Craft/Equipment Limits:**
  - Up to three (3) vehicles/crafts
  - Up to five (5) pieces of equipment
- **Match:**
  - \$5,000 cash match

Because this is a vehicle/equipment grant, the contract term for *FAST* will be twelve months. We understand that the timeline for larger, custom-built apparatus may exceed the 12-month term. If this is the case, please note the anticipated timeline in the “Lead Time” section of the vehicle/equipment application form and consult the application guide for further instructions.

Applicants may apply for up to three (3) vehicles and five (5) pieces of equipment within the minimum and maximum award limits. For example, an applicant could propose to purchase two brush trucks at \$150,000 each and one powered vehicle extraction saw for \$5,000, for a total of \$305,000 (not including administration costs). The applicant would include the two vehicles and one piece of equipment in one application.

Equipment that is not integral to the operation of the vehicle/craft must be broken out separately as “equipment” in the application. Examples of non-integral equipment include (but are not limited to) protective gear, tools, saws, cutters, spreaders, etc. The goal of the equipment component of this grant is to allow communities to purchase higher-cost pieces of EMS or rescue equipment, not less expensive vehicle accessories. *FAST* requires a \$5,000 cash match. Like other TxCDBG grants, this commitment must be formalized in an authorizing resolution and a letter of commitment.



## Overview

- **Eligible Applicants:**
  - Non-entitlement cities
    - Incorporated, largely rural, <50k persons & not participating in urban county program
  - Non-entitlement counties
    - Largely rural, <200k persons & not receiving HUD funds directly
  - Cities/Counties may apply on behalf of service providers
    - FDs, VFDs, ESDs and Third-party EMS providers
    - Either can own vehicle/craft/equipment

Contact Michelle Phares at [michelle.phares@texasagriculture.gov](mailto:michelle.phares@texasagriculture.gov) or 512-936-6702 for questions about applicant eligibility

Eligible Applicants. There are two ways cities and counties receive Community Development Block Grant (CDBG) funds. Larger cities and counties in urban areas receive CDBG funding directly from the federal government via the Department of Housing and Urban Development or “HUD”. These are called “entitlement” cities and entitlement or “urban” counties. Smaller, more rural, cities and counties compete for CDBG funding through a state administered program: the Texas Community Development Block Grant program or “TxCDBG”. *FAST* is one of several TxCDBG programs and only non-entitlement entities are eligible to apply. For cities, non-entitlement means incorporated communities, less than 50,000 persons in size, that aren’t receiving funds directly from HUD and aren’t participating in an entitlement program with their county. For counties, non-entitlement means counties that are largely rural in nature, less than 200,000 persons in size, and aren’t receiving CDBG funds directly from HUD.

An eligible city or county may apply on behalf of a fire department, volunteer fire department, emergency service district or third-party EMS provider. In the application, these entities would be considered “service providers”. Applicants may apply on behalf of more than one service provider. However, multiple service providers must be accounted for in one application and serve eligible communities. If you have any questions about applicant eligibility, please contact me at the information provided.



## Overview

- **Eligible Projects:**
  - Fire trucks (most types)
  - Ambulances and similar emergency medical vehicles
  - Jaws of Life and similar rescue equipment
  - Rescue boats and specialized emergency vehicles

Eligible projects include most types of fire trucks and brush trucks, ambulances and similar medical emergency vehicles, rescue equipment (vehicle extraction equipment, for example), rescue boats or crafts and specialized emergency vehicles.

Mobile command vehicles are eligible, but must be used for EMS or rescue purposes (non-law enforcement purposes).



## Overview

- **Ineligible Projects:**

- Police cars and other vehicles used primarily by law enforcement
- Vehicles that do not address a specific public safety or emergency rescue requirement
- Vehicles used primarily for the general conduct of government
- Supplies (e.g. restocking equipment or vehicle components)

Contact Michelle Phares at [michelle.phares@texasagriculture.gov](mailto:michelle.phares@texasagriculture.gov) or 512-936-6702 for questions about project eligibility

Ineligible projects include police cars and other vehicles used primarily by law enforcement, vehicles that do not address a specific public safety requirement and vehicles that are used primarily for the general conduct of government (such as garbage trucks and utility trucks). Vehicle components including, but not limited to, tires, batteries, mechanical, HVAC, interior, exterior or electrical system components are also ineligible. Anything that has a one-time use, is disposable or needs to be re-filled, such as fire suppression foam, is considered “restocking” or “operations and maintenance” and is also ineligible.

Self conversions are not eligible under *FAST*. For example a city or county may not propose to purchase a commercial model truck with the intention of allowing its own volunteer fire department to convert it to a wildland apparatus (brush-truck) after purchasing it. The language surrounding eligible or ineligible projects can be a bit general when considering the quantity and variety of fire/EMS vehicles, crafts and equipment out there. If your project doesn't fit neatly into one of these categories or if you are buying a specialized vehicle, craft or piece of equipment, please contact me to verify eligibility prior to application submission.



## Overview

- **National Program Objective:**
  - Principally benefitting low-to-moderate income (LMI) persons
    - *FAST* = Area Benefit
  - I.e. 51.00% of the persons benefitting **MUST** be LMI
  - New 2019 LMISD data set on the TDA Website

National Program Objective or NPO. For those of you that have participated in the TxCDBG program before, this will be a familiar concept, but for newcomers to the TxCDBG program, I want to stress how important this concept is for any proposed *FAST* project. All TxCDBG funded projects must meet one of three National Program Objectives. They must either 1) benefit low-to-moderate income persons or 2) aid in the prevention or elimination of slum and blight or 3) meet an urgent need.

