

State of Iowa

Community Development Block Grant

National Disaster Resilience

Policies and Procedures Manual

April 2021



PURPOSE

The Iowa Economic Development Authority's (IEDA) accounting and Community Investments teams are committed to the effective financial management of the CDBG National Disaster Resilience (NDR) Grant. The purpose of this policy and procedures document is to establish and communicate guidelines for the IEDA accounting and Community Investments teams related to cash management, reporting, budgeting, and internal controls. This document will be updated periodically to incorporate policy and procedure changes in the NDR Grant program.

This full NDR Policy and Procedures Manual contains both State specific policies and procedures as well as policies passed on to Recipients through the CDBG Management Guide, originally developed for CDBG funded projects.

STATE OF IOWA CDBG-NDR POLICY AND PROCEDURES/MANAGEMENT GUIDE

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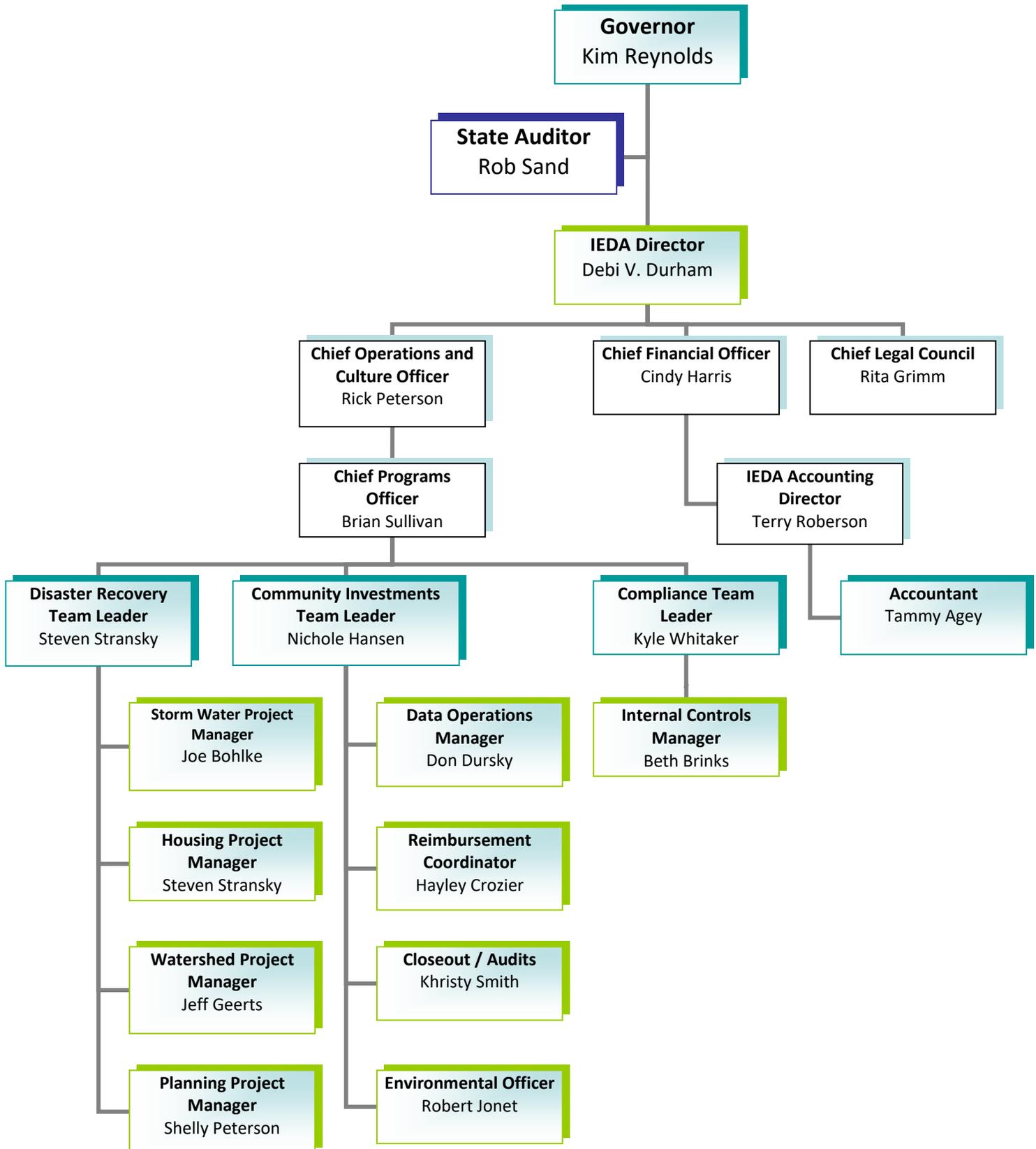
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IEDA – Existing Administrative Structure for NDR Grant



Community Development Division:

Disaster Recovery (NDR) & Community Investments (CI): Team members split their time between the CDBG program and the CDBG-DR program.

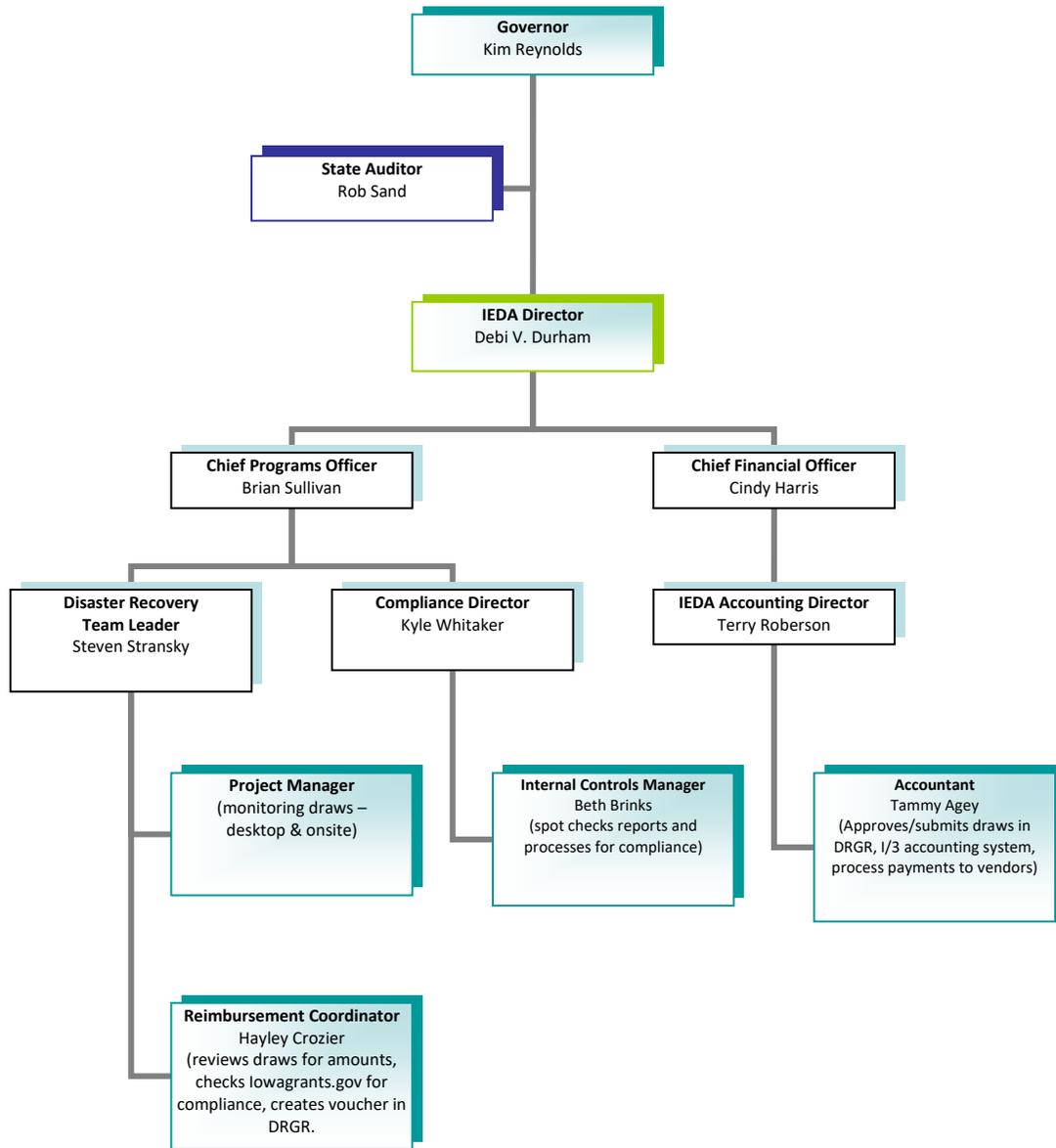
Name	Title	Area	Funding
Brian Sullivan	Chief Program Officer	IEDA and IFA Community Development Divisions	
Nichole Hansen	CI Team Leader	Team Leader, Section 3	CDBG, State Tax Credit Programs
Steven Stransky	Disaster Recovery Team Leader	CDBG-DR, NDR Housing Project Manager	CDBG, CDBG-DR
Don Dursky	Data Operations Manager	CDBG, CDBG-DR, State Tax Credits, lowagrants.gov	CDBG, CDBG-DR
Ed Basch	Project manager	CDBG housing, CDBG economic development projects	CDBG
Joyce Brown	Project Manager	CDBG housing	CDBG
Hayley Crozier	Reimbursement Coordinator DOB Coordinator	CDBG and CDBG-DR draw processing, DRGR data entry, Audits	CDBG, CDBG-DR, State Tax Credit Programs
Khristy Smith	Audit/Close-out Coordinator	DRGR data entry, Audits, Close-outs, IDIS data entry	CDBG, CDBG-DR, NSP
Joe Bohlke	Project Manager	CDBG and CDBG-DR Infrastructure	CDBG, CDBG-DR
Jeff Geerts	Project Manager	Special Projects – watershed, energy efficiency	CDBG, CDBG-DR
Richard Bell	Project Manager	State Historic Preservation Tax Credit, Workforce Housing Tax Credit	State Tax Credit Programs
Dan Narber	Project Manager	CDBG infrastructure, DR Technical Assistance for Labor Standards, Procurement and Section 3	CDBG, CDBG-DR
Jared Morford	Project Manager	Disaster Housing	CDBG-DR
Jacob Levang	Project Manger	Disaster Buy-outs	CDBG-DR
Robert Jonet	Environmental & Historic Preservation Specialist	Environmental Review, Section 106	CDBG-DR

IEDA/IFA Shared Resources:

In order to create separation of duties and internal controls, IEDA and IFA share resources to improve processes and efficiencies.

Name	Title	Area	funding
Brian Sullivan	Chief Program Officer	IEDA and IFA Community Development Divisions	
Kyle Whitaker	Compliance Director	IFA	
Beth Brinks	Internal Controls Project Manager	Works with all HUD programs to ensure annual and ongoing compliance	CDBG, CDBG-DR, HOME, HOPWA, ESG

Claims Process



Claim Process Overview: Contractors create invoices for work incurred. Invoices are sent to CDBG grant administrator (hired by sub recipient to administer all federal requirements). Grant administrator reviews invoices for eligibility, creates GAX (Iowa claim voucher), submits GAX package to sub recipient. Sub recipient holds a City/County Council meeting to approve GAX package. Once approved, grant administrator submits GAX in IowaGrants (IEDA grant management system). GAX is reviewed for financial accuracy and eligibility by Haley Crozier. Hayley Crozier then creates voucher in DRGR. GAX documentation is forwarded to Tammy Agey in fiscal. Tammy reviews GAX and voucher and then approves voucher in DRGR. Once LOCS payment is received at the Department of Revenue, the 1/3 system (state accounting database) is updated and electronic payments are sent to sub recipients. Payment documentation is forwarded to Hayley Crozier who then updates IowaGrants with date the payment was sent to the recipient.

Financial Procedures

FRAUD AND WASTE POLICY

Responsible personnel or unit: IEDA Management, Division Administrator

The Authority has zero tolerance for the commission or concealment of acts of fraud, waste, or abuse. Allegations of such acts will be investigated and pursued to their logical conclusion, including legal action where warranted. All employees are responsible for reporting suspected instances of fraud, waste, and abuse in accordance with this Policy.

Management is responsible for the effectiveness and efficiency of operations, including the protection of Authority assets from fraud, waste, and abuse. Management has the responsibility for the implementation of internal controls to deter and detect fraud and also responsible for assisting in the deterrence and detection of fraud, waste, and abuse in government by examining and evaluating the adequacy and the effectiveness of the Authority's systems of internal control, commensurate with the extent of the potential risk in the various segments of the organization. Management has primary responsibility for the request for investigation of fraudulent acts committed by or against the Authority.

Scope

This policy applies to all employees. The provisions of this policy apply to any instance of fraud, waste, or abuse involving not only employees, but also external organizations doing business with the Authority and Authority-sponsored events.

Commitment to Confidentiality and Anonymity

The Authority will attempt to ensure that anonymity of the reporter is maintained. When you report, please remember the following concerning confidentiality and anonymity:

- Even if you report anonymously, once the report has been made and the investigation begins, your coworkers or others who are familiar with the situation you are reporting may still be able to guess your identity.
- Whether you report anonymously or not, the Authority will treat your report confidentially.
- It is not possible to guarantee absolute confidentiality in all circumstances. Disclosure to others inside or outside the Authority may be required by law in certain cases.

Please do not let these possibilities discourage you from reporting an incident.

Protection

Retaliation against an employee who in good faith reports a violation of law or rule, mismanagement, a gross abuse of funds, an abuse of authority, or substantial and specific danger to public health or safety is a violation of state law per Iowa Code Chapter 70A.29. Please note that this section does not apply if the disclosure of the information is prohibited by statute. See also Code of Iowa 8A.417, 70A.28 and 685.

Definitions

Fraud consists of an illegal act (the intentional wrongdoing), the concealment of this act, and the deriving of a benefit (converting the gains to cash or other valuable commodity). Legally, fraud can lead to a variety of criminal charges including theft, embezzlement, and larceny – each with its own specific legal definition and required criteria – each of which can result in severe penalties and a criminal record.

Waste means the thoughtless or careless expenditure, consumption, mismanagement, use, or squandering of resources owned or operated by the Authority to the detriment or potential detriment of the Authority. Waste also includes incurring unnecessary costs because of inefficient or ineffective practices, systems, or controls. Waste does not normally lead to an allegation of "fraud", but it could.

Abuse means the excessive, or improper use of something, or the use of something in a manner contrary to the natural or legal rules for its use; the intentional destruction, diversion, manipulation, misapplication, maltreatment, or misuse of resources owned or operated by the Authority; or extravagant or excessive use so as to abuse one's position or authority. "Abuse" does not necessarily lead to an allegation of "fraud", but it could.

Examples of fraud, waste, and abuse activities include, but are not limited to:

- Forgery or alteration of documents (checks, contracts, purchase orders, invoices, time sheets, leave records, etc.).
- Misrepresentation of information on documents (employment history, time sheets, leave records, travel reimbursement requests, financial records, etc.).
- Theft, unauthorized removal, or willful destruction of records, property, or the property of other persons (to include the property of employees, customers, or visitors).
- Misappropriation of funds, equipment, supplies, or any other asset.
- Improprieties in the handling and reporting of financial transactions.
- Serious abuse of Authority time such as unauthorized time away from work, falsification of work hours reported, or excessive use of Authority time for personal business.
- Authorizing or receiving payments for goods not received or services not performed.
- Vendor kickbacks.
- Authorizing or receiving payment for hours not worked.
- Misuse of authority for personal gain.
- Any computer-related activity involving the alteration, destruction, forgery, or manipulation of data for fraudulent purposes.
- Inappropriate use of Authority owned electronic devices such as computers, PDAs, cell phones, pagers, or e-mail.

Responsibilities

Any employee who has knowledge of fraud, waste, or abuse, or who has good reason to suspect that such conduct has occurred, shall adhere to the procedures outlined below.

When suspected fraudulent activity, waste, or abuse is observed by, or made known to, an employee, the employee shall immediately report the activity to their direct supervisor. If the employee believes that the supervisor is involved with the activity, they shall immediately report the activity to the CFO or Director's Office. If the employee believes that the CFO or Director's Office (or staff of) may be involved with the activity, the employee shall report the activity to the State Auditor's Office.

The employee shall not make any attempt to investigate the suspected activity prior to reporting it. The CFO or Director's Office shall coordinate investigations of fraud, waste, or abuse with the State Auditor's Office, Federal Oversight Agency or State Ombudsman's Office.

An employee shall not destroy, or allow to be destroyed, any document or record of any kind that the employee knows may be relevant to a past, present, or future investigation

The Authority cannot compel citizens and customers (non-employees) to report suspected instances of fraud, waste, or abuse. However, the Authority strongly encourages them to do so.

CASH MANAGEMENT

Responsible personnel or unit: Accounting Team & Disaster Recovery Team

Cash management includes requests for payments from Recipients and direct payments to vendors as well as management of funds drawn down on the NDR-CDBG grants from the U.S. Department of Housing and Urban Development (HUD) while remaining in compliance with 2 CFR 200.305 and 31 CFR 205 and the Treasury-State Agreement (if applicable).

Both the Disaster Recovery team and the Accounting team are responsible for review and approval of the funds requested and for properly entering those transactions into both the Disaster Recovery Grant Reporting System (DRGR) and the State of Iowa's accounting system, I/3.

Request for Payment

Recipients must submit a claim form through Iowa Grants and include a General Accounting Expenditure (GAX) form. Direct payments to vendors are paid from submitted invoices.

Recipient Requests

The claim form is created by the Recipient in Iowa Grants for both administrative and program funds. The electronic version of the General Accounting Expenditure (GAX) form is submitted, along with a claim form, as funds are needed by recipients to make payment. The following are considered allowable expenditures for which funds may be requested:

- An allowable CDBG expenditure which has been incurred (paid out) by the recipient.
- An allowable CDBG expenditure for which the recipient has a bill on hand. For example, if the Recipient has an approved award to an individual, the Recipient may request the funds to pay out the award without first expending the funds.

The above applies to both program and administrative expenses. The Iowa Grants claim form serves as the documentation of a cost incurred. Original receipts and original signed GAX forms are maintained by the Recipient and reviewed at the time the project is monitored.

Recipients are also tasked with submitting requests for reimbursement at least quarterly. If forms are to be signed by someone other than the individual(s) who signed the Grant Agreement, a "Signature Authorization for CEO Change" must be uploaded to Iowa Grants prior to the request for payment. Additionally, if recipients wish to name an alternative signatory, a "Signature Authorization for Alternative Signators" must be on uploaded to Iowa Grants.

Improper Payments

To ensure that program expenditures will not result in improper payments the Reimbursement Coordinator completes a CDBG-NDR Claim Review Checklist prior to approving each claim request. In addition, the following are reviewed:

- Duplication of Benefits has been completed
- The draw(s) does not exceed the award (Need minus DOB)

If the Grantee discovers an improper payment was made the Reimbursement Coordinator will notify the Recipient and the improper payment will be corrected on the next claim form. The Reimbursement Coordinator maintains a file of the Claim Review Checklists.

The Reimbursement Coordinator then forwards a printed copy of the claim from Iowa Grants along with the signed GAX to the Budget Analyst on the Accounting Team. **The GAX submitted to the Accounting team is the GAX of record, and subject to audit by State and Federal auditors.** Once the GAX is submitted to Accounting for processing, it will not be returned for changes.

