



**COMMUNITY, HOUSING, AND  
HUMAN SERVICES  
DEPARTMENT**  
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## **COMMUNITY DEVELOPMENT BLOCK GRANT (CDBG) PROGRAM Neighborhood Allocation**

### **Request for Proposals**

2025 Program Year

The City of Spokane assures that grants will be conducted and administered in compliance with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d), the Fair Housing Act (42 U.S.C. 3601-3620), the Age Discrimination Act of 1975, Executive Orders 11063, 11625, 12138, 12432 and 12892, Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), the Americans with Disabilities Act (title II) and implementing regulations.



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## STAFF CONTACTS

Staff	Email	Phone
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Carlos Plascencia, Program Professional Capital Projects & Public Facilities	cplascencia@spokanecity.org	(509) 625-6321

## TIMELINE

*Subject to change without notice.*

Activity/Process	Date
RFP Advance Notice to Community Assembly	January 9, 2025
Publish Public Notice of Funding Availability	January 17, 2024
<b>Applications Available</b>	<b>January 17, 2024</b>
Individual Technical Assistance meetings available*	January 20 – March 7, 2025
Technical Assistance Virtual Workshop*	January 22, 2025
<b>Applications Due 5:00 pm</b>	<b>March 14, 2025</b>
Acknowledgement Letter sent to all applicants	March 17, 2025
Parks, CHHS Staff reviews	March 17 – 31, 2025
CHHS Committee application review	April 1 – 15, 2025
CHHS Committee funding recommendations	April 22, 2025
CHHS Board approval of funding recommendations	May 7, 2025
Neighborhoods notified of funding decisions	May 9, 2025
Contract Start Date	July 1, 2025

\*Applicants must attend either a technical assistance workshop or an individual technical assistance meeting before submitting a CDBG application. Applications will be rejected if the applicant does not participate in a technical assistance session.

## FUNDING SOURCES

Source	Amount
U.S. Department of Housing and Urban Development, <b>Community Development Block Grant (CDBG)</b>	\$3,046,000*

\*Estimated 2025 allocation. This can and will change.

## FUNDING ALLOCATIONS

Category	Maximum Amount
Neighborhood Community Development Program	\$400,000*

\*Estimated 2025 allocation. This can change.

## INTRODUCTION

The City of Spokane, through the Community, Housing, and Human Services (CHHS) Department is seeking proposals from formally defined Neighborhoods for park improvements that can be completed during Program Year 2025. Successful proposals must address the 2025 CDBG Neighborhood allocation funding priorities and must meet the guidelines articulated in this Request for Proposals (RFP).

A description of Spokane Neighborhoods can be found at:  
<https://my.spokanecity.org/neighborhoods/councils/>

Not all Spokane City Parks will be eligible for CDBG funding. Please review the list of eligible parks before applying.

Neighborhood Councils may submit one application for funding. Neighborhood Council approval of an application is required for the application to be accepted. To demonstrate Neighborhood Council approval, the application must include signed Neighborhood Council meeting minutes authorizing submittal of a Community Development Block Grant application, *or a signature by an officer of the Council accompanied by By-Laws or Policies and Procedures that clearly authorize Council action by the Officer in the absence of a meeting.*

Applications that specify more than one project, either in one park or more, must prioritize the projects.

Those interested in submitting a proposal for consideration must meet with City Staff for technical assistance before March 7, 2025; and submit the application and all required documents by 5:00 pm on Friday, March 14, 2025, to [hpage@spokanecity.org](mailto:hpage@spokanecity.org) and [cplascencia@spokaencity.org](mailto:cplascencia@spokaencity.org).

## 2025 CDBG FUNDING PRIORITIES – NEIGHBORHOOD ALLOCATION

The 2025 CDBG Neighborhood allocation will prioritize improvements to neighborhood parks. All improvements selected for funding will be eligible as *construction* or *rehabilitation* projects. General *maintenance* and *repairs* of publicly owned streets, parks and other facilities are ineligible activities. Sometimes there is a gray area between what is considered maintenance or repairs versus construction or rehabilitation. The regulations specifically state certain items are *ineligible* in 570.207(b)(2)(i), for example, pothole repairs. Generally, improvements with a useful life of less than five to eight years are maintenance or repairs and not new construction. For example, road sealing is considered maintenance, while a new asphalt overlay is considered construction. All improvements completed must have a minimum life span of more than 5 years. The federal code is found in APPENDIX D. CHHS will review the project description/scope to ensure CDBG eligibility.

City of Spokane Parks and Recreation department will perform the improvements selected for funding. Improvements to be prioritized for funding include:

### **Playground Improvements**

### **Restroom Improvements**

## **Pathway improvements (may or may not be within a park boundary)**

### **Sport Court Improvements**

## **ELIGIBLE PARKS**

To meet the National Objective of providing a primary benefit to low- and moderate-income persons or households, under the **Area Benefit** definition, only parks with service areas within HUD's LMI qualified area are eligible to apply for funding. APPENDIX A maps out the eligible parks listed below.

Pathways not located within the boundary of a city park will be reviewed for eligibility based on whether the location of the pathway falls within the boundary of an LMI eligible neighborhood as defined in APPENDIX B.

### **Eligible parks include:**

FRANKLIN PARK  
NEVADA PARK (CHIEF GARRY MIDDLE SCHOOL)  
ROCHESTER HEIGHTS PARK  
HILL JAMES PARK (JIM HILL)  
HARMON PARK  
GLASS PARK  
BYRNE PARK  
B.A. CLARK PARK  
KEHOE PARK  
HAYS PARK  
COURTLAND PARK (BEMISS)  
WILDHORSE PARK  
LOGAN PEACE PARK  
CHIEF GARRY PARK  
STONE PARK  
LIBERTY PARK  
COWLEY PARK  
EDWIDGE WOLDSON PARK  
UNDERHILL PARK  
POLLY JUDD PARK  
HIGHBRIDGE PARK  
WHITTIER PARK  
REDBAND PARK  
PEACEFUL VALLEY PARK  
DUTCH JAKES PARK  
A.M. CANNON PARK  
THREE ISLANDS CONSERVATIONS AREA  
RIVERFRONT PARK  
CORBIN PARK  
EMERSON PARK  
RUTH PARK  
MISSION PARK  
FAIRVIEW PARK  
LOREN KONDO PARK  
PEOPLE'S PARK  
PARKWATER PARK

## IMPROVEMENT COSTS ESTIMATES

To assist applicants, Parks and Recreation provided the following cost estimates for improvements.

