April 24, 2025

Ms. Sarah Plowmann
CDBG Project Manager
1963 Bell Ave, Suite 200
Des Moines, Iowa 50315

RE: Emergency Shelter Operating Funding – Authorizing IDEA to consider City of Council Bluffs Application

Dear Ms. Plowman,

Please accept this letter signed by me, Mayor Matthew Walsh – the mayor of the City of Council Bluffs, authorizing IDEA to consider the City's application for Emergency Shelter Operating Funding through the Community Development Block Grant-Covid (CDBG-CV) program.

Thank you for your considerations.

Sincerely,

Mayor Matthew Walsh
City of Council Bluffs

Homelessness Operations CDBG-CV Application

Name of City: City of Council Bluffs

Allocation Amount: $425,000

General Considerations:

1. 100% of funds must be for Low-to Moderate Income Activities. 24 CFR 570.208(a)(2)(i)(A) includes homeless persons in the definition of presumed to be principally low and moderate income persons.
2. Activity costs must be for shelter operations expenses; no construction, rehab, etc., work is allowed. CDBG matrix code 03T "Homeless/AIDS Patients Programs" (e.g., staff costs, utilities, maintenance, insurance).
3. Estimate the amount of funds allocated to activity delivery cost per activity/homeless program. Activity delivery cost would be the source of administration dollars for entitlement cities to administer these funds, and non-entitlement communities would allocate those admin dollars to a grant administrator as per regular CDBG program awards. HUD put out a CPD Notice about activity delivery costs vs. general administration costs: https://files.hudexchange.info/resources/documents/Notice-CPD-13-07-Allocating-Staff-Costs-Program-Administration-Delivery-Costs-CDBG.pdf.
4. This is a non-competitive application. IEDA is seeking information on how you will expend your allocation (referenced above) of IEDA's remaining CDBG-CV allocation.
5. 100% of funds must be expended post-award after the IEDA environmental/historic review and approval date and before the contract end date of 5/31/26. All costs must be incurred post-award and before 5/31/26.
6. This is a reimbursement grant. Requests for reimbursement of shelter operations expenses and any city activity delivery expenses should be submitted in IowaGrants ideally monthly but at a minimum on a quarterly basis.
7. Unless waived or modified by the Federal Register Notice, all state CDBG regulations will govern these funds. This includes but is not limited to: going through IEDA for the environmental/historic review process, using IowaGrants for all form submissions, using the IEDA Procurement Policy for any purchases made with grant funds, and complying with IEDA records retention, monitoring, and other requirements.

Submit with the Application:

1. Cover Page: The application must be accompanied by a letter on City letterhead signed by the Chief Elected Official authorizing IEDA to consider the application
2. Applicant Disclosure Report: https://www.hud.gov/sites/dfiles/OCHCO/documents/2880.pdf
3. Federal Assurances Signature Page: Included on page seven (7) of this document.
4. Public Hearing minutes and the notification of the public hearing. Instructions for the public hearing can be found on page two (2).
5. The completed Program pages that follow in this document, on pages 3-6. Complete one page per shelter that would receive funding.
6. Duplication of Benefits (DOB) documentation: a) the IEDA CDBG DOB Policy to be adopted by the City, and b) documentation demonstrating that this award would not constitute a duplication of benefits for either the City as recipient or shelter subrecipient(s).
7. Email all materials to Sarah Plowman (sarah.plowman@iowaeda.com) by June 1, 2025.

Origin of Funds:

In 2020, HUD made three allocations of CDBG-CV funds to states. States are allowed to fund either entitlement or non-entitlement communities with these funds. For the Federal Register notice, see here: https://www.hud.gov/sites/dfiles/CPD/documents/CDBG-CV_Notice_Federal_Register_Publication_2002-08.pdf For memos regarding the methodology of the second and third allocations of funds, see these links respectively: https://www.hud.gov/sites/dfiles/CPD/documents/Revised_CDBG-CV2_Methodology.pdf and https://www.hud.gov/sites/dfiles/CPD/documents/Methodology-for-CDBG-CARES-Act-Final-Allocation-CV-3-Part-A-9-11-2020.pdf

Next Steps:

Applications due by 6/1/25. After your community submits the entitlement application, it will be reviewed by IEDA staff who will notify you if any other application materials will be needed for clarification. If the application is complete and meets the CDBG-CV regulations, upon Director approval IEDA would then send you an award letter and contract. Award funds are contingent upon the successful return and execution of the contract.

