

ADDENDUM NO.3 Notice of Funding Availability

Workforce Training Program

Community Development Block Grant-Disaster Recovery Puerto Rico Department of Housing

CDBG-DR-NOFA-2020-02

This addendum consists of twelve (12) digital size pages (8.5" x11").

This Addendum is hereby included in, and made part of, the Notice of Funding Availability CDBG-DR-NOFA-2020-02 for the Workforce Training Program (WT or Program) dated March 30, 2020 (NOFA). All requirements and provisions of the amended NOFA for the WT Program under CDBG-DR shall remain in full force and effect except as amended by this Addendum. This Addendum only provides answers to questions related to the WT Program. If there are questions related to other programs and NOFAs, please refer directly to those programs and NOFAs.

In accordance with the NOFA, the PRDOH is issuing this Addendum to address questions posed by prospective Applicants regarding the NOFA and provide responses related thereto. Please note that in addition to addressing questions posed by prospective Applicants, this addendum contains revisions to the Funding Opportunity Description Section, the Program Description Section, Number of Awards and Maximum Award Information Section, and the Evaluation Committee Section.

NOFA Section 1

<u>Question #1</u>: In the case of for-profit entities authorized under provision 24 C.F.R. § 570.201 (o) and are not currently excluded. Can you explain what you mean by saying "and are not currently debarred"?

Answer: Organizations that are not currently debarred refers to organizations that are not excluded or prohibited from applying to government funded programs. You may refer to Exhibit E of the NOFA.

NOFA Section 3.8

<u>Question #1</u>: Is there a set percentage in the event that a participant, for justified reasons, could not complete any phase? In this case, what aspects will be taken into account for the payment or deduction? Could it be the time invested in the participant?

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 2 / 12

Answer: No, there is not a set percentage defined for a program completion rate. If participants do not complete the program we ask you to provide documentation on the individual, what was completed, what was not completed, and a basic explanation. For payment, this program has a reimbursement structure. Therefore you will be able to submit an invoice for work completed while the individual was still engaged in the program.

NOFA Section 3.10

Question #1: As an institution requesting funds, must we comply with the requirement of the WMBE certification, because our institution is made up of 90% women? How do we have access to this certification and registered companies? Currently 95% of the companies we serve are managed by women; Would these companies have to have the MWBE certification?

Answer: No, your organization, as a subrecipient of WT Program funding, does not have to individually comply with the MWBE certification.

The MWBE goals apply when you are seeking to subcontract work. PRDOH has published Section 3 policy guidance and MWBE policy guidance on their website in both English and Spanish.

Please feel free to review the PRDOH policies available at the links below and pressing the download button:

MWBE English Policy - https://www.cdbg-dr.pr.gov/en/download/mwbe-policy/
Section 3 English Policy - https://www.cdbg-dr.pr.gov/en/download/section-3-policy/

PRDOH will provide training for Section 3, MWBE, and Fair Housing and Equal Opportunity federal requirements which apply to the use of CDBG-DR funding. This extensive training program begins once you are awarded funding. Reporting on these two compliance areas – Section 3 and MWBE- is mandatory for all subrecipients of CDBG-DR funding.

<u>Question #2</u>: By submitting the compliance plan, would we be classified as a registered or eligible corporation?

Answer: No, the PRDOH does not issue a MWBE certification or registration. The document MWBE Utilization Plan is a document that helps recipients of CDBG-DR funds identify subcontracting opportunities they could make available to minority or women owned businesses. Completing this form does not provide you that status of a registered corporation.

PRDOH will be providing Subrecipients training on MWBE and Section 3.

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 3 / 12

NOFA Section 5.2

Question #1: The proposal must be submitted on 07/01/2020 or can it be submitted at any time on or before 07/01/2020?

Answer: The online application can be submitted from June 1, 2020 until July 1, 2020.

NOFA Section 6.1

<u>Question #1</u>: PRDOH will review the budget proposal to determine whether the Applicant has proposed a reasonable budget and fee structure to accomplish the proposed services.

Please clarify what you mean and if there is a form for the "fee structure".

Answer: A reasonable budget refers to cost guidelines established for recipients of Federal awards. A cost is considered reasonable if it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost. These are further explained in section 7 (Cost Principles) of the Cross Cutting Guidelines which can be found at https://www.cdbg-dr.pr.gov/en/download/cross-cutting-guidelines/. Fee structure refers to the costs associated with running your program. You can refer to Exhibit I Budget Proposal for more information on program budgets.

