

Community Development

CDBG

Block Grant

Community First.



Community Always.

2025 Round 2

Application Instructions

Available Programs

*Wastewater & Drinking Water Program
Stormwater Improvements Program
Main Street Revitalization Program
Blight Clearance Program
Facilities Program*



Indiana Office of Community and Rural Affairs
CDBG Program
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Key Dates and Updates

2025 Round 2

Key Dates

- Proposals Due
 - October 24, 2025
- Pre-Approvals Due
 - December 5, 2025
- Application Due
 - December 19, 2025
- Award Announcement
 - February 2026

Important Updates

- General Selection Criteria
- Proposal Parameters
- National Objective Scoring Process
- Blight Clearance Eligible Properties
- Facilities Program Eligible Activities & Program Specific Points
- Main Street Revitalization Program Program Specific Points
- Wastewater Drinking Water Program Specific Points
- Bonus Points-Resilience Index & Designated Disaster Areas
- Policy Changes
 - CDBG Policy Notice 2025-002 Project Overdue Policy
 - CDBG Policy Notice 2025-003 Income Survey Policy
 - CDBG Policy Notice 2025-004 In-Kind Contribution Policy

New Documents

- Program Specific Points Forms
- Green Infrastructure Forms
- Site Redevelopment Plan

OCRA CDBG Mission Statement

Indiana's state-administered Community Development Block Grant program fosters growth and resilience in rural cities and towns by investing in local initiatives that encourage communities to build, strengthen and thrive.

Introduction

This guidance has been developed specifically for OCRA-certified Grant Administrators to support the preparation and submission of a comprehensive and compliant CDBG application. Given the limited availability of funds and the high volume of submissions received for each grant cycle, Grant Administrators should understand that this program is highly competitive, and the quality of the application is taken into consideration. OCRA values the significant time, effort, and resources required to develop a full application and acknowledges the complexity of the process.

By following these instructions and using the provided tools and recommendations, Grant Administrators will be better prepared to clearly demonstrate the needs of applying communities and ensure each application meets all criteria required for a high-quality submission.

PART 1: BEFORE YOU APPLY

The Office of Community and Rural Affairs (OCRA) seeks applications from local units of government for programs funded through the State Community Development Block Grant (CDBG) program. Eligible local units of government are counties, cities, or incorporated towns not located within an entitlement community. Unincorporated areas must apply through the county in which they are located.

A. Program Description

The goal of the State CDBG program is to encourage communities with eligible populations to focus on long-term community development. Competitive projects must demonstrate the following:

- They meet a National Objective of the Housing and Community Development Act of 1974, as amended
- The project addresses the long-term planning and development efforts of the community
- The funds granted will have a significant impact on the overall project
- The community has demonstrated a strong commitment to the project and its sustainability

B. General Selection Criteria

The Office of Community and Rural Affairs (OCRA) will assess applications and the proposed CDBG projects based on the general selection criteria outlined below. All submissions will be evaluated for threshold criteria, ensuring each submission demonstrates a sufficient level of readiness to proceed upon grant approval and will be completed within eighteen (18) months. Applications with significant deficiencies may be excluded from the scoring process.

1. The applicant must be a legally recognized non-entitlement local unit of government.
2. The applicant must have the legal capacity to implement the proposed program.

3. If the applicant partners with a non-profit to conduct eligible project activities, that organization must be able to provide documentation of its non-profit status from the U.S. Internal Revenue Service, the Indiana Department of Revenue, and the Indiana Secretary of State.
4. At the time of the application submission, the applicant must not have any overdue documents or outstanding semi-annual reports, closeout reports, State Board of Accounts audit findings, or unresolved monitoring issues from OCRA/IHCDA. The determination of what constitutes “overdue” is entirely at the discretion of OCRA.
 - a. Applicants must verify their overdue status in the [CDBG Project Timeliness Report](#) on the CDBG webpage, which is updated monthly.
5. The applicant must clearly demonstrate how the proposed project will fulfill one of the three national CDBG objectives and meet the criteria outlined in 24 CFR 570.483.
6. The applicant must show that the proposed project is an eligible activity under Title 1 of the Housing and Community Development Act of 1974.
7. The applicant must first encumber or expend all CDBG program income receipts before applying for additional grant funds from OCRA.
 - a. The use of CDBG program income must be in compliance with [CDBG Policy Notice 2024-004](#).
8. The applicant may only submit one proposal or application per round per program. 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.
9. At the time of application submission, an applicant must not have more than three open CDBG grants or pending awards (for cities and incorporated towns) or four open CDBG grants or pending awards (for counties)
 - a. For applicants with an open Preserving, Stellar or any other capacity building program as stipulated by OCRA must closeout the grant successfully before the deadline set by OCRA for receiving funding applications.
 - b. For applicants with an open MSRP, WDW, PFP, SIP, or BCP, a “Notice of Release of Funds and Authorization to Incur Costs” must have been issued for the construction activities under the open MSRP, WDW, PFP, SIP or BCP contract, and a contract for construction of the principal (largest funding amount) construction line item (activity) must have been executed prior to the deadline established by OCRA for receipt of applications for funding.
 - c. For applicants with open Planning Grants, the community must have the final plan approved by OCRA prior to submission of MSRP, SIP, WDW, PFP or BCP application for the project.
10. An applicant must not have 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”).
11. The cost per beneficiary ratio for all CDBG funds will be maintained at \$5,000.
12. Required leveraging based on program must be proposed. OCRA may rule on the suitability and eligibility of such leveraging.
13. The applicant or third party must provide the required local match percentage using local, state, non-HUD federal funds, or in-kind contributions. The local match is calculated on the total project cost, not on the grant amount requested. Minimum local match percentage requirements vary by program.
 - a. To request an in-kind match, please submit your request by the pre-approval deadline via email at cdbg@ocra.in.gov. All in-kind contribution requests must include all of the information and follow the format outlined in [CDBG Policy Notice 2025-004](#).

- b. OCRA may approve using CDBG program income toward the local match requirement. To obtain approval, applicants must email cdbg@ocra.in.gov. The use of CDBG program income must be in compliance with [CDBG Policy Notice 2024-004](#).
- c. Indiana Finance Authority State Revolving Loan Funds are only permitted as an eligible local match for CDBG applications submitted in Round 2. Any application submitted in Round 1 that lists SRF funds as the local match source will be deemed ineligible and will not be accepted.

14. The application must be completed and submitted by the announced deadline; no exceptions apply.

15. The applicant must have an active SAM registration by the application deadline.

16. Applicants are required to procure an OCRA Certified Grant Administrator to support both the submission and administration of a CDBG application. Subsequently.

17. CDBG submissions must be made by an [OCRA certified Grant Administrator](#) with active certification through [Indiana's Grants Management System \(GMS\)](#).