The Budget Analyst receives the GAX and validates that it has been authorized in accordance with the procedures noted above and reviews the funds requested for compliance with period of availability (contract in full force and effect) and budget restrictions. The GAX is also compared to the prior request

and the contract to verify the vendor name, vendor code, request number, original grant amount, prior balance, and that remaining balance is adequate for the current request.

The GAX is entered into the State's accounting system (I/3) after it has been reviewed and approved by both the Community Development Division and Accounting staff and payment is issued. Approximately 99% of program funds are paid from accounting string 0340-269-4910.

Leverage

Acceptable Direct and Supporting Leverage was determined by HUD attorneys and included in the CDBG-NDR award. The amount of Direct Leverage is included in each Recipient's budget and reported as indicated in the timeline/scope of work. Direct Leverage is also reported quarterly through lowagrants.gov and monitored by the project manager.

Supporting Leverage records are verified and maintained by Homeland Security Emergency Management Department and reported to IEDA through lowagrants.gov.

Invoices

IEDA receives invoices for such items as newspaper publishing charges, room rental, and meeting supplies/food. These items are purchased as needed.

When an invoice is received, it is received by the person who ordered the item/requested the work and a GAX form is completed. The GAX form and invoice are forwarded to the Community Development Division Administrator or Coordinator for their review and approval as evidenced by their signature on the GAX. The form is then forwarded to the Budget Analyst on the Accounting team for their review and approval, as evidenced by their initials. The GAX form is reviewed by the Budget Analyst for allowability and appropriate coding. The GAX is then entered into the I/3 by the Accounting Tech and payment is processed/issued.

In addition to the items noted above, office supplies and furniture may also be purchased. These items are purchased through the Master Contract the State of Iowa has with Office Max or through Iowa Prison Industries (for office furniture) after a request is made by a member of the Community Development team. This request can be made via email or by paper form completed by the person requesting the item. Furniture purchases must be approved by the Division Administrator or Coordinator. When the item is received the Accounting team ensures that the item ordered is what was received and payment is processed. Payment approval by the Budget Analyst is evidenced on I/3 via electronic approval.

Timesheet Approval- IEDA Employees

Timesheets are completed bi-weekly by each employee and show the breakdown of time spent by an employee on disaster related activities. Employees must sign/certify their timesheet and submit to the supervisor for approval. The timesheets are forwarded to the Human Resource Associate where they undergo review and employee leave balances, etc, are monitored and updated.

IOWAGRANTS.GOV MANAGEMENT SYSTEM PROCESS

Responsible personnel or unit: Community Development Division including Disaster Recovery Team

The IEDA is using iowagrants.gov to handle the myriad of functions needed to operate a federal program. lowagrants.gov is a statewide system used to manage grants from application to closeout. It assists the IEDA in allocating dollars to various programs, making awards, producing contracts, monitoring compliance with both CDBG regulations as well as cross-cutting regulations such as environmental.

The IEDA Project Managers will utilize iowagrants.gov for the day-to-day management of the NDR contracts. Project Managers will be able to review submitted information, run reports on financial activity or inactivity of the grant recipient, evaluate steps taken by the recipient to ensure compliance with applicable laws and executive orders, and have access to over-all contract information in order to manage

grants and provide technical assistance. Per 2 CFR 200.309 this process ensures IEDA will charge to HUD award only allowable costs incurred during the period of performance and authorized pre-award costs.

Allocations and Obligations

Per 2 CFR 200.302(b)(3) records that identify the CDBG-NDR allocation, authorizations, obligations and unobligated funds are recorded in iowagrants.gov, the Allocation Log (ALOG) and DRGR. Each grant from HUD is recorded in iowagrants.gov and funding opportunities are funded in accordance with the HUD approved CDBG-NDR Action Plan for eligible activities. For each contract, the activities are setup in iowagrants.gov in accordance with contract budgets. In addition to iowagrants.gov, the IEDA maintains an Allocation Log (ALOG) in Excel for the NDR grant. As contracts are executed with Recipients, contract award totals and administration amounts are recorded in this spreadsheet, as well as final costs. This log provides a cross check of the amount of money available in each program area, and the obligations of those funds. Each quarter, the amounts recorded in both the iowagrants.gov and the ALOG are reconciled with the Quarterly Performance Reports (QPR) and the DRGR budget per 2 CFR 200.302(b)(2). Amendments to contract budgets are also recorded. At contract closeout, amounts remaining undisbursed in each activity and the contract are deobligated, returning the funds to the program and making them available for other eligible activities. Located in the Appendices to this manual are:

- Internal Allocation Log Summary and Allocation Log Detail (ALOG)
- Monthly DRGR Allocation Report submitted to HUD – includes dollars budgeted, awarded, obligated, remaining to obligate, disbursed, remaining to be disbursed and status.

Intent to Obligate Construction Funds

The National Disaster Resilience Competition Grant Requirements state the following (per page 36563 of FR Vol. 81, No. 109):

(8) Design. This notice amends the NOFA to clarify that prior to the Grantee's obligation of funds for construction, the Grantee will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Grantee for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards.

Therefore, the following clause is included in all contracts for recipients conducting construction activities:

(k) DESIGN. Prior to the Recipient's obligation of funds for construction, the Recipient will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Recipient for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards (as applicable)."

The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete and construction is feasible. The form must be submitted through iowagrants.gov following the completion of final design and prior to release of the bid package. The form is uploaded as part of the process of completing the Wage Rates Status Reports section under the "Compliance Forms and Quarterly Status Reports" tab. The recipient will download the form from this site, obtain the required signatures verifying the feasibility of the project, and upload the completed form under the tab "Wage Rate Supporting Documents".

IEDA reviews the report and will approve the status report if all required documentation is provided. If the Intent to Obligate Construction Funds is not included or incomplete, the status report will not be approved the recipient must make the necessary corrections and resubmit the status report.

Period of Performance and Authorized Pre-award Costs

IEDA will ensure it will charge to HUD only allowable costs (except as described in 200.461, Publication and Printing costs) incurred during the period of performance and authorized pre-award costs per 2 CFR 200.309.

In addition, IEDA follows 2 CFR 200.458 which states pre-award costs incurred prior to the effective date of the Federal award directly pursuant to the negotiation and in anticipation of the Federal award where such costs are necessary for efficient and timely performance of the scope of work. Such costs are allowable only to the extent that they would have been allowable if incurred after the date of the Federal award and only with the written approval of the Federal awarding agency.

Reimbursement of disaster recovery expenses was outlined in the NDR Phase TWO NOFA (FR-5800-N-29A2), Appendix A, page 25. Expenses also included reimbursement of allowable Application-related costs incurred by State or its Recipients. Application-related costs were included in IEDA's Action Plan approved by HUD.

Claim Reviews

The Community Investments team is responsible for the maintenance of data in all three of these systems (grants.gov, ALOG and DRGR). Each claim is recorded by activity. lowagrants.gov documents budget amounts, current draw activity, cumulative draws, and remaining funds. lowagrants.gov allows contracts to be suspended which would prevent claim creation. After the review and approval of the claim, the Reimbursement Coordinator sends the claim to Fiscal.

(detailed claim review and process of federal funds is included in "Request for Federal Funds" section.)

Program Income and Return of Funds

All funds are provided to Recipients on a reimbursement basis. Although no revenue-generating activities will be undertaken with NDR funds, the lowagrants.gov management system is set up to track program income. Should this occur, program funds are not allowed to be drawn until all program income has been expended. Return of funds will be treated in the same manner as program income. An excess program income that is not obligated to NDR projects will be transferred to the State's annual CDBG program.

When funds are returned to the state through repayment, recapture or insurance proceeds, and current incoming draws are not anticipated in the short-term, in order to comply with all first-in, first-out policies, the funds will be receipted as Program income, to be re-obligated to future eligible projects.

Progress Reports

CDBG-NDR Recipients (housing and infrastructure only) report expenditures and status of project on each draw. Watershed and planning activities report progress through a quarterly status report. lowagrants.gov also tracks performance milestones per Timeline/Scope of Work included with each contract.

Information about the individual clients served by the disaster funds is maintained in lowagrants.gov. Data from this database is utilized by the IEDA staff in determining eligibility for the programs and determining if a duplication of benefits will exist by using our funds. This data is also used to track progress in a variety of ways – by recipient, by county, etc.

The IEDA Project Manager will track actual quarterly spending for each partner and compare this to the projected quarterly spending as listed in the project contract. Deviation from the projected spending is anticipated, however, as the project nears completion the percent variation should decline. The guideline sections of this manual provide a detailed procedure for each project type: housing, infrastructure, planning, and watershed implementation.

IowaGrants NDR Amendment Process

Minor Amendment

- Recipient submits a request to revise Attachment A, "Project Description" uploads a letter requesting change with supporting documentation through IowaGrants.
- Project Manager receives notice through IowaGrants of request.
- Project Manager notes the reason for the amendment in the comments section and approves or disapproves Recipient request. Notifies Division Coordinator via IowaGrants.
- Division Coordinator approves or disapproves request and notifies DRGR Coordinator.
- DRGR Coordinator makes any revisions to DRGR Action Plan
- Iowa Grants notifies Recipient of final Action.

Major Amendment

- Recipient submits a request to revise “Budget Activity” or “Project Description” including either/or federal budget, direct leverage, or supporting leverage amount. Recipient uploads a letter requesting change with supporting documentation through IowaGrants.
- Project Manager receives notice through IowaGrants of request.
- Project Manager notes the reason for the amendment in the comments section and approves or disapproves Recipient request. Notifies Division Coordinator via IowaGrants.
- Division Coordinator approves or disapproves and notification is sent to Contract and Compliance Manager.
- Contract and Compliance Manager prints “Contract Amendment Details”, attaches proposed revision to A-log and routes to DA and Fiscal for signatures.
- Contract and Compliance Manager uploads signed “Contract Amendment Details” to Iowa Grants (Contract Amendment Details) and notifies (e-mail) DRGR Coordinator.
- DRGR Coordinator reviews documents in IowaGrants and makes revisions in DRGR and Iowa Grants.
- DRGR Coordinator notifies (e-mail) Contract and Compliance Manager that changes in DRGR are complete.
- Contract and Compliance Manager approves amendment in IowaGrants which notifies Recipient.
- The approved version of Budget becomes the active version. If changes are made to the A-Log note date A-Log is changed.
- Result of Budget Revisions: A-Log = IowaGrants = DRGR

IEDA/Project Manager initiated Amendment

- Reasons for an amendment include a Unilateral Modification to accommodate any change in the applicable Act, Federal, State or local laws, regulations, rules or policies. These may be a minor or major amendment. A unilateral modification will be given to the Recipient as an amendment.
- Project Manager may initiate either a minor or major amendment and amendments will be processed similar to the recipient initiated amendment process.
- A minor amendment could be for reasons such as an update to the guidelines, citation changes, clarification received from HUD, a revision or addendum to guidelines or Project Description, etc.
- An example of a major amendment would be for a change to the contract such as adding or removing language incorporating Guidelines, conditions, or attachments. These may or may not require a signature by both parties. Changes will be appended to the original contract found in IowaGrants.gov.
- IEDA major amendments require same sign-off as Recipient initiated major amendment.

Any other requests for changes outside of the of the above state will be made through IowaGrants in consultation with Authority’s management. The IEDA contract specialist can provide a detailed list of the steps required for data entry in iowagrants.gov.

Recipient Closeout Procedures

When a contract reaches the established end date or upon notification by the project manager, the closeout coordinator generates the Final Project Closeout Checklist. The checklist assesses total expenditures, satisfactory compliance with contract terms, and the contract status for audit compliance. The closeout coordinator completes the first part of the checklist by verifying contract award and spent amount in IowaGrants and DRGR. They also note if any funds will be de-obligated. The checklist is then forwarded to the project manager that verifies satisfactory compliance and that the contract has been monitored and that all monitoring findings have been cleared. The project manager returns the form to the closeout coordinator, who ensures the activities associated with the contract are then closed in IowaGrants, the action plan and DRGR. The checklist is forwarded to the contract coordinator who ensures the Allocation Log is updated. The closeout coordinator then issues the Contract Completion letter to the recipient and uploads the signed form into IowaGrants.

As allowable within the project timeline, funds deobligated by a recipient will be made available to other recipients to further support efforts directly related to existing project goals and deliverables.

Compliance

In addition to financial and performance information, several areas of compliance are tracked in iowagrants.gov including environmental, historic, monitoring visits and results, to name a few. Within the Compliance Forms and Quarterly Status Reports Component of iowagrants.gov the Recipient can complete and submit Compliance forms associated with: Section 3, NHPA Section 106, Environmental Review, Wage Rates, Wage Restitution and Duplication of Benefits. Each form includes instructions along with relevant links.

The Site Visits component of iowagrants.gov allows project managers to document as many monitoring reviews as necessary. More information about this can be found in the Monitoring Policy section of this document.

Duplication of Benefits

A detailed DOB review of each proposed disaster award to an entity is required by federal law and is intended to ensure that two different sources of funding are not being provided to the same entity for the same purpose. To avoid this potential duplication, the State will check each proposed award against awards already made (or in process) by FEMA, SBA, private insurance companies, etc. The State has developed a detailed DOB Process Manual (Appendix D) to assist in compliance with the federal law and regulations in this area.

Contractor Clearance

All contracts entered into through a CDBG-DR award are documented through the Contractor Clearance form. This form documents that the Grant Administrator has checked all potential contractors against the SAM.gov website for debarred contractors. IEDA reviews the information provided and approves the form. This form is also cross-checked to ensure all DOB forms are approved prior to construction.

Wage Rates

For construction projects triggering the Federal Labor Standards requirements, the Grant Administrator will complete and submit a wage rates compliance form and submit the form for IEDA review and approval. For NDR Infrastructure and watershed construction projects, the Intent to Obligate Funds form will be included in this submittal as documentation of compliance with FR Notice Vol, 81, No 109, page 36563 (8) *Design*.

Environmental Review

All NDR projects undergo an environmental review process. The environmental review is to ensure that no adverse environmental impacts would result from the proposed project. The environmental review also includes a "Section 106" review, which includes assessment of effect on historic and cultural resources.

The Environmental Review Record (ERR) process formally begins with the issuance of a grant award letter to the recipient responsible entity (RE) that contains the following paragraph:

No HUD Funds or non-HUD funds may be committed to the project until the applicant has secured environmental approval from the State, as provided in HUD regulation 24 CFR Part 58. In addition, pending environmental approval and pursuant to 24 CFR Part 58.22(a), no grant recipient or participant in the development process, including contractors or sub-contractors, may undertake an activity that may limit the choice of reasonable alternatives. Such choice limiting actions include real property acquisition, conducting a competitive sealed bid process for the project, signing a construction contract, leasing, rehabilitation, repair, demolition, conversion, and construction.

IEDA provides documents and training materials for ERR development on our website under the CDBG Management Guide and other resources. When the RE believes that it has completed and documented the appropriate level of environmental review of its project, all relevant documents and forms are

uploaded into the iowagrants.gov system at a specifically designated location. The iowagrants system automatically notifies the IEDA Environmental Review Officer that this upload has occurred.

For any projects that are legitimately categorized and accepted as Exempt or CENST, forms are checked for completeness as well as proper signatures and dates. If all is in proper order and documented, the ERR is approved by the Environmental Officer and the system notifies the applicant of same. Date of approval is recorded.

If the project requires a CEST or EA or EIS level of review, it is immediately logged into the system and the state comment period and potential release of funds dates are calculated. Any comments that may be received during the State 15-day period are also entered into the system. Oversights or errors of a minor and non-substantial or non-substantive nature are negotiated and can potentially be corrected during the comment period. Errors in the level of determination, or in any vital step of the process, result in rejection of the submittal and the RE is instructed to correct the errors and begin the ERR anew. Any error in the evaluation, documentation or mitigation of items relating to the 58.5 or 58.6 checklist regulations may also, depending on severity, result in dismissal of the ERR and instruction to the RE to make corrections and restart the process.

Upon receipt of a properly dated and executed form 7015.15 RROF and given the Environmental Review Officer's judgment that the entire ERR is proper and complete, (including the Section 106 approval and sign-off of IEDA's Historic Preservation Officer as applicable), a formal Release of Funds letter bearing the signature of the Environmental Review Officer is sent to the RE certifying officer. It is simultaneously uploaded into iowagrants.gov. An original of the RROF form 7015.15 is kept on file at the IEDA offices.

Those projects involving tiered environmental reviews must submit (upload) subsequent Tier II/Section 106 review forms in iowagrants.gov with attached documentation for each project site. Any project mitigation measures are to be identified and included with the ERR submittal. Such measures are verified for implementation and positive effect as part of the normal IEDA grant monitoring process.

Section 106 Review: One unique component of Iowa's ERR process for CDBG-DR funds is the executed Programmatic Agreement among the IEDA, the Iowa State Historic Preservation Office and the Advisory Council on Historic Preservation, which allows the IEDA Historic Preservation Specialist (HPS) the final review responsibility for all projects resulting in No Adverse Effect to Historic Preservation or lower finding for compliance with Section 106 of the National Historic Preservation Act. All Section 106 reviews are submitted through iowagrants.gov for the IEDA HPS to review. If the IEDA HPS concurs with the finding based on the provided support documentation, the submittal is "Approved." If there are errors in the form, the form is negotiated back to "correcting status" for changes to be made and resubmitted prior to "approval." The Tier II/Section 106 form is used in the following circumstances:

- If a project triggers an EA or EIS, the Section 106 form is submitted prior to the completion of the EA or EIS checklist and local public comment period. The RE submits information to the IEDA HPS through iowagrants.gov limited to Section 106 compliance. Once "approved" the RE includes screen shot approval in the ERR prior to completing the Environmental Review form in iowagrants.gov.
- If a project is CEST, (or a Tiered EA) the Environmental Review form with ERR is submitted in iowagrants.gov and processed as noted above. As individual project sites are identified (typically post release of funds) the Tier II/Section 106 form is completed in iowagrants and reviewed by the IEDA HPS.
- If a project is co-funded with another federal agency, that has already consulted with the SHPO, no further Section 106 review is required and those review and compliance documents are simply added to the ERR with no unique Section 106 form in iowagrants.gov.

Claims

All NDR projects are required to submit claims through iowagrants.gov in order to have funds disbursed to them. The claim form requires information relating to the overall activity budget for that Recipient,

funds previously drawn, the amount of the current draw, the amount of funds being drawn down for “project delivery costs”, where applicable, the amount of funds being drawn for administration, and addresses for which the funds are being drawn. The draws for also request detail on the amount being requested for each individual address, to reduce the chances of accidentally overdrawing funds for that activity.

Each claim is reviewed for various compliance issues: Request for Release of Funds; Section 106 Clearance; DOB completion for each address listed; contract status, monitoring, and budget variations.

Record Retention and Access

Per 24 CFR 570.490, IEDA requires Recipients to maintain all original receipts, administrative records, financial records and project activity records pertaining to the NDR award for a period of five years after the date the Grant is closed with HUD.

Iowagrants complies with all Federal and State security and accessibility regulations. IEDA electronic records are maintained through iowagrants.gov via the following process.

- Required Recipient documents/information are uploaded to iowagrants.gov
- Documents/information are stored on a highly secure, encrypted and hosted on dedicated servers.
- Documents are retrieved using a standard web based system fully compatible with Pcs and mobile devices.
- Reports are provided through Jasper Reports and iowagrants.