Please use these estimates in completing your CDBG application:

### Playground Improvement

- **Minor Playground Update - \$25k-\$50k**

Replace selected components of existing play structure (ie. a missing slide or bridge), replacement or addition of one or two playground components (post and deck structure), filling / topping off of playground mulch

- **Full playground Replacement - \$150-\$200k**

Removal & replacement of all existing play structures within a playground area, and replacement with new structures and playground mulch.

Note – existing playground curbing / boundary to remain. Does not include new walkway/sidewalk replacement around playground.

### Restroom Improvement

- **Minor Restroom - \$50k-\$75k**

Replace damaged fixtures, new interior paint

- **Major Restroom / Restroom replacement - \$150k-\$300k**

Complete Interior paint, replace fixtures, new electrical & lighting, and partition walls.

Complete restroom replacement with 4-stall pre-manufactured concrete building.

### Pathway Improvement

- **New Park Trail - \$175-\$250 per lineal foot**

For 6'-8' wide asphalt path. Includes removal of turf and construction of path and repair of landscape / irrigation.

Does not account for major re-grading / walls / site furnishings.

- **Existing Trail Improvement \$150-200 per lineal foot**

Removal of existing asphalt path, compaction of pathway base, and installation of new pavement.

- **New Park Staircase - \$1,000 per step**

New concrete staircase, 5' wide. Does not include walls.



NOTE – assumes a minimum number of 10 steps. Fewer steps would result in a higher cost per step.

- **Existing Park Staircase Replacement (\$150-250/sf)**

Removal of existing wood stair treads & railings, repair and replacement of framing installation of new wooden stair treads handrail

Does not include construction of a steel structure or steel stair treads. Does not include lighting.

### **Sport Court Resurfacing**

- **Court Replacement - \$150k per court (ie. 2 court complex = \$300k)**

Remove and replace all court surface and base material to a 'new' condition. Install new acrylic surfacing & nets. Possible replacement of fencing (if budget permits).

NOTE – does not include lighting.

## **CONTRACT TERM**

All projects funded through the Neighborhood allocation will have a contract term beginning July 1, 2025, and ending June 30, 2026. The project scope and budget should reflect a project that can be completed during the contract term. Projects unable to be completed by June 30, 2026, will not be selected for funding. The City of Spokane's Parks and Recreation department will review and verify that the scope and budget meet the timeline restriction.

Projects funded through this RFP will be completed by the City of Spokane Parks and Recreation department. All CDBG funds for selected park improvement projects will be disbursed directly to the Parks and Recreation Department for project completion.

## **TECHNICAL ASSISTANCE**

Applicants must attend either a technical assistance workshop or an individual technical assistance meeting before submitting a CDBG application. Applications will be rejected if the applicant does not participate in a technical assistance session.

### **Virtual Workshop (will be held via Microsoft Teams)**

**Wednesday, January 22, 2024**

**2:00-3:00 pm**

Contact Heather Page at [hpage@spokanecity.org](mailto:hpage@spokanecity.org) for an invitation.

### **Individual Technical Assistance Meetings**

Individual technical assistance meetings are available by appointment through March 7, 2025. Contact the appropriate staff below to schedule an appointment:

Staff	Technical Assistance Areas	Email	Phone
Heather Page, Program Manager	Housing, Community Development	hpage@spokanecity.org	(509) 625-6578
Carlos Plascencia, Program Professional	Capital Projects Public Facilities	cplascencia@spokanecity.org	(509) 625-6321

## DOCUMENTS REQUIRED FOR APPLICATION SUBMISSION

- Completed Community Development Block Grant application
- Estimated Project Budget Worksheet
- Copy of signed Neighborhood Council resolution or signed Neighborhood Council meeting minutes authorizing submittal of a Community Development Block Grant application
- List of Neighborhood Council Officers
- Map of Project Area if not Listed as an Eligible Park
- Photographs of areas to be improved (as applicable)

## APPLICATION AND SELECTION PROCESS

Applicants must attend either a technical assistance workshop or an individual technical assistance meeting before submitting a CDBG application. Applications will be rejected if the applicant does not participate in a technical assistance session.

Please carefully review the conflict-of-interest policy in APPENDIX F. Conflict of Interest forms must be submitted at the time the application is submitted for anyone with a conflict of interest as defined in the policy. Conflict of interest forms are found at <https://my.spokanecity.org/chhs/funding-opportunities/chhs/>

All conflicts will be reviewed by the CHHS Director and the City’s Legal Department and must be addressed in a satisfactory manner.

### Application and Project Selection Process:

The following outlines the typical process of an application for CDBG funds. (APPENDIX E)

- Applicant contacts appropriate staff for and individual CDBG technical assistance session if unable to attend the technical assistance workshop.
- Applicant submits application and all associated documents via email to both [hpage@spokanecity.org](mailto:hpage@spokanecity.org) and [cplascencia@spokaencity.org](mailto:cplascencia@spokaencity.org).
- Parks and Recreation staff will review the applications for feasibility.
- CHHS Staff will conduct a threshold review of the applications and summarize information for the Affordable Housing Committee (AHC). The threshold review will be completed within two weeks from the application deadline. The purpose of this screening is to determine the project’s eligibility for CDBG funding.