18. The applicant must have proof all funding is secured by the application submittal deadline.

B. Eligible & Ineligible Activities

Eligible Activities

The following CDBG programs activities are eligible for funding this round. This list is not meant to include or to exclude any particular project.

Resource: For questions regarding specific activities, consult your [Community Liaison](#).

Programs	Eligible Activities
Blight Clearance Program (BCP)	<ul style="list-style-type: none"> • Acquisition • Clearance • Demolition • Remediation of environmentally contaminated properties <p>Eligible properties for this program include deteriorated or abandoned non-residential buildings, as well as vacant single-family homes or residential buildings with up to four units that demonstrate the existence of conditions detrimental to public health and safety that poses a threat to the general public.</p>
Facilities Program (FP)	<ul style="list-style-type: none"> • Removal of Architectural Barriers for ADA Accessibility • Community Centers • Daycare Centers • Facilities for Special Needs Groups • Fire/EMS Stations • Historic Preservation • Healthcare Centers • Learning Centers • Libraries • Senior Centers • Youth Centers

Main Street Revitalization Program (MSRP)	<ul style="list-style-type: none"> • Traffic Control or Pedestrian Safety • Functional Art • ADA Improvements • Sidewalk Rehabilitation or Addition • Signage or Utility Relocation for Accessibility • Pavers • Water Management • Energy Efficiency (LED Traffic Lights or Signals) • Alley Activation
Stormwater Improvements Program (SIP)	<ul style="list-style-type: none"> • Stormwater improvements <ul style="list-style-type: none"> ◦ Retention ◦ Lines ◦ Other stormwater improvements
Wastewater & Drinking Water Program (WDW)	<ul style="list-style-type: none"> • Wastewater Improvements <ul style="list-style-type: none"> ◦ collection lines ◦ treatment plant ◦ Other Improvements • Drinking Water System Improvements <ul style="list-style-type: none"> ◦ water tower ◦ distribution ◦ treatment ◦ Other Improvements
Other Costs	
Property Acquisition	<ul style="list-style-type: none"> • Acquisition <ul style="list-style-type: none"> ◦ Surveying and appraisal costs ◦ Legal costs related to acquisition ◦ Actual purchase costs of land or easement provided URA is followed, and the property is not purchased before release of funds
Administration	<ul style="list-style-type: none"> • Reasonable and eligible costs associated with the administration of the pr (Maximum of 8% of the grant, if paid with CDBG funds)
Environmental Review	<ul style="list-style-type: none"> • Costs related to obtaining the necessary environmental review of the proposed project
Labor Standards	<ul style="list-style-type: none"> • Costs related to labor standards compliance

Ineligible Activities

The following are common activities that are not eligible for CDBG funding, this list is not exhaustive. :

- The acquisition, construction, or rehabilitation of buildings for the general conduct of government
- Real property acquisition for ineligible activities
- General equipment purchase
- Purchase of items that are living (plants, trees, sod, animals, etc.)
- Operation and maintenance expenses associated with public facilities or services
- General government expenses
- Political activities of any nature
- The direct construction of new housing

Resource: For questions regarding specific activities, consult your [Community Liaison](#).

Projects Combining Eligible and Ineligible Activities

Depending on a community's needs, it may be appropriate for a project to combine CDBG eligible and ineligible activities. This type of project may still be eligible for CDBG funds, provided that:

- The budget clearly delineates the costs of the eligible and ineligible activities
- Local funds that are used to cover expenses related to the ineligible activities must be clearly indicated in the budget as "ineligible costs"
- CDBG funds will not pay for any ineligible activities; and
- Local funds comprise at least the minimum percentage required local match portion of the project
- OCRA's [Detailed Budget Template](#) must be used to outline these costs.

Resource: For guidance on combining eligible and ineligible activities, please consult the CDBG Program Team at cdbq@ocra.in.gov.

C. Demonstrating Compliance with the Federal National Objective

To ensure alignment with the statutory requirements of Title I of the Housing and Community Development Act of 1974, as amended, all federally funded CDBG activities must demonstrate and fulfill one of the three National Objectives as outlined in the chart for each of the CDBG programs.

Program	National Objective(s)
Blight Clearance Program	<ul style="list-style-type: none">• Prevention or Elimination of Slum and Blight<ul style="list-style-type: none">○ Spot Basis○ Area Basis
Facilities Program	<ul style="list-style-type: none">• Low-and Moderate Income<ul style="list-style-type: none">○ Area Basis○ Limited Clientele○ Presumed Class• Prevention or Elimination of Slum and Blight<ul style="list-style-type: none">○ Spot Basis
Main Street Revitalization Program	<ul style="list-style-type: none">• Prevention or Elimination of Slum and Blight<ul style="list-style-type: none">○ Area Basis
Stormwater Improvement Program	<ul style="list-style-type: none">• Low-and-Moderate Income<ul style="list-style-type: none">○ Area Basis
Wastewater Drinking Water	<ul style="list-style-type: none">• Low-and-Moderate Income<ul style="list-style-type: none">○ Area Basis

Demonstrating a National Objective

Applicants must clearly establish that their proposed activity satisfies the designated National Objective as outlined above by providing all the required documentation and answering all relevant questions for that National Objective in Section 3 of the application in GMS.

Benefit to Low- and Moderate-Income Persons – Area Basis

1. What are the boundaries of the service area?
2. How do the boundaries correspond to the project's intended beneficiaries?
3. Using HUD Census data or an OCRA approved [income survey](#), what percentage of persons in the service area are of low-to-moderate income?
4. How were the income characteristics of the target population determined?
5. Is the proposed facility available to all service area residents?

Benefit to Low- and Moderate-Income Persons- Limited Clientele

1. For Limited Clientele projects serving other persons, the benefit to low- and moderate-income persons must be documented by an income verification process and should include at least three (3) months of data.
2. Who will use the proposed facility? How will the beneficiaries be qualified based on income? Which income limits will be used?
3. If the facility is to be used on an income-eligible basis, how will income and family size information of users be documented?
4. How was the percentage of low- to moderate-income users determined or estimated?

Benefit to Low- and Moderate-Income Persons- Presumed Class

There are eight groups of people that are presumed by federal regulations to be 51% low- and moderate-income persons. Those groups are as follows:

- Abused children
- Elderly persons, (people who are 62 years of age or older)
- Battered spouses
- Homeless persons
- Adults meeting Census Bureau's definition of severely disabled adults
- Illiterate adults
- Persons living with disease AIDS
- Migrant farm workers

To show that a project benefits low- and moderate-income people- Presume Class, the following questions must be answered in Section 3 of the application on the National Objective.