The State of Iowa has an agreement with Dulles Technology to provide iowagrants to multiple state agencies. The agreement includes data ownership and data transfer. The state of Iowa owns the data.

IEDA’s Data Operations Manager is the person responsible for electronic recordkeeping.

Personally Identifiable Information (PII)

IEDA follows Iowa Administrative Rules 261, Chapter 195.14 which describes the nature and extent of personally identifiable information which is collected, maintained and retrieved by the agency by personal identifier in record systems as defined in rule 195.2(17A,22). This rule describes the means of storage of that information and indicates whether a data processing system matches, collates, or permits the comparison of personally identifiable information in one record system with personally identifiable information in another record system. Unless otherwise stated, the authority for IEDA to maintain the record are provided in Iowa Code chapter 15.

Iowa Administrative Rules 261, Chapter 195.14(6) Grant and loan application records. The agency administers a variety of state and federal grant and loan programs. Records of persons or organizations applying for grants, awards or funds are available through the agency. These records may contain information about individuals collected pursuant to specific federal or state statutes or regulations. Personally identifiable information such as name, address, social security number and telephone number may be included in these records when the applicant is an individual. Many program applicants are political subdivisions or corporations, not individuals.

CDBG-NDR documents/information are stored on a highly secure, encrypted system and hosted on dedicated servers. IEDA staff are required to participate in annual cyber safety certification training which also includes an emphasis on not sharing passwords.

IEDA also complies with Chapter 22.7 which outlines the public records that shall be kept confidential.

REQUEST FOR FEDERAL FUNDS

Responsible personnel or unit: IEDA Accounting Team & Disaster Recovery Team

The Accounting team group is responsible for drawing down funds on the NDR-CDBG from HUD in compliance the standards below that meet the requirements of subpart B of 31 CFR Part 205. The major requirements of subpart B of 31 CFR Part 205 are:

- A State must minimize the time between the drawdown of Federal funds from the Federal government and their disbursement for Federal program purposes.
- A Federal Program Agency must limit a funds transfer to a State to the minimum amounts needed by the State and must time the disbursement to be in accord with the actual, immediate cash requirements of the State in carrying out a Federal assistance program or project.
- The timing and amount of funds transfers must be as close as is administratively feasible to a State's actual cash outlay for direct program costs and the proportionate share of any allowable indirect costs.
- States should exercise sound cash management in funds transfers to subgrantees in accordance with OMB Circular A-102 (For availability, see 5 CFR 1310.3.).

The Iowa Economic Development Authority will apply the cash management rules that apply to Authority's Community Development Block Grant Funding (CFDA #14.228) which is subject to the State of Iowa Treasury-State agreement to the Disaster Resiliency Community Development Block Grant Funding (CFDA #14.272). These rules require that funds received from the federal government be expended within three business days and also that funds requested by the Iowa Economic Development Authority are the minimum amounts needed by the state and are in accordance with the actual, immediate cash requirements of the State in carrying out the Disaster Resiliency Community Development Block Grant Funding. The timing and amount of funds requested will be as close to the State's actual cash outlay for program and administrative costs as feasibly possible.

Program funds are receipted into and spent from accounting string 0340-269-4710.

Administrative funds (including payroll) are receipted into and spent from accounting string 0001-269-C460.

All funds are provided to Recipients on a reimbursement basis.

Program Funds

Reimbursement Coordinator reviews claims submitted through iowagrants.gov, approves claims per NDR Claim Review Checklist and prints 3 copies for additional approval by Division Coordinator.

Reimbursement Coordinator prepares "CDBG Funding, Draws – Disaster List of Requests to Fiscal" and a "CDBG-Funding, Draws-Disaster to FISCAL for DRGR" (reports). Reports along with approved claims are forwarded to the Budget Analyst.

The Budget Analyst logs onto DRGR and enters the dollars for each activity based on the "Draws-Disaster to FISCAL for DRGR" report. The Analyst creates a voucher in DRGR and returns the voucher and report to the Reimbursement Coordinator to approve in DRGR. Once approved, Reimbursement Coordinator copies "print approval screen" from DRGR and forwards to Budget Analyst.

The Budget Analyst then prepares a Cash Receipt on the State's Accounting system (1/3). The cash receipt is approved by the Accounting Tech 3 and forwarded to the State Treasurer's Office. When the funds from HUD reach the state's bank account the cash receipt is approved by the State Treasurer's Office. The Budget Analyst then modifies the cash receipt to move the funds to the correct accounting string. The modified cash receipt is then approved by the Budget Analyst and Accounting Tech 3. State Accounting then approves the cash receipt. A copy of the completed cash receipts in addition to the DRGR printouts and "Draws-Disaster to FISCAL for DRGR" and "Draws – Disaster List of Requests to Fiscal" documenting all the approvals is maintained by the Budget Analyst.

Administration Funds

Administration accounts related to the FCDBG are reviewed on a bi-weekly basis by the Budget Analyst. The Budget Analyst must review all requests for payment that are processed through the administration account so all costs that have been incurred during the two weeks have been deemed proper and allowable.

Every other Thursday the Budget Analyst summarizes all activity in the FCDBG administration account and determines how many dollars to draw. This determination is based on prior history and approximate payroll costs. The Budget Analyst completes a "Administration Draw" form and enters this information into DRGR. Supporting documentation for this amount is retained on a spreadsheet summarized by fiscal year. The voucher number from DRGR is noted on the "Administration Draw" form in addition to the date and the Analyst's initials. The "Administration Draw" form and a screen print from DRGR are then forwarded to the EO2 or DA for approval of the draw. Upon approval, the Budget Analyst prepares a CR which follows the same process as the Program Funds.

All CDBG administrative funds (CDBG, CDBG-DR and CDBG-NDR) are drawn every other Thursday-Monday to comply with the Cash Management Improvement Act payroll warrant requirements regardless of if the program is subject to the Act.

PROCEDURE TO DETERMINE TIMELY EXPENDITURES

Responsible personnel or unit: Project Manager, Division Coordinator

Track/Monitor Expenditures:

- Claims are submitted through lowagrants.gov. Recipient expenditures will be tracked both in lowagrants.gov, DRGR and IEDA accountant on an ongoing basis
- Recipient contracts state funds must be drawn at least every 3 months.
- Project Managers will receive quarterly report from lowagrants.gov indicating if their projects are drawing funds within the contracted time frame.
- Project manager will remind those that are not timely.

Reprogram funds:

- Through review of lowagrants.gov reports and grantee progress reports it will be determined which project are not able to move forward. Those projects will be cancelled and the HUD disaster representative will be consulted.
- IEDA will follow the procedures outlined on page 30 to request either a substantial amendment or nonsubstantial amendment, as applicable, through HUD.
- If requested by HUD, IEDA will submit an updated BCA to support a request for a substantial amendment.
- Re-programmed funds will be given to projects with additional unmet needs that are successfully moving forward and are over budget or that have additional work that can be performed prior to grant close-out as long as the project meets all program requirements.

Project expenditures:

- NDRC application contained strict time lines and budgets for each stage of the projects.
- Recipient contracts detail projected quarterly expenditures and budgets.
- Grantees will be evaluated as to how they are meeting expenditures as they relate to these timelines and deliverables.
- IEDA will generate a report in lowagrants.gov and DRGR to track progress.

PROGRAM INCOME

The Authority does not anticipate gross income earned by the Recipient that is directly generated by a supported activity or earned as a result of the CDBG-NDR Award during the period of performance. If the situation arises;

- Recipient will report, via Iowa Grant's normal claim process, the amount of program income earned.
- Recipient will disburse and report through Iowa Grants, funds available from program income prior to drawing additional program funds.
- The Authority will report and enter program income into DRGR
- If a NDR funded project results in return of funds during or after the HUD closeout procedure, the funds will be held by IEDA and treated as program income. The funds will be expended through IEDA's regular CDGB program prior to the expenditure of additional regular program funds.

When funds are returned to the state through repayment, recapture or insurance proceeds, and current incoming draws are not anticipated in the short-term, in order to comply with all first-in, first-out policies, the funds will be receipted as Program income, to be re-obligated to future eligible projects.

ADVANCE PAYMENTS

No advanced payments are received at this time. However, in the event that advance funds are received the funds are received by the Treasurer of State and held per Code of Iowa Chapter 12C.

COLLECTIONS

In the event that the IEDA disburses funds and subsequently determines that the funds were disbursed in error the following procedure will be followed:

The project manager will contact the recipient of the funds and determine if subsequent funds will be drawn for the same activity. If the award is still open and subsequent funds will be drawn the amount disbursed in error will be deducted from the next amount drawn.

If the award is closed or no subsequent funds will be drawn the IEDA will send an invoice to the recipient of the funds for repayment.

REPORTING/FINANCIAL AND PERFORMANCE REVIEW

Control of Funds

Responsible personnel or unit: IEDA Accounting Team

The Iowa Economic Development Authority follows the language of Chapter 8.38 of the Code of Iowa for all funds (not only appropriations as noted in the Code section).

No state department, institution, or agency, or any board member, commissioner, director, manager, or other person connected with any such department, institution, or agency, shall expend funds or approve claims in excess of the funds received, nor expend funds for any purpose other than that for which the money was appropriated or awarded, except as otherwise provided by law.

Internal Control System

The internal control system is reviewed on a yearly basis by the Office of the Auditor of the State of Iowa during the annual audit of the Iowa Economic Development Authority. Additionally, internal control will be reviewed through the internal audit function provided by the Office of the Auditor of the State of Iowa, per Agreed Upon Procedures for the CDBG-NDR funds. The results of these audits/reviews are reported to Authority Community Development personnel, the general public, the IEDA board, HUD and the IEDA director.

Appendix includes:

- Copy of Article IV, Constitution of the State of Iowa, Section 22 – states the auditor of state is an elected official.
- Letter dated April 7, 2009 from the Office of the Auditor of State regarding Agreed Upon Procedures for CDBG Supplemental funds awarded in 2008.

Internal Reporting

Monthly Reports to Management

The Accounting team is responsible for providing accurate and timely financial reports to the Department Management. The monthly budget vs. actual reports is prepared by the Budget Analyst to enable management to quickly analyze the financial position of the CDBG program. The report shows the current budgeted amount in the action plan for each program and the amounts disbursed both by program and region. Total disbursed funds by region are split between program and administrative costs to monitor compliance with the administration allocation.

External Reporting

Responsible personnel or unit: Reimbursement Coordinator

The Action Plan and Quarterly Performance Report (QPR) are submitted to HUD each quarter through the Disaster Recovery Grant Reporting (DRGR) system. HUD gathers information from the Iowa QPR and reports to the U.S. Congress.

The Action Plan is submitted to HUD through DRGR by the end of the last month in each quarter. The Action Plan lists all of the activities in the NDR grant, the activity description, the total NDR Grant Funds Budgeted for each activity and the expected performance measures. The budgeted totals for each program must not exceed the amount authorized in the DRGR system. After the Action Plan is updated in DRGR, it is then submitted to HUD to review and approve. Only after the Action Plan is approved, can the QPR be submitted.

The Quarterly Performance Report must be submitted to HUD through DRGR 30 days after the end of the quarter. The QPR contains financial information, performance measures achieved and an activity progress narrative for each activity. Actual amounts expended, drawn down (revenue) and obligated during the quarter are included in the financial information reported. The drawdown and obligated amounts are automatically updated from the DRGR drawdown module each quarter. However, the amounts expended have to be manually entered into the QPR. After the QPR has been updated, reviewed by either the Division Coordinator or the Division Administrator, and reconciled, it is then submitted to HUD to review and approve. HUD will review the QPR and submit data from the report to the U.S. Congress by the 19th of the following month. The table below outlines the target dates for Disaster Recovery Grant Reporting.

Target Dates – Deadlines

	<i>Jan 1st to Mar 31st Report</i>	<i>Apr 1st to Jun 30th Report</i>	<i>Jul 1st to Sep 30th Report</i>	<i>Oct 1st to Dec 31st Report</i>
Grantee to submit Action Plan changes with new or modified activities	March 30	June 30	September 30	December 31
HUD to review Action Plan changes - approve or reject for modification	April 15	July 15	October 15	January 15
Grantee to submit Quarterly Performance Report (QPR)	April 30	July 30	October 30	January 30
HUD to submit QPR data in Reports to Congress	May 19	August 19	November 19	February 19

Reports Available to Public

NDR staff ensures that all DRGR quarterly reports that have been reviewed and approved by HUD are posted on the IEDA website for public review.

BUDGETING

Responsible personnel or unit: Budget performance is monitored by the Budget Analyst and Division Administrators and Coordinators of the Community Development and Administration Division.

The state fiscal year runs from July to June. The Budget Analyst is responsible for determining the CDBG budgetary needs for inclusion in the overall IEDA budget. The IEDA budget is coordinated with the Department of Management, and is ultimately approved or denied by the State Legislature.

Budget categories are salaries and fringe, travel, supplies, postage, phone, rent, utilities, professional services, outside services, transfers, reimbursement to other agencies, equipment, indirect costs, refunds, and state aid.

CITIZEN PARTICIPATION

Responsible personnel or unit: IEDA Disaster Recovery Team

Pursuant to the citizen participation requirements of 24 CFR Section 91.115 and further guidance in the Notice of National Disaster Resilience Competition Grant Requirements, the State of Iowa's Economic Development Authority (IEDA), set forth the following requirements as it relates to the CDBG-NDR Program for resiliency programs funded by the Department of Housing and Urban Development (HUD).

1. **Phase 1 Application.** Conduct citizen participation in accordance with the requirement of the CDBG-NDR NOFA (see section III.C.1 of the CDBG-NDR NOFA) and Appendix A, including at least one public hearing and at least 15 days for Phase 1 citizen comment including publication of Executive Summary, Factor Narratives, Eligibility, National Object, Overall Benefit, and Schedule responses, Threshold requirement documentation and all Exhibits (A-G), Attachments D and F.
2. **Phase 2 Application.** Conduct citizen participation in accordance with the requirements of CDBG-NDR NOFA (see section III.C.1 of the CDBG-NDR NOFA), including one public hearing and at least 15 days for Phase 2 citizen comment.
3. **Substantial Amendments.** Conduct one public hearing at the Applicant level of government for each substantial amendment and provide at least 15-day citizen comment and ongoing citizen access to information about the use of grant funds.
4. **Nonsubstantial Amendment.** A nonsubstantial action plan amendment does not require public comment.
5. **Website.** The topic of disaster recovery is navigable by citizens from IEDA website homepage. Previously published portions of the Application as submitted to HUD, the DRGR Action plan, action plan amendments and performance reports are available on the website.
6. **Accessibility/Availability.** Grantee and Recipients will ensure the public reasonable access to all local meetings, project records and information relating to the proposed and actual use of federal funds. Grantee will all citizen have equal access to information about the programs, including persons with disabilities and limited English proficiency (LEP). Program information is available in the appropriate languages for the geographic area served by the jurisdiction and the appropriate format for persons with disabilities.
7. Applicants/Recipients are encouraged to notify citizens by any other means, including public posting, postings on relevant Web sites, etc. to keep citizens informed about the project.
8. **Citizen Complaints.** Provide citizens with names and addresses of the person(s) authorized to receive and respond to citizen questions and complaints concerning proposed and funded activities. A timely written response must be made to every citizen complaint, and the response must be provided within 15 working days of the receipt of the complaint, if practicable.

PLANNING FOR AUDIT COSTS

Grantee

The Iowa Economic Development Authority is billed for only single audit work performed by the Iowa Auditor of State and specific internal auditor functions they provide related to the CDBG-NDR funds. Single

Audit bills are allocated to major programs based on prior fiscal year expenditures. If the federal funds are not selected as a major program of the state, no audit costs are charged. The specific internal auditor functions provided by the Iowa Auditor of State will be billed, in entirety to the CDBG-NDR program as no other programs are reviewed as part of the internal audit function.

Local Governments/Nonprofit Organizations

For Recipients of \$750,000 or more in federal funds received from more than one source of federal funding in a fiscal year, an organization-wide audit must be performed. Auditees submit copies of audits to the Federal Audit Clearinghouse (FAC) to publish on the Web where it is available for public inspection (200.512(b)(2)).

For recipients of \$750,000 or more in federal funds received from a single source of funding in a fiscal year, a project audit, targeting only transactions dealing specifically with the project, may be performed in lieu of an organization-wide audit.

Recipients of less than \$750,000 in federal funds within a year are exempt from federal audit requirements.

IEDA reserves the right to request additional information as needed.

Pre-Award Audit

A Pre-Award Audit may be required of all for-profit and non-profit direct recipients of grant funds that exceed \$150,000. Pre-Award Audits will be initiated by IEDA following awards. Completion of the Pre-Award Audit survey including satisfactory results or remedies must occur prior to contract execution and transfer of funds from IEDA.

Audit Process

Making Audits Publicly Available

Auditees submit copies of audits to the Federal Audit Clearinghouse (FAC) to publish on the Web where it is available for public inspection (200.512(b)(2)).

Federal Agency Responsibility

- IEDA utilizes the State Auditors to meet single audit requirements which are conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS) (200.514(a))

2 CFR part 200 – Audit Process

1. Set up in iowagrants.gov – if IEDA is awarding more than \$750,000 to a City/County the Closeout/Audit section of iowagrants.gov is checked that an audit is required.
2. July of each year closeout coordinator sends Appendix XI Compliance Supplement Audit letter and Single Audit Form (SF-SAC) to every recipient. The Single Audit Form must be returned to IEDA.
3. As audits are received, they are logged into the iowagrants.gov by contract.
 - Date audit received
 - Type of Audit (City, County)
 - Audit Year
 - Audits are maintained in File Cabinets marked “Audits”
4. If the audit has findings or issues the project manager assigned to the contract will follow up until resolution. Per 2 CFR 200.331(d)(3), IEDA will issue a management decision for audit findings that relate to the NDR awards made to Recipients.
5. Prior to closing a contract, closeout coordinator
 - Verifies receipt of 2 CFR 200 Audit or Single Audit Form

- If not received, the recipient is contacted or auditor’s website is checked to see if audit is available. If available, print, update iowagrants.gov, file copy of audit and close out contract.
6. Check Federal Audit Clearinghouse (FAC) to verify audit has been received. Log date received into iowagrants.gov

Revision of Budget and Program Plans (200.308)

These policies are to ensure that any changes made to the HUD-NDR approved budget, scope, or objectives will be identified to HUD.

1. Prior to making any of the following changes to a non-construction award IEDA will obtain HUD approval:
 - Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval)
 - Change in a key person specified in the NDR application or the NDR Award.
 - The approved project director disengages from the project for more than three months, or a 25% reduction in time devoted to the project.
 - 200.308(c)(1)(iv) Inclusion of costs that require prior approval - (iv) The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with Subpart E—Cost Principles of this part or 45 CFR part 75 Appendix IX, “Principles for Determining Costs Applicable to Research and Development under Awards and Contracts with Hospitals,” or 48 CFR part 31, “Contract Cost Principles and Procedures,” as applicable.
 - The transfer of funds budgeted for participant support costs as defined in 200.75, *Participant support costs*, to other categories of expense. (*participant support costs mean direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects*)
 - Unless described in the application and funded in the approved Federal awards, the subawarding, transferring or contracting out of any work under a Federal award, including fixed amount subawards as described in §200.332, Fixed amount subawards. (With prior written approval from the Federal awarding agency, a pass-through entity may provide subawards based on fixed amounts up to the Simplified Acquisition Threshold, provided that the subawards meet the requirements for fixed amount awards in §200.201 Use of grant agreements (including fixed amount awards), cooperative agreements, and contracts.) This provision does not apply to the acquisition of supplies, material, equipment or general support services.
 - Changes in the approved direct leverage (match) provided by Recipients
 - The need arises for additional Federal funds to complete the project.