In the case of *FAST*, the National Program Objective that must be met is “benefitting low-to-moderate income (LMI) persons”. Activities benefitting low-to-moderate income persons can fall into one of four categories: LMI area benefit, LMI housing, limited clientele and LMI jobs. For *FAST*, we will be only operating under the “area benefit” category. In order to meet the NPO for area benefit, at least 51.00% or more of the persons benefitting from the project must be low-to-moderate income (LMI). For *FAST*, this means that the vehicle, craft or piece of equipment’s service area must meet the 51.00% LMI threshold. Applicants can determine whether their service area meets the LMI requirement by using HUD published LMISD data, located on the TDA website, or by conducting income surveys. Please note that the LMISD data was updated by HUD on February 14, 2019. Applicants should be using only the 2019 LMISD data to qualify their service areas. I will go into more detail about the updated LMISD, the unique nature of *FAST* service areas and determining project beneficiaries for *FAST*, later on in the presentation.





## Overview

- **FAST Scoring:**

- Statewide competitive program

- Scoring Criteria:

- I. Poverty rate: 20 points max

- Applicant versus other applicants

- II. Previous funding: 20 points max

20 points	Applicant has not been funded in 2015-2016, 2017-2018 CD cycle nor received a CEF award
15 points	Applicant was last funded in 2015-2016 CD cycle and has not received a CEF award
10 points	Applicant was last funded in 2017-2018 CD cycle and has not received a CEF award
5 points	Applicant was last funded in 2015-2016 CD cycle AND 2017-2018 CD cycle and has not received a CEF award
0 points	Applicant has received a CEF award

*FAST* Scoring. The *FAST* fund is a statewide competitive program. Applicants will be scored based on 3 criteria. The first is:

**I. Poverty rate:** the applicant's poverty rate will be compared to other applicant poverty rates. Cities will be compared to cities and counties will be compared to counties. There are 20 maximum points available. The next criteria is....

**II. Previous funding:** this is fairly straightforward and taken straight from the application guide. Points are awarded based on whether the applicant has received previous funding from two TxCDBG grant programs: the Community Development (or CD) Fund and the Community Enhancement Fund (or CEF). There are 20 maximum points available. Applicants that have received a CEF award will get zero points. Applicants that have received CD funding in both of the previous application cycles (that's 2015-2016 and 2017-2018) will receive 5 points. Applicants that have received CD funding in only the 2017-2018 application cycle will receive 10 points. Applicants that have received CD funding in only the 2015-2016 application cycle will receive 15 points. Applicants that have not received CD funding in the previous two application cycles will receive full points.



## Overview

- **FAST Scoring:**
  - Scoring Criteria: (continued)
  - III. Past performance on TXCDBG grants (16 points max)
    - Timely submission of closeout reports (4 points)
    - Environmental Clearance (4 points)
    - Extension of contracts (4 points)
    - Maximum utilization of grant funds (4 points)
  - Tie Breaker – Per Capita Income

**III. Past Performance on TxCDBG Grants:** this criteria is based on the 2019-2020 CD fund state scoring factors for past performance (only) with a maximum of 16 points available. Factors include timely submission of closeout reports, completion of environmental clearance, the number of contract extensions (indicating timely completion of projects) and maximum utilization of grant funds (in which points are awarded for completed contracts that fully expend grant funds). Applicants who have not been awarded a previous CDBG contract will receive full points for past performance.

**Tie Breaker:** In the event of a tie between multiple applications with regards to overall scoring, applicant per-capita income will be the deciding factor, with a lower per-capita income ranking higher.



## Overview

- **Applications Due:**
  - 5:00pm CST on June 13, 2019
- **Submit two (2) complete copies of the application:**
  - One with an original signature (paper)
  - One copy (paper OR a scanned copy of the entire application including all attachments on a CD or flash drive)

Applications are due on June 13, 2019 by 5:00pm Central Standard time. The original May due date was extended to June to accommodate the recent HUD LMISD data update.

Applicants are required to submit two full copies of the application, one with original signatures and one copy. The copy may be a paper copy or a scanned copy of the entire application, including all appendices or attachments, on a CD or flash drive.



## **FAST Program Requirements – Business as Usual**

- **Some TxCDBG requirements that remain unchanged as part of FAST:**
  - Choosing a Prequalified Administrator (page 2 of the app guide)
  - Citizen Participation Plan (page 9 of the app guide)
  - Local Certifications (page 11 of the app guide)
  - Fair Housing Activities (page 11 of the app guide)
  - Conflict of Interest (page 12 of the app guide)

*FAST* Program Requirements – Business as Usual. There are some new requirements associated with the *FAST* fund, but a few basic requirements remain unchanged. I'm not going to go into too much detail about these requirements, but I've had a few inquiries as to whether these still apply to *FAST*; so for confirmation purposes:

1. The process of choosing a prequalified grant administrator is the same for *FAST* as in other TxCDBG programs.
2. Applicants must comply with Citizen Participation Plan requirements, **prior to submitting an application.**
3. Applicants must agree to adhere to the Local Certifications listed on page 11 of the application guide. Applicants do so by signing the 424 form at the beginning of the *FAST* application.
4. Applicants must certify that they will affirmatively further fair housing by engaging in the required Fair Housing Activities; and
5. Applicants must avoid conflicts of interest. If a conflict exists, only TDA can approve the appropriate resolution.

If you have questions please consult the application guide and then contact me directly and we can discuss.