1. Who will use the proposed facility?
2. Are the beneficiaries' part of a presumed class as stipulated by the U.S Department of Housing and Urban Development? Which category of low- and moderate-income people will be served by the proposed project?
3. Will any other groups or the general public also use the facility? If so, to what extent?
4. How was the percentage of low- to moderate-income users determined or estimated?

Prevention or Elimination of Slums or Blight – Area Basis

1. What are the boundaries of the area?
2. What are the conditions that cause the area to be considered blighted?
3. What percentage of buildings in the area are deteriorated? How are they deteriorated?
4. What are the public facilities in the area that are deteriorated? Describe this deterioration.
5. How will the proposed project remedy one or more of the blighted conditions described above?
6. The following documentation must be attached to a slum and blight, area basis application:
 - **Municipal Resolution:** A resolution adopted by the governing body prior to the application deadline. This resolution must:
 - i. Clearly define the boundaries of the area exhibiting blighted conditions
 - ii. Officially designate the area as blighted or in need of redevelopment in accordance with **IC 36-7-1-3** and **IC 36-7-14**.
 - iii. Be no more than ten (10) years old, in accordance with **24 CFR 570.483(c)(1)(iv)**.

- Provide photographic documentation of the slum or blighted conditions that prompted the municipal resolution.
- Provide a street-level detailed map of the area showing the location of project activities.
- If for MSRP, the approved Mainstreet district map must be provided.

Prevention or Elimination of Slums or Blight – Spot Basis

1. What specific blighted or deteriorated structure—located outside a designated slum or blighted area—will be impacted by the proposed project, and how can its condition be demonstrated?
2. In what ways is the proposed project specifically designed to address and eliminate the identified conditions of blight or deterioration?
3. For projects involving historic preservation rehabilitation under this national objective, what are the specific conditions for each assisted structure that posed a threat to public health and safety, and how does the scope of CDBG-assisted rehabilitation directly address only those conditions?
4. The following documentation must be attached to a slum and blight, spot basis application:
 - **Municipal Resolution:** A resolution must be adopted by the governing body prior to the application deadline. This resolution should:
 - i. Clearly identify and describe the blighted or deteriorating structure
 - ii. Define the boundaries of the blighted structure
 - iii. Include a legal description of the structure verifying that the structure meets the definition of an unsafe building under **IC 36-7-9-4**
 - iv. Officially designate the structure as blighted on a spot basis
 1. Resolutions related to slum and blight designations must be no more than ten (10) years old, in accordance with **24 CFR 570.483(c)(1)(iv)**.
5. Provide a street-level detailed map of the area showing the location of project activities.
6. Photographic documentation of the slum or blighted conditions that prompted the municipal resolution.

If the project is for a residential structure, provide the completed [Form BCP-001-Residential Structure Site Evaluation and Documentation Checklist](#). This form must be uploaded in Indiana's Grant Management System and be submitted by the application deadline.

Note: Spot basis slum/blight projects are limited to five project activities: acquisition, relocation, clearance, historic preservation, and limited rehabilitation to correct specific conditions detrimental to public health and safety. **A spot basis blight project must not be located within a designated blight area.**

D. Maximum Grant Amounts

The OCRA established maximum grant award amount(s) for each CDBG grant program are outlined below. The amount of CDBG funds granted will be limited to a \$5,000 cost per project beneficiary for each proposed project.

Blight Clearance Program

- **Maximum Grant Award:** \$500,000
- **Local Match:** 10% total project cost

For the Blight Clearance Program, the maximum grant award amount is \$500,000. If OCRA determines that a lesser amount is appropriate, it may be necessary to revise the project before final submission.

Facilities Program (FP)

- **Maximum Grant Award:** \$750,000
- **Local Match:** 10% total project cost

Maximum grant award amount for all FP projects is \$750,000. The maximum award is not intended to serve as a target figure for requests for grant assistance. OCRA will review the level of grant assistance requested and will consider the appropriateness of the project's scope, the level of demonstrated need, and the financial resources of the applicant. If OCRA determines that a lesser amount is appropriate, it may be necessary to revise the project before final submission.

Main Street Revitalization Program (MSRP)

- **Maximum Grant Award:** Maximum grant award amounts for MSRP are based upon the proposed project cost as shown in the matrix below
- **Local Match:** 10% total project cost

Projects over \$2 million in total project cost	\$600,000
Projects under \$2 million in total project cost	\$500,000

Stormwater Improvements Program (SIP)

- **Maximum Grant Award:** \$750,000
- **Local Match:** 10% total project cost

Maximum grant award amount for all SIP projects is \$750,000. If OCRA determines that a lesser amount is appropriate, it may be necessary to revise the project before final submission.

Wastewater & Drinking Water Program (WDW)

- **Maximum Grant Award:** Maximum grant amounts for communities with existing systems are based on the current combined rates (water, wastewater) at the time of application, and grant amounts for communities constructing new systems will be based on a verified rate study included in a Preliminary Engineering Report (PER).
- **Local Match:** 20% total project cost

Maximum Grant Amounts	User Rates for 4,000 gallons		
	Over \$50	\$30 to \$50	Under \$30
Projects over \$1 million in total project cost	\$750,000	\$700,000	\$650,000
Projects under \$1 million in total project cost	\$700,000	\$650,000	\$600,000

E. Grant Administration Procurement & Fees

Grant Administrators must be selected in compliance with all relevant federal and state procurement laws. CDBG program requires professional services to be procured using the Request for Proposals (RFP) method if being paid with CDBG funds. CDBG funds may be used to pay for the professional service fees of grant administrators. Grant Administrators may charge the following:

Type of Service	CDBG Maximum Amount
Environmental Review	\$5,000 maximum
Labor Standards	\$5,000 maximum
Administration	8% of the CDBG grant amount

When local funds are used to cover grant administration services, applicants should adhere to their local procurement policies. If administrative fees are paid from local funds, OCRA will allow up to 8% of the grant amount toward local match. Any additional funds toward administration will be considered ineligible local match for this purpose.

Example: A community requests \$500,000 in CDBG funds for a Blight Clearance Project. Total project cost is \$600,000. Local match provided is \$60,000 (10% of total project cost). Grant administration fees are \$50,000 paid from non-CDBG funds. \$10,000 of this fee is considered an ineligible cost. OCRA will count \$40,000 (or 8%) of CDBG funds toward eligible local match.

NOTE: Private firms or non-governmental entities that perform project development and administration activities for CDBG-assisted projects (project development, environmental review, grant application preparation, procurement assistance, grant administration) will NOT be allowed to perform architectural, engineering, planning, or other related services/activities for grantees or their non-profit sub-recipients on those projects.

PART 2: WHEN YOU APPLY

A. Timeline



B. Two Stage Application Process

There are two stages to the construction application process: the Proposal stage and the Application stage.