2. Prior to making any of the following budget revisions to infrastructure or housing awards IEDA will obtain HUD approval:
 - A revision resulting from changes in the scope or the objective of the project.
 - Additional funds are needed to complete the project
 - A revision is desired which involves specific costs for which prior written approval requirements may be imposed consistent with applicable OMB cost principles listed in 2 CFR part 200, Subpart E—Cost Principles. [2 CFR 200.308(g)]

Recapture Policy for CDBG-NDR Funds

Responsible personnel or unit: Project Manager, Recipient, IEDA Collections Manager

Recapture process at Recipient level

1. How disaster funds to be recaptured are detected and documented are included in written recapture policies.

- Each Recipient will develop policies and procedures to address how Recipient will audit disaster awards including detecting general over disbursement and eligibility of awards.
 - General over disbursement: Administrative entity disbursed more than the applicant was eligible to draw (disbursed more than the award/contract amount or award was calculated incorrectly therefore the administrative entity disbursed more funds than the applicant was eligible to draw).
 - Eligibility over disbursement: a) Administrative entity disbursed funds to an applicant that was not eligible to receive assistance (i.e. applicant is not an LMI household) or b) Eligible applicant did not provide required program documentation or meet contract terms of forgiveness requirements (i.e. did not sign Subrogation Agreement)
 - Recapture of forgivable loans for Housing Repair/Rehab Program: Assistance for housing rehab is limited to forgivable loans. All construction costs associated with a unit will be protected in the form of a mortgage lien on the property in the amount of the expended construction expenses (loan amount) for repair/rehabilitation/resiliency improvements. The mortgage lien shall include the covenants and restrictions as established by these guidelines and the Administrative Plan and shall be enforced for the term of the loan – five years from the date of filing. Forgivable loans under this activity must be 5-year receding. Receding equally 20% per year after the mortgage lien is filed. Payback of CDBG-NDRC funds remaining, or the total of the net proceeds of the sale, whichever is less, will be required if the assisted property owner sells, vacates, rents or abandons the property any time within the 5-year period, unless such transfer or sale meets the requirements of these guidelines specific to Rental Rehab (activities 731 & 733)

2. If it is detected that the Recipient provided funds in excess of what the applicant was eligible to receive, the Recipient may immediately repay the excess funds to the state.

- The Recipient must also document in the applicant file detailing the reason for the over disbursement of funds
- The applicant file should clearly identify the name of the program through which the funds were provided to the applicant, the dollar amount provided and the portion of the funds deemed over disbursed.

3. If the Recipient determines the applicant did not meet contract or program eligibility requirements, the Recipient must recapture the funds using their established policy/procedures. The Recipient's recapture policy/procedures must contain at a minimum the following:

- Documentation of reason(s) for recapture
- 30-day notice requiring repayment options and opportunity to cure:
 - Repayment amount
 - Partial repayment request for repayment plan (installments) – request is sent to IEDA for approval including financial supporting repayment plan).
 - Appeal process, contesting repayment. An applicant may appeal to the Recipient. Recipient gathers additional information regarding the appeal and makes a determination. Recipient forwards appealed determination to IEDA.
- If a notice is returned the Recipient will take action to locate the applicant.
- Recipient sends 15-day notice & demand for repayment with opportunity to cure, if no response from 30-day notice.
- If fraud is suspected, the file is turned over to IEDA immediately.

4. If Recipient has not recaptured funds by locating applicants and sending notices, Recipient may make a formal request to IEDA to initiate collection and/or legal actions for specific applicants. (note: IEDA will only take assignment on an enforceable lien/contract). Recipient submits:

- A request to initiate collections and legal action for specific applicants, approved by the City Council/Board of Supervisors;
- An "Assignment of Contract" signed by City/County official
- Summary of reason(s) for recapture of funds and collection actions taken by the Recipient;

- Copy of applicant file including original signed contract between applicant and Recipient, signed contract documents, applicant name, address and contact information; demand notices sent to applicant and correspondence and/or results of notices; copy of bankruptcy notification if applicable.

5. Recipient sends repayment or the file (in the event the funds were uncollectable) to IEDA. Repayments are returned on a claim form accompanied by a completed Return of Funds Form.

IEDA process for recapture of disaster funds

1. IEDA monitoring of the Recipient recapture process.

- The IEDA project manager will review the Recipient’s recapture policies and procedures through a desktop monitoring prior to the first construction draw.

2. IEDA Collections Manager follows IEDA collections process:

- If the Recipient has notified IEDA of suspected fraud. IEDA will provide information to the Iowa Attorney General.
- IEDA reviews the Recipient’s collection/attempts to collect over disbursed funds to ensure an attempt to contact the recipient has been made.
- Where applicable, IEDA may attempt to recoup or recover funds or assets.
- IEDA reviews any requests for payment terms other than full and immediate repayment and request additional documents as applicable.
- IEDA may recommend a charge-off, if one of the following conditions occurs.
 - Funds to be recaptured are less than \$100.
 - Recipient of funds has very little or no means to repay with no assets that can be garnished.
 - Costs of collection would exceed the payment due amount.
 - Recipient cannot be located.
- If legal action is required, IEDA Director approves prior to forwarding to collection attorneys.
- IEDA documents resolution of all State-handled collection cases.

HUD Closeout Procedure and Deobligation of Funds

Responsible personnel or unit: IEDA NDR Division Coordinator

IEDA will follow closeout procedures for recipient agreements as contracts are completed, as stated in the previous section Financial Procedures, lowagrants.gov Management System Process, Recipient Closeout Procedures. Upon the closeout of all recipient agreements, IEDA will begin the closeout procedure for the NDR award. IEDA's role in the closeout procedure includes the following steps, or as determined by HUD closeout guidance.

- Expend all grant funds in accordance with needs or return funds
- Update accomplishments data to reflect all activities completed (or canceled)
- Update the performance measures for actual versus proposed
- Review final QPR
- Resolve all audit and monitoring issues
- Complete closeout certification and checklist as provided by HUD
- Complete closeout agreement

If a NDR funded project results in return of funds during or after the HUD closeout procedure, the funds will be held by IEDA and treated as program income. The funds will be expended through IEDA's annual CDGB program prior to the expenditure of additional regular program funds.

State Procurement Policy

Responsible personnel or unit: Each state agency or university, Recipient City/County

IEDA

The State of Iowa has procurement standards for state agencies per 24CFR570.489G. IEDA follows these standards.

The State of Iowa does not have procurement regulations for Cities and Counties to follow. However, IEDA requires Recipient Cities and Counties to adopt the federal procurement policies and procedures that align with Federal provisions of 2 CFR 200.318-200.326. Appendix contains:

- Sample Procurement Policies indicating sections that align with 2 CFR 200.318-200.328
- Sample Evaluation Criteria for Procurement of Professional Services
- Sample Evaluation Criteria for Procurement of Architectural Design, Construction Management and/or Construction Activities
- Sample Code of Conduct

Recipient - State Agencies

Iowa Department of Natural Resources (DNR), Iowa Department of Agriculture and Land Stewardship (IDALS), and Iowa Homeland Security and Emergency Management (HSEMD) are state agencies and follow the state's procurement policy as interpreted by their respective agencies.

Recipient – Regents Universities

Iowa State University (ISU), University of Iowa (UI), and University of Northern Iowa (UNI) are considered state agencies and are governed by the Board of Regents, State of Iowa. Purchasing authority is delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.

Cost Reasonableness

State agencies and regent universities, while following state mandated procurement policies, must also follow the cost reasonableness standard set forth in 2 C.F.R. § 200.323. Entities must develop an independent price or cost estimate before receiving bids or proposals for services. The appropriate form of analysis should be based on the complexity of the procurement. Example methodologies include:

- 1) Compare prior (historical) proposed prices and contract prices for the same or similar goods and services
- 2) Compare competitively published catalog prices, published market prices, or similar indices.

Per Iowa Code Chapter 118, purchasing standards for service contracts, Section 11-118.4(8A), intergovernmental agreements are not required to use competitive selection. The partner agreements between IEDA and state agencies/cities/counties are considered intergovernmental agreements and therefore should not be subject to the cost reasonableness standard.

City and County partners follow the procurement standards set forth in 2 C.F.R. 200 and will apply the cost reasonableness process for all service contracts.

Section 3

Responsible Personnel or Unit: IEDA Section 3 Coordinator (Dan Narber), Section 3 Technical data Manager (Don Dursky), technical project managers (Joe Bohlke, Ann Schmid, Jeff Geerts) & Section 3 clerical support (Khristine Smith)

Purpose of Section 3

(a) *Section 3*. The purpose of section 3 of the Housing and Urban Development Act of 1968 ([12 U.S.C. 1701u](#)) (section 3) is to ensure that employment and other economic opportunities generated by certain HUD financial assistance shall, to the greatest extent feasible, and consistent with existing Federal, State and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to businesses which provide economic opportunities to low- and very low-income persons.

(b) *Part 135*. The purpose of this part is to establish the standards and procedures to be followed to ensure that the objectives of section 3 are met.

Section 3 Terms and Definitions

Applicant – any entity which makes an application for Section 3 covered assistance, and includes, but is not limited to, any State, unit of local government, public housing agency or other public body, public or private nonprofit organization, private agency or institution, mortgagor, developer, limited dividend sponsor, builder, property manager, community housing Development organization, resident management corporation, resident council, or cooperative Association.

Assistant –Assistant Secretary for Fair Housing and Equal Opportunity.

Business – a business entity formed in accordance with State law, and which is licensed under State, county, or municipal law to engage in the type of business activity for which it was formed.

Contractor - any entity which contracts to perform work generated by the expenditure of Section 3 covered assistance, or for work in connection with a Section 3 covered project.

Employment Opportunities Generated by Section 3 Covered Assistance – all employment opportunities generated by the expenditure of Section 3 covered public assistance (i.e. operating assistance, development assistance and modernization assistance, as described in Section 135.3 (a)(1)). With respect to Section 3 covered housing and community development assistance, this term means all employment opportunities arising in connection with Section 3 covered projects (as described in Section 135.3 (a)(2)), including management and administrative jobs. Management and administrative jobs include architectural, engineering or related professional services required to prepare plans, drawings, specifications, or work write-ups; and jobs directly related to administrative support of these activities, (e.g. construction manager, relocation specialist, payroll clerk, etc.).

Housing and Community Development – any financial assistance provided or otherwise made available through a HUD housing or community development program through any grant, loan, loan guarantee, cooperative agreement, or contract, including community development funds in the form of community development block grants, and loans guaranteed under Section 108 of the Housing and Community Development Act of 1974, as amended. Housing and community development assistance does not include financial assistance provided through a contract of insurance or guarantee.

Housing Development – low-income housing owned, developed, or operated by public housing agencies in accordance with HUD's public housing program regulations codified in 24 CFR Chapter IX.

Low-income person – Families (including single persons) whose incomes do not exceed 80% of the median income for the area, as determined by the Secretary of HUD, with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80% of the median for the area on the basis of the Secretary’s findings that such variations are necessary because of prevailing levels of construction costs or unusually high- or low-income families.

Neighborhood area – For HUD housing programs, a geographical location within the jurisdiction of a unit of general local government (but not the entire jurisdiction) designated in ordinances, or other local documents as a neighborhood, village, or similar geographical designation.

New Hires – Full-time employees for permanent, temporary, or seasonal employment opportunities.

Non-Metropolitan County – Any county outside of a metropolitan area.

Other HUD programs - HUD programs, other than HUD Public and Indian Housing programs, that provide housing and community development assistance for “Section 3 covered project” as defined in this section.

Public housing resident – Any individual who resides in public housing as a signatory on a public housing lease, or as a member of the family of the individual(s) who is the signatory on the public housing lease has the meaning given this term in 24 CFR part 963.

Recipient – Any entity which receives Section 3 covered assistance, directly from HUD or from another recipient and includes, but is not limited to, any State unit of local government, PHA, or other public body, public or private nonprofit organization, private agency or institution, mortgagor, developer, limited dividend sponsor, builder, property manager, community housing development organization, resident management corporation, resident council, or cooperative association. Recipient also includes any successor, assignee, or transferee of any such entity, but does not include contractors and does not include any ultimate beneficiary under the HUD program to which Section 3 applies.

Section 3 – Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).

Section 3 Business –

- 51 percent or more owned by Section 3 residents; or
- 30 percent or more of permanent, full-time employed staff are currently Section 3 residents or were Section 3 residents within three years of the date of first employment with said business; or
- 25 percent or more of the dollar award of all subcontracts are awarded to businesses that meet the qualifications in points 1 and 2 above.

Section 3 Covered Assistance –

- Public housing development assistance provided pursuant to Section 5 of the 1937 Act;
- Public housing operating assistance provided pursuant to Section 9 of the 1937 Act;
- Public housing modernization assistance provided pursuant to Section 14 of the 1937 Act;
- Assistance provided under any HUD housing or community development program that is expended for work arising in connection with housing rehabilitation, construction, or other public construction project (which includes other buildings or improvements, regardless of ownership).

Section 3 Clause – the contract provisions set forth in Section 135.38. This Section 3 Clause must be inserted into all contracts. (A sample of the contract provision is provided within this policy guide.)

Section 3 Covered Contracts – a contract or subcontract (including a professional service contract) awarded by a recipient or contractor for work generated by the expenditure of Section 3 covered assistance or for work arising in connection with a Section 3 covered project. Note: Section 3 covered contracts do not include contracts awarded under HUD’s procurement program, which are governed by the Federal Acquisition Regulation (FAR). Section 3 covered contracts also do not include contracts for the purchase of supplies and materials. However, whenever a contract for materials includes the installation of the materials, the contract constitutes a Section 3 covered contract.

Section 3 Covered Project – the construction, reconstruction, conversion or rehabilitation of housing (including reduction and abatement of lead-based paint hazards), other public construction which includes buildings or improvements (regardless of ownership) supported by housing or community development assistance.

Section 3 Resident –

- A public housing resident; or
- An individual who resides in the metropolitan area or nonmetropolitan County in which the Section 3 covered assistance is expended, and who is:

A low-income person, as this term is defined in section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act defines this term to mean families (including single persons) whose incomes do not exceed 80 per centum of the median income for the area, as determined by the Secretary, with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 80 per centum of the median for the area on the basis of the Secretary's findings that such variations are necessary because of prevailing levels of construction costs or unusually high- or low-income families; or

A very low-income person, as this term is defined in section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)). Section 3(b)(2) of the 1937 Act (42 U.S.C. 1437a(b)(2)) defines this term to mean families (including single persons) whose incomes do not exceed 50 per centum of the median family income for the area, as determined by the Secretary with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50 per centum of the median for the area on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes.

- A person seeking the training and employment preference provided by section 3 bears the responsibility of providing evidence (if requested) that the person is eligible for the preference.

Service Area – the geographical area in which the persons benefitting from the Section 3 covered project reside. The service area shall not extend beyond the unit of general local government in which the Section 3 covered assistance is expended.

Subcontractor – any entity (other than a person who is an employee of the contractor) which has a contract with a contractor to undertake a portion of the contractor's obligation for the performance of work generated by the expenditure of Section 3 covered assistance, or arising in connection with a Section 3 covered project.

Very low-income person – families (including single persons) whose incomes do not exceed 50 per centum of the median family income for the area, as determined by the Secretary [of HUD] with adjustments for smaller and larger families, except that the Secretary may establish income ceilings higher or lower than 50 per centum of the median for the area on the basis of the Secretary's findings that such variations are necessary because of unusually high or low family incomes.

Applicability of Section 3 to Community Planning and Development Assistance

The requirements of Section 3 apply to recipients of HUD CDBG-DR funding exceeding \$200,000. Section 3 covered projects are those in which a combined (or aggregate) amount of covered funding exceeding **\$200,000**, is invested into activities as described below.

Section 3 applies to training, employment, contracting and other economic opportunities arising in connection with the expenditure of housing assistance and community development assistance that is used for the following projects:

1. Housing rehabilitation (including reduction and abatement of lead-based paint hazards, but excluding routine maintenance, repair and replacement) [Example: Section 3 applies to the

- combined investment of more than **\$200,000** into multiple single-family housing rehab projects during a program year];
2. Housing construction; and
 3. Other public construction (roads, sewers, community centers etc.)

Contractors or subcontractors that receive contracts in excess of **\$100,000** for Section 3 covered projects/activities are required to comply with the Section 3 regulations in the same manner as direct recipients.

Triggering the Requirements of Section 3

Section 3 is triggered when the normal completion of construction and rehabilitation projects creates the need for **new** employment, contracting or training opportunities.

Section 3 regulations should not be construed to mean that recipients are required to hire Section 3 residents or award contracts to Section 3 businesses other than what is needed to complete covered projects/activities

If the expenditure of covered funding does not result in new employment, contracting, or training opportunities, the requirements of Section 3 have not been triggered. However, each agency must still submit Section 3 annual reports indicating this information

Section 3 minimum Numerical Goals (24 CFR 135.30)

Each recipient, contractor and subcontractor may demonstrate compliance with the “greatest extent feasible” requirement by achieving certain numerical goals set out in 24 CFR 135.30 for providing employment and contracting opportunities to “section 3 residents” and “section 3 businesses” as defined below.

Recipients, their contractors and subcontractors may show compliance with Section 3 requirements by:

1. Employing Section 3 residents as 30 percent of the new hires each year (24 CFR 153.30(b)(3).

Each recipient, contractor and subcontractor may show compliance by awarding Section 3 business:

1. Awarding 10 percent of the total dollar amount of all covered construction contracts to Section 3 businesses; and
2. At least 3% of the amount of all other Section 3 covered contracts (non-construction or professional services contracts)

135.32 Recipient Responsibilities Pursuant to Section 3

Each Recipient (and their covered contractors, subcontractors or sub-recipients) are required to comply with the requirements of Section 3 for **new** employment, training or contracting opportunities resulting from the expenditures of covered funding.

1. IEDA has implemented procedures designed to assist recipients in the notification of Section 3 residents and businesses about training, employment and contracting opportunities generated by Section 3 covered assistance.
2. All Recipients must notify potential contractors for Section 3 covered projects of their responsibilities
3. All Recipients must incorporate, in full, the Section 3 Clause into all covered solicitations and contracts as indicated in 24 CFR Part 135.38.
4. All Recipients are responsible for facilitating the training and employment of Section 3 residents and the award of contracts to Section 3 businesses.

5. All Recipients are responsible for assisting and actively cooperating with IEDA in making contractors and subcontractors comply.
6. All Recipients must refrain from entering into contracts with contractors that are in violation of Section 3 regulations. - Recipients regularly checks the SAM database for debarred contractors and refrains from entering into contracts with them. In addition, IEDA will develop an internal list of business that are in violation of Section 3 regulations and refrain from entering into contracts with them.
7. Document action taken to comply with Section 3
8. Submit Section 3 Annual Summary Report (form HUD-600002) in accordance with 24 CFR Part 135.90.