## **FAST Program Requirements – What's New?**

- **New or updated TxCDBG requirements in *FAST*:**
  - Administrative costs
  - Application Activities
  - Applicant Threshold Requirements
  - Types of Applications
  - Pre-agreement
  - Readiness to Proceed Requirements
  - Supporting Project Costs
  - Determining Service Areas & Identifying Beneficiaries

In terms of “What’s New” with *FAST* program requirements, there are quite a few tweaks to existing requirements and also some brand new elements. Today we will be discussing administrative costs, application activities, applicant threshold requirements, types of applications, pre-agreement, readiness to proceed requirements, supporting project costs and determining service areas and identifying beneficiaries.

Please note that, with the exception of the threshold requirements, these requirements apply ONLY to the *FAST* fund and not other TxCDBG programs.



## **FAST Program Requirements – What's New?**

- **Administrative Costs:**

- Administrative costs may not exceed either \$35,000 or 16% of the TxCDBG vehicle/craft/equipment request

Example:

- \$300,000 request = \$35k max allowable administrative costs

The *FAST* fund places a limitation on administrative costs: administrative costs may not exceed either \$35,000 or 16% of the TxCDBG vehicle/craft/equipment request.

For example, two (2) brush trucks at \$150,000 each, results in a TxCDBG grant fund request of \$300,000. The maximum administrative cost allowed in this scenario is \$35,000. The reason for this is that 16% of \$300,000 (which is \$48,000) exceeds the \$35,000 limit.



## **FAST Program Requirements – What's New?**

- **Application Activities:**
  - There should be only two (2) activities selected in the application and Table 1:
    1. “03O – Fire Stations/Equipment”
    2. “21A – General Program Administration”

Construction/rehabilitation of fire stations is NOT eligible under *FAST*.

Application Activities. Unlike other TxCDBG grants, there should only be two application activities listed in your *FAST* application:

- 1 “03O – Fire Stations/Equipment”
2. “21A – General Program Administration”

Please note that these are the HUD based activity codes you need to use when filling out forms on the application, like the Table 1. This does not mean that construction of fire a station is an eligible project for *FAST*. ONLY vehicles/crafts/equipment are eligible projects for *FAST*.



## FAST Program Requirements – Changes

- **Applicant threshold requirements:**
  - TxCDBG program-wide policy change

Fund Category	Contract Period	Progress Threshold #1	Progress Threshold #2
Disaster Relief	12 months	Obligate 50% of TxCDBG contract funds at 9 months	Construction complete, PCR and final draw submitted at 12 months
FAST Fund	12 months	Obligate 50% of TxCDBG contract funds at 9 months	Construction complete, PCR and final draw submitted at 12 months
Community Development	24 months	Obligate 50% of TxCDBG contract funds at 12 months	Construction complete, PCR and final draw submitted at 24 months
Downtown Revitalization/Main Street	24 months	Obligate 50% of TxCDBG contract funds at 12 months	Construction complete, PCR and final draw submitted at 24 months
Colonia Fund (Except Self-Help)	24 months	Obligate 50% of TxCDBG contract funds at 12 months	Construction complete, PCR and final draw submitted at 24 months
Planning Capacity Building	24 months	Obligate 50% of TxCDBG contract funds at 12 months	Construction complete, PCR and final draw submitted at 24 months
Community Enhancement	24 months	Obligate 50% of TxCDBG contract funds at 12 months	Construction complete, PCR and final draw submitted at 24 months
TCF Infrastructure/Real Estate	36 months	Obligate 50% of TxCDBG contract funds at 18 months	Construction complete, PCR and final draw submitted at 36 months

Applicant Threshold Requirements. There was recently a TxCDBG program-wide policy change. The threshold requirements listed above apply to applicants for the FAST fund. If you are a prospective applicant and have never been awarded a TxCDBG contract or have, but the contract or contracts are closed, then these requirements won't apply to you. If you are a prospective applicant and have an open or ongoing TxCDBG contract in one of the programs above, you need to meet the required project thresholds in order to be eligible for a FAST award.





## FAST Program Requirements – What’s New?

- **Types of Applications:**

- There are two (2) types of Applications:

- Single Jurisdiction
- Multi-Jurisdictional

However,

- Some additional clarification for *FAST* Fund:

SERVICE AREA	BENEFICIARIES	APPLICATION TYPE
Service to city primarily with only incidental service outside city limits (excluding mutual aid)	Primarily in city limits	Single Jurisdiction
Service to the city and the county or other parts of the county equally (excluding mutual aid)	Within city limits AND outside areas (whole county, parts of county, etc.)	Multi-jurisdictional

Types of Applications. As with other TxCDBG programs, *FAST* allows for two (2) types of applications, single jurisdiction applications and multi-jurisdictional applications. However, given the unique nature of *FAST* service areas, some clarification is being provided.

Typically, a single eligible applicant submits a single jurisdiction application if the project beneficiaries are limited to the applicant’s jurisdiction. For cities, this is generally limited to those beneficiaries within the city limits or within the city’s extra-territorial jurisdiction (ETJ). For counties, this would be limited to beneficiaries in unincorporated areas in the county’s jurisdiction. When the project beneficiaries are persons located within more than one unit of general local government (the city and the county or example) a multi-jurisdictional application is generally required.

In the case of *FAST*, a vehicle, craft or piece of equipment may serve beneficiaries of a city primarily, but also provide incidental service (excluding mutual aid) to beneficiaries outside of city’s jurisdiction. In this case, a single jurisdiction application is allowed.

If the vehicle, craft or piece of equipment serves the beneficiaries of a city, but also provides equivalent service (excluding mutual aid) to beneficiaries outside of the city’s jurisdiction, then a multi-jurisdictional application is required.