General Considerations:

1. Submission of both a proposal and application require detailed supporting materials and documentation. As such, materials and documents must be referenced in narratives using the file name and page number. For example, (Filename-00). Do not include attachments that are not discussed and referenced in the narratives unless required by federal or state policy.
2. The proposal and application must be submitted via the Indiana Electronic Grants Management System (GMS) by a Certified Grant Administrator.
3. In order to submit a competitive application, applicants are strongly encouraged to take advantage of the technical assistance available from their Community Liaison.

Resource: The system is accessed via the CDBG webpage or by using the link [Grant Management System](#).

Stage 1: Proposal

1. Develop a comprehensive proposal of the proposed CDBG project. The proposal is a document which outlines the proposed project, the principal parties, the project budget, and how the proposed project will

meet a goal of the Federal Act. The proposal must constitute at least **95% completion** of all required documentation and information intended for the final application submission.

- OCRA will evaluate applications using the criteria listed above, which serve as essential eligibility standards for CDBG-funded projects.
- The community will be informed of any issues identified during the proposal review. Communities must address and rectify any identified deficiencies prior to submitting a final application for the project to be considered for funding.
- OCRA reserves the right to invite or exclude any applicant from proceeding to the final application stage, based upon the submitted proposal.

2. **Submit the proposal by 11:59 p.m. ET on Friday, October 24, 2025.**

- Failure to comply with submission requirements could render a project ineligible to submit a full application for the current round.

3. A site visit may be conducted by a Community Liaison between the proposal and application steps. At the site visit, the applicant is provided with information on the review of the project scope, clarify specific grant program requirements, and provide tailored technical assistance to assist in refining and strengthening the application.

NOTE: OCRA retains full discretion in determining whether a visit is warranted, based on the clarity, completeness, and overall quality of the submitted proposal.

Stage 2: Application

1. **All pre-approval requests and documentation must be submitted by December 5, 2025, via email to cdbq@ocra.in.gov.**
2. Pre-approvals may be submitted for:
 - Bonus points
 - Green infrastructure element program specific points. The required documentation must be provided:
 - [Green infrastructure Justification Form](#)
 - [Green Infrastructure Certification](#)
 - Approval to use in-kind match.
 - See [CDBG Policy Notice 2025-004 In-Kind Contribution Policy](#) for the process of requesting the use of in-kind contributions.
 - Any overdue documents that could render a community ineligible to submit a grant application. Check your overdue status on the [CDBG Project Timeliness Report](#).
3. **Complete and submit the final application by 11:59 p.m. ET on Friday, December 19, 2025, using Part 3 of these instructions.**
 - Failure to comply with submission requirements could render an application ineligible.

Applicants **MUST** include the following forms with their application: [CDBG Legal Section](#), [CDBG Signature Page](#), [Duplication of Benefits Disclosure](#)

4. **Note:** OCRA reserves the right to invite or exclude an applicant from submitting a final application based on the strength and credibility of the information presented in the proposal. Applications demonstrating insufficient readiness may be denied.

Resource: For questions about the proposal or application content, consult your [Community Liaison](#).

Resource: For questions about the Indiana Electronic Grants Management System (GMS) contact the GMS administrator at lggmsadmins@office365groups.in.gov or refer to the [GMS FAQ page](#) on OCRA's website.

PART 3: SUBMITTING AN APPLICATION IN THE GRANT MANAGEMENT SYSTEM

General Instructions

1. Go to the [Grant Management System](#).
2. Select the program to which you are applying.
3. Ensure all Federal I.D./EIN, SAMS UEI, CAGE, and DUNS are correct and up to date for the local unit of government and sub-recipient (if applicable).
4. Fill out the application using the [Evaluation Criteria](#) and [Project Design Factors](#) in [Part 4](#) of these instructions as your guide.
5. Ensure all questions are answered and all relevant documents are attached.
6. Utilized the [GMS FAQs for submitting an application guidance](#) for any other questions related to the GMS application.
7. Complete a final check of your work. Be sure to:
 - Review each section and make sure all information is accurate.
 - Use line breaks to separate paragraphs in the narratives.
 - Pictures should be in a single PDF file at the highest resolution possible with clear captions and dates.
 - Reference the file name and page number of each piece of supporting documentation that has been uploaded.
 - Do not include uploads that are not discussed or referenced in the narrative or are not related to the project (unless federal or state policy requires).
 - Do not provide handwritten notes, dates, etc. within any upload — handwriting is not considered in scoring.
8. Submit the appropriate document by the due date.

PART 4: APPLICATION EVALUATION METRICS

A. Grant Evaluation Criteria

There are 700 in total points available for this application. To be eligible for award, applications must attain a minimum score of 450 out of 700 possible points. Applications that complete the Bonus Point section can receive up to an additional 40 points towards their application total. If the point reduction policy applies, 50 points will be deducted out of the total score achieved

The scoring framework includes:

Scoring Framework	Maximum Points
National Objective Score	100 points
Community Distress factors	175 points
Local Match Contribution	75 points
Project Design Factors	300 points
Program Specific Points	50 points
Point Reduction	-50 points

NATIONAL OBJECTIVE SCORE (100 POINTS)

Each proposed project submitted for funding must meet one of the three National Objectives. Depending on the National Objective to be met by the project, one of the following mechanisms will be used to calculate the score for this category.

1. **National Objective = Benefit to Low- and Moderate-Income Persons:** 100 points maximum awarded according to the percentage of low- and moderate-income individuals to be served by the project. The total points given are computed as follows:

$$\text{National Objective Score} = \% \text{ Low/Mod Beneficiaries} \times 1$$

2. **National Objective = Benefit to Low- and Moderate -Limited Clientele:** 51 points minimum awarded according to the percentage of low- and moderate- income individuals to be served by the project.
3. **National Objective = Prevention or Elimination of Slums or Blight:** 100 points maximum awarded based on the characteristics listed below. The total points given are computed as follows:

a. For Historical Preservation:

National Objective Score: Total of the points received in each category below.

- Applicant has a Slum/Blight Resolution for the project area that is no more than 10 years old. (50 pts.)
- The building is a historical building (10 pts.)
- The project site is a brownfield* (10 pts.)
- The building or district is listed on or is eligible for listing on the Indiana or National Register of Historic Places (10 pts.)**
- The building is on the Historic Landmarks Foundation of Indiana's "10 Most Endangered List" (20 pts.)

b. For Demolition or Clearance:

National Objective Score: Total of the points received in each category below

- Applicant has a Slum/Blight Resolution for the project area that is no more than 10 years old. (50 pts.)
- The project site is a brownfield* (25 pts.)
- The building or site has completed a Phase I ESA (15 pts.)
- The building received a condemnation order that it's at least 3 years old (10 pts.)

