



CDFA Policy

Related to: Community Center Investment Program (CCIP)
Subject: Structure of award policy
Date: March 23, 2023

This policy outlines to applicants the New Hampshire Community Development Finance Authority's (CDFA) policy for the Community Center Investment Program structuring of the award to awardees.

The Community Center Investment Program is funded by resources from the Federal American Rescue Plan Act (ARPA) State Fiscal Recovery Fund (SFRF), therefore **prime** recipients and their **subrecipients**¹ must be in compliance with all of the aspects of the Uniform Guidance ([2 CFR 200](#)) that apply to the SFRF federal grant award, as defined by the [SFRF Assistance Listing](#) and the [Final Rule](#).

In order for the structure of the CCIP award to meet the needs of the applicant, objectives of the program, the Federal requirements, and the obligation and expenditure deadlines, CDFA will offer two types of awards, either a subaward (grant) or a forgivable loan.

The forgivable loan will have the following conditions:

- The award/initial reservation of funds will be in the form of a conditional commitment letter.
- Awards will be issued in the form of forgivable loans at 0% interest, from commitment letter through the construction period.
- The loan will have limited federal compliance requirements and uniform guidance.
- Funds will be issued on a reimbursement basis for eligible costs.
- The loan will be forgiven, in full, upon the completion of the project and adherence with the loan agreement.
- The awarded entity will be required to repay the loan if they fail to comply with the conditions of the award.

The grant will have the following conditions:

- The award/ initial reservation of funds will be in the form of a conditional award letter.
- Awards will be issued in the form of grants.
- The grant will have significant federal compliance requirements and uniform guidance, additional information will be provided to applicants in the program FAQ's and contract. Requirements will likely include 2 CFR 200 requirements and the following requirements:
 - Program Administration, including record retention;
 - Financial Management, including audit requirements;
 - Environmental evaluation;
 - Civil Rights including ADA compliance;
 - Procurement;
 - Perpetual Federal interest in the property, Plan for real property reporting and disposition plan;

¹ Defined as a recipient of federal award money that receives a subaward from the prime recipient to carry out the mission of the federal award money on behalf of the prime recipient.

- Labor Standards; and
- Acquisition / Relocation.

CDFA will provide applicants the ability to choose which award vehicle they prefer to avoid a potential chilling effect on the program.

Given the nature of the entities eligible for the program (municipalities and nonprofits), various factors could impact whether those entities have the capacity to fulfill certain compliance requirements and can meet required project timelines.

Therefore, applicants can request one award type or the other, with the preferred method for the program being forgivable loans in accordance with GOFERR's forgivable loan policy given the nature and intent of the program. Subawards (grants) would be the preferred award type for applicants that demonstrate their project or project timeline would otherwise be infeasible under a forgivable loan.

Applicants will be made aware of the various compliance requirements and timeline implications associated with each award type to make an informed request.

Under a grant, applicants must also complete the following additional forms:

- Community Center Investment Program (CCIP): Risk assessment for structure of award
- Community Center Investment Program (CCIP): Compliance Plan