Section 3 Reporting

Annual Section 3 Compliance Reporting by Recipient by December 31st

1. Recipients will document actions taken to comply with Section 3.
2. Recipients will complete and submit Section 3 Annual Reports to IEDA, annually by December 31st, to lowagrants.gov. Section 3 annual Reports include accomplishments and/or provides a detailed explanation of why Section 3 goals are not met. Explanation includes efforts taken to comply with Section 3 and any impediments to meeting Section 3 goals.
3. Section 3 Data Manager (Don Dursky) runs a report from [lowagrants](http://lowagrants.gov) to ensure all Section 3 Reports have been received. If Section 3 reports have not been submitted project managers follow up with grant administrators until all reports have been submitted

Annual Section 3 Summary Reporting to HUD by March 31st

IEDA Data Manager submits Section 3 Annual Summary Report (form HUD-600002) in accordance with 24 CFR Part 135.90. IEDA will document actions taken to achieve compliance and explain failings to meet the minimum employment goals, if applicable.

Penalties for Non-compliance

Recipients of CDBG funding have the responsibility of complying with Section 3 regulations and ensuring compliance among its contractors and subcontractors. Federal code established penalties for Section 3 violations and non-compliance. (See 135.38(f))

Communities and contractors found in violation of Section 3 requirements may result in:

- Sanctions from HUD
- Termination of contract for CDBG funds
- Debarment or suspension from future HUD assisted (CDBG) contracts

Non-compliance with Section 3 can impact a community's ability to receive CDBG funding in the future. Under federal code, the state of Iowa may not enter into a contract with any entity when the state has knowledge that the entity has been found in violation of the Section 3 regulations. (See 24 CFR 135.32(d) and 24 CFR 135.72(b)).

Section 3 Training for Recipients

As part of IEDA ongoing continuing education, IEDA conducts two trainings annually for CDBG Administrators regarding Section 3 requirements. One opportunity for in-depth Section 3 training will occur in the fall each year in conjunction with Davis Bacon training. CDBG training which occurs each June provides an overview of all applicable regulations for CDBG projects, including Section 3.

In addition the CDBG Management Guide is distributed to all CDBG Administrators and available on IEDA's website. The Management Guide includes:

- Section 3 procedures
- Section 3 Regulations (24 CFR Part 135)
- Frequently Asked Questions on Section 3

- Examples of Efforts to Offer Training and Employment Opportunities to Section 3 Residents
- Examples of Efforts to Award Contracts to Section 3 Businesses
- Examples of Procurement that provide preference to Section 3 Businesses
- Steps for Section 3 Compliance
- Section 3 Clause, in full.
- Sample Section 3 Employment Notice
- Intent to comply with Section 3 Requirements Form
- Section 3 Business Certification form
- Section 3 New Hire Compliance report form
- Sample format for Section 3 Employee Interview form

Procedure to identify and notify Section 3 residents about covered training and employment opportunities for CDBG-DR projects pursuant to 24 CFR 135.32(a)

IEDA has established a partnership with the Iowa Chapter of NHARO (National Association of Housing and Redevelopment Officials) for the purpose of facilitating the hiring of Section 3 Residents in an effort to meet the Section 3 numerical goals for employment opportunities. NHARO is a consortium of public housing agencies (PHA) around the State that provides education information and advocacy in housing and community development.

- Grant Administrators will notify the designated NHARO representative regarding Section 3 job opportunities and provide a posting and/or flyers.
- NHARO will share the information with PHAs who will advertise/notify section 3 residents about training and employment opportunities generated by section 3 covered assistance.

Examples of Efforts to Offer Training and Employment Opportunities Section 3 Residents

Recipients can recruit Section 3 residents in public housing development and in the neighborhoods when HUD assistance is being spent. The CDBG Management Guide outlines and 24 CFR 135.5 offers examples of efforts to offer training and employment opportunities to Section 3 residents:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12054.pdf

Section 3 Hiring Preference

Employment opportunities generated from the expenditure of section 3 covered assistance to section 3 residents in the order of priority listed below. Priority consideration shall be given, where feasible, to:

- 1st: Section 3 residents residing in the service area or neighborhood in which the section 3 covered project is located (collectively, referred to as category 1 residents).
- 2nd: Participants in HUD Youthbuild programs (category 2 residents).
- 3rd: Where the section 3 project is assisted under the Stewart B. McKinney Homeless Assistance Act (42 U.S.C. 11301 et seq.), homeless persons residing in the service area or neighborhood in which the section 3 covered project is located shall be given the highest priority.
- 4th: Other section 3 residents.

Section 3 Resident Certification (eligible resident)

Recipients will have individuals complete a Section 3 Resident Certification. In addition, any individual seeking the Section 3 resident preference for employment and training will provide proof of Section 3 status upon request. Such proof of eligibility includes but is not limited to the following:

- Proof of residency in a public housing development (lease in a HUD or other federally assisted program) in the Section 3 area
- Proof of public assistance,
- Proof of participation in a federally assisted program such as job training programs, tec.
- Proof of participation in a state or local assistance program, or other program that assists low- or very-low income persons.
- Evidence that the individual residents in the Section 3 area and is a low or very low-income person and/or,

- Self-certification of eligibility by perspective Section 3 residents. Any self-certification should include a statement of penalty for falsifying information

Procedures to Identify and notify Section 3 Businesses about availability of covered contracting opportunities

Procedures for Recipients to notify potential contractors working on Section 3 covered projects of their responsibilities

- Recipients will notify potential contractors of Section 3 requirements in their RFP/RFQ and bid documents and include Section 3 clause in it's entirely as set forth in 24CFR 135.38 on all solicitations and contracts.
- Recipients, grant administrator monitors for compliance of the previous clause by:
 - regular IEDA monitoring,
 - review of bid documents and advertisements
 - attendance at pre-bid meeting and pre-construction conferences.
- Section 3 business registry

Procedures to Identify and notify Section 3 Businesses about availability of covered contracting opportunities

- Soliciting Section 3 businesses is required for all CDBG projects.
- Contractor will
 - Search HUD's Section 3 business registry to find business that meet the definition of a Section 3 business in order to solicit and or promote the award of CDBG project contracts AND
 - Provide information on how to register on HUD's Section 3 business registry on all procurement advertising for the CDBG project. OR
 - Describe additional strategies that were utilized to solicit Section 3 businesses.

Section 3 Preference for Contracting with Section 3 Businesses

Section 3 businesses shall be given priority in contracting for work, in the following order of priority:

- 1st: Section 3 businesses that provide economic opportunities for section 3 residents in the service area or neighborhood in which the section 3 covered project is located (category 1 businesses); and
- 2nd: Applicants (as this term is defined in 42 U.S.C. 12899) selected to carry out HUD Youthbuild programs (category 2 businesses);
- 3rd: Other section 3 businesses.

Examples of Efforts to Award Contracts to Section 3 Businesses

The CDBG Management Guide outlines some examples of efforts to award contracts to Section 3 businesses. 24 CFR 135.5 examples may also be found at the following link:

http://portal.hud.gov/hudportal/documents/huddoc?id=DOC_12055.pdf

Section 3 Business Registry

The Section 3 Business Registry is a registry of firms that have self-certified their status as Section 3 Businesses. Businesses who self-certify that they meet one of the regulatory definitions of a Section 3 business will be included in a searchable online database. The database can be used by agencies that receive HUD funds, developers, contractors, and others to facilitate the award of covered construction and non-construction contracts to Section 3 businesses. Section 3 residents are also encouraged to use the registry to identify businesses that may have HUD-funded employment opportunities.

CDBG recipients should utilize HUD's Section 3 Business Registry to find Section 3 businesses that may be able to participate in the CDBG project.

Recipients can search through HUD's Section 3 registry here:

<https://portalapps.hud.gov/Sec3BusReg/BRegistry/What>

Businesses may register as a Section 3 Business through HUD's website here:

<https://portalapps.hud.gov/Sec3BusReg/BRegistry/RegisterBusiness>

It is important to note that Section 3 businesses are not entitled to receive contracts simply by being listed in HUD's Section 3 Business Registry database.

FREQUENTLY ASKED QUESTIONS

Section 3 of the Housing and Urban Development Act of 1968

What is Section 3?

Section 3 of the Housing and Urban Development Act of 1968 (Section 3) ensures that HUD-funded jobs, training, and contracts are provided to local low-income residents, particularly those that reside in public housing, and businesses that substantially employ them. Section 3 is important because it helps foster local economic development, neighborhood improvement, and individual self-sufficiency in communities where covered financial assistance is spent.

What is the Section 3 Business Registry?

The Section 3 Business Registry is a national registry of businesses that have self-certified to HUD that they meet one of the definitions of a Section 3 business. Businesses can sign up for the Section 3 Business Registry at: www.hud.gov/sec3biz.

How Does the Section 3 Business Registry Help PHAs, Other HUD Grantees, and Their Contractors?

PHAs, other HUD grantees, and their contractors are required to notify Section 3 businesses about the availability of HUD-funded contracts to solicit their submission of bids/proposals. The Section 3 Business Registry is a tool that helps PHAs, other HUD grantees, and their contractors locate prospective Section 3 businesses to be notified about, and ultimately receive, HUD-funded contracting opportunities. Please visit www.hud.gov/sec3biz to search for local Section 3 businesses.

How Does the Section 3 Business Registry Benefit Section 3 Businesses?

Firms that sign up for the Section 3 Business Registry are able to promote themselves to PHAs, other HUD grantees, and contractors in their community. As a result, their chances of receiving notification about HUD-funded contracts, and receiving preference for them greatly increases.

Are Businesses in the Section 3 Business Registry Guaranteed HUD-funded Contracts?

No. Businesses in the Section 3 Business Registry still compete for local HUD-funded contracts which means that they must possess the necessary qualifications for contracts they are seeking and comply with all procurement requirements.

Does HUD Verify Businesses in the Section 3 Business Registry?

HUD does not verify that self-certified businesses in the Section 3 Business Registry meet one of the definitions, nor does the Department endorse the services they provide. As such, PHAs, other HUD grantees, and their contractors are encouraged to exercise due diligence by checking the eligibility of businesses in the Section 3 Business Registry before providing them preference for HUD-funded contracts.

How Can A Business Sign Up for the Section 3 Business Registry?

Businesses can sign up for the Section 3 Business Registry at: www.hud.gov/sec3biz

Why did HUD Recently Propose a New Rule to Implement Section 3?

The Obama Administration has made it a priority to ensure greater compliance with Section 3 regulations in order to expand opportunity for public housing and low-income residents and workers. In a listening session with stakeholders, HUD heard the need for a clearer regulation that closed current loopholes.

What Will the New Proposed Rule to Implement Section 3 Mean for Public Housing Authorities and Other Grantees?

We hope that it will keep economic development and jobs local for PH residents and other low-income residents. The proposed rule clarifies definitions and provisions that are left to interpretation and eases barriers to reaching compliance for recipients of HUD funding. It ensures that Public Housing Authorities and other grantees are implementing consistent procedures for determining which residents and businesses should be counted towards Section 3 compliance. The proposed rule also addresses a number of concerns expressed by stakeholders to HUD and formalizes “best practices” implemented by high-performing grantees.

What Impact Will the Proposed Rule Have on Local Economics?

The proposed rule is estimated to direct an additional 1,400 jobs to Section 3 residents, and an additional \$172+ million in HUD-funded contracts awarded to Section 3 businesses each year. Section 3 requirements apply to approximately 5,000 recipients of HUD funding (such as Public Housing Authorities, State and local government agencies, low-income housing providers, etc.) and their sub-recipients and contractors. Up to 40 percent of HUD’s annual budget is subject to Section 3 requirements.

Where Can I Read the Proposed Rule?

Text of the proposed rule is available [here](#).

How Do I Find Out More Information About Section 3?

Please visit: www.hud.gov/section3.

Procedures to Maintain a Comprehensive Website

Responsible personnel or unit: See below

The IEDA will develop and maintain a comprehensive website dedicated to NDR activities assisted with these funds per P.L. 113-2 and applicable Federal Register Notices.

IEDA's Communications Department will maintain the NDR Website. The Website will be updated quarterly as DRGR Action Plans and QPRs are submitted and approved by HUD. Action Plan Amendments will be posted within 15-days of HUD approval.

The NDR website will contain the following links and responsible personnel:

- NDR Action Plan/Application
- All Action Plan Amendments – both substantial and non-substantial - Project Manager
- DRGR Action Plan – Closeout Coordinator
- DRGR Quarterly Performance Reports (QPRs) – Closeout Coordinator
- Citizen Participation Requirements – Division Coordinator
- All contracts IEDA procures directly – Contract Compliance Manager
- Summary of all contracts procured by sub recipients – Closeout Coordinator

NDR Website link: <http://www.iowaeconomicdevelopment.com/Community/NDR>

Action Plan Amendments

Responsible personnel or unit: Disaster Recovery Division Coordinator

SUBSTANTIAL AMENDMENTS

All amendments must comply with provisions of the Federal Register published June 2, 2016. The following modifications constitute a substantial amendment requiring HUD approval:

- Any change to the funded portions of the Phase 1 or Phase 2 application that would result in a change of more than 5 points in the score for Capacity or Soundness of Approach factors
- Any change to the Most Impacted and Distressed target area(s)- (a revised area must meet Most Impacted and Distressed threshold requirements in the NOFA, including Appendix G to the NOFA).
- Any Change in program benefit
- Any change in beneficiaries
- Any change in eligibility criteria
- Allocation or reallocation of more than \$1million
- Addition or deletion of an eligible activity

In addition, citizen participation requirements are required for substantial amendments as outlined in IEDA's Citizen Participation Plan.

NONSUBSTANTIAL AMENDMENTS

Amendments that do not fall within the definition of a substantial amendment are referred to as "nonsubstantial amendments."

- Although IEDA is not required to undertake public comment for a nonsubstantial amendment, IEDA must impose an effective date of 5 business days after submission to HUD.
- Substitution of a leverage source in the same amount committed and identified in the grant terms and conditions is a nonsubstantial amendment

Amendments that may affect BCA

If requested by HUD, a BCA may need to be submitted to support a request for a substantial amendment.

Treatment of Leverage

IEDA will show through quarterly reports evidence that firmly committed leverage (direct and supporting) resources in the amount required by the grant terms and conditions are received and used for their intended purposes.

Duplication of Benefits Policy

The Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act) requires that recipients of federal disaster recovery funding ensure that no, “person, business concern or other entity” will receive duplicative assistance and imposes liability “to the extent such assistance duplicates benefit available to the person for the same purpose from another source”.¹

A Duplication of Benefits occurs when:

- A Beneficiary receives assistance, and
- The assistance is from multiple sources (i.e. private insurance, NFIP, FEMA, SBA, non-profits, City, State, etc.), and
- The assistance amount exceeds the total need for a particular recovery purpose.

In order to identify and assure that CDBG-NDR assistance does not duplicate other funds received for the same activity (i.e. does not replace other funds received), IEDA will use the following process/steps to prevent a DOB from occurring:

1. Identify the total need for assistance prior to any assistance being provided.
2. Identify all potentially duplicative assistance received or to be received.
3. Deduct assistance determined to be duplicative.
4. Determine final award.

The following is an example of the use of the four-step process:

- | | |
|--|----------|
| 1. Applicant’s total need prior to any assistance..... | \$50,000 |
| 2. All potentially available duplicative assistance..... | \$35,000 |
| 3. Assistance determined to be duplicative..... | \$30,000 |
| 4. Final award (item 1 less item 3)..... | \$20,000 |

Since disaster recovery needs are calculated at one point in time, subsequent circumstances may occur that affect need. If, after the assistance has been calculated and/or CDBG-NDR award has been made, an applicant can demonstrate a change in circumstances, the award calculation may subsequently be reevaluated to take the increased need into consideration. Such changes in circumstances may include: vandalism, contractor fraud, and increase in cost of materials and labor, a change in local zoning law and building codes, or subsequent damage to a home or business that was partially repaired. However, the reevaluation must be done before the initial need for which assistance was granted has been fully met (e.g. before a damaged house is fully repaired).

Once funds are awarded, minus any determined DOB, the applicant is required to notify the City/County of the receipt of any additional funds received for the same activity. In the event that the additional funds are determined to be a DOB, funds will be withheld from future pay requests. In the event that all funds have been expended and a DOB is identified, the applicant will be required to repay the funds to the City/County who will repay funds to the IEDA.

¹Stafford Act, Title III, Sec. 312, (a)

Program Specific Guidelines

Community Development Block Grant - National Disaster Resilience (CDBG-NDR)
Iowa Watershed Approach (IWA)
Public Infrastructure Guidelines for Contracts:
City of Coralville 13-NDRI-010
City of Dubuque 13-NDRI-011
City of Storm Lake 13-NDRI-012

Purpose

The CDBG-NDR grant provides funding to selected cities with identified public infrastructure needs to accomplish the following NDR goals: 1) reduce flood risk; 2) increase resilience; 3) improve quality of life and health, especially for vulnerable populations.

Eligible Recipients -Project Area

Eligible recipients of CDBG-NDR funding for public infrastructure projects are cities identified in Iowa's NDR proposal and subsequently approved by HUD.

The CDBG-NDR assisted projects address unmet recovery and resiliency needs in areas most impacted by a presidentially declared major disaster in 2011, 2012 or 2013.

Eligible Activity/National Objective

Eligible Activity: Public Infrastructure - 105(a)(2)

National Objective: LMA

All activities funded through this program must comply with these guidelines, the contract executed with the project partner, and IEDA's most recent Community Development Block Grant Management Guide.

Eligible activities include the following: stormwater improvements such as replacing storm sewer with permeable pavers and bio cells, constructed wetlands, pump station repairs including back-flo prevention, back-up power supply and updated controls, culvert and pipe installation; and sanitary sewer improvements such as lining of existing pipes, replacing sewer line and other activities as approved by IEDA.

The NDR funds cannot be used to supplant projects previously appropriated through capital improvement funding.

Direct Leverage/Match Requirement

Direct Leverage (match) as stated in IowaGrants reflects the direct leverage obligated by the city in Iowa's CDBG-NDR application for the HUD approved activities. Per the applicable Federal Register Notice related to the use of CDBG-NDR as Match and Order of Assistance Between FEMA, U.S. Army Corps of Engineers, and CDBG-NDR: As provided by the HCD Act, funds may be used as a matching requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG-NDR activity. This includes programs or activities administered by FEMA or the U.S. Army Corps of Engineers. By law, the amount of CDBG-NDR funds that may be contributed to a U.S. Army Corps of Engineers Project is \$250,000 or less. However, the Appropriations Act prohibits use of funds for any activity reimbursable by, or for which funds are made available by, FEMA or the U.S. Army Corps of Engineers.

Reimbursement of Funds

The Iowa Economic Development Authority (IEDA) will reimburse funds for actual costs incurred up to the CDBG Amount stated in IowaGrants. Claims for reimbursement will be submitted by the recipient via the online www.iowagrants.gov system. The recipient shall maintain a file of all claim supporting documentation including claim documents, invoices, payments and approvals.

Maintenance Agreement

The recipient will maintain the project property in good repair and condition, ordinary wear and tear excepted, and shall not suffer or commit waste or damage upon the project property.