If you are proposing a service area that has beneficiaries primarily within the city limits, with only incidental service to beneficiaries outside of the city limits, that determination

must make sense. For example: an applicant is proposing the purchase of powered vehicle extraction equipment in a single jurisdiction application. The applicant's service provider is a small rural fire department claiming that their equipment will primarily serve beneficiaries within the city limits, with only incidental service to beneficiaries in other parts of the county. However, there is a large and well-trafficked interstate highway that runs just outside the applicant's city limits and ETJ. In this case, the applicant may want to rethink how its framing the service area and a multi-jurisdictional application might be more appropriate.

Lastly, an entity cannot be a "co-applicant" on a multi-jurisdictional application, for more than one applicant. For example, if there are 3 cities within a county seeking to apply for *FAST* and each wants the county to serve as a co-applicant on their respective multi-jurisdictional applications, the county can only pick one to partner with.



## FAST Program Requirements – What's New?

- **Pre Agreement: *FAST* Fund ONLY**
  - Certain administrative costs incurred before contract start date may be reimbursed; limited to:
    - Those necessary to complete environmental review
    - Those necessary for competitive procurement of vehicles/crafts/equipment
  - Must complete, sign (original signature) and submit Pre Agreement Certification in application

Pre-Agreement. Typically, administrative activities that occur before a TxCDBG contract start date (such as those associated with application preparation) are not reimbursable with TxCDBG funds. However, in some cases, applicants ARE allowed to incur certain administrative costs, prior to the contract start date, using something called “pre-agreement”.

For pre-agreement in the context of *FAST*, administrative costs are limited to those associated with completion of the environmental review and those necessary for competitive procurement of a vehicle, craft or piece of equipment. Applicant’s electing the pre-agreement option must complete, sign and submit the pre-agreement certification in the application.

I want to be clear that pre-agreement in *FAST* refers only to administrative costs for activities associated with the environmental review and procurement activities. Pre-agreement does not apply to the vehicle/craft/equipment itself. In other words, applicants cannot apply for reimbursement of a previously purchased vehicle. In addition to not meeting the environmental review requirements, HUD Regulations prohibit the substitution of CDBG funds for non-Federal funds. The test applicants must pass is as follows: “If not for TxCDBG funds, the applicant could not purchase the proposed vehicle/craft/equipment.”



## FAST Program Requirements – What's New?

- **Readiness to Proceed Requirements:**

- All FAST Fund projects must include:

- Evidence of Environmental Review
      - Must occur prior to application submission and
      - Must occur prior to vehicle/craft/equipment vendor contract

\*\*\*If Environmental Review requirement not met, project is ineligible for reimbursement by TxCDBG\*\*\*

- Support for Project Costs:

- Quotes
      - Competitive procurement with pre-agreement

Readiness to Proceed Requirements. *FAST* requires applicants to provide evidence of environmental review and support for project costs in order to document readiness to proceed. *FAST* allows for the initiation of vehicle/craft/equipment procurement. This can mean getting to the point where an applicant has accepted bids or even as far as executing a vendor contract for a vehicle, craft or piece of equipment.

However, if you are going to as far as executing a vendor contract for vehicles/crafts/equipment, the environmental review must be completed prior to contract execution. Also, applicants intending to proceed as far as executing a vendor contract for vehicles/crafts/equipment, should only do so with contract language that makes the purchase “contingent upon a *FAST* grant award”, which is language that is only for use in *FAST*.

Whatever the case, the environmental review must also occur prior to the application due date.



## **FAST Program Requirements – What's New?**

- **Supporting Project Costs:**

- #1 - Quotes:

- Required: price quote dated within 90 days of app submission
    - Competitive procurement required after award
    - Vehicle/craft/equipment vendor quotes will not exclude a vendor from participating in procurement

Supporting Project Costs. Due to the nature of funding set-aside for this program, the proposed funding amount must be precise, rather than a general estimate. For *FAST* (only), there are two ways to support project costs: using quotes or through competitive procurement with pre-agreement.

When using quotes, applicants must provide a price quote from a potential vehicle/craft/equipment vendor dated within 90 days of application submission. The quote must be submitted as an attachment to the application. Quotes are for the purposes of budget justification; applicant's providing quotes will still be required to comply with competitive procurement requirements for the proposed vehicle/craft/equipment, if awarded. Vehicle/craft/equipment vendors providing quotes will not be excluded from participating in the procurement process.



## FAST Program Requirements – What's New?

- **Supporting Project Costs: (cont'd)**

- #2 - Competitive Procurement with Pre-Agreement

- Procurement must follow TxCDBG requirements
    - Submit documentation of cost (bid tab, contract, etc.)
    - If Bids, recommend "hold bid prices"
    - If executed contract, "contingent upon funding" (only for *FAST*) and **environmental review must be completed prior**
    - Submit full procurement documentation upon award

When choosing competitive procurement with pre-agreement, applicants must submit documentation of cost as an attachment to the application. Procurement documentation could include the bid tab or even an executed contract. If submitting the bid tab, TDA recommends that applicants require vendors to hold the bid prices until at least August 13, 2019 (60 days after application submission). If submitting an executed vendor contract, applicants need to include a "contingent upon funding" provision, which is only for use in *FAST*. As mentioned previously, an environmental review MUST be completed prior to executing any contract with a vehicle/craft/equipment vendor. The full procurement packet will be required after an award and the procurement process must comply with competitive procurement requirements.