Overall Budget *(fill as many lines as you need):*

Program	Amount of Funds	Activity Delivery Cost Per Unit or Individual Activity	National objective
1. MICAH House	$125,000	Operating Costs	LMC – Low/Mod Limited Clientele Benefit
2. New Visions Homeless Services	$300,000	Operating Costs	LMC – Low/Mod Limited Clientele Benefit
Total amount	$425,000		

Plus, $1,500 per shelter ($3,000 total) for activity delivery/admin fees.

Public Hearing Instructions:

The purpose of the hearing is to make the public aware of the application to IEDA to spend the CDBG-CV funds allocated to the City.

Publication: The public hearing notice must be published no more than 20 days and no less than 4 days from the date of the public hearing. The notification should follow the City's normal protocols for publication but should at a minimum be published in a newspaper of general circulation.

Public Hearing: The City should follow their normal public hearing protocols. These can be virtual or in-person. The public hearing must include:

1. Need for the CDBG project
2. Description of the CDBG funded project & activities
3. The amount of CDBG funds for the project
4. Estimated amount of CDBG assistance that will benefit low-and moderate-income persons
5. The location of project activities
6. Any relocation that will have to take place because of the CDBG project, plans to minimize any displacement of persons as a result of the funded activity, and plans to assist persons actually displaced if that were to occur
7. City/ County contact information for residents to contact with concerns or complaints regarding the project
8. Community Development and Housing Needs of low to moderate persons in the City and any planned or potential activities to address these needs. The City should ask for public input on this item and include public comments in the minutes.
9. Other Community Development and Housing needs and any planned or potential activities to address these needs. The City should ask for public input on this item and include public comments in the minutes.

Minutes: The public hearing minutes from the hearing must include the information provided at the hearing on the 9 points listed above.

Applicant Disclosure Report

Applicant/Recipient Disclosure/Update Report

U.S. Department of Housing and Urban Development

OMB Number: 2501-0044
Expiration Date: 2/28/2027

Public Reporting Burden Statement: This collection of information is estimated to average 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering, and maintaining the data needed, and completing and reviewing the collection of the requested information. Comments regarding the accuracy of this burden estimate and any suggestions for reducing this burden can be sent to: U.S. Department of Housing and Urban Development, Office of the Chief Data Officer, R, 451 7th St SW, Room 8210, Washington, DC 20410-5000. Do not send completed HUD-2880 forms to this address. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid OMB control number. This agency is authorized to collect this information under Section 102 of the Department of Housing and Urban Development Reform Act of 1989. The information you provide will enable HUD to carry out its responsibilities under this Act and ensure greater accountability and integrity in the provision of certain types of assistance administered by HUD. This information is required to obtain the benefit sought in the grant program. Failure to provide any required information may delay the processing of your application and may result in sanctions and penalties including of the administrative and civil money penalties specified under 24 CFR §4.38. This information will not be held confidential and may be made available to the public in accordance with the Freedom of Information Act (5 U.S.C. §552). The information contained on the form is not retrieved by a personal identifier, therefore it does not meet the threshold for a Privacy Act Statement.