NOFA Section 6.2

<u>Question #1</u>: We request clarification if something more than a Certificate of Incorporation and compliance it is required, or if we can submit some other document because the focus of section 6.2 is on non-profit entities and according to section 3.2 authorized for-profit entities are allowed under provision 24 CFR § 570.201 (o).

Answer: If you are a for-profit entity we ask you to carefully review, and be prepared to provide proof that you meet the criterial outlined in provision 24 C.F.R. § 570.201 (o) before applying to this program.

NOFA Section 7

<u>Question #1</u>: Could you expand on what is meant by "cost benefit and resiliency" in the answer to the application evaluation?

Answer: Cost benefit refers to how much your proposed program will cost versus how much benefit each program participant will receive. Resiliency refers to what plans your organization and your proposed program has in place to allow for continuity of business operations in the event of power outages, natural disasters, or other disruptive events.

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 4 / 12

Other Questions

<u>Question #1</u>: Regarding the Training Program, I would like to know if spending time for curriculum planning and development is an allowable expense during the grant?

Answer: No, it is not an allowable expense. As stated in section 5.2 of the WT Program Guidelines, applicants, "[m]ust be running an existing training program with proven capacity or have a training curriculum developed for a new or expanded training program."

Question #2: We would like to be able to identify where we can access the link to upload/write the proposal. We will appreciate it if you can send it to us.

Answer: You will not be able to view the full application until the Application Submission Start Date on June 1, 2020.

<u>Question #3</u>: Can the premises used for the Job Training grant also be used to offer other educational services when it is not being used for job training courses? Would the grant pay the rent in full or part?

Answer: CDBG-DR Program funding is to be used only for the support of Program participants. As stated in Section 3.4 of the WT Program NOFA eligible expenses include rent and utilities that are directly related to executing a training program.

Organizations can use the space for other purposes, but must be able to explain what percent of time the space is used for CDBG-DR funded programing and what percent is used for other programming and invoice accordingly.

<u>Question #4</u>: Do the premises have to be ADA Compliant or can they be on a second floor?

Answer: Yes. As stated in Section 14 (Civil Rights and Non-Discrimination) of the Cross Cutting Guidelines, which are applicable to all PRDOH programs:

Section 109 of the Housing and Community Development Act of 1974, as amended, supra, requires that no person in the United States shall on the grounds of race, color, national origin, religion, or sex be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance made available pursuant to the Act. Section 109 also directs that the prohibitions against discrimination on the basis of age under the Age Discrimination Act and the prohibitions against discrimination on the basis of disability under Section 504 shall apply to programs or activities receiving Federal financial assistance under Title I programs. The policies and procedures necessary to ensure enforcement of Section 109 are codified in 24 C.F.R. § part 6. See 24 C.F.R. § 570.602

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 5 / 12

Question #5: Can you buy a parking lot within Phase 2?

Answer: We have not finalized the Phase 2 program design, so we are not able to comment on this question at this moment.

<u>Question #6</u>: In phase 2, can you request for a cistern, a power plant, solar panels, among other equipment to make the facilities more resilient to a natural disaster?

Answer: We have not finalized the Phase 2 program design, so we are not able to comment on this question at this moment.

Question #7: How long are the reimbursements for the Job Training program?

Answer: The invoicing period can take approximately from forty-five (45) to ninety (90) days for reimbursement.

<u>Question #8</u>: Is there a minimum or maximum number of participants that we must impact in Job Training?

Answer: No, there is not a minimum or maximum number of participants required in your training program. Programs should state their expected capacity and show that they are able to meet the need expected.

<u>Question#9</u>: Are the Job Training participants required to leave with any certification leading to a degree or can they be provided with short courses that do not require certification?

Answer: While it is not required to provide certifications or degrees at the completion of a training program, providing certifications, accreditations, or other credentials that program participants will receive upon successful completion of the training will be scored positively during the Evaluation Period, as described in Section 6.3 of the NOFA.

If you do not provide certifications, we ask applicants to make efforts to show how their training will allow trainees to be more competitive in the job market.

<u>Question #10</u>: Pursuant to the second amendment to the Notice of Availability of Funds, the deadline to submit an application under the WTP is July 1, 2020. Correct?

Answer: Yes, the deadline to submit an application for the WT Program is July 1, 2020.

Question #11: If after August 2020, which is the estimated date, the Subrecipient Agreements are signed with those applicants that were chosen under the WT Program, the chosen business continues to be closed as a consequence of the executive order of the Government of Puerto Rico to prevent COVID- 19:

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 6 / 12

- Will the funds that have been obligated be withheld in favor of that applicant and then disbursed when they can reopen? or,
- How would you handle this situation?