* The State of Indiana defines a brownfield as an industrial or commercial property that is abandoned, inactive, or underutilized, on which expansion or redevelopment is complicated due to actual or perceived environmental contamination. Points are awarded for sites listed on the IFA Brownfield registry which indicates prior involvement of the Indiana Brownfield Program or a letter is provided from the IFA Brownfield program that states the site is a brownfield.

** Project may either be listed on or eligible for listing on the Indiana or National Register of Historic Places. Both cannot be checked.

COMMUNITY DISTRESS FACTORS (175 POINTS)

Various factors are used to determine the distress of a community. OCRA has partnered with Stats Indiana, an Indiana University entity, to analyze and calculate the distress of Indiana's small cities, towns, counties, and townships. Local government scores, which are updated and published annually, can be found at [Stats Indiana](#). Factors used to calculate the [Community Distress points](#) used for CDBG scoring include:

- Poverty Rate
- Median Household Income
- Unemployment Rate
- Non-seasonal Housing Vacancy Rate
- Housing Cost Burden
- Population Change (10-year % Change)

LOCAL MATCH CONTRIBUTION (75 POINTS)

Maximum of 75 points based on the percentage of local funds devoted to the project, not grant request. This total is determined as follows:

Total Match Points = % Eligible Local Match X 1

The points total is capped at 75 points or 75% match, i.e., a project with 75% match or greater will receive 75 points. Below 75% match, the formula calculation will apply.

Eligible local matches can be local cash, debt or in-kind sources. Federal, state, and local government grants are considered eligible match. In-kind sources may provide eligible local matches for the project, but the amount that can be counted as a local match is limited to 5% of the total project budget or a maximum of \$25,000. Use of in-kind donations as eligible matches require approval from the CDBG Program Staff by the deadline. Date of deadline will be announced each round.

All In-Kind Contribution Requests must include all information and follow the format outlined here:
[CDBG Policy Notice 2025-004 In-Kind Contribution Policy](#).

PROJECT DESIGN FACTORS (300 POINTS)

A maximum of 300 points awarded according to the evaluation in three areas:

Project Description – Is the project clearly defined as to determine eligibility? – 50 points

Project Need - Is the community need for this project documented and compelling? – 125 points

Financial Impact - Why is grant assistance necessary to complete this project? – 125 points

The points in these categories are awarded by the OCRA Scoring Committee when evaluating the projects. Scoring questions for these categories are defined for each round and are provided to applicants that submit a proposal at the site visit. The questions are subject to change each round. Applicants should refer to the application instruction, scoring guide and other resources to address all questions present. Applicants are encouraged to work with their OCRA Community Liaison to identify ways to increase their project's competitiveness in these areas and of the application.

PROGRAM SPECIFIC POINTS (50 POINTS):

Facilities Program: Public Facilities

- **Philanthropic Contributions (20 points)** - Points are assigned based on philanthropic contribution to the project (match) as a percentage of total project costs.
 - 0 points - Less than 1%
 - 5 points - 1-1.99%
 - 10 points - 2-2.99%
 - 15 points - 3-3.99%
 - 20 points - 4% or higher
- **Project Sustainability (Maximum 20 Points)** - A maximum of 20 points for the establishment of a (or documentation of existing) permanent Community Facility Fund, to be used for ongoing operation and maintenance activities of the project.
 - 0 points - Less than \$3,000
 - 10 points - \$3,000-\$5,000
 - 20 points - More than \$5,000
- **Green Infrastructure (Maximum 10 Points)** - A maximum of 10 points for the Inclusion of green infrastructure elements in the project.

Program specific points must be submitted to the Office of Community and Rural Affairs in [Form PF-001 CDBG Facilities Program Specific Points](#). The form must be uploaded to Indiana's Grants Management System and submitted by the application deadline.

Facilities Program: Historical Preservation

- **Local Government Incentives (Maximum 25 points)** - A maximum of 25 points will be local governments that have established and documented their own incentives, such as property tax abatements or reductions for historic properties, to encourage homeowners and businesses to maintain and restore historic structures.
- **Local Grant Funding Program (Maximum 25 points)** - A maximum of 25 points will be awarded local historical preservation grants programs that are made available to support local restoration and preservation projects.

Program specific points must be submitted to the Office of Community and Rural Affairs in [Form PF-002 CDBG Facilities Program Specific Points](#). The form must be uploaded to Indiana's Grants Management System and submitted by the application deadline.

Stormwater Improvements Program (SIP)

- **Financial Gap (Maximum 10 points)** – A maximum of 10 points per each \$1 in financial gap. The result of the OCRA Gap Calculation Worksheet should give you the amount that your community would have to increase the monthly rate charged to each customer without grant assistance, given the above assumptions. This amount is the “gap,” which is the amount by which grant funds will reduce or “buy down” your utility rates. This amount added to the actual rates anticipated with OCRA grant funds will give you the rates needed “without OCRA grant funds.” (Maximum 10 points)
- **Green Infrastructure (Maximum 15 points)** – A maximum of 15 points for the Inclusion of green infrastructure elements in the project.
- **Project Sustainability (Maximum 25 points)** – A maximum of 25 points for the Establishment of, or documentation of existing stormwater utility rate for the ongoing operation and maintenance activities of the storm system.
 - 0 points – under \$3 monthly Stormwater utility user rate
 - 10 points – \$3-\$5 monthly stormwater utility user rate
 - 25 points – \$5 or higher monthly stormwater utility user rate

The required documentation must be provided: [Green infrastructure Justification Form](#) and [Green Infrastructure Certification](#) and must be provided by the pre-approval deadline.

Wastewater Drinking Water (WDW)

- **Financial Gap (Maximum 10 points)** – A maximum of 10 points per each \$1 in the financial gap. The result of the OCRA Gap Calculation Worksheet should give you the amount that your community would have to increase the monthly rate charged to each customer without grant assistance, given the above assumptions. This amount is the “gap,” which is the amount by which grant funds will reduce or “buy down” your utility rates. This amount added to the actual rates anticipated with OCRA grant funds will give you the rates needed “without OCRA grant funds.” (Maximum 10 points)
- **Green Infrastructure (Maximum 15 points)** – A maximum of 15 points for the inclusion of green infrastructure elements in the project.
- **Project Sustainability (Maximum 25 Points)** – A maximum of 25 points for the establishment of, or documentation of existing combined utility rate for the ongoing operation and maintenance activities of the wastewater and drinking water systems.
 - 0 points – Less than \$55 combined user rates
 - 10 points – \$55-\$100 combined user rates
 - 25 points – \$100 or higher monthly combined user rate

The required documentation must be provided: [Green infrastructure Justification Form](#) and [Green Infrastructure Certification](#) and must be provided by the pre-approval deadline.