## **FAST Program Requirements – What's New?**

- **Supporting Project Costs:**
  - Worth noting:
    - No substitutions or additions to projects included in original app
    - Vehicles/crafts/equipment for a service area are considered one project for competitive procurement
    - Application request must be less than or equal to the quote/procurement amount, less \$5,000 for match

With regards to supporting project costs, there are some things worth noting:

Applicants may not make substitutions for any vehicles/crafts/equipment that were included in the original application and vehicles/crafts/equipment may not be added to the application after submission. All vehicles/crafts/equipment for each specific service area are considered one project for the purposes of competitive procurement. And lastly, the application may request no more than the amount supported through quotes or procurement, less the \$5,000 match.



## FAST Program Requirements – What's New?

- **Updated LMISD Data & Requirements:**

- [HUD Notice](#) and 2019 LMISD data released Feb 14, 2019
- Based on 2011-2015 5-year ACS
- Effective April 1, 2019
- 2019 LMISD **MUST** be used for *FAST*
  - LMISD located on TDA [Beneficiary Documentation](#) web page
  - [HUD mapping tool with updated LMISD](#)

*Service areas must meet the 51.00% LMI threshold*

Updated LMISD Data and Requirements. On February 14, 2019, the U.S. Department of Housing and Urban Development (HUD) refreshed the data-set used for determining the LMI percentages and issued new guidance on determining beneficiaries. Part of this change in data resulted in some communities and block groups becoming 51% LMI and others dropping below the 51% threshold, so it is imperative (and required) to use the 2019 LMISD for *FAST* Fund applications. The 2019 LMISD data can be found on TDA's website, but HUD also hosts an interactive mapping tool that utilizes the updated data set.





## **FAST Program Requirements – What's New?**

- **Identifying Service Areas and Beneficiaries:**

- Considerations include:

- Who/what area does the vehicle/craft/equipment primarily serve? (excluding incidental service or mutual aid)
- What is the proposed vehicle/craft/equipment?
- Where will it be located?
- How is it going to be used?

Identifying Service Areas and Beneficiaries. I want to contextualize how to think about the beneficiaries of *FAST* projects with respect to their unique nature, that is having a more generalized service area, and the recent changes by HUD in beneficiary guidance. When defining your service area and identifying vehicle/craft/equipment beneficiaries, applicants should consider the following:

- Who does the vehicle/craft/equipment primarily serve? (excluding incidental service or mutual aid)
- What is the proposed vehicle/craft/equipment?
- Where will it be located?
- How is it going to be used?

For example:

A ladder truck would generally be used in a city. Whereas a brush truck would generally be used in surrounding areas.

Does an ambulance transport city residents to the local hospital, or does it serve multiple localities on a regular basis?

While a Fire department may have a larger service area, does it regularly serve the residents of a city or does it regularly serve residents in outlying areas as well?

A city is served by two fire stations; station one is on the east side of town and station two is on the west side of town. Do the stations respond to calls on the respective sides of town? Or is this going to be the only Jaws of Life and will it address calls citywide?

Based on the answers to these questions (and any other pertinent information) does it make sense to use place data, (e.g. City, CDP) or block group data to identify the beneficiaries? A comment we have heard from some organizations, when asked about their service area, is “well, we serve the whole county.” That’s great, but think about who the primary beneficiaries of the vehicle or equipment would be. Circumstances like mutual aid and incidental service should not be considered when determining the service area.

Note: While income surveys are an option as well, the HUD guidance on surveys is in transition and we don’t anticipate communities to conduct a survey for the *FAST* fund, so they are not addressed here. However, if LMISD data doesn’t make sense for your proposed project, let TxCDBG know so we can discuss any unique circumstances.



## FAST Program Requirements – What's New?

- **Identifying Service Areas and Beneficiaries:**

- Proposed service area must pass two tests:

1. A reasonable person reviewing the proposed project must be able to understand how the beneficiary population was determined and is appropriate (HUD language: “reasonably delineated”)
2. The beneficiary population or service area should NOT be identified as a matter of convenience (HUD language: “drawn to include LMI persons that would not benefit, nor shall it...intentionally exclude non-LMI persons that would benefit.”)

When reflecting on how to determine the “service area” for a project, consider these two concepts:

1. Could a reasonable person review the proposed project, and understand how the beneficiary population was determined and is appropriate; HUD language - “reasonably delineated” AND
2. A beneficiary population should not be identified as a matter of convenience. HUD language - “...drawn to include LMI persons that would not benefit, nor shall it...intentionally exclude non-LMI persons that would benefit.” We have had some questions like, “my city is 55% LMI so I can buy any eligible vehicle/project, right?” And the answer is, “Tell me more”.



## FAST Program Requirements – What's New?

- **Identifying Service Areas and Beneficiaries:**

- The application must include:

- I. A project map that shows:

- 1. The boundaries of the applicant's jurisdiction
      - 2. The boundaries of the county
      - 3. The boundaries of the service area of the proposed vehicle/craft/equipment
      - 4. Location where the vehicle will be housed when not in use

AND

- 5. For service areas that do not conform to a city or county, the numbers and boundaries of the census geographic areas that comprise the service area

AND



Applicants must provide documentation that supports their beneficiary/service area determination as part of the application submission. The application must include a project map that shows:

1. The boundaries of the applicant's jurisdiction
2. The boundaries of the county
3. The boundaries of the service area of the proposed vehicle/craft/equipment
4. Location where the vehicle will be housed when not in use; AND
5. For service areas that do not conform to a city or county, the numbers and boundaries of the census geographic areas that comprise the service area



## FAST Program Requirements – What's New?

- **Identifying Service Areas and Beneficiaries:**

- II. LMISD data chart

- Can be the row or rows of the applicable place or census block groups that comprise the service area, copied and pasted directly from the 2019 LMISD excel workbook

geoname	Stusab	State	Place	low	lowmod	lowmoduniv	lowmod_pct	moe_lowmod_pct
Coleman, Texas	TX	48	15916	1665	2,565	4,470	57.4%	+/-7.90

geoname	Stusab	Countynam e	State	County	Low	Lowmod	Lowmoduniv	Lowmod_pct	MOE_Low modPct
Block Group 1, Census Tract 9501, Sample County, Texas	TX	Sample County	48	083	25	51	100	.51	+/-12.33

Applicants should also include a chart that depicts the LMISD for the service area. The first chart is an example of the LMISD for a city. This identifies the geoname or place, the LMI population, the total population and the LMI percent. The second chart is an example of the LMISD for a block group. I have deleted some of the columns in the data for space, but the key is to identify the correct block group(s) and the respective LMI data.