Design Requirements

Prior to the Grantee's obligation of funds for construction, the Grantee will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Grantee for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards (as applicable)

The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete and construction is feasible. The form must be submitted through iowagrants.gov following the completion of final design and prior to release of the bid package. The form is uploaded as part of the process of completing the Wage Rates Status Reports section under the "Compliance Forms and Quarterly Status Reports" tab. The recipient will download the form from the "Wage Rate Supporting Documents" section of the Wage Rates Status Report page, obtain the required signatures verifying the feasibility of the project, and upload the completed form under the tab "Wage Rate Supporting Documents".

IEDA reviews the report and will approve the status report if all required documentation is provided. If the Intent to Obligate Construction Funds is not included or incomplete, the status report will not be approved. The recipient must make the necessary corrections and resubmit the status report.

Monitoring

IEDA will use the following process to monitor the CDBG-NDR Infrastructure activities

Desktop Monitoring

- IEDA will review claim reports in www.iowagrants.gov; and
- IEDA will review timely expenditure of funds by partner; and
- IEDA will identify performance and expenditure timeliness issues and contact partner to address any timeliness issues.

Onsite Monitoring

- Upon expenditure of at least 50 percent of the CDBG-NDR funds by the recipient, a monitoring visit to the project area will be scheduled;
- The IEDA project manager will email the recipient and grant administrator to set up the monitoring visit;
- Monitoring visit date information and forms will be completed in www.iowagrants.gov;
- The monitoring visit report will be uploaded to www.iowagrants.gov and sent to the recipient and grant administrator;
- Project manager will instruct grant administrators to upload any additional information identified as needed during the monitoring visit;
- Project manager will enter into www.iowagrants.gov the date requested additional information is received and approved.

Expenditure Monitoring

The IEDA Project Manager will track actual quarterly spending for each partner and compare this to the projected quarterly spending as listed in Attachment A of the project contract. The spending tracker worksheet will be stored in the iowagrants.gov Required Uploads tab, Quarterly Budget and Plan, for each partner and updated quarterly by the Project Manager. Deviation from the projected spending is anticipated, however, as the project nears completion the percent variation should decline. Allowable discrepancy limits are established in the table below.

Year	Budget Discrepancy Limit
1	40%
2	35%
3	30%

4	20%
4.5	10%
5	0%

If the spending differential is greater than the limit shown, the Project Manager will determine the reason for the spending discrepancy. The Project Manager will review current reporting narratives or metrics to determine if spending is reasonable in regards to the status of tasks and deliverables. The Project Manager may request additional information from the partner in order to complete this assessment. The Project Manager will also determine if delays in spending or the completion of deliverables/tasks can potentially result in a negative impact to the project.

If the discrepancy in spending or progress is deemed reasonable, the Project Manager will continue to monitor expenditures. The annotations function of iowagrants.gov will be used to note the findings of the status review.

If the Project Manager has concerns about the spending discrepancy or the status of project deliverables/tasks OR the partner has reported a spending discrepancy for 3 consecutive quarters, the Project Manager will confer with IEDA management. One of the following action items will result:

- Project Manager will continue to monitor the project status;
- A meeting with partner management will be held. Partner will submit revised quarterly budget projection and/or a plan to overcome progress delay;
- Terminate the agreement. IEDA will repurpose funds with HUD approval.

Correspondence related to quarterly budget discussions will be documented in the correspondence feature of iowagrants.gov. Notes regarding project status will be documented using the annotations function.

Duplication of Benefits

No duplication of benefits (DOB) will be allowed. To assist IEDA in making a duplication of benefits determination, the recipient will complete an IEDA provided Affirmation of Duplication of Benefits form for signature by the City documenting any additional funds the City received for the same purpose for which the CDBG-DR funds were provided. The administrator will complete the fields in the Duplication of Benefits compliance form in www.iowagrants.gov and upload the signed Affirmation.

Reporting

Recipient will report project progress through claims via www.iowagrants.gov to IEDA outlining progress made toward deliverables outlined in the recipient's contract with IEDA. Progress on completing the following deliverables will be reported.

- Design infrastructure projects; and
- Installing infrastructure projects.

Procurement

Recipient shall follow the federal procurement requirements in 2 CFR 200, the IEDA CDBG Management Guide online at <http://www.iowaeconomicdevelopment.com/Community/CDBG>, and the instructions for procurement provided by IEDA online at <http://www.iowaeconomicdevelopment.com/userdocs/documents/ieda/InstructionsProcurementServicesCDBGprojects.pdf>.

City and County partners follow the cost reasonableness standard set forth in 2 C.F.R. § 200.323. Entities must develop an independent price or cost estimate before receiving bids or proposals for services. The appropriate form of analysis should be based on the complexity of the procurement. Example methodologies include:

- Compare prior (historical) proposed prices and contract prices for the same or similar goods and services
- Compare competitively published catalog prices, published market prices, or similar indices

The Recipient must maintain a record of this analysis onsite.

Environmental Requirements for CDBG-NDR Funding

The infrastructure program follows CDBG environmental regulations – 24 CFR Part 58. Recipients will follow the environmental review procedures in IEDA’s online CDBG Management Guide. Recipients will not take any choice limiting actions prior to receiving release of funds from IEDA.

National Historic Preservation Act

Recipients must comply with standards for treatment of historic properties, documentation and reporting requirements per Section 106 of the National Historic Preservation Act and programmatic agreement between IEDA and the State Historic Preservation Office. Recipients will retain qualified consultant(s) to prepare reports.

Tie-back to the Qualified Disasters

Watershed activities reasonably tie-back to the unmet recovery needs of the Qualified Disaster. The projects cover areas of the state impacted by declared disasters from 2011 and 2013, as specified below. The following tie-back strategy is contained in individual Partner contract agreement – scopes of work:

City of Coralville: *The City of Coralville experienced repeated flooding in the MID-URN area, including the floods of 2013. Modifications to two storm water pump stations, the weak links in a new flood protection system, are the final step to protect more than 178 acres of businesses and multi-family residences in a vulnerable LMI area. The area was impacted by disasters DR-4119 and DR-4126 in 2013.*

City of Storm Lake: *The City of Storm Lake experienced repeated flooding in the MID-URN area, including the floods of 2011 and 2013. A series of 8 projects will upgrade the wastewater treatment plant and conveyance system to reduce sewer backups into homes and avoid release of untreated wastewater into the environment. The area was impacted by disasters DR-1977 and DR-4126 in 2011 and 2013.*

City of Dubuque: *The City of Dubuque experienced severe flooding in July 2011, causing substantial damage, especially in the historic Bee Branch Creek Watershed. Dubuque’s unmet infrastructure needs as a result of the flooding include three storm water management projects to safely convey water. The area was impacted by disaster DR-4018 in 2011.*

**Community Development Block Grant - National Disaster Resilience (CDBG-NDR)
Iowa Watershed Approach Guidelines for Contract:
Bee Branch Healthy Homes Resiliency Program
City of Dubuque 13-NDRH-001**

Purpose

The Bee Branch Healthy Homes Resiliency Program (BBHHRP) is designed to support residential properties with flood damage from the 2011 storms in the low to moderate income areas of Dubuque that are strategically aligned with and extending to and from the Bee Branch Creek Restoration Project, in accordance with the application for and award of HUD National Disaster Resiliency Funds. The BBHHRP is eligible for NDR funding as a result of the presidentially declared Disaster DR-4018, *Severe Storms and Flooding* with an Incident Period of July 27-29, 2011.

Eligible Recipients – Project Area

The City of Dubuque is the only recipient entity of this program. All activities funded through this program shall comply with these guidelines, the City of Dubuque’s Administrative Plan and IEDA’s Management Guide and any other guidance provided by IEDA.

Participating properties will be located within the Flood Resiliency Eligible Area (see attached map), will be flood impacted, and will be determined eligible to participate by the City of Dubuque. The City of Dubuque’s Administrative Plan will provide a written description of the Flood Resiliency Eligible Area in the form of neighborhood name or streets bounding the area.

Eligible Activity/ National Objective

For the purposes of this program, a “Disaster Assisted Unit” shall be defined as a residential unit occupied by a household, either single family as a single unit, or multiple units included in a multi-family complex. The unit must be eligible to participate in the BBHHRP, must be located within the eligible area, and must be occupied by an LMI qualifying household or at least 51% of LMI qualifying households in a rental complex. The owner of the property (either single family owner occupied or landlord) is not required to have been the owner of record at the time of the 2011 disaster, as all rehabilitation need will be documented as of 2016, all repair work will be completed in a way that both recovers the unit(s) from disaster impact and makes the unit(s) more resilient against future flooding, and all invested funds will be secured by a lien on the property documenting the terms of the forgivable loan.

The form of assistance shall be limited to forgivable loans. All construction costs associated with a unit will be protected in the form of a mortgage lien on the property in the amount of the expended construction expenses (loan amount) for repair/rehabilitation/resiliency improvements. The mortgage lien shall include the covenants and restrictions as established by these guidelines and the Administrative Plan and shall be enforced for the term of the loan – five years from the date of filing. Forgivable loans under this activity must be 5-year **receding**. Receding equally 20% per year after the mortgage lien is filed. Payback of CDBG-NDRC funds remaining, or the total of the net proceeds of the sale, whichever is less, will be required if the assisted property owner sells, vacates, or abandons the property any time within the 5-year period, unless such transfer or sale meets the requirements of these guidelines specific to Rental Rehab (activities 733 & 734).

Eligible resiliency activities include:

- | | |
|--|--|
| 1. Interior Drain Tile/Sump Pump Install | 7. Mechanical/HVAC: Furnace/Water Heaters |
| 2. Foundation Repair/Tuck-Point Work | 8. Mold Remediation |
| 3. Foundation Waterproofing/Exterior Drain Tile | 9. Sewer Lateral Replacement |
| 4. Exterior Soil Modification/Retaining Walls/Berms/Grading and Excavating | 10. Lead Water Service Line Replacement (if damaged) |
| 5. Gutter/Exterior Drain Tile | 11. Basement Windows |
| 6. Dehumidifiers/Ventilation | |

- | | |
|---|--|
| 12. Damaged or Rotted Wood/Footings/ Support Columns/Cellar Doors | 18. Damaged Interior Trim |
| 13. Insulation | 19. Damaged Flooring |
| 14. Electrical Panels and Components | 20. Roofing |
| 15. Damaged Exterior Siding/Trim/Wood Components | 21. Radon remediation tied to flooding |
| 16. Damaged Exterior Doors/Interior Doors | 22. ADA |
| 17. Damaged Interior Drywall/Plaster | 23. Flood Damage Caused by Neighboring income eligible Structure |

All activities undertaken must meet the CDBG National Objective of LMH Housing Repair/Rehabilitation activities will benefit only low and moderate income (LMI) persons or households (at or below 80% of median family income). The City of Dubuque will develop application materials for residents to qualify to participate in the program through their Administration Plan.

All units to be rehabilitated must be both financially and structurally feasible to rehabilitate. The City of Dubuque shall establish parameters for making this determination in their Administrative Plan.

While there is no specific funding cap for construction activities, the CDBG-NDR funds are subject to the requirements of the Federal Lead Safe Housing regulations, impacting all dwelling units that were constructed prior to January 1, 1978. This will limit rehabilitation hard costs at an amount not-to-exceed \$24,999 in federal funds (CDBG-NDR and/or HUD Healthy Homes) in order to work under Lead Safe Interim Controls, unless the property qualifies for an exemption under 24CFR35.115 or the contractor implements full lead abatement in accordance with the Federal Lead Safe Housing regulations.

The City or their Administrator should notify IEDA at the time they become aware of any funds that will be returned to the City as a result of a sale, or change in use per the applicable housing guidelines. These returned funds should be recorded in iowagrants.gov through the claim process, indicating the negative dollar amount for the activity the funds were returned from and the address they are associated with.

Floodplain

No benefits to structures located within the 100-year floodplain will be allowed, unless the activity meets all HUD environmental requirements, all applicable flood mitigation design standards, and the property is insured by Federal Flood Insurance. Benefits should be limited to the resiliency eligible items and should not create a “Substantial Improvement” as defined in 24CFR55.2(b)(10). 24 CFR 58.6. applies to buildings renovated in a 100-year floodplain. Such buildings must maintain flood insurance on the property. Section 102(a) of the Flood Disaster Protection Act of 1973 (42 U.S.C. 4106), requires that recipients of financial assistance maintain flood insurance. The rule for loans included in that section applies to deferred payment loans, i.e. flood insurance is to be maintained for the **full term of the loan**. The City shall, through their Administrative Plan, establish a procedure for assisting applicants with an understanding of the potential cost of Flood Insurance prior to participating in the program.

Project Delivery

For purposes of the CDBG-NDR funds, all technical services related costs (also known as soft costs; carrying costs; direct administration costs) will be considered as "project delivery costs". Project delivery costs, although administrative in nature, must be considered as project costs attributable to each housing unit within the housing activities undertaken per unit/address and accounted for in this manner. **Overall, project delivery costs need to be reasonable, documented and cannot exceed \$15,000 per housing unit.** All project delivery costs must be supported with backup documentation to justify their expenditure. In some cases, due to the nature of project delivery and the requirement to meet social, economic and physical resiliency, project delivery may exceed the amount of rehab on a single unit. Project Delivery may include:

- Site Specific Environmental Review, such as Section 106 documentation
- Relocation Expenditures per unit as applicable
- Lead testing and Lead hazard control
- City of Dubuque Staff time for inspecting participating units, developing work scopes,
- Home Advocate – costs associated with this component of project delivery will help achieve the social resiliency requirements of this program and achieve the projected outcome value.
- Intake Verification of applicants

- Lien Development and Filing

Administration expenses are all expenses associated with the implementation of the BBHHRP as a whole, including overall environmental review and publications, developing application materials and program procedures, office supplies, office space, etc. These expenses are NOT considered project delivery and should be drawn out of admin (Activity 181) funding and not program funding.

GreenStreets

It is the IEDA's goal to utilize the CDBG-NDR funds in a manner that results in green-rehab sustainable structures for all rehab/resiliency work. All project must utilize the HUD CPD Green Building Checklist as enhanced by IEDA, included in the appendices of this document as *Homeowners HUD Green Building Retrofit Checklist Certification*.

Duplication of Benefits

No duplication of benefits (DOB) will be allowed. Prior to assisting properties, IEDA will need to determine and verify any monies received from any other federal or state financial resources providing disaster recovery funding and any insurance settlement payments provided to the rental property owner, and adjust the CDBG-NDR amount and project scope accordingly. For additional information about DOB, See IEDA provided DOB Guidance.

Reporting

The CDBG-NDR program requires the documentation of Outcome Values associated with this rehabilitation program. The City of Dubuque will document through iowagrants.gov completion of the following annual reports:

- Environmental Outcome Value will be documented through an annual reporting of the number of asthma cases documented through the schools. On or before December 31st of each reporting year, beginning in 2017, the City of Dubuque will upload to iowagrants.gov a summary report including the name of each school included in the analysis, the student population of each school for that school year, and the number of asthma cases reported.
- Economic Outcome Value will be documented through an annual reporting of the assessed value of all properties participating in the CDBG-NDR program. On the 1st of October of each reporting year, IEDA will send the City of Dubuque a report including all properties that were completed within the reporting year, ending September 30th of each year, and the baseline 2016 property value collected through iowagrants.gov. The City will then provide the current property value at the time of reporting, and upload the report no later than October 15th.

Tie-back to the Qualified Disasters

Housing activities reasonably tie-back to the unmet recovery needs of the Qualified Disaster. The projects cover areas of the state impacted by declared disasters in 2011, as specified below. The following tie-back strategy is contained in individual Partner contract agreement – scope of work:

The City of Dubuque experienced severe flooding in July 2011, causing substantial damage, especially in the historic Bee Branch Creek Watershed. The Bee Branch Healthy Homes Resiliency Program addresses unmet recovery needs from the 2011 flooding event. The area was impacted by disaster DR-4018 in 2011

Expenditure Monitoring

The IEDA Project Manager will track actual quarterly spending and compare this to the projected quarterly spending as listed in Attachment A of the project contract. The spending tracker worksheet will be stored in the iowagrants.gov Required Uploads tab, Quarterly Budget and Plan, and updated quarterly by the Project Manager. Deviation from the projected spending is anticipated, however, as the project nears completion the percent variation should decline. Allowable discrepancy limits are established in the table below.

Year	Budget Discrepancy Limit
1	40%
2	35%
3	30%
4	20%
4.5	10%
5	0%

If the spending differential is greater than the limit shown, the Project Manager will determine the reason for the spending discrepancy. The Project Manager will review current reporting narratives or metrics to determine if spending is reasonable in regard to the status of tasks and deliverables. The Project Manager may request additional information from the partner in order to complete this assessment. The Project Manager will also determine if delays in spending or the completion of deliverables/tasks can potentially result in a negative impact to the project.

If the discrepancy in spending or progress is deemed reasonable, the Project Manager will continue to monitor expenditures. The annotations function of iowagrants.gov will be used to note the findings of the status review.

If the Project Manager has concerns about the spending discrepancy or the status of project deliverables/tasks OR the partner has reported a spending discrepancy for 3 consecutive quarters, the Project Manager will confer with IEDA management. One of the following action items will result:

- Project Manager will continue to monitor the project status;
- A meeting with partner management will be held. Partner will submit revised quarterly budget projection and/or a plan to overcome progress delay;
- Terminate the agreement. IEDA will repurpose funds with HUD approval.

Correspondence related to quarterly budget discussions will be documented in the correspondence feature of iowagrants.gov. Notes regarding project status will be documented using the annotations function.

Procurement

Recipient shall follow the federal procurement requirements in 2 CFR 200, the IEDA CDBG Management Guide online at <http://www.iowaeconomicdevelopment.com/Community/CDBG>, and the instructions for procurement provided by IEDA online at <http://www.iowaeconomicdevelopment.com/userdocs/documents/ieda/InstructionsProcurementServicesCDBGprojects.pdf>.

City and County partners follow the cost reasonableness standard set forth in 2 C.F.R. § 200.323. Entities must develop an independent price or cost estimate before receiving bids or proposals for services. The appropriate form of analysis should be based on the complexity of the procurement. Example methodologies include:

- Compare prior (historical) proposed prices and contract prices for the same or similar goods and services
- Compare competitively published catalog prices, published market prices, or similar indices

The Recipient must maintain a record of this analysis onsite.