Blight Clearance Program (BCP)

- **IFA Registry (Maximum 25 points)** – A maximum of 25 points awarded for sites registered with the [IFA Brownfield program](#) which indicates prior involvement of the Indiana Brownfield Program or a letter is provided from the IFA Brownfield program that states the site is a Brownfield.
**Documentation must be provided in the application.*
- **Site Redevelopment Plan (Maximum 25 points)** – A maximum of 25 points will be awarded for projects that have a site redevelopment plan for the future use of the Brownfield site.

Program specific points must be submitted to the Office of Community and Rural Affairs in [Form BCP-001 - Blight Clearance Program Program Specific Form](#). The form must be uploaded to Indiana's Grants Management System and submitted by the application deadline.

Main Street Revitalization Program (MSRP)

- Community is designated as a Nationally Accredited Main Street Organization (**10 points**)
- Documentation of active and continued involvement in the application and project by the Main Street organization (**10 points**)
- The Main Street Organization has provided proof of philanthropic match for the project (**Maximum of 10 pts**)
- The project has unique design elements or is part of a community branding effort. (**Maximum of 10 points**)
- The project design includes green infrastructure elements (**Maximum of 10 points**)

Program specific points must be submitted to the Office of Community and Rural Affairs in [Form MSRP-001 - CDBG Main Street Revitalization Program Specific Points](#). The form must be uploaded to Indiana's Grants Management System and submitted by the application deadline.

BONUS POINTS (40 Points):

- 1) **Resilience Bonus Points (Maximum 25 Points):** Grant application will receive a maximum of 25 points for the submission of a community resilience vision plan, and their corresponding point awarded value from the Community Resilience improvement plan Index as provided by Stats Indiana.

The Chief Elected Official must:

- Schedule a meeting with the Community Liaison to discuss how the proposed CDBG plan will increase the community's resilience score.
- The Chief Elected Official must submit a community resilience vision plan clearly describing how the project benefits the community short term and increases the community resilience in the long term. The community resilience improvement plan must explain how the project will increase the community's resilience score in the next five years in the following metrics:
 - Structure of the local economy / Industry diversity
 - Entrepreneurship
 - Human capital (Education attainment and Labor force participation)
 - Labor force participation
 - Social Network/Social Connectivity
 - Broadband
 - Wealth Gap
 - Homeownership (an indicator of community attachment)

A formula will be used to convert the Community Resilience Score Index into a straightforward point awarded system. This system will assign a point value based on the Community Resilience Index calculated by Stats Indiana. Indiana Community Resilience Index below 110, the points awarded will be determined using the formula: Slope * Community Resilience Score - Intercept. Community Resilience Index scores, which are updated and published annually, can be found at: <https://www.stats.indiana.edu/topic/cdbg.asp>.

The community resilience vision plan as described above, must be submitted to the CDBG Program Manager by the pre-approval deadline via email at cdbg@ocra.in.gov.

All submissions must follow the [Resilience Bonus Points Request Minimum Standards](#).

NOTE: The required meeting with the Community Liaison must take place prior to the pre-approval deadline.

2) Designated Disaster Areas (15 Points): Communities designated as disaster areas with a Presidential Disaster within the last three years from round opening, which have been approved for individual assistance and public assistance categories A-G, are eligible to receive an additional 15 points if documentation is provided.

Designated disaster areas as described above, must be submitted to the CDBG Program Manager by the stated deadline via email at cdbg@ocra.in.gov. Resources are available under the [Bonus Points Resources](#)

POINTS REDUCTION POLICY

It is the policy of OCRA not to fund more than one phase or component of a single project type in different funding rounds. This applies to all project types, although it is particularly relevant to utility projects. If a community needs to phase a project to complete it, they should consider which phase would be most appropriate for CDBG assistance. Even if a community doesn't intentionally phase a project, OCRA will consider previously awarded projects for the same project type. A Community that has previously been awarded a grant for the same project type will likely not be competitive and will be subject to the following point reduction. This applies to all project types, although it is particularly relevant to utility projects.

0 – 5 years since previous funding – -50 points

Example: Community submits and receives a Wastewater Drinking Water (WDW) grant in 2015. When applying for a WDW grant in 2020, they would be subject to a point reduction of 50 pts. In 2021 they would have no point reduction.

B. Project Design Scoring Criteria

GMS Section	Project Design Factors	300 Total Points
Section 4	PROJECT DESCRIPTION	50 Points
4.1	Project Description	
4.1. a	Provide a detailed description of the program without the use of technical language. <ul style="list-style-type: none"> Give an overview of the project in only two to three sentences. 	
4.1. b	Write at least three (3) clear, specific, and objectively measurable outcomes for the proposed program. <ul style="list-style-type: none"> Include a baseline, a specific desired outcome, and how each of these are or will be measured. Note: the completion of the project itself is not considered an outcome. 	
4.2	Scope of Work	
4.2. a	Write a scope of work that is clear and logical for the type of project. <ul style="list-style-type: none"> Identify any ineligible items. 	
4.2. b	Correlate the scope of work with the detailed budget. <ul style="list-style-type: none"> Include per item costs in the detailed budget. Include specific information about soft costs in the detailed budget. Best Practice: Double check calculations before submitting detailed budget. Best Practice: Detailed budget should be uploaded as an excel document. 	
4.3	Project Development and Support	
	Provide description and documentation of the project development process spanning at least three (3) to six (6) months. Project development includes evidence of: <ul style="list-style-type: none"> Research and identification of issues and solutions for this specific project. Evaluation of multiple alternatives. Multiple methods of public input. Provide timeline showing milestones of development process. 	
	Identify the project area on high-quality, colored, clearly labeled maps. <ul style="list-style-type: none"> Maps show project area in relation to 1. Place, 2. County, and 3. State. Detailed project area maps include clear map markers, labels, legends, etc. for key locations and/or features. Any boundaries marked within the map are clearly defined and labeled. 	
Section 5	PROJECT NEED	125 points
5.1	Priority	
	Provide a summary of the history of issues across the past 3-5 years. Support with documentation (e.g. local data, residential anecdotes, maintenance logs, newspaper articles related to the issue, etc.) <ul style="list-style-type: none"> A summary table presents a well-organized display of information. Highlight information within uploads that is specifically cited in the narrative. 	
5.1. a	Provide a compelling explanation of the frequency and prevalence of the issue(s) this program would address. Upload adequate documentation.	
5.2. b	Provide a clear and compelling explanation of the risk of the issue(s) having a significant impact on residents. Include adequate documentation showing a connection between the risk(s) and residents' daily lives. <ul style="list-style-type: none"> Documentation is specific to the community. 	
5.3.c	Demonstrate in the narrative specifically how this project is a priority to both residents and local units of government. Include adequate documentation.	