Applicant/Recipient Information *** UEI Number**: MP6AX535XXK3 *** Report Type**: INITIAL UPDATE

1. Applicant/Recipient Name, Address, and Phone (include area code)

* Applicant Name: City of Council Bluffs		
* Street 1: 209 Pearl Street		
Street 2:		
City: Council Bluffs	State Abbreviation: IA	* Zip Code: 51503
County: Pottawattamie		
* Country: USA		
* Phone: 712-890-5350		

2. Employer ID Number (do not include individual social security numbers): 42-6004428
3. HUD Program Name: CDBG-CV
4. Amount of HUD Assistance Requested/Received: $400,000
5. State the name and location (street address, City and State) of the project or activity

Project Name: New Visions Homeless Services/MICAH House		
* Street 1: 1435 N 15th Street		
Street 2: 1415 Ave J		
City: Council Bluffs	State Abbreviation: IA	* Zip Code: 51501
County: Pottawattamie		
* Country: USA: UNITED STATES		

Part I Threshold Determinations

1. Are you applying for assistance for a specific project or activity? These terms do not include formula grants, such as public housing operating subsidy or CDBG block grants. For further information see 24 CFR Sec. §4.3.

   ☐ Yes ☑ No

2. Have you received or do you expect to receive assistance within the jurisdiction of the Department (HUD), involving the project or activity in this application, in excess of $200,000 during this fiscal year (Oct. 1-Sep. 30)? For further information, see 24 CFR §4.9.

   ☑ Yes ☐ No

If you answered "**No**" to either question 1 or 2, **Stop!** You do not need to complete the remainder of this form. However, you must sign the certification at the end of the report.

Form **HUD-2880** (1/27/2023)

Part II Other Government Assistance Provided or Requested/Expected Sources and Use of Funds. Such assistance includes, but is not limited to, any grant, loan, subsidy, guarantee, insurance, payment, credit, or tax benefit.

Department/State/Local Agency Name	Department/State/Local Agency Name
* Government Agency Name:	* Government Agency Name:
Government Agency Address:	Government Agency Address:
* Street 1:	* Street 1:
Street 2:	Street 2: 1415 Ave J
City: State Abbreviation: * Zip Code:	City: State Abbreviation: * Zip Code:
County:	County:
Country:	Country:
* Type of Assistance:	* Type of Assistance:
* Amount Requested/Provided: $	* Amount Requested/Provided: $
* Expected Uses of the Funds:	* Expected Uses of the Funds:

Note: For Part 1, use additional pages if necessary. Add Attachment:

Part III Interested Parties. You must disclose:

1. All developers, contractors, or consultants involved in the application for assistance or in the planning, development, or implementation of the project or activity.

* Alphabetical list of all persons with a reportable financial interest in the project or activity (for individuals, give the last name first)	* Unique Entity ID	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity ($ and %)			
			$			%
			$			%
			$			%

2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower).

* Alphabetical list of all persons with a reportable financial interest in the project or activity (for individuals, give the last name first)	* City of Residence	* Type of Participation in Project/Activity	* Financial Interest in Project/Activity ($ and %)			
			$			%
			$			%
			$			%

Note: For Part 2, use additional pages if necessary. Add Attachment:

Certification:

I/We, the undersigned, certify under penalty of perjury that the information provided above is true and correct. WARNING: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties. (18 U.S.C. §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. §3729, 3802; 24 CFR §28.10(b)(iii)).

* Signature:  * Date: (mm/dd/yyyy): 04/24/2025

Instructions

Overview.
A. Coverage. You must complete this report if:

(1) You are applying for assistance from HUD for a specific project or activity **and** you have received, or expect to receive, assistance from HUD in excess of $200,000 during the during the fiscal year;
(2) You are updating a prior report as discussed below; or
(3) You are submitting an application for assistance to an entity other than HUD, a State or local government if the application is required by statute or regulation to be submitted to HUD for approval or for any other purpose.

B. Update reports (filed by "Recipients" of HUD Assistance):
General. All recipients of covered assistance must submit update reports to the Department to reflect substantial changes to the initial applicant disclosure reports.

Line-by-Line Instructions.