Answer: If Subrecipients are not able to begin programming due to the executive order of the Government of Puerto Rico to prevent COVID-19, PRDOH will work to find an appropriate solution for programming needs, or modifications of programming timing, with the individual Subrecipient on a case-by-case basis.

Question #12: Our University is a non-profit corporation dedicated to being a Higher Education Institution. The University has a unique employer social security, however, it is divided into three campuses. Each site has its own DUNS ID, and as a custom and use, each site submits their respective proposals, to federal, state, and private entities using their own DUNS ID.

In this particular case, one of our campuses is interested in submitting a project to the Workforce Training Program and the Incubator Program.

The question is:

- 1. Can each campus submit its own proposal separately with its respective DUNS ID (given the scenario I explained to you), and,
- 2. If the first question is affirmative, can the same campus submit more than one proposal (from different schools) with the same DUNS ID)?

Answer: Yes, each campus or program can submit its own proposal separately with its respective DUNS number. The entity however cannot receive more than five million dollars (\$5,000,000) in funding through the WT Program, including future program phases or offers.

<u>Question #13:</u> The document entitled Notice of Funding Available for the Workforce Training Program that was downloaded from the website <a href="https://cdbg-dr.pr.gov/en/download/notice-of-availability-of-funds-nofa-for-work-force-training/does not contain the annex and exhibits referenced in the table of contents."

Are they going to be sent?

Answer: The exhibits referenced in the table of content are all available for download online at the following link: https://cdbg-dr.pr.gov/en/workforce-training/

<u>Question #14</u>: I have read all the information in the call, the annexes, etc., etc. and cannot find access to the application form, the "application", online or otherwise.

How do I prepare the proposal if I can't see the questions?

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 7 / 12

Answer: The application is not open yet. You will not be able to view the full application until the Application Submission Start Date on June 1, 2020. The questions though, are all based directly on the scoring criteria provided in section 6.3 of the NOFA. We recommend you be prepared to respond to each bullet point included therein.

<u>Question #15</u>: We would like to clarify if a Training Program for Agricultural Entrepreneurship, Agricultural Construction and Technology, Food Safety can be considered an area of need for the reconstruction and economic Development of Puerto Rico therefore eligible for this proposal.

Answer: The industries mentioned may be eligible to apply to the WT Program, though some may be better suited to the Small Business Incubators and Accelerators Program, which has released its own NOFA, or the Re-Grow PR Urban-Rural Agriculture Program, which is in development. More information on both programs can be found on the CDBG-DR website.

Small Business Incubators and Accelerators Program: https://www.cdbg-dr.pr.gov/en/download/small-business-incubators-and-accelerators-program/Re-Grow PR Urban-Rural Agriculture Program: https://www.cdbg-dr.pr.gov/en/download/re-grow-pr-urban-rural-agriculture-program/

We recommend you carefully review the WT Program Guidelines and NOFA to make sure that your specific organization meets the eligibility requirements and that your proposed program meets the application requirements.

This program is intended to assist people who are unemployed or under employed to find new and/or better employment opportunities. Your program may be eligible if it is intended to teach the trainees new skills which will support them in seeking new employment opportunities.

<u>Question #16</u>: Because there is no specificity of guidelines for Phase 2 should we include the proposed construction budget in this NOFA?

Answer: No, do not include the proposed construction budget for future program phases in this NOFA application.

<u>Question #17</u>: When calculating Planning and Development Cost for the training program can we use a unitary cost per participant ie. Cost per module \$3,000 for the 5 modules leading to certificate Total Cost \$15,000 per participant?

Answer: No, Funding for this Program will be distributed on a reimbursement basis for the eligible expense of grant funds, as supported by substantiated supporting documentation.

Selected Applicants will execute a Subrecipient Agreement with PRDOH which provides

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 8 / 12

direct reimbursement of costs associated with eligible activities defined in the WT Program Guidelines and in this NOFA. Costs incurred in the performance of the Program, as determined by HUD or PRDOH must be allowable, allocable, and reasonable in accordance with the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, 2 C.F.R. part 200, and the Grant Agreement. PRDOH reserves the right to reject funding requests for any cost outside of the scope of the Program.

<u>Question #18</u>: We would like to learn more details and offer examples of what is covered by the term: "Medical Services". It is found in Section 3 (Program Description) on page 7, Version 2 of the Program Guide.