	<ul style="list-style-type: none"> • Diverse documentation must demonstrate support from residents in the project area, residents of the whole community, local officials/leaders, residents of the community, etc.
5.4.c	Provide a summary of relevant data that adequately describes the need for the project.
5.2	Current Conditions
5.2. a	Explain in detail and document the current system/facility conditions. <ul style="list-style-type: none"> • Provide analysis and summary of any data included.
5.2. b	Explain the current and proposed uses, programs, or services. If the project is an expansion, explain why it is necessary. <ul style="list-style-type: none"> • Provide analysis and summary of any data included.
5.2.c	Include high-quality color pictures showing conditions within the past five (5) years. <ul style="list-style-type: none"> • Each picture must have a caption and date stamp. • Provide reason(s) if no pictures are provided. • Photos must be taken within the past five years. • Photos must be relevant to current issues and the proposed project.
5.3	Residential Impact
5.3. a	Explain and document the residential impact of the proposed project. Summarize the potential impacts on residents if the project is not funded. <ul style="list-style-type: none"> • Include summary of specific existing needs impacting residents. • Provide a summary of resident survey data.
5.3. b	Outline and document the residential support and need for the program. <ul style="list-style-type: none"> • Demonstrate resident support during project development. • Demonstrate resident support of desired program outcomes. Include evidence of resident support beyond the context of public hearings (e.g. filed complaints, letters of support, social media posts, etc.).
5.4	Health and Safety
5.4.1	Describe how this project will specifically address health and safety issues in the community. <ul style="list-style-type: none"> • Clear state the current prevalence and level of health and safety risk. • Include local data and documentation (e.g. local health department notices, letters, etc.) • Best Practice: Photos with date stamp and captions should be used to support narratives.
5.4.2	Demonstrate through documentation the specific health and safety issues this project would address. <ul style="list-style-type: none"> • Outline and support with documentation potential health risks if the project is not completed. • Examples: health code violations, reports of blighted homes, fire run data, unsafe building code listing history, local health department letters, photos, etc.
Section 6	FINANCIAL IMPACT 125 Points
6.1	Previous Efforts
6.1. a	Summarize the community's previous efforts to address the issue(s) this project aims to remediate. <ul style="list-style-type: none"> • Provide a timeline or table demonstrating previous efforts.
6.1. b	Provide supporting documentation explaining in detail past efforts, partnerships, expenditures, and labor hours.

	<ul style="list-style-type: none"> Documentation clearly demonstrates the who, when, how much, and why of previous efforts.
6.2	Sustainability
6.2. a	Outline and document an adequate sustainability plan for this project. <ul style="list-style-type: none"> Plan includes the who, what, when, where, and how.
6.2. b	Include in narrative and uploads the Chief Elected Official's (CEO) commitment to maintain the project past the 5-year closeout window. <ul style="list-style-type: none"> CEO commitment must be supported in official documentation.
6.3	Financial Options
6.3. a	Outline viable alternative financial options investigated for the project before CDBG funds were considered. <ul style="list-style-type: none"> Provide alternative funding sources with amount and terms in the narrative or in a spreadsheet. Viable financial options must have the capacity to fund some portion of the project. E.g. <i>Listing organizations that do not provide funding for the type of project will not be considered to have capacity or be a viable option.</i> OCRA funds cannot be considered as an alternative option.
6.3. b	Explain why CDBG is the best option and why other financial options are not the best option for the project.
6.3.c	Explicitly state if the project will or will not move forward without CDBG funds. <ul style="list-style-type: none"> Explain how the project would change if CDBG funds are not awarded.
6.4	Local Match
6.4. a	Explain and document the local match option. <ul style="list-style-type: none"> Local match documentation includes local match resolution and local match letter(s).
6.4	Fund Balances
6.4. a	Explain the fund balances and include relevant documentation for the applicant and sub-recipient. <ul style="list-style-type: none"> Include most recent Gateway report in uploads. If applicable, include sub-recipient financials in discussion and support with documentation.
6.4. b	Explain all discretionary fund balances and include supporting documentation.
6.4.c	Detail in the narrative how the community, and/or sub-recipient demonstrate fiscal responsibility. Support with documentation.

PART 5: POST AWARD

A. Funded Communities

- Grant awards will be publicly announced via press release in February 2026. Following the announcement, Grant Services will contact each awarded community to initiate the next steps in the grant process.

Resource: To receive information on awards [subscribe to OCRA's Press Releases](#).

B. Unfunded Communities

- Applicants whose proposals are not selected for funding are required to complete a feedback meeting with their assigned Community Liaison. This meeting is mandatory for any applicant intending to resubmit their application in a future grant cycle.

PART 6: APPENDICES

Appendix A: Duplication of Benefits

Many communities have received or will receive federal stimulus funds from the CARES Acts, American Rescue Plan (ARP), or other federal allocations that can be used for the same eligible activities as CDBG, as such OCRA must consider any duplication of benefit. Per the Stafford Act “Duplication occurs when an agency has provided assistance which was the primary responsibility of another agency, and the agency with primary responsibility later provide assistance.”

To determine if any duplication has or will occur, applicants who intend to use ARPA funds or other federal allocations as their local match must complete the [Duplication of Benefits form](#) and upload it with their application. On the form, applicants will provide details on any federal stimulus funds received and their status. Any of those funds that are not yet obligated could be considered duplicative of CDBG funds and could decrease an award from this round.

Appendix B: Income Surveys

Special Note: Under [Policy Notice 2025-005: Income Survey Policy](#) transition policy, the Office of Community and Rural Affairs will allow local units of government to continue using previously approved income surveys under OCRA's Income Survey Policy - Validity Time (effective June 5, 2022) to qualify activities under the National Objective area benefit under the 51% LMI criterion so long as:

1. The boundary of the service area is the same as the boundary defined as the service area when the income survey was conducted.
2. The approved income survey may be used up until 5 years from the date the final income survey report was approved by the Office of Community and Rural Affairs, or until HUD issues LMISD base-data changes with the update to the American Community Survey 5-year estimate or any other data source, whichever occurs first.

The application must include the following documentation if the applicant is utilizing an income survey that was previously approved under OCRA's 2018 former income survey policy and **was not processed in GMS**:

1. Detailed map(s) showing the location and boundaries of the service area, including street names.
2. HUD LMI Data Maps and Worksheet
3. The methodology of the income survey, the low-to-moderate income worksheet, and the sample survey instrument must be included.
4. Preapproval email to conduct an income survey from OCRA CDBG program staff (see submission and timeline section below).