Applicant/Recipient Information.
All applicants for HUD competitive assistance, must complete the information required in blocks 1-5 of form HUD-2880:
1. Enter the full name, address, city, State, zip code, and telephone number (including area code) of the applicant/recipient. Where the applicant/recipient is an individual, the last name, first name, and middle initial must be entered.
2. Entry of the applicant/recipient's EIN, as appropriate, is optional. Individuals must not include social security numbers on this form.
3. Applicants enter the HUD program name under which the assistance is being requested.
4. Applicants enter the amount of HUD assistance that is being requested. Recipients enter the amount of HUD assistance that has been provided and to which the update report relates. The amounts are those stated in the application or award documentation. NOTE: In the case of assistance that is provided pursuant to contract over a period of time (such as project-based assistance under section 8 of the United States Housing Act of 1937), the amount of assistance to be reported includes all amounts that are to be provided over the term of the contract, irrespective of when they are to be received.
5. Applicants enter the name and full address of the project or activity for which the HUD assistance is sought. Recipients enter the name and full address of the HUD-assisted project or activity to which the update report relates. The most appropriate government identifying number must be used (e.g., RFP No.; IFB No.; grant announcement No.; or contract, grant, or loan No.) Include prefixes.

Part I. Threshold Determinations - Applicants Only
Part I contains information to help the applicant determine whether the remainder of the form must be completed. Recipients filing Update Reports should not complete this Part.

If the answer to **either** questions 1 or 2 is No, the applicant need not complete Parts II and III of the report, but must sign the certification at the end of the form.

Part II. Other Government Assistance and Expected Sources and Uses of Funds.
A. Other Government Assistance. This Part is to be completed by both applicants and recipients for assistance and recipients filing update reports. Applicants and recipients must report any other government assistance involved in the project or activity for which assistance is sought. Applicants and recipients must report any other government assistance involved in the project or activity. Other government assistance is defined in note 4 on the last page. For purposes of this definition, other government assistance is expected to be made available if, based on an assessment of all the circumstances involved, there are reasonable grounds to anticipate that the assistance will be forthcoming.

Both applicant and recipient disclosures must include all other government assistance involved with the HUD assistance, as well as any other government assistance that was made available before the request, but that has continuing vitality at the time of the request. Examples of this latter category include tax credits that provide for a number of years of tax benefits, and grant assistance that continues to benefit the project at the time of the assistance request.

The following information must be provided:
1. Enter the name and address, city, State, and zip code of the government agency making the assistance available.
2. State the type of other government assistance (e.g., loan, grant, loan insurance).
3. Enter the dollar amount of the other government assistance that is, or is expected to be, made available with respect to the project or activities for which the HUD assistance is sought (applicants) or has been provided (recipients).
4. Uses of funds. Each reportable use of funds must clearly identify the purpose to which they are to be put. Reasonable aggregations may be used, such as "total structure" to include a number of structural costs, such as roof, elevators, exterior masonry, etc.

B. Non-Government Assistance. Note that the applicant and recipient disclosure report must specify all expected sources and uses of funds - both from HUD and any other source - that have been or are to be, made available for the project or activity. Non-government sources of Form HUD-2880 funds typically include (but are not limited to) foundations and private contributors.

Part III. Interested Parties.
This Part is to be completed by both applicants and recipients filing update reports. Applicants must provide information on:
1. All developers, contractors, or consultants involved in the application for the assistance or in the planning, development, or implementation of the project or activity and
2. Any other person who has a financial interest in the project or activity for which the assistance is sought that exceeds $50,000 or 10 percent of the assistance (whichever is lower). Note: A financial interest means any financial involvement in the project or activity, including (but not limited to) situations in which an individual or entity has an equity interest in the project or activity, shares in any profit on resale or any distribution of surplus cash or other assets of the project or activity, or receives compensation for any goods or services provided in connection with the project or activity. Residency of an individual in housing for which assistance is being sought is not, by itself, considered a covered financial interest.

The information required below must be provided.
1. Enter the full names and addresses. If the person is an entity, the listing must include the full name and address of the entity as well as the CEO. Please list all names alphabetically.
2. Entry of the Unique Entity Identifier (UEI), for non-individuals, or city of residence, for individuals, for each organization and person listed is **optional.**
3. Enter the type of participation in the project or activity for each person listed: i.e., the person's specific role in the project (e.g., contractor, consultant, planner, investor).
4. Enter the financial interest in the project or activity for each person listed. The interest must be expressed both as a dollar amount and as a percentage of the amount of the HUD assistance involved.