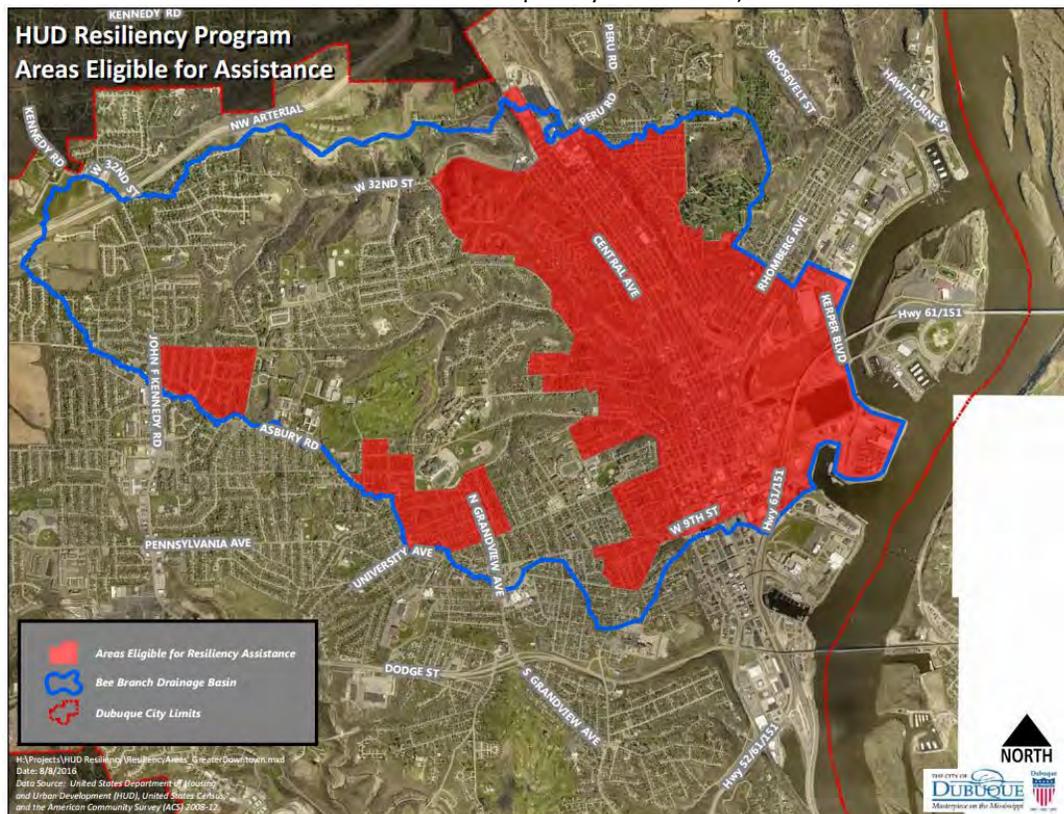
Single Family Owner Occupied Resiliency Rehab (Activity 971):

- Eligible property owners will be income qualified to ensure that the persons or households receiving the benefit of Resiliency Rehab/Repair are qualified at or below the CDBG Median Income Levels for 80% of median family income (MFI).
- Assistance to owner occupied single family homes will be limited to forgivable loans. Forgivable loans under this activity must be at least 5-year **receding**. Receding equally 20% per year after the mortgage lien is filed. Forgivable loans must be secured as a mortgage lien on the assisted property. Payback of CDBG-NDRC funds remaining, or the total of the net proceeds of the sale, whichever is less, will be required if the assisted property owner sells, vacates, rents or abandons the property any time within the 5-year period.
- Beneficiaries of this activity must be the owner of record of the property to be assisted (ownership type is limited to fee simple title or 99-year leasehold ownership). Land sales contracts are not typically eligible; however such contracts may be reviewed on a case-by-case basis by IEDA and the City of Dubuque.
- Single Family units must have been residential at the time of the qualifying disaster, and will continue to be solely residential. No recent conversions or mixed-use types of properties will be eligible under this activity.
- Housing repair/rehabilitation assistance is allowed only on the beneficiary's primary residence. The City of Dubuque shall document eligibility.

Rental Resiliency Rehab (Activity 733 & 734):

- Rental Rehabilitation will be completed in accordance with the City's Administrative Plan. In cases of properties with eight units or more, Davis-Bacon regulations will be followed.
- This activity is available only to rental property owners that agree to comply with all federal, state and local requirements (including, but not limited to: these guidelines; the forgivable mortgage lien and agreement for covenants and restrictions for rental rehabilitation; Fair Housing and Equal Opportunity requirements; accessibility for persons with disabilities; procurement and contracting requirements; local rental housing codes and requirements; etc.).
- Eligible properties within proposed projects will be limited to those that were entirely (100%) residential rental units at the time of the qualifying disaster, and will continue to be solely residential. No recent conversions or mixed-use types of properties will be eligible under this activity.

- Assistance to rental single or multi-family will be limited to forgivable loans. Forgivable loans under this activity must be 5-year **receding**. Receding equally 20% per year after the mortgage lien is filed. Payback of CDBG-NDRC funds remaining, or the total of the net proceeds of the sale, whichever is less, will be required if the assisted property owner sells, vacates, or abandons the property any time within the 5-year period. Upon mutual agreement and consent between the IEDA, the recipient and the originally assisted rental property owner, the assisted rental project may be sold or transferred without the remaining amount of the loan repaid, but, only if the purchaser agrees to continue with the terms of the forgivable loan agreement and the covenants and restrictions, to complete the remainder of the five-year term of the loan.
- CDBG National Objective - All assisted rental properties must meet the national objective of “Primarily benefits persons of low and moderate income – Housing”. Effectively, this means that at least 51% of the units in an assisted property must be occupied by persons or households whose incomes are at or below 80% of the area median income limits (LMI) for the term of the loan.
 - In a one unit project – the one unit must be made available to and occupied by a LMI tenant.
 - In a two-unit project – one of the two units must be made available to and occupied by a LMI tenant.
 - Projects of three or more units – 51% of all units in the project (rounded up to the nearest whole number) must be made available to and occupied by a LMI tenant (e.g., in a four-unit project, three units must be made available to and occupied by LMI tenants).



ADDENDUM

Start to Finish Process for NDR Housing on Dubuque:

- City advertises program and provides application materials.
- Applicant Submits application.
- ECIA enters applicant into “My Inventory” in iowagrants.gov
- City determines if applicant is eligible in accordance with the Administrative Plan, contract and Program Guidelines.
- ECIA schedules inspection
- ECIA (as the contractor selected by City) conducts inspection to document the total housing need to bring the home up to housing standards and NDR program eligible need(s), generate scope of work and provide cost estimates

- ECIA sends IEDA NDR Housing Project Manager an email including the Applicant’s Name, Address and ID and requests the applicant be made “Active” in the iowagrants.gov system – **the following items can be completed simultaneously:**
 - Once the applicant is Active, ECIA completes and submits the Tier II/Section 106 form in iowagrants.gov
 - For NDR Housing – this will include the Site Specific Environmental Review including noise, floodplains, wetlands and toxic substances.
 - For NDR Housing – this will all documentation required for Section 106 review such as scope of work, Iowa Site Inventory Form, maps, etc.

IEDA Historic Preservation Specialist reviews the submitted Tier II/Section 106 documents. If changes are needed the “negotiation/correction” feature in iowagrants.gov will be used until the Section 106 documents are final and acceptable. IEDA NDR Historic Preservation Specialist will “Approve” the Tier II/Section 106 form in iowagrants.gov. This review and approval process typically takes 2-4 weeks per property.
 - ECIA will submit the Duplication of Benefits (DOB) form in iowagrants.gov. Initially this will only include all required uploads fully executed and signed by applicant:
 - Subrogation of Assignment Agreement
 - Consent and Release Form
 - Insurance and Other Funds Sources Affidavit
 - Inspector’s Cost Estimate for whole house needs as Documentation of Need

Upon receiving the form with attachments IEDA Duplication of Benefits Coordinator will initiate the verification process based on the uploaded documents and submit form back to “correcting/editing” status so that the Grant Administrator can finalize the form when the final “Need” amount is determined based on received bids.
- After Tier II/Section 106 is approved and the initial DOB has been submitted and IEDA has sent it back to “correcting’ status, the City will follow procurement and go out for bid on the approved scope of work.
- Once bids are received back – and the City has selected the lowest qualified bidder, ECIA will complete the DOB form including the final “Need” amount and upload the scanned bid document.
- Once the DOB review is completed, IEDA Duplication of Benefits Coordinator will generate the DOB verification form, which will state the “Final Award Amount.” This verification will be a .pdf documented generated from IEDA and uploaded to the submitted DOB form in iowagrants.gov. IEDA Duplication of Benefits Coordinator will add all necessary review notes in the form and “Approve” the DOB in the iowagrants.gov system.
- IEDA Duplication of Benefits Coordinator will email ECIA to inform her of the approval and that the verification has been uploaded and is available for ECIA to view in iowagrants.gov.
- Once a contractor is selected but before a contract is executed, ECIA will conduct the contractor clearance review by checking the necessary websites and databases.

PLEASE NOTE: the City cannot enter into any construction contracts prior to the approval of Section 106, and DOB and documentation that contractor clearance has been conducted by the City.

- Once IEDA Duplication of Benefits Coordinator approves the DOB, the City is free to enter into contract.
 - If Davis Bacon is trigger – ECIA Requests Wage Rates through iowagrants.gov
- After the contract is executed with the contractor, ECIA will complete and submit the contractor clearance form in iowagrants.gov
- If the scope of work comes in at or below the DOB the City should proceed with the project.
- ECIA will conduct any necessary progress inspections, Lead compliance, home advocate, change orders (may trigger modification to DOB and Section 106 as noted above), etc. during construction.

PLEASE NOTE: The City will only be able to draw down funds up to the DOB approved amount, so it is very important to notify IEDA if costs are expected to exceed the DOB approved amount.

- Once costs are incurred on a property, the City will be able to claim funds. ECIA (on behalf of the City) will initiate a claim in iowagrants.gov based on documentation provided by the City.
 - For NDR Housing – All Claims will need to break down Project Delivery vs. Construction by providing details in each claim broken down per property for: Hard Construction Cost, Lead Hazard Reduction Costs, Home Advocate Costs, Other Project Delivery, Non-CDBG Funds, etc.
- While the City can claim as many times as they would like on any property, the total investment in that property will be collected on the claim when that property is documented with a “completion date.” No further Construction or Project Delivery should be drawn after a property is marked “completed.”
- IEDA will run reports prior to the approval of each draw to verify that the requested construction cost (and the total requested-to-date) does not exceed the DOB award amount or that the requested project delivery (and the total requested-to-date) does not exceed the \$15,000 cap per unit.

- ECIA will complete mortgage filing for forgivable loan

Parties Involved in the Above Process:

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MEMORANDUM

CRENNA M. BRUMWELL, ESQ.
CITY ATTORNEY

To: File

DATE: October 12, 2017

RE: Memo to File Related to Resiliency Grant, Federal Law, State Law, & Local Policy

BACKGROUND

I participated in a conference call with representatives from the Iowa Economic Development Authority (IEDA), Ann Schmid and Leslie Leager as well as Mark Schneider from the East Central Intergovernmental Association (ECIA) on August 7, 2017. The conversation revolved around a memo I had prepared which discussed federal law, Iowa Code, and City policy in depth. The conclusion of the conference call was that a memo to file outlining the procedures the City intends to follow to ensure compliance with federal law (2 CFR 200.320) (this memo) would be drafted and put in the HUD Resiliency CDBG contract file.

The challenge in working with federal and state law as well as local policy is that terminology is not consistent from one to the other. The nomenclature related to procurement at the federal level is outlined at 2 CFR 200.320:

- 1) Micro Purchase Procedures
- 2) Small purchase procedures
- 3) Sealed bids (formal advertising)
- 4) Competitive proposals
- 5) Non-competitive proposals (Sole source)

Previously, I reviewed these options conservatively to correspond with Iowa Code. I made the following equations:

Sealed bids (formal advertising) = Iowa Code Chapter 26
Competitive Bidding

Competitive proposals = Iowa Code Chapter 26
Competitive Quotations

The City originally intended to utilize the strictest procurement methodology under Iowa Code Chapter 26 (26.14A) whereby regardless of the total cost of the project, it was bid via competitive bidding. If the City was required to procure contractors through sealed bids (formal advertising) as competitive bidding under Iowa Code Chapter 26 each of the projects (320 projects) would require a public hearing in front of the City Council before going out for bid. This would drastically slow down the process and progress. The City anticipates most of the projects will be under \$25,000. While state law would only require an informal proposal, the City's internal policy requires competitive quotations equated to competitive proposals under federal law. This process was evaluated as compliant with federal law, state law, city policy and the most effective for accomplishing the heavy lifting which much be done swiftly and efficiently to comply with the grant time lines and avoid requiring City Council approval of each contract in advance. This change needs to be approved by IEDA.

In speaking with IEDA it is the IEDA determination that use of the language "sealed bids (formal advertising)" in the federal law does not exactly equate to competitive bidding under Iowa Code Chapter 26. IEDA sees no requirement for each project to go to public hearing in front of the City Council unless a project hits the \$135,000 threshold (Iowa Code §26.12). The City must simply have sealed bids (formal advertising). The City intends to use the competitive quotation process/procedures as outlined in state code and city policy using sealed bids (formal advertising) for compliance with 2 CFR 200.320. The following Table depicts the differences between State Law and City Policy. The second Table details the Federal Law compliant procurement to be used by the City.

Required by State Law and City Policy

Type of Bidding	State Threshold	City Threshold
Informal Contracting	Less than \$75,000	Less than \$25,000
Competitive Quote	\$75,000 - \$134,999	\$25,000 - \$134,999
Competitive Bidding	\$135,000	\$135,000

Federal Law Compliant Procurement for Use by City for Resiliency Grant

Type of Bidding	Threshold
Competitive Quote with Sealed Bids (formal advertising)	\$0 - \$134,999
Competitive Bidding with Public Hearing by City Council and sealed bids (formal advertising)	\$135,000+

The bidding process will be accomplished through an inspection of the property whereby an inspector inspects the property for locations of storm or flood waters entering the structure, components that have been damaged by prior flooding, code violations, and lead-based paint issues when dictated by the project cost. The following process will be implemented on each project:

- ECIA develops project bid specifications to address these items within the context of the HUD Resiliency Program contract with cost estimates and provides them to the (Dubuque) Housing Resiliency Committee team *
- The Housing Resiliency Committee team reviews and approves each project bid specification with the estimated cost. At least two of the three Committee

members (or their designees) need to be present and initial the bid specifications for each property. The Resiliency Project Coordinator will sign the bid specification.

At this point in the process, the projects are sent out for bids. The bid advertising will be accomplished for the projects with all projects using the following process:

- All known area contractors will be notified, and
 - Contractors identified through the City's contractor marketing efforts
 - Contractors will receive digital notification via the City of Dubuque's website if they have signed up for notifications from the Housing and Community Development Department. This site can also be viewed by the general public at any time, and
 - Contractors meeting the requirements of Section 9.12 of the City's administrative plan
- Invitations to bid will also be sent to the eastern Iowa plan review rooms and area clearinghouses as well

The publicly advertised bidding process will allow sufficient time for contractors to compile and submit their bids. Following the receipt of the bids, the following process will be followed:

- Bids received will be sealed and opened publicly and read aloud at a specified date, time and place.
- ECIA will tabulate and verify the accuracy of each bid and provide a Bid Tabulation, recommendation, and the Bids to the Housing Resiliency Committee.
- The Housing Resiliency Committee will meet to review the bids, bid tabulation, and recommendation, and award the contract to the lowest responsible, responsive bidder, subject to meeting all Program requirements including, but not limited to, being cleared to assure they are not on the state or federal debarred list, insurance certificates and bonds (if applicable).
- The Resiliency Project Coordinator (or her designee) will sign Bid Recommendation letter and Notice of Award to the successful contractor.

Upon acceptance of all documentation, the construction contract will be signed by the City Manager (or his designee) on behalf of the City. The other parties to the contract will sign the contract at the pre-construction meeting and work commences.

Community Development Block Grant - National Disaster Resilience (CDBG-NDR) Iowa Watershed Approach Guidelines for Watershed Project Contracts:

Benton County 13-NDRI-002
Buena Vista County 13-NDRI-003
Fremont County 13-NDRI-004
Howard County 13-NDRI-005
Iowa County 13-NDRI-006
Johnson County 13-NDRI-007
Mills County 13-NDRI-008
Winneshiek County 13-NDRI-009

Purpose of Grant

The CDBG-NDR grant provides funding to Iowa county recipients to accomplish six specific goals: 1) reduce flood risk; 2) improve water quality; 3) increase resilience; 4) engage stakeholders through collaboration and outreach/education; 5) improve quality of life and health, especially for vulnerable populations; and 6) develop a program that is scalable and replicable throughout the Midwest and the United States.

Eligible Recipients

Eligible recipients of CDBG-NDR funding are the Iowa counties identified in the state of Iowa's proposal to HUD for CDBG-DNR funding. The counties were selected based on CDBG-NDR eligibility criteria in HUD's national solicitation, flood mitigation and environmental need, unmet recovery needs, and opportunities to natural and community resilience to flooding.

Eligible Project Areas

The CDBG-NDR assisted project area will be within, or primarily serve one or more counties in a presidentially declared major disaster in 2011, 2012 or 2013. Grant funds must also be used to primarily benefit the most impacted and distressed areas within these counties.

Eligible Activities

- Watershed management authority formation per Iowa Code chapter 466B.2;
- Watershed coordinator establishment;
- Watershed planning;
- Watershed assessment, modeling and evaluation; and
- Flood mitigation, water quality and resilience project design and installation of best practices including, but not limited to, ponds, detentions basins, wetlands, terraces, floodplain restoration, streambank stabilization, bioreactors, saturated buffers, perennial crops, buffer strips, permeable pavements, bioretention systems, bioswales, infiltration basins, and infiltration trenches. If available, practices shall be designed according to NRCS specifications or Iowa Stormwater Management Manual specifications. Practices without an NRCS specification or Iowa Stormwater Management Manual specification shall be designed to available current best practices.

Elements within the forming watershed management authority activity include:

- Funding for watershed management authority (WMA) formation, including among other things, legal fees and facilitation costs;
- Recipient identifying a lead entity to coordinate formation of the (WMA);
- WMA formation technical assistance by Iowa Department of Natural Resources;
- Recipient invites, as required by Iowa law, all political subdivisions within the watershed to participate in the WMA;
- Meetings with WMA participants and stakeholders to develop WMA agreement;
- Public meetings held for input into WMA;
- Approval of WMA agreement by WMA participants;
- Filing of WMA agreement with Iowa Secretary of State;
- Installment of WMA board of directors; and
- Meetings of the WMA board of directors.

A watershed management authority may perform all of the following duties:

- Assess the flood risks in the watershed.
- Assess the water quality in the watershed.
- Assess options for reducing flood risk and improving water quality in the watershed.
- Monitor federal flood risk planning and activities.
- Educate residents of the watershed area regarding water quality and flood risks.
- Allocate monies made available to the authority for purposes of water quality and flood mitigation.
- Make and enter into contracts and agreements and execute all instruments necessary or incidental to the performance of the duties of the authority. A watershed management authority shall not acquire property by eminent domain.

Elements within the watershed coordinator activity include:

- Funding for the hiring and support of watershed coordination services;
- Stakeholder engagement including researching, planning, and implementing an information and education outreach program to raise awareness about the Iowa Watershed Approach program, encourage participation in the planning process and the implementation of flood mitigation and water quality practices;
- Oversee development of the watershed management plan including collaboration with partners and contractors to ensure the watershed management plan is on track, and assist with collecting water quality data and conducting field assessments;
- Implementation of the watershed management plan including implementing the information and education outreach plan, coordinating water quality monitoring, and assisting with the implementation of best management practices designed to increase flood resilience in the project area;
- Evaluation of project activities on an ongoing basis, working with local partners and stakeholders to prioritize current and future project activities;
- Overall project coordination including oversee efforts to collaborate with appropriate agencies, groups, and individuals that can affect the success of the project;
- Project reporting and administration including work with project advisory groups and WMA members to complete annual plans of operations and budgets for the project and as needed, completing and submitting all required financial and progress reporting documents.