If requesting approval to conduct an income survey & utilizing an income survey that was initiated under OCRA's [Policy Notice 2024-003: Income Survey Policy](#) effective September 1, 2025:

1. Review the [Income Survey Booklet](#) and [income survey policy](#).
2. Applicants seeking approval to conduct an income survey must submit
 - a. Current LMISD for the service area (2016-2020 American Community Survey data must be used to calculate LMSID)
 - b. A map clearly demonstrating the boundaries of the service area
 - c. A letter of justification citing economic reason why the current Census data does not accurately reflect incomes in the area
3. OCRA has 10 full business days from the date the request was received to process and provide authorization.
4. Please note that conducting an income survey can take up to 120 days to be completed.

5. All income survey documentation for this round must be submitted for final approval in GMS by **the pre-approval deadline**. OCRA has 10 full business days from the date received to complete its review. See [**Policy Notice 2025-002: Income Survey Policy**](#).
6. All income surveys for this round must be approved by OCRA in GMS ahead of the application due date as outlined in the instructions.

Appendix C: Public Hearings and Citizen Participation

Two public hearings must be held at different stages of project development. One public hearing must be held before submission of the proposal, and the second must be held before the submission of the full application. **Note: New public hearings must be held for each grant round, regardless of prior application(s).**

Public hearing notice must be posted at least 10 days prior to the hearing date. **Therefore, the public hearing cannot occur until the 11th day or after.** Applicants should be aware of local newspaper deadlines for submitting advertisements. Some smaller newspapers are published weekly and will require that the advertisement is placed well in advance of the public hearing. Other methods of advertising the public hearing are also encouraged. All public hearings must be accessible to disabled persons. Public hearings should also be made convenient for low- and moderate-income residents who will benefit from the project.

The public hearing notice and the publisher's affidavit documenting publication dates, the dated sign-in sheet and signed minutes must be attached to the application for **both** public hearings. The affidavits are the only application document accepted after the application due date. **The affidavits must be received within 14 days of the application due date. OCRA is not responsible for reminding applicants to submit the documents.** Public hearing documentation should be packaged independently as Hearing 1 and Hearing 2.

Minutes must be signed and dated by the party that recorded them.

*If a third party, such as a grant administrator, takes the minutes of the meeting, the applicant **must** include a document stating that the third party is acting as the applicant's representative.*

It is recommended that an audiotape of the public hearing be recorded and kept until the grant is closed out. OCRA may request transcripts of the public hearings.

- Place all documents from each public hearing together in the application. Do not separate by type of documentation.
- All public hearing ads submitted with the application must be of sufficient size to be readable upon review.
- Minutes should be a transcript that documents the topics of discussion and comments made. Not merely state, "there was a discussion."
- Minutes are a great source of quotes showing residential impact.

All questions regarding Limited English Proficiency must be answered on the Citizen Participation page. Please attach the [4 Factor Analysis](#) and [Language Access Plan](#) as required.

For more information, please refer to the [CDBG Handbook](#).

Appendix D: Build America Buy America Act

The Build America, Buy America Act requires any infrastructure project funded by any Federal Financial Assistance, such as CDBG, to apply a domestic procurement preference. This means that all iron, steel, manufactured products, and construction materials used in infrastructure projects must be produced in the United States, unless the U.S Department of Housing and Urban Development (HUD) has issued a waiver of the domestic procurement requirement also referred to as the "Buy America Preference" (BAP).

On March 15, 2023, the U.S Department of Housing and Urban Development (HUD) issued a public interest waiver referred to as [Phased Implementation Waiver](#). The waiver established a phased implementation schedule to allow for orderly implementation of the [Buy America Preference](#) to infrastructure materials used across HUD programs, including the Community Development Block Grant (CDBG) program, through fiscal year 2025.

In accordance with the [Phased Implementation Waiver](#), the Office of Community and Rural Affairs has determined that all Iron & Steel products, along with Specifically Listed Construction Materials, such as (1) non-ferrous metals, (2) lumber, and (3) plastic- and polymer-based composite building materials, pipes, and tubes used in infrastructure projects funded in the 2025 Round 1 must adhere to the Buy America Preference.

As required by HUD, record keeping should be maintained in accordance with applicable program requirements. To ensure record keeping compliance is fully maintained, the applicant must complete the [BABA-01: Determination Form](#). A completed form must be submitted as part of FEPS. Grant administrators are required to ensure that the Buy America Build America provision is incorporated in bid advertisement and prime/subcontractors' contracts. For sample material please refer to [OCRA BABA Resources](#).

A completed [BABA-03: Self Certification Form](#) must be provided by awarded communities to receive Release of Funds and the [BABA-04: Manufacture Certification Letter Template](#) will be collected at closeout.

Appendix E: Environmental Review Radon Requirements

The U.S. Department of Housing and Urban Development (HUD) issued CPD notice 23-103, effective April 11, 2024, outlining the addition of radon as a radioactive material which must be considered in the site contamination analysis required under 24 CFR 58.5(i).

Radon testing and mitigation (when necessary) is required for CDBG-funded projects that require an environmental review at the level of Categorical Excluded Subject to 50.4 or 58.5 (CEST), Environmental Assessment, or Environmental Impact Statement and involve structures that are occupied or are intended to be occupied for at least four hours a day.

The Indiana Office of Community and Rural Affairs (OCRA) has established a [policy](#) to implement these requirements. Radon testing is required to assess whether a project must undergo radon mitigation. Applicants must consider radon during the project design phase to ensure the cost of testing and potential mitigation are incorporated. Radon testing and mitigation, if necessary, are eligible expenses through CDBG funding. To determine if a project must undergo radon testing, grantees must complete [Form Radon-001: CDBG Radon Applicability Checklist](#) as part of the environmental review process.

Appendix F: Federal Flood Risk Management Standard Requirements (FFRMS Requirements)

Federal floodplain management risk standards apply to proposed projects that are classified as Categorically Excluded from NEPA, but Subject to related laws at 58.5 or 50.4 (CEST), Environmental Assessment and Environmental Impact Statement. FFRMS applies to all federally funded projects, including construction, renovation, and repairs that occur in flood-prone areas.

Grantees must determine whether floodplain management is applicable to the project and complete [Form Floodplain-001: Determination of 24 CFR Part 55 Applicability](#). This worksheet will help determine whether a project is exempt, if it will follow the 8-Step process, or complete the 5-Step process form. Whether you use the 8-Step or 5-Step process will depend on activity type. OCRA advises that applicants coordinate with the Environmental Review Specialist early to ensure that the proper procedure is completed.

If the project is not eligible for an exemption, a project within a FFRMS floodplain would be required to complete the 8-Step decision-making process to consider how their actions affect floodplains and/or wetlands. Other projects may be required to follow a modified 5-Step process and complete the 5-Step process form.

Early public notice and public notice of final decisions is required if a project is located within a FFRMS floodplain that is required to follow the 8-Step decision making process. **Local governments must start planning early to allow enough time for all necessary processes to be completed.**