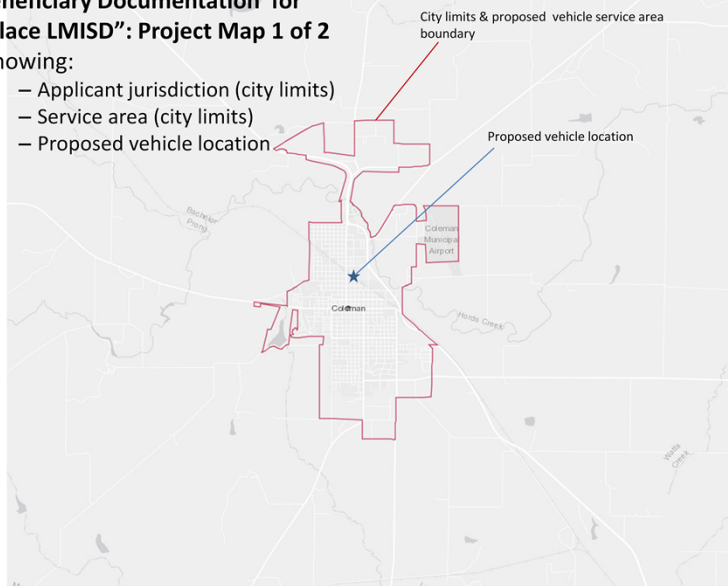


## FAST Program Requirements – What's New?

### Beneficiary Documentation for "Place LMISD": Project Map 1 of 2

Showing:

- Applicant jurisdiction (city limits)
- Service area (city limits)
- Proposed vehicle location



When putting together the beneficiary maps for FAST projects, it may be necessary to include two or more maps that represent all of the required elements. Trying to place all of the required map elements on one map may render it illegible, so please make sure your maps are clear and make sense to the viewer. This is one of two project maps that support "Place" LMISD for a small city. It identifies the boundaries of the applicant's jurisdiction and the service area (which happen to be the same), as well as, the proposed vehicle location.

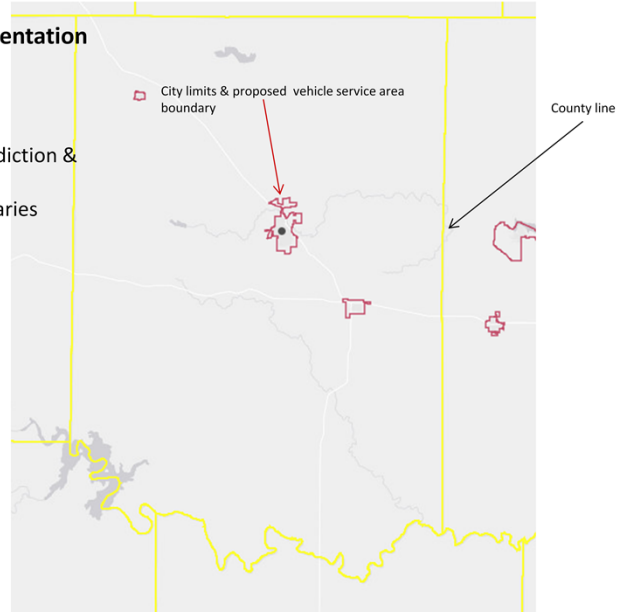


## FAST Program Requirements – What's New?

### Beneficiary Documentation for "Place LMISD": Project Map 2 of 2

Showing:

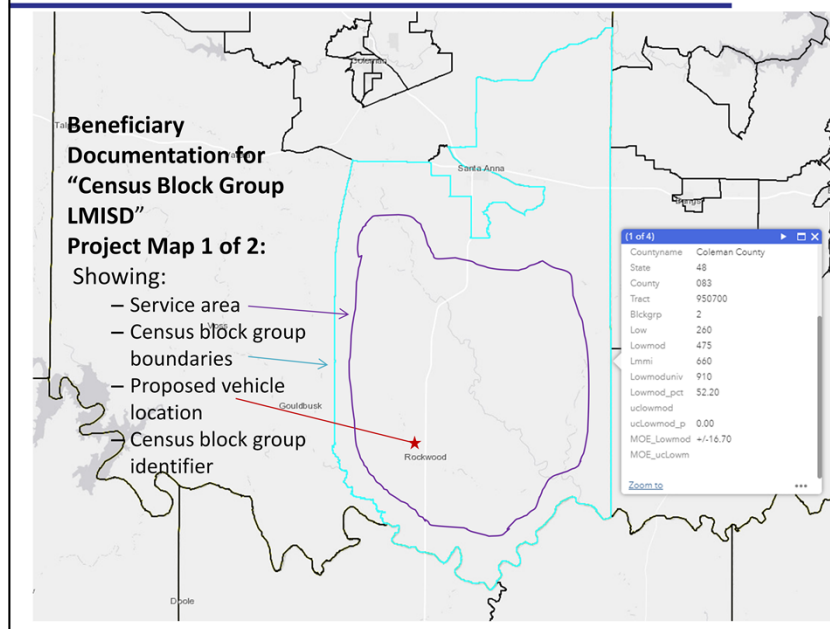
- Applicant jurisdiction & service area
- County boundaries



Here is project map 2 of 2, supporting "Place" LMISD for a small city. It identifies the applicant's jurisdiction in relation to the county. So, if the proposed project makes sense to use "place" data, and by that we are referring to cities, census designated places or CDPs, etc., these two maps, in addition to the chart, represent examples of the necessary beneficiary documentation.