Answer: We used the term Medical Services to be broad and encompassing; medical technicians, nursing assistants, and mental health service providers are a small set of examples. However, if you are able to demonstrate that your program will support the workforce of Puerto Rico, specifically in addressing identified training needs for physical or mental health providers, we encourage you to apply.

<u>Question #19</u>: Among our objectives related to the proposal, is to offer training to mental health professionals, such as psychologists and psychiatrists, on issues of anxiety management, among others, under an emergency such as hurricanes. To this end, we wish to validate that we can include internships and / or volunteers.

Answer: There is no restriction on who can participate in the program provided the program is designed to prepare Puerto Rican residents with the skills required to gain employment in industries that will drive the Island's economy over the next decade, and that it meets the eligibility requirements laid out in Section 3 of the WT NOFA.

<u>Question #20</u>: Validate being able to include the offer of training to employees of the Department of Health in subjects related to programs such as Excel, Power Point, among others, that reinforces the appropriate use of these resources and strengthens their job performance.

Answer: This program is intended to assist people who are unemployed or under employed to find new and/or better employment opportunities. Your program may be eligible if it is intended to teach the trainees new skills which will support them in seeking new employment opportunities.

<u>Question #21</u>: Will our company be able to offer specific Trainings in Construction Areas and/or Technology Areas? Is it not necessary to offer all the training or topics indicated in the CDBG document?

Answer: Correct. It is not necessary to offer all of the trainings indicated. Training in one field is sufficient.

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 9 / 12

<u>Question #22</u>: Does this proposal give us the possibility of making an Alliance with an Educational Institution, to divide the tasks? For example, the Educational Institution trains and certifies and our Company would be in charge of Administrative tasks.

Answer: There should be only one (1) entity as the applicant since the agreement with PRDOH will only be with one (1) entity. However, Applicants are welcome to support their programming using partner agencies, in which case, that entity will be required to establish and provide evidence of agreements with all partner entities.

Question #23: Do the ten thousand (10,000) characters include space or are they counted without space?

Answer: The ten thousand (10,000) characters does not include spaces.

<u>Question #24</u>: In the previous Addendum Question no. 4: A definition for job training is included in the WT Program Guidelines. Does this apply to NOFA?

After examining the CDBG-DR Program Guide, Workforce Training Program, March 26, 2020 (v.2), we did not find the definition of job training mentioned in question number 4. Could you clarify where the definition is?

Answer: As stated in Section 1 of the WT Program Guidelines:

Job training is defined in this Program as a method of skill development different from the types of learning typically delivered to students seeking high school diplomas or college degrees. Job training focuses primarily on the practical application of work-related skills rather than theoretical concepts. While there may be classroom learning, the focus of this type of training is specific to a current job or job opportunity. The training under this Program will teach specific tasks and may provide a competency certification versus teaching general concepts.

<u>Question # 25</u>: Is there a format, structure or specifications for the proposal and its content?

Answer: Section 5 (General Application Requirements) in the WT NOFA outlines the format, structure, or specifications for the application and its content. The application will be online and open from June 1, 2020 until July 1, 2020. It will be posted on the Workforce Training page of the CDBG-DR website:

https://cdbg-dr.pr.gov/en/workforce-trainning/

Question #26: What are the parameters under "proven capacity" as a background to the program?

Answer: If your organization is running an existing program you must demonstrate in your

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 10 / 12

application that you have the capacity to successfully train individuals in your field of study and that you have the capacity to expand your program to train more individuals or offer more courses of study. Potential ways to show capacity may include, but are not limited to, examples such as previous rates of placing participants in jobs or demonstrating sufficient qualified staff and facilities to expand operations, among other things.

Question #27: What are the Grant terms and conditions?

Answer: A sample grant agreement will be provided to each selected applicant. Terms and conditions include compliance with the Program Guidelines as well as all PRDOH and HUD requirements.

The Program Guidelines and Cross Cutting Guidelines can be found on the CDBG-DR website:

https://cdbg-dr.pr.gov/en/workforce-trainning/

<u>Question #28</u>: By participating in the program, would I have to share or deliver my intellectual property to you, or does it remain the property of the participant?

Answer: It is not anticipated that the eligible costs for this program will be directly related to the development of intellectual property.

However, if new IP is developed while using WT Program funding, said IP will be property of the CDBG-DR Program and the PRDOH.