Note that if any of the source/use information required by this report has been provided elsewhere in this application package, the applicant need not repeat the information, but need only refer to the form and location to incorporate it into this report. (It is likely that some of the information required by this report has been provided on SF 424A, or on various budget forms accompanying the application.) If this report requires information beyond that provided elsewhere in the application package, the applicant must include in this report all the additional information required. Recipients must submit an update report for any change in previously disclosed sources and uses of funds as provided in Section I.D.5., above.

Notes:

1. All citations are to 24 CFR Part 4, which was published in the Federal Register. [April 1, 1996, at 63 Fed. Reg. 14448.]
2. Assistance means any contract, grant, loan, cooperative agreement, or other form of assistance, including the insurance or guarantee of a loan or mortgage, that is provided with respect to a specific project or activity under a program administered by the Department. The term does not include contracts, such as procurements contracts, that are subject to the Fed. Acquisition Regulation (FAR) (48 CFR Chapter 1).
3. See 24 CFR §4.9 for detailed guidance on how the threshold is calculated.
4. "Other government assistance" is defined to include any loan, grant, guarantee, insurance, payment, rebate, subsidy, credit, tax benefit, or any other form of direct or indirect assistance from the Federal government (other than that requested from HUD in the application), a State, or a unit of general local government, or any agency or instrumentality thereof, that is, or is expected to be made, available with respect to the project or activities for which the assistance is sought.
5. For the purpose of this form and 24 CFR Part 4, "person" means an individual (including a consultant, lobbyist, or lawyer); corporation; company; association; authority; firm; partnership; society; State, unit of general local government, or other government entity, or agency thereof (including a public housing agency); Indian tribe; and any other organization or group of people.

TO BE ADDED AFTER 5/5/2025 Public Hearing

Notification of the Public Hearing

To Whom It May Concern:

You and each of you are hereby notified that the City Council of the City of Council Bluffs, Iowa, has scheduled a public hearing for the purpose to make the public aware of the application to Iowa Economic Development Authority (IEDA) to spend the CDBG-CV funds allocated to the City for the funds to support operating expenses to New Visions Homeless Services (NVHS) located at 1435 N. 15th Street, Council Bluffs IA 51503 and MICAH House located at 1415 Avenue J, Council Bluffs, IA 51501. The need for this CDBG-CV project comes from individuals, families, men and women experiencing homelessness. The project and activities will assist NVHS and MICAH house with operating expenses of the facilities to assist homeless persons defined as low- and moderate-income persons. The amount of assistance is $300,000 to NVHS that anticipates to assist 800 men and $125,000 to MICAH House that anticipates to assist 700 families and women. The project may include relocation that will have to take place, plans to minimize any displacement of persons as a result of the funded activity, and plans to assist persons actually displaced if that were to occur. Community Development and Housing Needs of low to moderate persons in the City and any other planned or potential activities to address these needs. The City is asking for public input on Community Development and Housing Needs of low to moderate persons and activities to address these needs. All members of the community are encouraged to attend and provide feedback. Any questions, concerns or complaints regarding this project should be directed, at least 48 hours in advance to Jodi Quakenbush, City Clerk, 209 Pearl Street, Council Bluffs, Iowa 51503; phone (712) 890-5263 or email jquakenbush@councilbluffs-ia.gov. You are further notified that the public hearing on said matter will be held by the City Council of the City of Council Bluffs, Iowa, at its regular meeting held at 7:00 p.m., on the 5th day of May, 2025 in the City Council Chambers, 2nd Floor of City Hall, 209 Pearl Street, Council Bluffs, Iowa at which time and place all persons interested in said matter will be given an opportunity to be heard.