- The Community Assembly Community Development committee will review the application submissions for completeness and will reach out to applicants for additional information if needed.
- The AHC review and rating period will occur approximately two weeks following the threshold review, depending on the number of applications. The AHC will score the proposals, select proposals for funding, and identify funding amounts for selected proposals. The AHC will submit funding recommendations to the CHHS Board for review.
- The CHHS Board reviews the funding recommendations. If in agreement, the CHHS Board approves the funding recommendations.
- Applicants will be notified as to the status of their application via an “Application Status” email sent to the email addresses provided for the contacts listed in the application. For applicants not selected for funding, the email will identify the reason(s) that a project was not selected for funding.

#### **Application Submission:**

The application, and budget worksheet are available on the CHHS funding opportunities website <https://my.spokanecity.org/chhs/funding-opportunities/chhs/>

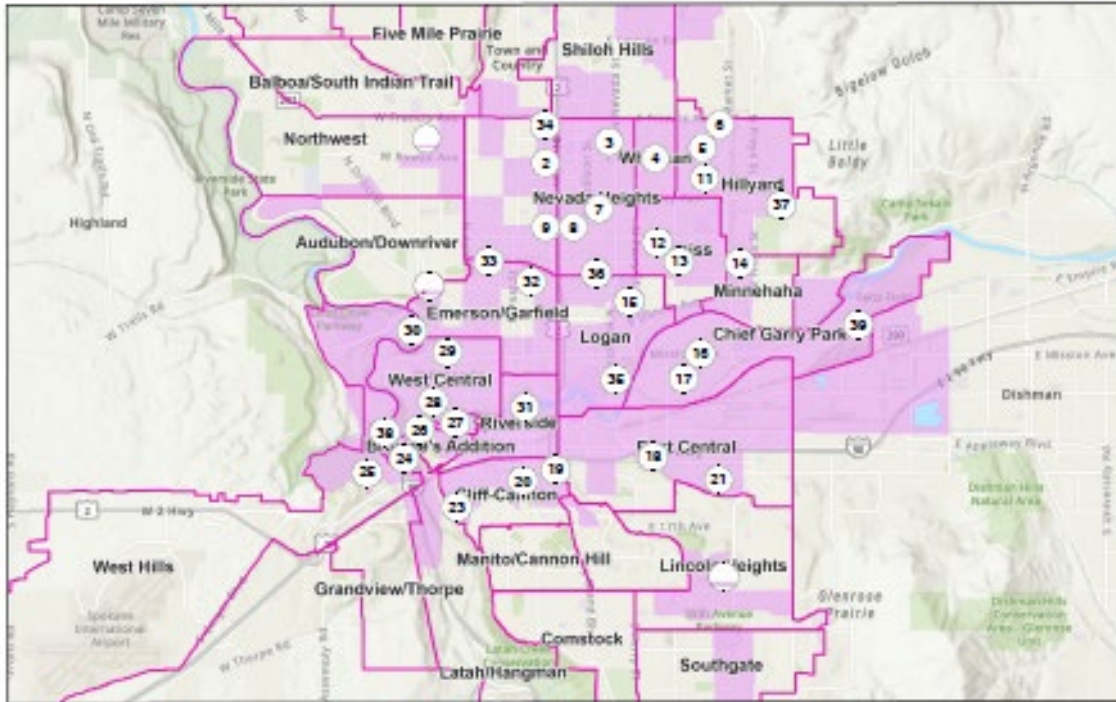
**Complete applications must be received by the CHHS Department by 5:00 p.m., March 14, 2025.**

#### **Evaluation Criteria:**

Projects will be evaluated based in part on conceptual soundness, financial feasibility, project readiness. A brief description concerning each factor is listed below.

- **Conceptual Soundness** - The project addresses the 2025 CDBG Neighborhood allocation funding priorities. The project meets all threshold and eligibility requirements of the CDBG program. CHHS staff will confirm that the project meets all threshold and eligibility requirements. The project design and scope of work is thoughtful and complete, detailing all improvements requested. The requested improvements are needed and necessary as described in the project summary. The applicant has clearly described how the requested improvements will benefit low-to-moderate income households in the neighborhood.
- **Financial Feasibility** - Estimates and costs are reasonable and align with Parks and Recreation department’s cost estimates. Documentation of any other leveraged funding is included if applicable. Parks staff to confirm that budget will cover costs of proposed project.
- **Readiness** - The project scope and budget indicate that the project can be completed between July 1, 2025, and June 30, 2026. Parks staff to confirm that schedule is possible.

# APPENDIX A – LMI ELIGIBLE PARKS



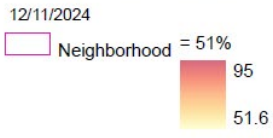
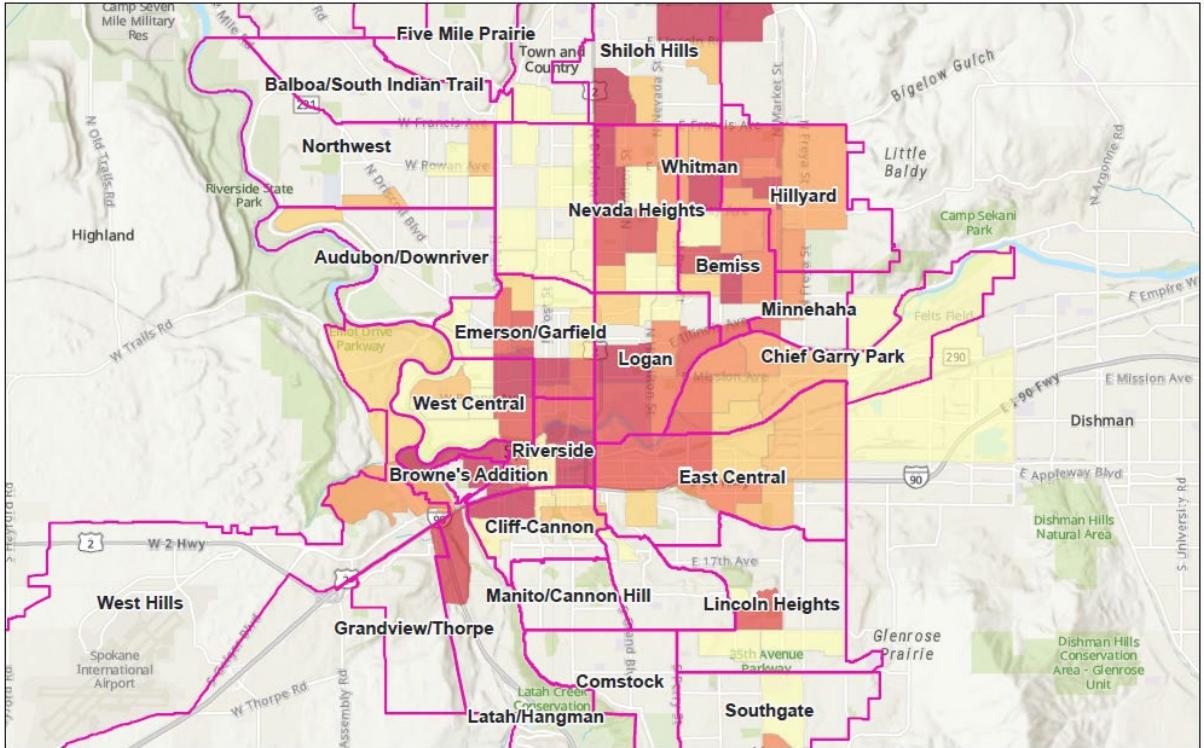
<51% NEIGHBORHOOD HOUSEHOLD INCOMES AT OR BELOW 80% AREA MEDIAN INCOME.