## FAST Program Requirements – What's New?



Here is the first of two project maps that support "Census Block Group" LMISD. This is for a service area located in an unincorporated region of a county. It identifies the service area, census block group boundaries, proposed vehicle location and includes the census block group number.





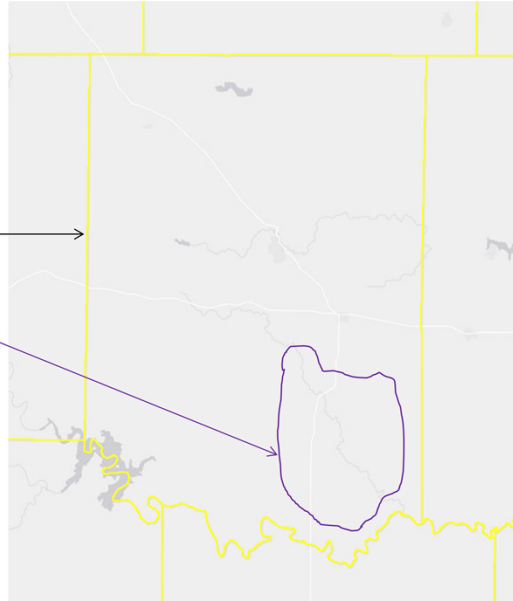
## FAST Program Requirements – What's New?

### Beneficiary Documentation for "Census Block Group LMISD"

#### Project Map 2 of 2:

Showing:

- Applicant jurisdiction (county boundaries)
- Applicant service area



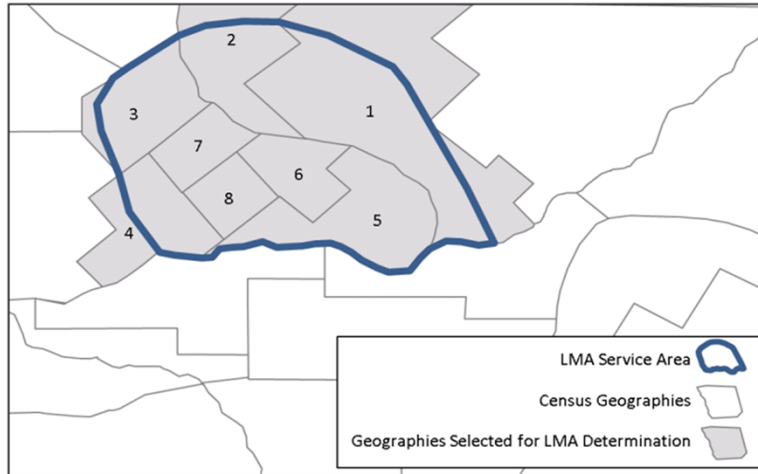
Here is project map 2 of 2, supporting "Census Block Group" LMISD. It identifies the applicant's jurisdiction (or the county boundaries) in relation to the service area. If the proposed project makes sense to use "Census Block Group" data, these two maps, in addition to the chart, represent examples of the necessary beneficiary documentation.



## FAST Program Requirements – What's New?

- **Identifying Service Areas and Beneficiaries:**

- **Combined Block Group LMISD**



Combined Block Group LMISD. This is a HUD provided representation of a “service area” superimposed over a block group map. This is more typical of some of the maps that we have seen come in, so I anticipate seeing this type of map in the *FAST* applications. The new HUD guidance states, “The LMA (low-to-mod area) determination shall be made based on the entirety of the data of the census geography which the service area both completely encloses and significantly overlaps.” So for the above map, HUD indicates that all block groups, 1-8 meet that standard and as such should be included in the calculation of LMI. I do not expect any service map to exactly match the census geographies, so in cases where there is a question about whether a “substantial overlap” exists we will consider the location and nature of the activity, as discussed earlier. For example, it is reasonable to expect the area immediately surrounding the fire station would be included in the service area, so the further away from the location of the vehicle or equipment, the less likely that block group would be considered to be included in the service area. Again, with the variety of project types and service areas in *FAST*, we are going to keep it as close to the appropriate geographies and the new guidance permits.



## FAST Program Requirements – What's New?

- **Identifying Service Areas and Beneficiaries:**

- Combined Block Group LMISD

When a service area is comprised of multiple block groups, it is appropriate to sum the populations to determine the total LMI percent.

$$\text{LMI \%} = \frac{(\text{LMI Persons Geography A} + \text{LMI Persons Geography B} + \text{LMI Persons Geography C...})}{(\text{LMI Universe Geography A} + \text{LMI Universe Geography B} + \text{LMI Universe Geography C...})}$$

DO NOT COMBINE PLACE AND BLOCK GROUP DATA!

In cases like the previous slide, documenting beneficiaries would consist of totaling all of the LMI persons for each block group and totaling all of the LMI universes for each block group, and then dividing the total LMI persons by the total LMI universe for the final LMI percentage. This is no different than it has been calculated in the past.

NOTE: Do not combine place and block group data! The areas overlap and would result in double counting certain populations.