_____

Jodi Quakenbush, City Clerk

Federal Assurances Signature Page

I, Mayor Matthew Walsh, (applicant official) hereby certify that in carrying out the activities funded under the CDBG Program, the City of Council Bluffs:

A. will minimize displacement of persons as a result of such activities;
B. will conduct and administer the program in conformity with Public Law 88-352 (Title VI of the Civil Rights Act of 1964), and Public Law 90-284 (Title VIII of the Civil Rights Act of 1968) and will affirmatively further fair housing);
C. will provide for opportunities for citizen participation, hearings, and access to information with respect to our community development program comparable to the requirements found under sections 104(a)(2) and 104(a)(3) of Title I of the Housing and Community Development Act of 1975 as amended through 1987; and
D. will not attempt to recover any capital costs of public improvements assisted in whole or part under the CDBG Program by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements, unless (i) funds received under the CDBG Program are used to pay the proportion of such fee or assessment that relates to the capital costs of such public improvements that are financed from revenue sources other than under Public Law 93-383, as amended, or (ii) for purposes of assessing any amount against properties owned and occupied by persons of low and moderate income who are not of very low income, the city/county has certified to the State that it lacks sufficient funds received under the CDBG Program to comply with the requirements of clause (i) above.

I also certify that to the best of my knowledge and belief, data in the application is true and correct, including commitment of local resources; the document has been duly authorized by the governing body of the applicant; and the applicant will comply with all applicable federal and state requirements, including the following, if assistance is approved:

A. Civil Rights Acts;
B. Housing and Community Development Acts of 1974, as amended;
C. Age Discrimination Act of 1975;
D. Section 504 of the Rehabilitation Act of 1973;
E. Davis-Bacon Act, as amended, where applicable under Section 110 of the Housing and Community Development Act of 1974, as amended; Contract Work Hours and Safety Standards Act; the Copeland Anti-kickback Act; the Department of Defense Reauthorization Act of 1986 and the Fair Labor Standards Act.
F. National Environmental Policy Act of 1969 and 24 CFR 58 (Environmental Review).
G. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended;
H. State of Iowa Citizen Participation Plan;
I. Lead-based Paint Poisoning Prevention Act;
J. Residential Anti-displacement and Relocation Assistance Plan;
K. Government-wide Restriction on Lobbying and the Hatch Act; and
L. Prohibition on the Use of Excessive Force.

Mayor Walsh Typed Name of Applicant Official	Signature	4/24/2025 Date
Courtney Harter Typed Name of Person Attesting	Signature	4/24/2025 Date

Program Descriptions *(fill as many as would be funded):*

Shelter 1 Name: MICAH House

1. Amount of funds to be allocated to the shelter: $125,000

2. Description (pre- and post-pandemic) of the shelter and its operations:

   MICAH House (MH) has remained a consistent, essential resource for families and women experiencing homelessness—before, during, and after the COVID-19 pandemic. While our core service model has not changed, the pandemic required increased focus on infection control, staffing stability, and safety protocols. Specifically, MICAH House co-created an Infectious Disease policy and guidelines with the Pottawattamie County Health Department.

   Our non-congregate shelter model proved invaluable during the height of COVID-19, allowing us to implement distancing and safety precautions more effectively than traditional models. Post-pandemic, this model continues to offer a health-conscious and trauma-informed environment that promotes dignity and stability for our residents.

   We've also seen our clients experience significant challenges to exiting our shelter into safe, affordable housing. This has dramatically increased our length of stay. Before the COVID-19 pandemic, MICAH House served an average of 802 clients annually, with 50% exiting into stable housing. In 2023, MICAH House's average length of stay shifted to 100 days in the family shelter and 57 days in the women's shelter (triple the length of stay prior to COVID). In 2024, we saw a decrease, but still double what it was before the pandemic. Now, MICAH House is averaging 771 clients served annually, with only 32% exiting into stable housing. MICAH House still serves high rates of extremely low-income individuals - what has changed is their ability to exit shelters into safe, affordable housing.

3. Estimate of the number of individuals to be assisted with this funding over the contract period: 700

4. Describe how the planned activity will prevent, prepare for, and/or respond to the effects of the COVID-19 pandemic in this shelter specifically and the community as a whole:

   MICAH House is a safety net for individuals experiencing housing instability, which has only increased since the pandemic. Housing costs have risen, individual landlords have decreased, and increased eviction rates have created an additional barrier for families and individuals. While there is much community work to address our local affordable housing issues, these plans take time to implement and work downstream. MICAH House works directly with community members needing support now. Funds will help cover costs to maintain critical programming and shelter operations to help families and women experiencing homelessness and support their journey to self-sufficiency. MICAH House programming and services work to address each barrier through our intensive case management, trauma-informed care, and basic needs support, including daily meals, health and wellness programming, economic empowerment programming, and our onsite childcare center. Together, through implementation with our essential, caring staff, MICAH House provides safety and hope to these individuals.