## CITY OF SPOKANE LMI PARK LOCATIONS

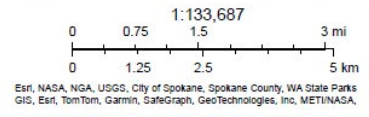
### City of Spokane Parks within LMI Zone

Code	Park Name	Code	Park Name
2	FRANKLIN PARK	21	UNDERHILL PARK
3	NEVADA PARK (CHIEF GARRY MIDDLE SCHOOL)	23	POLLY JUDD PARK
4	ROCHESTER HEIGHTS PARK	24	HIGHBRIDGE PARK
5	HILL JAMES PARK (JIM HILL)	25	WHITTIER PARK
6	HARMON PARK	26	REDBAND PARK
7	GLASS PARK	27	PEACEFUL VALLEY PARK
8	BYRNE PARK	28	DUTCH JAKES PARK
9	B.A. CLARK PARK	29	A.M. CANNON PARK
11	KEHOE PARK		THREE ISLANDS CONSERVATIONS AREA
12	HAYS PARK	30	AREA
13	COURTLAND PARK (BEMISS)	31	RIVERFRONT PARK
14	WILDHORSE PARK	32	CORBIN PARK
15	LOGAN PEACE PARK	33	EMERSON PARK
16	CHIEF GARRY PARK	34	RUTH PARK
17	STONE PARK	35	MISSION PARK
18	LIBERTY PARK	36	FAIRVIEW PARK
19	COWLEY PARK	37	LOREN KONDO PARK
20	EDWIDGE WOLDSON PARK	38	PEOPLE'S PARK
		39	PARKWATER PARK

# APPENDIX B – LOW-TO-MODERATE INCOME AREA DATA – CITY OF SPOKANE



World Hillshade



## APPENDIX C – CITY OF SPOKANE HOUSEHOLD INCOME LIMITS

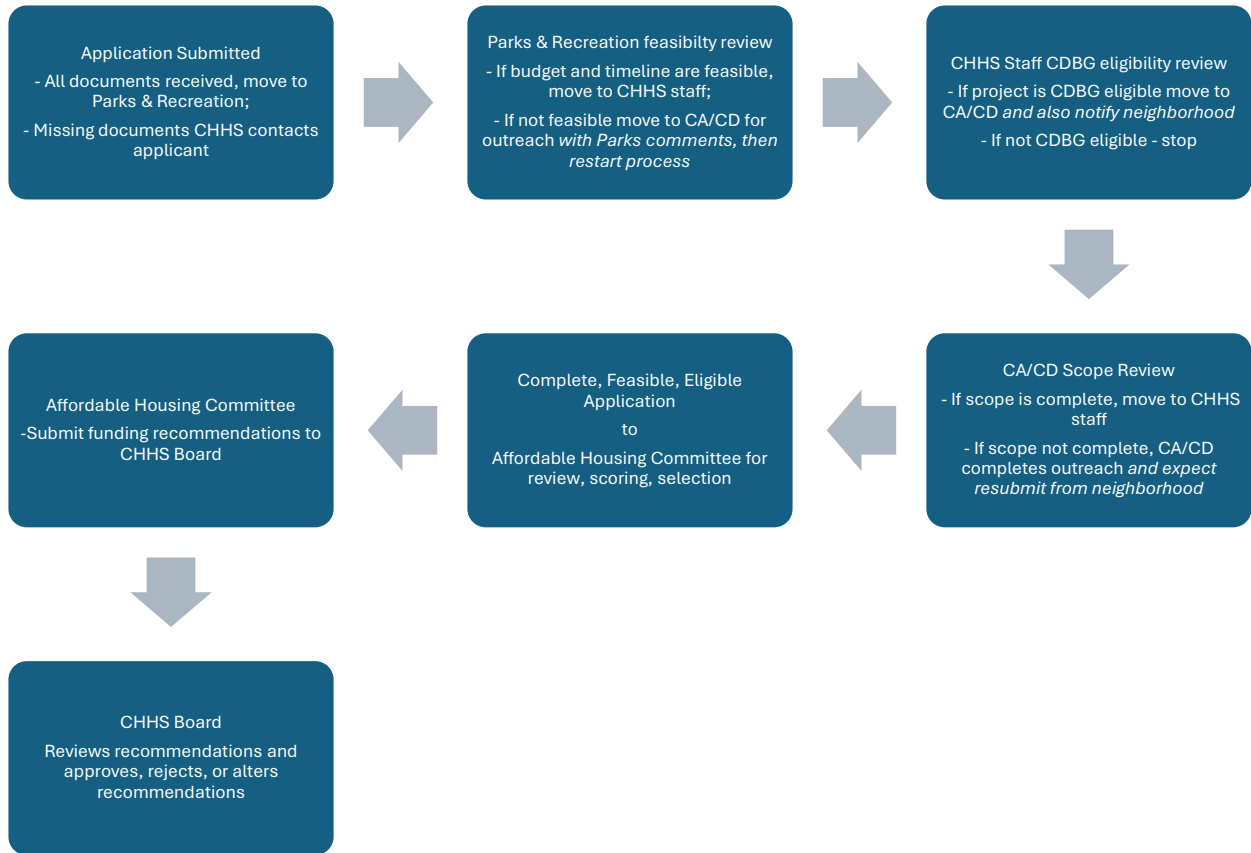
<b>2024 HUD MEDIAN FAMILY INCOME LIMITS FOR CITY OF SPOKANE</b>								
Effective June 1st, 2024								
<b>Household Size</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>	<b>8</b>
Extremely Low (30%) Income Limits	\$20,550	\$23,500	\$26,450	\$29,350	\$31,700	\$34,050	\$36,400	\$38,750
Very Low (50%) Income Limits	\$34,250	\$39,150	\$44,050	\$48,950	\$52,900	\$56,800	\$60,700	\$64,600
Low (80 %) Income Limits	\$54,800	\$62,650	\$70,500	\$78,300	\$84,550	\$90,850	\$97,100	\$103,400