Amendments to NOFA Sections:

The Funding Opportunity Description under the Funding Announcement Summary of the NOFA is hereby revised to read as follows and such changes shall be considered by Applicants:

"Funding Opportunity Description: In accordance with the PRDOH Action Plan, as amended, the WT Program was assigned forty million dollars (\$40,000,000) of CDBG-DR funds and currently has twenty million dollars (\$20,000,000) in available funds. However, because funds are provided through various allocations as detailed in the Action Plan approved by HUD, availability is subject to HUD's release of such funds. The selection of Applicants will be based on the complete funds assigned to the Program; however, initial awarding will be subject to the amount of funds available to the PRDOH at the moment of selection and award, as included in this document. Therefore, resulting Subrecipient Agreements entered into with awarded Applicants will be amended to the extent modifications in award quantities for each project are necessary when additional funds become available to the PRDOH. PRDOH reserves the right to award selected Applicants

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 11 / 12

in accordance with funds made available by HUD and based on any applicable statutory constraint at the time of award issuance. Under the conditions of this NOFA, it is the intent of PRDOH to award grant funds to eligible workforce training Applicants not to exceed five million dollars (\$5,000,000) total per Program participant.

..."

Section 3.1 Program Description of the NOFA is hereby revised to read as follows and such changes shall be considered by Applicants:

"3.1 Program Description

. . .

. . .

Additional funds may become available for award as a result of PRDOH's efforts to recapture unused funds, carryover funds, or availability of additional appropriated funds. Use of these funds is subject to statutory constraints. The funds announced in this NOFA cover various allocations as detailed in the Action Plan approved by HUD. Funding opportunities referenced in this NOFA, and all obligations of the PRDOH herein, are expressly subject to and conditioned upon the ongoing availability of funds, as well as the continued authority of the PRDOH to operate the CDBG-DR Program. The selection of Applicants will be based on the complete funds assigned to the Program; however, initial awarding will be subject to the amount of funds available to the PRDOH at the moment of selection and award, which is included in this document. Therefore, resulting Subrecipient Agreements entered into with awarded Applicants will be amended to the extent modifications in award quantities for each project are necessary when additional funds become available to the PRDOH. In the event that funds are not available to fund any, or all, activities offered herein, or if the PRDOH's authority to operate the CDBG-DR Program or act under this NOFA is eliminated, or in any way restricted, the PRDOH reserves the right, at its sole discretion, to amend, rescind, suspend, or terminate this NOFA and any associated funding pursuant to the provision set forth immediately above. This NOFA is not a commitment of funds to any activity or Applicant.

..."

Section 3.6 Number of Awards and Maximum Award Information of the NOFA is hereby revised to read as follows and such changes shall be considered by Applicants:

"Section 3.6 Number of Awards and Maximum Award Information

PRDOH estimates that at least one (1) or more awards may be issued. Maximum number of awards will be determined by the amount of funds available for the Program and the

ADDENDUM No. 3 CDBG-DR-NOFA-2020-2 Workforce Training Program Community Development Block Grant-Disaster Recovery Page 12 / 12

responses received. All awards are subject to the applicable funding restrictions contained in this NOFA.

- Maximum Total Award Amount per Program Participant: Eligible Applicants are eligible to receive not more than five million dollars (\$5,000,000) from the WT Program. This maximum award includes all services proposed under Phases One (1) and Two (2) combined.
- Award Adjustments: PRDOH reserves the right to adjust funding levels for each grantee. Once Applicants are selected for award, PRDOH will determine the total amount to be awarded based upon the scope of services to be provided, funds available, and other factors that PRDOH may determine. It is possible that not all awardees will receive the maximum amount as funding will be based on Applicant capacity as proposed in the Application. Applicant selection will be based on the complete funds assigned to the Program; however, initial awarding will be subject to the amount of funds available to the PRDOH at the moment of selection and award, which is included in this document. Therefore, resulting Subrecipient Agreements entered into with awarded Applicants will be amended to the extent modifications in award quantities for each project are necessary when additional funds become available to the PRDOH."

Section 7.1 Evaluation Committee, Selection and Award of the NOFA is hereby revised to add an additional paragraph that reads as follows and such changes shall be considered by Applicants:

"Section 7.1 Evaluation Committee, Selection and Award

The selection of Applicants will be based on the complete funds assigned to the Program; however, initial awarding will be subject to the amount of funds available to the PRDOH at the moment of selection and award, which is included in this document. Therefore, resulting Subrecipient Agreements entered into with awarded Applicants will be amended to the extent modifications in award quantities for each project are necessary when additional funds become available to the PRDOH."

Miguel M. Matos Flores Deputy Director Economic Recovery Grant Management

mmint

Puerto Rico Department of Housing

San Juan, Puerto Rico May 26, 2020