5. Describe any additional ways that the planned activity will address public health, coronavirus, and/or housing and economic disruption needs:
   Continued funding is essential to sustain safe, clean, and operational shelter facilities while maintaining qualified, compassionate staff who can provide trauma-informed care. The intended outcome is to ensure uninterrupted shelter services that meet public health standards and adapt swiftly to future crises.

6. Describe how the full allotment of funds will be expended on operations expenses by 5/31/26:

   Funds will be utilized to cover our largest operational expense, personnel, by supporting the hiring and retention of qualified staff members to assist clients on a daily basis and providing ongoing maintenance and upkeep to the shelters.

7. Describe how this funding will not constitute a duplication of benefits (DOB) for either the City as recipient or the shelter as subrecipient. Attach supporting documentation.

   It shall be the policy of the City to take affirmative steps to ensure that a duplication of benefit does not occur in the administration of its CDBG-CV funding. Subrecipients and partners responsible for implementing projects and activities funded under the City's CDBG-CV grants shall be required to adhere to the policy and procedures outlined in this document and must ensure that DOB prevention is specifically addressed in their policies and procedures.

Shelter 2 Name: New Visions Homeless Services

1. Amount of funds to be allocated to the shelter: $300,000

2. Description (pre- and post-pandemic) of the shelter and its operations:

   New Visions Homeless Services operates western Iowa's only low-barrier men's shelter. Pre-pandemic, NVHS was serving approximately 1,000 men a year in our shelter and only about 12% of our shelter guests had a chronicity of homelessness of over a year and we were able to quickly exit them into a housing situation.

   Post pandemic our numbers have dropped to serving about 800 men a year in our shelter but the chronicity of homelessness of over a year has dramatically increased to 40% of the men we serve, not allowing us to turn over beds and overflow mats as often. This is due to a less than a 1.5% rental vacancy rate in Pottawattamie County leaving our vulnerable neighbors not having affordable and attainable housing options. According to HUD's national Point-In-Time(PIT) data, Council Bluffs' COC is experiencing the fastest increase in street level homelessness in the country and Council Bluffs have counted half of the number of people experiencing street level homelessness in our COC during the last two PIT, even though Omaha is 10x bigger than Council Bluffs. Due to this we are seeing extreme pressure on our shelter, facility, and staffing needs as the level of individuals experiencing street level homeless are accessing our shelter services but are not able to stay in due to no open beds, or shelter options in our community (i.e. no couple shelters, limited women shelter beds, no inter-generation shelters, or pet friendly shelter other than ours). Many live in their cars in front of our shelter or in tents around our facility but still utilize our showers, hygiene kits, food and other programming services offered at our shelter as it is the only facility that is open and welcomes this population daily regardless if they receive a bed or mat at night.

   NVHS has slept overflow men in our shelter since we opened our doors in 2008, but for the first time in history and post pandemic we have had to start capping how many men we have in our dining room on mats due to safety concerns from the fire department and we now have men lining up to get an available bed/ mat leaving some of them on the streets trying daily to get a spot.

3. Estimate of the number of individuals to be assisted with this funding over the contract period: 800 men

4. Describe how the planned activity will prevent, prepare for, and/or respond to the effects of the COVID-19 pandemic in this shelter specifically and the community as a whole:

   The pandemic broke the housing system where many of "mom and pop" landlords sold to corporations which then resulted in rent increases in our community of 30 to 40% forcing many low-income earners of those on fixed income to seek shelters due to not being able to find places that would rent to them, or they could afford. Increased funding can help expand the services available in our low-barrier shelter, providing immediate, safe places for people to sleep, especially crucial during Iowa's harsh weather conditions. Low-barrier shelters minimize requirements for entry, such as sobriety or participation in mandatory classes regardless if they are needed in individual situations, making our shelter more accessible to a wider range of individuals, including those with substance use disorders or mental health challenges. This inclusivity ensures that more people can access safety and warmth without facing immediate obstacles. This model helps benefit our community as a whole as our shelter provides a place where individuals can go to access immediate assistance as opposed to being on the streets in our community with no access to support or help.