## APPENDIX D – CDBG PUBLICLY OWNED STRUCTURES - INELIGIBLE ACTIVITIES

### **24 CFR 570.207(b)(2)(i)**

“Maintenance and repair of publicly owned streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for persons with a disabilities, parking and other public facilities and improvements. Examples of maintenance and repair activities for which CDBG funds may not be used include the filling of pot holes in streets, repairing of cracks in sidewalks, the mowing of recreational areas, and the replacement of expended street light bulbs;”

# APPENDIX E – APPLICATION REVIEW PROCESS





## APPENDIX F – CONFLICT OF INTEREST

In allocating funds for CDBG, the City of Spokane relies on the substantial expertise available from private and public sector individuals who have agreed to volunteer their time. The City recognizes that these individuals, and the entities with which they are associated, may have an interest in applying for the funding made available through this program. While the City recognizes the need to protect against the exercise of undue influence in obtaining benefits made available through this program, the program should be available to those who have the experience, expertise, and willingness to undertake the development of critically needed services for low-income, Spokane residents. At the same time, it is necessary to ensure that the City retains its ability to call upon residents to assist in the ongoing development of the program, without requiring them to forego possible benefits from the program.

The conflict in a conflict of interest exists when there is a perception of conflict regardless of whether a particular individual is influenced by a secondary interest. If the circumstances are reasonably believed (based on experience and objective evidence) to create a risk that decisions made may be unduly influenced by other interests, then a conflict does exist. Any conflict of interest must be disclosed, and the appropriate procedures must be followed. A conflict of interest may be classified as one of the following:

**Primary and Material Conflicts of Interests** - A project will not be eligible if any of its sponsors, owners, or members of their households or immediate families are directly involved in the evaluation and funding determinations under the program. These include, but are not limited to: 1) members of the Spokane City Council or staff, the CHHS Affordable Housing Committee, CHHS Human Services Committee, the CHHS Board; 2) staff members of the City of Spokane Community, Housing, and Human Services; staff members of the City of Spokane Parks and Recreation; 3) members, staff members, or family members of any developer consultant or developer membership group; 4) members of any other state or local government unit that has regulatory involvement in the development, site, or approval of the project; and 5) board members and employees of any organization under contract or retained by the City to manage, advise, or assist in the program for compensation.

**Remote Conflicts of Interest** - A project owner or sponsor must adhere to the following procedures when they or a member of their household or immediate family are directly involved in the management of or serves in a decision or policy making capacity with the program. In addition, these procedures must be adhered to if the sponsor is a membership group, corporation or partnership and there is a director, officer, partner, or shareholder who is directly involved in the management of or serves in a decision or policy making capacity with the program. Under such circumstances, the project sponsor or owner must:

1. disclose in writing the existence and extent of a conflict of interest and the individual, or group's interest in the project to the program staff and/or Director of the City of Spokane Community, Housing, and Human Services Department;
2. the individual, or group with a conflict of interest must remove himself/herself from all involvement in the process of evaluating and determining whether the project is eligible for, and/or approved for, funding;

3. the individual, or group with a conflict of interest must refrain from influencing any other person involved in evaluating and/or determining whether the project is eligible for, and/or approved for, funding; and/or
4. an individual, or group with a conflict of interest regarding project proposals under consideration will not vote on or rank projects during the funding round in which his/her project is being considered.

The application includes a conflict-of-interest form to be used in disclosing conflicts of interest. All owners/developers/sponsors/providers must review and complete the form. The CHHS Director will consult with City Legal regarding all potential conflicts of interest and will make decisions concerning conflict of interest issues on an individual basis.

## APPENDIX G – 2025-2029 CONSOLIDATED PLAN GOALS

Through extensive public engagement, the City of Spokane identified the following four goals, and associated priorities for CDBG, HOME, and ESG funded activities. These goals and priorities will guide the City of Spokane in spending the yearly formula grants awarded by HUD. The City of Spokane will identify which CDBG priorities will be funded in each funding round. Not all priorities will be funded every year. However, to receive funding every project selected must meet at least one of the following goals.