## **FAST Program Requirements – What's New?**

- **Identifying Service Areas and Beneficiaries:**
  - Service Area and Beneficiary Verification
    - TxDBG strongly encourages beneficiary documentation review and verification in advance
      - Deadline for beneficiary/service area verification is May 16th, 2019
    - In providing beneficiary documentation, be sure to address the following
      1. the relevant questions posed in this webinar
      2. a description of the proposed purchase(s)
      3. map of the service area for the proposed vehicle/equipment
      4. proposed beneficiary data AND a brief narrative description of how the beneficiary data corresponds to the service area.

TDA strongly encourages applicants to submit beneficiary documentation for review, in advance of the application due date on June 13<sup>th</sup>. The more information an applicant provides about the service area determination, the better.

As an aside, if you have reached out to me already to get a general idea as to whether your entity's service area even has a shot at eligibility, this is not the same as verification. I am happy to provide a cursory review of a service area map to help prospective applicants decide whether its even worth going to their county judge or mayor for a *FAST* grant, but for actual verification purposes, you must submit the information listed above to me in writing and I will send you a response in writing.

This is a new fund, and as such, new challenges are to be expected. However, the goal for the *FAST* fund is to keep the beneficiary documentation reasonable and clear and expend these funds as *FAST* as feasible.



## I'm New to TxCDBG. Where Do I Start?

### Step 1: Are You Eligible?

- Are you a non-entitlement entity or located in a non-entitlement entity's jurisdiction?
- Does your proposed service area qualify based on the 2019 LMISD?
- Is your project eligible?

### Step 2: Is The Applicant Willing to Partner?

- Have you talked to a decision maker at the city or county (whichever is applying)?
- Are they aware of or on board with your project or are they supporting another project?

### Step 3: Prior Experience?

- Has the applicant applied for or been awarded a TxCDBG grant before?

Michelle Phares: 512-936-6702 or [michelle.phares@texasagriculture.gov](mailto:michelle.phares@texasagriculture.gov)

If you are brand new to TxCDBG and are interested in applying for *FAST*, you must first determine your potential eligibility. No one wants to go to their mayor or county judge with a project and then find out a short time later that its not eligible. The first step is to determine whether your are a non-entitlement city or county or, in the case of service providers, if your service area is located in a non-entitlement city or county. If the city or county in question already receives funds directly from HUD, is urban in nature, or exceeds the population limits (50k for cities and 200k for counties), then they are likely not eligible. If in doubt, contact me at the information provided to confirm.

Next, is your service area eligible in terms of LMI? Will it meet the 51.00% threshold? If your service area is defined by the city or county boundaries, then consult the 2019 LMISD data posted on the TDA website. If your service area is located in an unincorporated region of a county, or includes a city, plus portions of a county, then it might make sense to consult the census block group data posted on the TDA website and use the HUD interactive mapping tool. If you have done your due diligence and are still unsure about the eligibility of your service area, please submit a verification request as previously discussed.

Next, is your project eligible? Check the *FAST* application guide. If your project is a specialized vehicle, craft or piece of equipment or isn't specifically called out in the application guide, contact me for confirmation at the information provided.

Next, assuming you are eligible, is the city or county willing to partner? Have you talked to

the mayor, judge, city manager or city administrator about whether the city or county is willing to apply for this project or, if you are a service provider, apply on your behalf? The city or county may already be invested in another project. Or they may have an open TxDBG contract with performance issues. It may be worth reaching out even before you confirm eligibility.

Assuming you are eligible and the city or county is willing to partner, the next question is: does the applicant have prior experience with TxDBG projects? I've talked to contacts at cities and counties who have no idea that their entity currently has other TxDBG contracts. If the applicant has applied for or has been funded by TxDBG before, then someone at the city or county can probably provide guidance in terms of the procurement process for TxDBG grant administration services. If the applicant has never applied for or has never been awarded a TxDBG contract, please consult the TDA Professional Administrative Services web page and the Implementation Manual for guidance related to solicitation of administrators. TDA is also happy to provide technical assistance, but please review the resources provided first. Speaking of resources....



## FAST Program Resources

[TxCDBG FAST web page](#): application, application guide, verification request criteria, FAST-At-A-GLANCE two-pager

[TxCDBG Training web page](#): TxCDBG and FAST training schedule, webinar dial-in information, webinar slides

[TxCDBG Beneficiary Documentation web page](#): 2019 LMISD data, survey methodology manual link, questionnaires

[TxCDBG Professional Administrative Services web page](#): List of pre-qualified administrators, administrative procurement guidance for communities, Phase 2 solicitation forms

[TxCDBG Implementation Manual](#): Chapter 5 Procurement Procedures, Chapter 3 Environmental Review procedures, Appendix D "Sample Administration Services RFP Packet", Appendix H "Pre-Application Procurement Q&A", all procedures and forms associated with TxCDBG grant administration

[TxCDBG Listserv Signup](#): sign up for TxCDBG and FAST related announcements

[HUD Notice: CPD-19-02 Low- and Moderate Income Summary Data Updates](#): most recent LMISD data and methodology update

[HUD Mapping Tool \(Low- and Moderate Income Area Data based on 2011-2015 ACS\)](#): helpful interactive mapping tool

Here is a list of resources for prospective FAST applicants and administrators. It includes resources I've referenced throughout the webinar. A separate Word document has been posted on the TxCDBG training page with accessible links for each of these resources.

For additional information or questions,  
contact Michelle Phares at  
[Michelle.Phares@TexasAgriculture.gov](mailto:Michelle.Phares@TexasAgriculture.gov)



TEXAS DEPARTMENT OF AGRICULTURE  
**COMMISSIONER SID MILLER**

That concludes the FAST Program webinar.