5. Describe any additional ways that the planned activity will address public health, coronavirus, and/or housing and economic disruption needs:

   Additional funding will address the public health and housing needs as our shelter acts as a crucial first point of contact, connecting individuals with essential support services that can aid in their transition out of homelessness. Increased support will allow our shelters to employ case managers and give our community partners a place to assess individual needs and link our shelter guests to resources such as mental health care, substance abuse treatment, medical services, and job training which all address our public health and housing crisis. Funding is also crucial in the sustainability of our programs post pandemic especially with the uncertainty of some of our federal funding that we receive to run our programs in this political climate.

6. Describe how the full allotment of funds will be expended on operations expenses by 5/31/26:

   NVHS has a proven track record of expending all of their grants by the deadlines outlined in our grant agreements. All CV and ARPA funding awarded to our agency over the past couple of years have had successful draws that were audited and showed the correct allowable expenditure of all of our funding. Looking at our shelter's remaining budget of the year and into the first half of 2026 we will have enough expenses to expend all of the funding by the requested date.

7. Describe how this funding will not constitute a duplication of benefits (DOB) for either the City as recipient or the shelter as subrecipient. Attach supporting documentation.

   It shall be the policy of the City to take affirmative steps to ensure that a duplication of benefit does not occur in the administration of its CDBG-CV funding. Subrecipients and partners responsible for implementing projects and activities funded under the City's CDBG-CV grants shall be required to adhere to the policy and procedures outlined in this document and must ensure that DOB prevention is specifically addressed in their policies and procedures.

Duplication of Benefits

The purpose of the Policy on Duplication of Benefits (DOB) is to ensure that the City of Council Bluffs is not providing federal funds to pay for particular costs where there is another source of federal financial assistance that has paid for that same cost. Further, this document will identify specific processes that will assist in preventing the DOB.

"The CARES Act requires HUD to ensure that there are adequate procedures in place to prevent any duplication of benefits as required by section 312 of the Stafford Act, as amended by section 1210 of the Disaster Recovery Reform Act of 2018 (division D of Public Law 115–254; 42 U.S.C. 5121 et seq.)."

It shall be the policy of the City to take affirmative steps to ensure that a duplication of benefit does not occur in the administration of its CDBG-CV funding. Subrecipients and partners responsible for implementing projects and activities funded under the City's CDBG-CV grants shall be required to adhere to the policy and procedures outlined in this document and must ensure that DOB prevention is specifically addressed in their policies and procedures.

A duplication of benefits occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance.

All proposals/applications that are being considered for funds provided by the CARES Act Funds shall be assessed by how they address a community need and to what extent the prevent, prepare for and/or respond to the coronavirus. Additionally, proposals shall be evaluated alongside other available resources to meet the same need.

No proposals that duplicate a benefit at the time of funding will be recommended for approval. An analysis of funding available and current unmet need will be conducted prior to finalizing agreements.

Prior to award, Staff shall identify total need and determine whether all costs are reasonable and necessary. The City shall require applicants to identify all sources of funding received and reasonably anticipated and provide supporting documentation of such sources (for example, bank statements showing the receipt and expenditure of Payroll Protection Program funds). The City shall require the applicant (individual or entity) to certify that all assistance is reported. Whenever possible, third party verification for all sources of assistance shall be obtained.

If it is found that a duplication of benefits occurs after the award of funds (CDBG-DR, CDBG-CV or ESG-CV funds were used to pay expenses covered by other federal coronavirus relief programs and the total paid exceeds the demonstrated and documented need), the applicant/beneficiary must repay the CDBG-CV funds to the City.

Reference the HUD CDBG-CV Duplication of Benefits Quick Guide