Goal	Priorities
Increase access to essential services for low- and moderate-income households and neighborhoods in the City of Spokane.	Public services <ul style="list-style-type: none"> <li>• Mental health services</li> <li>• Childcare services</li> <li>• Addiction treatment services</li> <li>• Supportive services for vulnerable populations (low-to-moderate income residents, persons living with disabilities, LGBTQIA+, etc.)</li> </ul>
Improve public/community infrastructure for low- and moderate-income households and neighborhoods.	Help for nonprofits Neighborhood improvements More and/or improved childcare facilities
Increase and preserve the stock of affordable housing options for low- and moderate-income households.	Affordable rental housing Affordable homeownership opportunities Housing repair and rehabilitation
Create and expand economic development opportunities for low- and moderate-income individuals.	Workforce development <ul style="list-style-type: none"> <li>• Job training programs</li> <li>• Employment opportunities</li> </ul> Microenterprise programs

## APPENDIX H - GENERAL INFORMATION AND CDBG REQUIREMENTS

The Community Development Block Grant (CDBG) Program provides annual grants on a formula basis to cities and urban counties to develop viable communities by providing decent housing and a suitable living environment, and by expanding economic opportunities, principally for low- and moderate-income persons. The program is authorized under Title 1 of the Housing and Community Development Act of 1974, Public Law 93-383, as amended; 42 U.S.C. 5301 et seq. The regulations implementing the CDBG Program are found at 24 CFR Part 570.

HUD awards grants to participating jurisdictions to carry out a wide range of community development activities directed toward revitalizing neighborhoods, economic development, and providing improved community facilities and services. Participating jurisdictions develop their own programs and funding priorities, but all activities must meet one of HUD's national objectives:

1. Benefit to low- and moderate-income (LMI) persons;
2. Aid in the prevention or elimination of slums and blight; and
3. Meet a need having a particular urgency (referred to as urgent need)

### NATIONAL OBJECTIVES

All projects are required to meet at least one of the following three national objectives:

1. **Primary benefit low- and moderate-income persons or households.** Low- and moderate-income (LMI) refers to those earning less than 80% area median income.
  - a. **Area Benefit** – Most commonly used category for community-wide activities. To qualify, an activity must benefit all residents within a defined geographic area (service area) where residents are predominantly (51% or more) low- and moderate-income based on the latest available [HUD Low- and Moderate-Income Map](#). (Select the new interactive map application)
  - b. **Limited Clientele** – A limited clientele activity benefits a specific sector of the community rather than all the residents in a particular area, of which at least 51% must be LMI persons. To qualify for this category the activity must meet one of the following criteria:
    - i. Collect information from participants about family size and income through intake forms to demonstrate that at least 51% of clientele do not exceed the LMI limits.
    - ii. Exclusively benefit clientele HUD has presumed are principally LMI, including abused and neglected children, seniors, severely disabled adults, persons experiencing homelessness, domestic violence survivors, illiterate adults, migrant farm workers, or persons living with HIV/AIDS.
  - c. **Housing** - This is an eligible activity undertaken for the purpose of providing or improving permanent residential structures that, upon completion, will be occupied by low- and moderate-income households. (Specific requirements dependent upon activity type.)
  - d. **Jobs** - These are eligible activities designed to create or retain permanent jobs, at least 51 percent of which (computed on a fulltime equivalent basis) will be made available to, or held by, low- and moderate-income persons
2. **Aid in the elimination of slum or blight conditions** – HUD has strict guidelines on how CDBG funds can address the condition of physical decay or deterioration in the communities

through targeted interventions. Only acquisition, clearance, relocation, historic preservation, and building rehabilitation activities qualify for this national objective.

3. **Meet an urgent community need** – Generally, this objective is only used in the case of recent serious natural disasters (e.g., earthquakes, hurricanes, etc.).

For this PY 2025 Neighborhood allocation application only city parks meeting the national objective of providing a primary benefit to low- and moderate-income persons or households, under the **Area Benefit** definition will be considered for funding.

### TIMELINESS

Jurisdictions receiving CDBG grants must carry out their programs in a timely manner, as measured by the rate of expenditure of funds. A jurisdiction receiving CDBG, in accordance with the CDBG regulations at 24 CFR 570.902, must have a balance no greater than one and one-half (1.5) times its annual grant remaining, 60 days prior to the end of the program year. HUD has a longstanding policy of reducing the next year's grant allocation of a grantee that continues to be untimely.

Jurisdictions that fail to meet the timeliness requirement two or more years in a row, are required to work with HUD on plans to become compliant with the requirement. The City of Spokane is currently working with HUD to meet the timeliness requirement. The City and HUD agreed that the City will:

- Require mandatory technical assistance for CDBG applicants
- Clearly articulate the spend down requirements in new RFPs for all potential applicants
- Conduct quarterly reviews of all CDBG subrecipients for performance, including spend down as a performance metric
- De-obligate non-performing projects, and re-program funds into performing projects
- Limit contract extensions

### ELIGIBLE ACTIVITIES

To be considered an eligible activity, the following conditions must be met:

1. The proposed activity meets a HUD National Objective
2. The proposed activity falls under an identified goal in the 2025-2029 Consolidated Plan
3. The proposed activity for the Neighborhood allocation must be eligible based on the selected CDBG criteria below

#### Categories of Eligible Activities

Category	Definition	Application Type
Public Facilities and Improvements	Acquisition, construction, reconstruction, rehabilitation, or installation of public improvements or facilities. Facilities must be publicly owned or traditionally provided by the government, or owned by a nonprofit, and operated to be open to the general public.	Capital

## INELIGIBLE ACTIVITIES

The general rule is that any activity not specifically authorized under the CDBG regulations and statute is ineligible to be assisted with CDBG funds. In addition, the regulations stipulate the following activities may **not** be assisted with CDBG funds:

- Buildings for the general conduct of government. However, the removal of architectural barriers from government buildings is eligible under the category of public facilities and improvements.
- General government expenses
- Financing for religious activities
- Financing for political activities or to engage in other partisan political activities are ineligible. However, a facility assisted with CDBG funds may be used on an incidental basis to hold political meetings, candidate forums, or voter registration campaigns, if the building is available to all community organizations on an equal basis.
- Purchase of equipment, with the following exceptions:
  - Compensation for the use of construction equipment through leasing, depreciation, or use allowances is eligible
  - Fire protection considered an integral part of public facilities is eligible. This includes fire engines, specialized tools, life-saving equipment, and protective clothing worn by firefighters.
- Purchase of personal property, including equipment, fixtures, motor vehicles, furnishings, or other personal property
- Operating and maintenance expenses (of public facilities, improvements, and services), with the following exception:
  - Operating and maintenance expenses associate with public service activities, interim assistance, and office space for program staff employed in carrying out CDBG activities
- New housing construction, except under certain conditions or when carried out by a Community-based Development Organization (CBDO)
- Income payments made to an individual or family for items such as food, clothing, housing, or utilities

## ELIGIBLE APPLICANTS

1. Formally recognized Neighborhoods as listed at:  
<https://my.spokanecity.org/neighborhoods/councils/>
2. The activity (or activities) proposed by the applicant must meet one of the CDBG National Objectives and meet all eligible activity criteria
3. The activity (or activities) must respond to the needs of the City of Spokane, as outlined in the 2025-29 Consolidated Plan
4. The applicant must not have an inherent conflict of interest and must have no part in the net earnings of the City of Spokane, Parks and Recreation, or have any decision-making authority regarding the selection of activities for funding.

## ELIGIBLE COSTS

According to basic regulations in the Omnibus Circular, a cost is allowable under the CDBG program if the expenditure is:

**Necessary, reasonable, and directly related to the grant.**

The standard applies equally to:

- Salaried and administrative services contracts
- Real property and equipment purchase or leases
- Publication costs for electronic and print media, including distribution, and promotion
- Travel and other administrative expenditures

**Authorized by the grantee.**

The City of Spokane authorizes expenditures by approving the budget for the activity.

**Not prohibited under federal, state, or local laws or regulations.**

See “Ineligible Activities”.

**Consistently treated.**

The subrecipient must apply generally accepted accounting principles (GAAP) in computing the cost and use the same procedures in calculating costs for its non-Federally assisted activities.

**Allocable to the CDBG program.**

A cost is allocable to a specific cost objective (e.g., grant, program, or activity) in part to the relative benefits received by that objective ([2 CFR 200.405\(a-e\)](#)):

- If an office is used by two programs during the same hours, the costs of the office should be allocated between the two programs equally.
- The same expense cannot be claimed against more than one grant (i.e., double billing is prohibited).
- A cost originally allocable to a specific Federal grant program cannot be shifted to another Federal grant program to overcome funding shortages, avoid restrictions imposed by the grant or law, or any other reasons.
- In accordance with the guidance found in [2 CFR Part 200, Subpart E](#), the structure of direct and indirect costs must be clear. There is no universal rule for classifying certain costs as either direct or indirect under every accounting system. Therefore, it is essential that each item of cost incurred for the same purpose be treated consistently either as a direct or indirect cost.
  - *Direct costs* are directly related to a specific cost activity, as noted in [2 CFR 200.413\(a-f\)](#).
  - *Indirect costs* are for common objectives that benefit more than one activity (e.g., salaries and executive officers, accounting and auditing, other costs of general administration) as noted in [2 CFR 200.414\(a-g\)](#).
  - For major nonprofit organizations, indirect costs must be classified within two broad categories: Facilities and Administration as noted in [2 CFR 200.414\(a\)](#). For such organizations, indirect costs must be supported by an indirect cost proposal/allocation plan approved by the Cognizant Agency, on behalf of all Federal agencies (see [2 CFR 200.1](#)).

**Net of all applicable credits.**

Any credits such as purchase discounts or price adjustments must be deducted from the total costs charged. Subrecipients are not allowed to make a profit from any costs charged to CDBG funds ([2 CFR 200.406\(a-c\)](#)).

## RULES AND REGULATIONS

CDBG applicant must adhere to all federal guidelines and administrative requirements outlined in [2 CFR part 200](#) and [24 CFR Part 570 -- Community Development Block Grants](#). 2 CFR part 200 is the primary source for guidance on administration and financial management. Whereas 24 CFR part 570 outlines all CDBG program specific regulations. These regulations and requirements are also applicable to all subawards or sub-contractors. In the case of the Neighborhood allocation for PY 2025, the City of Spokane Parks and Recreation department will be required to comply with the regulations.

### Equal Opportunity and Fair Housing Accessibility Laws

Require that CDBG subrecipient administer their project in a manner that affirmatively furthers equal opportunity and fair housing. All CDBG grantees will be required to undertake specific activities to further fair housing. CDBG grantees must assure all activities and services are accessible to persons with disabilities.

The Fair Housing Act requires HUD and its recipients of federal financial assistance to do more than simply not discriminate; they must take meaningful actions to overcome patterns of segregation and foster inclusive communities.

### Lead-Based Paint

For all projects involving rehabilitation, acquisition, disposition, homebuyer assistance, leasing, support services, operations, or tenant-based rental assistance in federally owned residential property or other housing receiving federal assistance, the SUBRECIPIENT agrees to follow all requirements of the federal regulation at 24 CFR 570.608, and 24 CFR Part 35, Subpart B.

### Audit

Agencies receiving CDBG funds are required to submit an independent audit or an A133 single audit.

- **Agencies expending less than \$1,000,000 of federal funds** annually must submit an independent audit of their organization's financial statements.
- **Any agency expending more than \$1,000,000 or more of federal funds** must meet all federal single audit requirements as outline in 2 CFR Part 200. A single audit includes a financial audit and an audit of compliance with federal regulations.

### The Uniform Relocation Assistance and Real Property Acquisition Polices Act of 1987

Applies to federally assisted activities that involve acquisition of real property or the displacement of persons, including displacement caused by rehabilitation and demolition activities. Any person or business displaced as a direct result of federal assistance must be provided with the Uniform Relocation benefits.

### Section 3 Clause

When the total amount of federal assistance for a project exceeds the threshold of \$200,000, Section 3 applies. Section 3 is applicable to projects involving housing rehabilitation, housing construction, and other public construction projects assisted with HUD funds.

The Section 3 program requires recipients of HUD funding to direct employment, training, and contracting opportunities to low-income individuals and the businesses that employ these persons



within their community. Section 3 is a provision of the HUD Act of 1968 and is found at 12 U.S.C. 1701u. The regulations are found at 24 CFR Part 75.

#### Environmental Review requirements

All projects awarded CDBG funds are subject to an environmental review conducted by the City of Spokane CHHS department after a project is recommended for funding. A project may not begin until final environmental review is complete and a Notice to Proceed is issued.

#### Build America, Buy America (BABA)

The SUBRECIPIENT must comply with the requirements of the Build America, Buy America (BABA) Act, 41 USC 8301 note, and all applicable rules and notices, as may be amended, if applicable to the Subrecipient's infrastructure project. Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver.

#### Davis-Bacon and related acts

The SUBRECIPIENT agrees to comply with the requirements of the Secretary of Labor in accordance with the Davis-Bacon Act as amended, the provisions of Contract Work Hours and Safety Standards Act (40 U.S.C. 327 et seq.) and all other applicable Federal, state, and local laws and regulations pertaining to labor standards insofar as those acts apply to the performance of this Agreement. The Subrecipient agrees to comply with the Copeland Anti-Kick Back Act (18 U.S.C. 874 et seq.) and its implementing regulations of the U.S. Department of Labor at 29 CFR 5. The Subrecipient shall maintain documentation that demonstrates compliance with hour and wage requirements of this part. Such documentation shall be made available to the Grantee for review upon request.

The SUBRECIPIENT agrees that, except with respect to the rehabilitation or construction of residential property containing less than eight (8) units, all contractors engaged under contracts in excess of \$2,000.00 for construction, renovation, or repair work financed in whole or in part with assistance provided under this contract, shall comply with Federal requirements adopted by the Grantee pertaining to such contracts and with the applicable requirements of the regulations of the Department of Labor, under 29 CFR 1, 3, 5 and 7 governing the payment of wages and ratio of apprentices and trainees to journey workers; provided that, if wage rates higher than those required under the regulations are imposed by state or local law, nothing hereunder is intended to relieve the Subrecipient of its obligation, if any, to require payment of the higher wage. The Subrecipient shall cause or require to be inserted in full, in all such contracts subject to such regulations, provisions meeting the requirements of this paragraph.

#### Procurement

Subrecipient shall maintain and follow procurement policies and procedures in accordance with 2 CFR 200 subpart D, for all purchases funded by federal funds.

#### Change of Use Restrictions

All public facilities improved by CDBG funds must be used for their approved purpose and meet the approved national objective until five years after the project has been completed and closed in HUD's Integrated Disbursement and Information System (IDIS).

## APPENDIX I – RFP APPEAL PROCESS

CHHS has established a Request for Proposal (“RFP”) Appeal Process.

Applicants will be notified as to the status of their application via an “Application Status” email sent to the email addresses provided for the contacts listed in the application.

Applicants must request a debrief conference with a member of the selection committee prior to submitting an appeal for consideration. The request for a debrief must be received within three (3) business days after the “Application Status” email is sent to the Applicant.

Send requests for a debrief session to any of the following:

**Email:** [chhsrfp@spokanecity.org](mailto:chhsrfp@spokanecity.org)

**Or Mail:**

ATTN: CHHS Operations Manager  
Spokane City Hall, 6<sup>th</sup> Floor  
808 W. Spokane Falls Blvd  
Spokane, WA, 99201

**Or Phone:** 509-625-6009

Discussion at the debriefing conference is strictly limited to the following:

- Evaluation and scoring of that Applicant’s Application.
- Any written comments from evaluators related to that Applicant.
- Review of Applicant’s final score. This information is publicly posted.

The selection committee members will not discuss any items other than the three bullet points above. Debriefing conferences may be conducted on the telephone or by other electronic means and will be scheduled for a maximum of thirty (30) minutes. Inappropriate or hostile behavior will result in the termination of the debriefing session.

Appeals may be filed only by Applicants who submitted a response to this RFP and who have participated in a debriefing conference.

Upon completing the debriefing conference, the Applicant is allowed five (5) business days to submit a written appeal to the CHHS Operations Manager. Written appeals must be received no later than 5:00 pm Pacific time on the fifth business day following the debriefing. The written appeal should be addressed to the CHHS Operations Manager, signed by the applicant, and submitted in one of the following ways:

**Email:** [chhsrfp@spokanecity.org](mailto:chhsrfp@spokanecity.org)

Subject line should clearly state “APPEAL of RFP Funding Decision”

**Or Mail:**

ATTN: CHHS Operations Manager  
Spokane City Hall, 6<sup>th</sup> Floor

808 W. Spokane Falls Blvd  
Spokane, WA, 99201

The appeal must identify the RFP, the grounds for the appeal from the list below with specific facts, and complete statements of the action(s) being appealed. A description of the relief or corrective action being requested should also be included.

Only appeals stipulating an issue of fact concerning the following subjects will be considered:

- A matter of bias, discrimination, or conflict of interest on the part of an evaluator;
- Errors in computing the score;
- Non-compliance with procedures described in this RFP, CHHS, or federal policy.

Appeals will be dismissed as without merit if they address issues such as an evaluator's professional judgment on the quality of an application, or the City's assessment of its own and/or other agencies' needs or requirements.

Scores received are not a valid basis of appeal and will be dismissed as without merit unless included with facts supporting bias, discrimination, or conflict of interest on the part of an evaluator.

The written appeal will be reviewed by the CHHS Director. The CHHS Director is not involved in the award process. The CHHS Director will consider the record along with all available facts and issue a final decision within ten (10) business days of receiving the appeal.

The final determination of the appeal shall:

- Find the protest lacking in merit and uphold the selection committee's action; or
- Find only technical or harmless errors in the selection committee's process and determine the selection committee to be in substantial compliance and reject the protest; or
- Find merit in the protest and provide the selection committee options which may include:
  - Correct the error(s) and re-evaluate all applications, or
  - Cancel this RFP and begin a new process, or
  - Make other findings and determine other courses of action as appropriate.