Elements within the watershed planning activity include:

- Funding for watershed planning including among other things, consultation fees, facilitation costs, and staff time;
- Recipient procuring one or more contractors to assist in development of the watershed plan;
 - Recipient may use the watershed planning solicitation public notice and request for proposals template developed by IEDA;
 - Recipient, with guidance from the WMA board, selects the watershed planning contractor(s) utilizing the selection criteria included in the request for proposals;
- Technical assistance from the Iowa Department of Natural Resources and the Iowa Department of Agriculture and Land Stewardship;
- Funding to the Iowa Flood Center at the University of Iowa to conduct a detailed hydrologic assessment of the watershed;
- Meetings with general public, contractors and stakeholders to develop vision, goals and strategies for watershed plan;
- Development of watershed plan; and
- Acceptance of watershed plan by WMA Board of Directors and political subdivisions in the watershed participating in the WMA.

Elements within the watershed assessment, modeling and evaluation activity include:

- Recipient will contract with the Iowa Flood Center at the University of Iowa to lead implementation of the watershed assessment, modeling and evaluation activities;
- Hydrologic assessment of each watershed to understand the hydrology, assess flood and water-quality risks, and evaluate scenarios to maximize flooding mitigation and water quality;
- Deployment of a hydrologic network of monitoring stations with rain gauges, soil moisture and temperature probes, and shallow monitoring wells in each target watershed to gather data to directly support the development of the hydrologic models used to inform the distribution of built projects and to evaluate the success of the projects;
- Identification by the Iowa Flood Center at the University of Iowa of targeted subwatersheds for flood mitigation and water quality projects within each larger watershed and approval of those subwatersheds by the WMA; and
- Hydrologic assessment and evaluation of impacts of projects installed in each watershed.

Elements within the flood mitigation and water quality project design and installation activity include:

- Identification of potential project locations;
- Outreach to landowners to site projects and secure required local match;
- Hiring contractors by the CDBG-NDR recipient, following federal procurement requirements and the model public notice and request for proposals offered by IEDA, to design and install flood mitigation and water quality projects;
- Project maintenance agreements with landowners for the life of the installed project; and
- Evaluation by the Iowa Flood Center at the University of Iowa to identify the impact of projects installed on flood mitigation and water quality.

All activities funded through this program must comply with these guidelines, the contract executed with the Recipient, and IEDA's most recent Community Development Block Grant Management Guide.

Further guidance on practice eligibility was provided by HUD in the Federal Register Notice published February 19, 2019.

4840	Federal Register / Vol. 84, No. 33 / Tuesday, February 19, 2019 / Notices
<p>the State will no longer be able to use CDBG-DR funds for any RAP assistance.</p> <p>6. Waiver and alternative requirement to permit certain activities as part of the Iowa Watershed Approach (State of Iowa only). The Department awarded the State of Iowa \$96,887,177 in CDBG-NDR funds to support the Iowa Watershed Approach, a holistic watershed-scale program designed to sustain the State's agricultural economy while protecting vulnerable residents and communities. HUD funding will enable several watersheds to form Watershed Management Authorities, which will develop hydrological assessment and watershed plans, and implement pilot projects in the upper and lower watersheds, as well as invest in more resilient, healthy homes in Dubuque.</p> <p>As part of the Iowa Watershed Approach, the State's NDR application proposed to fund subrecipients to install improvements and implement stormwater management practices on mostly privately-owned agricultural land to collect and hold back water in times of increased rain to prevent or minimize the impact of downstream flooding. To the extent some of these activities take place on privately-owned land, all of the activities may not be eligible under section 105(a)(2) of the HCDA, which permits the acquisition, construction, reconstruction, or installation of public works, facilities, and site or other improvements. However, HUD recognizes that the improvements and planned management practices to be installed or applied on private lands provide public benefits that are similar to the public benefits derived from public works, facilities, and other improvements</p>	<p>generally eligible under section 105(a)(2). Accordingly, the Department is approving a waiver and alternative requirement to expand section 105(a)(2) of the HCDA to the extent necessary to permit Iowa to carry out the activities described in its NDR application by installing improvements and implementing stormwater management practices for the purpose of preventing downstream flooding. This eligible activity includes the expenditure of CDBG-NDR funds for actions necessary to obtain mandatory environmental permits (if approved by the permitting agency). The State must demonstrate at a program level that such payments are necessary and reasonable and are required in order to secure the permits needed to implement its CDBG-NDR project.</p> <p>III. Public Law 114-113 and 115-31 Waivers and Alternative Requirements</p> <p>This section of the notice applies to grantees that received an allocation for a major disaster in 2015 and 2016 under Public Law 114-113 and Public Law 115-31. Public Laws 114-113 and 115-31 authorize the Secretary to waive or specify alternative requirements for any provision of any statute or regulation that the Secretary administers in connection with the obligation by the Secretary, or use by the recipient, of these funds, except for requirements related to fair housing, nondiscrimination, labor standards, and the environment. Regulatory waiver authority is also provided by 24 CFR 5.110, 91.600, and 570.5. As required by Public Laws 114-113 and 115-31, waivers and alternative requirements provided in this section are based upon a determination by the Secretary that</p>
	<p>good cause exists and that the waiver or alternative requirement is not inconsistent with the overall purposes of title I of the HCDA.</p> <p>1. Most Impacted and Distressed Area Requirements (South Carolina and Texas only).</p> <p>This paragraph amends the Department's August 7, 2017 notice, which allocated additional CDBG-DR funds for qualified disasters that occurred in 2015. Table 2 of the August 7, 2017 notice indicates the HUD-identified "most impacted and distressed" (MID) areas impacted by the qualified disasters and the amounts that each grantee is required to expend in the MID areas. The notice required that at least 80 percent of the total combined funds provided within each State address unmet needs within the HUD-identified MID areas. The methodology, however, that HUD used to calculate the required amount to be expended in the MID areas for South Carolina and Texas was not correct. For the State of South Carolina, the amount established for its MID area expenditures did not account for CDBG-DR funds that would also be expended by Lexington County, Columbia, and Richland County as CDBG-DR grantees. For the State of Texas, the MID area expenditure calculation should have been based on a consideration of damage data received by HUD from December 2016, or fuller data received in May 2017. The MID calculation in the August 7, 2017 notice for Texas, however, only reflects the consideration of the December 2016 data. Therefore, this notice replaces Table 2 of the August 7, 2017 notice to reflect the corrected MID area expenditure amounts for the States of South Carolina and Texas:</p>

Flood Mitigation and Water Quality Project Site Selection

Recipients will utilize the following process to determine the locations for installing flood mitigation and water quality projects.

1. Recipients will identify interested and willing to participate landowners,
2. Iowa Flood Center will conduct watershed assessment and modeling work that will determine the 12-digit Hydrologic Unit Code (HUC-12) watersheds with the greatest runoff potential during rain events in the larger 8-digit Hydrologic Unit Code (HUC-8) watershed,
3. Recipients, in conjunction with the applicable watershed management authority, will review information on interested and willing to participate landowners, target HUC-12 watersheds identified by the Iowa Flood Center, the watershed management plan, and the benefit to Most Impacted and Distressed Unmet Recovery Need (MID-URN) areas in the watershed to identify priority HUC-12 watersheds to receive installation of flood mitigation and water quality practices,
4. Watershed coordinator will reach out to landowners in the priority HUC-12 watersheds to identify landowners willing to participate and potential projects,

5. The Recipient and watershed management authority with assistance as necessary from the Iowa Flood Center, watershed coordinator, and the recipient's watershed project designer, will identify the prioritized sites and project types for installation.
6. The Recipient will use site selection ranking criteria consistent with IEDA's issued site selection policy to assist in selecting sites to receive funding for the installation of flood mitigation and water quality practices.

Flood Mitigation and Water Quality Project Design

Prior to the Recipient's obligation of funds for construction, the Recipient will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Recipient for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards (as applicable).

The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete, and construction is feasible. The form must be submitted through iowagrants.gov following the completion of final design and prior to release of the bid package. The form is uploaded as part of the process of completing the Wage Rates Status Reports section under the "Compliance Forms and Quarterly Status Reports" tab. The recipient will download the form from the "Wage Rate Supporting Documents" section of the Wage Rates Status Report page, obtain the required signatures verifying the feasibility of the project, and upload the completed form under the tab "Wage Rate Supporting Documents".

IEDA reviews the report and will approve the status report if all required documentation is provided. If the Intent to Obligate Construction Funds is not included or incomplete, the status report will not be approved. The recipient must make the necessary corrections and resubmit the status report.

For each project bid packet, the project designer will check out at least one type of each practice installed (wetland, terrace, basin, etc). All projects requiring an Iowa Department of Natural Resources dam permit and all projects with a drainage area of 25 acres or more will be checked out by the project designer.

Funding Available

A total of \$40,612,471 is available plus \$812,249 for grant administration is available to grant recipients.

Administration

An additional amount equal to two percent of the recipient's CDBG-NDR funding award will be available to the recipient to contract with an experienced CDBG grant administrator. Administration expenses are all expenses associated with the implementation of the Iowa Watershed Approach as a whole, including overall environmental review and publications, reporting and program procedures, office supplies, office space, etc. These expenses are NOT considered project delivery and should be drawn out of admin (Activity 181) funding and not program funding.

Match Requirement

CDBG-NDR watershed project recipient grant funds for construction of watershed projects shall be matched by landowners, the recipient, or the recipient's project partners at an amount equal to at least 10 percent of the estimated construction cost of flood mitigation and water quality practices. **There is no match requirement for practices constructed on land owned by nonprofits or local governments.** Construction costs do not include project design and contractor mobilization costs. Therefore, project design and contractor mobilization costs do not need to be matched locally.

If the actual construction costs are greater than the estimated construction costs, NDR grant funds will be used to pay the difference in construction costs. If the actual construction costs are lower than the estimated construction costs, then local match funds may be returned, so that local match funds equal 10 percent of the total construction costs.

Per the applicable Federal Register Notice related to the use of CDBG-NDR as Match and Order of Assistance Between FEMA, U.S. Army Corps of Engineers, and CDBG-NDR: As provided by the HCD Act, funds may be used as a matching requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG-NDR activity. This includes programs or activities administered by FEMA or the U.S. Army Corps of Engineers. By law, the amount of CDBG-NDR funds that may be contributed to a U.S. Army Corps of Engineers Project is \$250,000 or less. However, the Appropriations Act prohibits use of funds for any activity reimbursable by, or for which funds are made available by, FEMA or the U.S. Army Corps of Engineers.

Watershed Project Site Selection Criteria

To ensure consistent and fair selection of watershed flood mitigation and water quality projects receiving NDR assistance, recipients shall establish a landowner application and site selection criteria. The site selection criteria may be customized to each watershed's unique needs but shall be based on achieving a minimum prerequisite score and consider at minimum the following selection criteria.

- Practice impact on flood mitigation or water quality
- Watershed practice type (E.g. pond, wetland, water and sediment control basin, etc.)
- Site location in the targeted sub-watersheds
- Landowner interest and current use of water management best practices (E.g. no-till, cover crops, etc)

The recipient will maintain a record of applications not selected for assistance and maintain assisted applications within the bid packet file for the assisted projects.

Reimbursement of Funds

The Iowa Economic Development Authority (IEDA) will reimburse funds not provided as match in the form of a grant for actual costs incurred. Claims for reimbursement will be submitted by the recipient via the online www.iowagrants.gov system. The recipient shall maintain a file of all claim supporting documentation including claim documents, invoices, payments and board of supervisor payment approval minutes.

For the watershed coordinator position, timesheets documenting hours worked are to be kept by the recipient for supporting documentation of watershed coordinator salary expenses.

Project Delivery

For purposes of the CDBG-NDR funds, all technical services related costs (also known as soft costs; carrying costs; direct administration costs) will be considered as "project delivery costs". Project delivery costs, although administrative in nature, must be considered as project costs attributable to specific watershed practices. All project delivery costs must be supported with backup documentation to justify their expenditure as it relates to a completed practice. Project Delivery may include:

- Site Specific Environmental Review, such as Section 106 documentation
- Engineering and developing work plans and scopes,
- Meeting with land owners for specific practice details,
- Lien Development and Filing

Administration expenses are all expenses associated with the implementation of the BBHHRP as a whole, including overall environmental review and publications, developing application materials and program procedures, office supplies, office space, etc. These expenses are NOT considered project delivery and should be drawn out of admin (Activity 181) funding and not program funding.

National Objective

As presented in the CDBG-NDR application to HUD, the coordination, assessment, modeling, design and construction of flood mitigation and water quality practices meet the national objective of urgent need. Design and construction of the flood mitigation and water quality practices installed in the East Nishnabotna and West Nishnabotna watersheds also meet the national objective of providing benefit to low-and-moderate-income persons.

The activity of developing watershed plans is a planning related activity and is exempt from meeting a national objective.

Monitoring

IEDA will use the following process to monitor the CDBG-NDR Iowa Watershed Approach program.

Desktop Monitoring

- IEDA will review quarterly partner reports in www.iowagrants.gov; and
- IEDA will review timely expenditure of funds by partner; and
- IEDA will identify performance and expenditure timeliness issues and contact partner to address any timeliness issues.

Onsite Monitoring

- Upon expenditure of at least 50 percent of the CDBG-NDR funds by the recipient, a monitoring visit to the project area will be scheduled;
- The IEDA project manager (project manager) will email the recipient and grant administrator to set up the monitoring visit;
- Monitoring visit date information and forms will be completed in www.iowagrants.gov;
- The monitoring visit report will be uploaded to www.iowagrants.gov and sent to the recipient and grant administrator;
- Project manager will instruct grant administrators to upload any additional information identified as needed during the monitoring visit;
- Project manager will enter into www.iowagrants.gov the date requested additional information is received and approved.

Expenditure Monitoring

The IEDA Project Manager will track actual quarterly spending for each partner and compare this to the projected quarterly spending as listed in Attachment A of the project contract. The spending tracker worksheet will be stored in the iowagrants.gov Required Uploads tab, Quarterly Budget and Plan, for each partner. Deviation from the projected spending is anticipated, however, as the project nears completion the percent variation should decline. Allowable discrepancy limits are established in the table below.

Year	Budget Discrepancy Limit
1	40%
2	35%
3	30%
4	20%
4.5	10%
5	0%

If the spending differential is greater than the limit shown, the Project Manager will determine the reason for the spending discrepancy. The Project Manager will review current reporting narratives or metrics to determine if spending is reasonable in regards to the status of tasks and deliverables. The Project Manager may request additional information from the partner in order to complete this assessment. The Project Manager will also determine if delays in spending or the completion of deliverables/tasks can potentially result in a negative impact to the project.

If the discrepancy in spending or progress is deemed reasonable, the Project Manager will continue to monitor expenditures. The annotations function of iowagrants.gov will be used to note the findings of the status review.

If the Project Manager has concerns about the spending discrepancy or the status of project deliverables/tasks OR the partner has reported a spending discrepancy for 3 consecutive quarters, the Project Manager will confer with IEDA management. One of the following action items will result:

- Project Manager will continue to monitor the project status;
- A meeting with partner management will be held. Partner will submit revised quarterly budget projection and/or a plan to overcome progress delay;
- Terminate the agreement. IEDA will repurpose funds with HUD approval.

Correspondence related to quarterly budget discussions will be documented in the correspondence feature of iowagrants.gov. Notes regarding project status will be documented using the annotations function.

Maintenance Agreement

The recipient will enter into a maintenance agreement with each private landowner where a flood mitigation or water quality project is installed. The maintenance agreement will prohibit the landowner or his/her agent(s) or successor(s) to remove, alter, or modify the project for whichever is the longest period of time below, from the date of the project agreement unless prior written authorization is obtained from the recipient's governing body and incorporated as an amendment to the maintenance agreement.

- At least five years; or
- The Natural Resources Conservation Service's federally accepted practice lifespan (https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb1076947.pdf), or
- A period of time determined by the recipient.

Duplication of Benefits

No duplication of benefits (DOB) will be allowed. Prior to assisting properties, IEDA will determine and verify any monies the recipient received from any other federal or state financial resources for the same purpose will not result in a duplication of benefits. If a duplication of benefits is identified, IEDA will adjust the CDBG-NDR project amount and project scope accordingly.

To assist IEDA in making a duplication of benefits determination, the recipient will complete an IEDA provided DOB verification form in www.iowagrants.gov prior to each construction contract bid letting documenting whether multiple sources of funding were utilized and if the amount of funding utilized was greater than the funding need.

Reporting

Recipient will report project progress at least quarterly via www.iowagrants.gov to IEDA outlining progress made toward milestones outlined in the recipient's contract with IEDA. Progress on completing the following deliverables will be reported.

- Forming a watershed management authority;
- Hiring a watershed coordinator;
- Developing a watershed plan;
- Completing hydrologic models, hydrologic assessments and hydrologic plans;
- Installing water quality sensors;
- Design watershed projects; and
- Installing watershed projects.

Reporting will be used to document progress towards achievement of the outcome values identified in IEDA's CDBG-NDR funded proposal including the following.

- Number of watershed plans developed;
- Number of watershed projects constructed;
- Percent of reduction in stream flow;
- Percent of reduction of watershed nitrate loading;
- Percent of reduction of watershed phosphorous loading; and
- Number of tons of soil lost per acre.

Procurement

Recipient shall follow the federal procurement requirements in 2 CFR 200, the IEDA CDBG Management Guide online at <http://www.iowaeconomicdevelopment.com/Community/CDBG>, and the instructions for procurement provided by IEDA online at <http://www.iowaeconomicdevelopment.com/userdocs/documents/ieda/InstructionsProcurementServicesCDBGprojects.pdf>.

Due to the rural nature of watershed projects and sparse traditional print media coverage in some watersheds, for the purposes of the Iowa Watershed Approach watershed projects publishing in one or more local newspapers is not required. A more effective way to publicize solicitations to ensure open and fair competition is to use a combination of two or more of the following.

- Publicize opportunity on applicable service provider industry plan rooms
- Direct mail opportunity to potential respondents
- Direct email opportunity to potential respondents
- Publicize opportunity on recipient or project website
- Publicize opportunity on applicable association websites or directly to association members (e.g. Iowa League of Cities, American Institute of Architects – Iowa Chapter, Iowa Land Improvement Contractors)
- Publicize opportunity in local or regional newspaper

The recipient must maintain records sufficient to detail the history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

Computers and supplies costing less than \$5,000 each and purchased following state and federal procurement requirements may be purchased to support the watershed coordinator work. Recipients are encouraged to seek out services from small and minority-owned businesses.

City and County partners follow the cost reasonableness standard set forth in 2 C.F.R. § 200.323. Entities must develop an independent price or cost estimate before receiving bids or proposals for services. The appropriate form of analysis should be based on the complexity of the procurement. Example methodologies include:

- Compare prior (historical) proposed prices and contract prices for the same or similar goods and services
- Compare competitively published catalog prices, published market prices, or similar indices

The Recipient must maintain a record of this analysis onsite.

Environmental Requirements for CDBG-NDR Funding

The Watershed Project program follows CDBG environmental regulations – 24 CFR Part 58. Recipients will follow the environmental review procedures in IEDA’s online CDBG Management Guide. Recipients will not take any choice limiting actions prior to receiving release of funds from IEDA.

IEDA will procure a contractor to complete five Programmatic Environmental Assessment (EA) for the project targeted eight HUC-8 watersheds to assess environmental impacts as they relate to the construction of water & soil conservation practices. The selected contractor will follow the guidance provided by the Council on Environmental Quality as it relates to Programmatic NEPA reviews. Reference website:

https://www.whitehouse.gov/sites/default/files/docs/effective_use_of_programmatic_nepa_reviews_final_dec2014_searchable.pdf.

National Historic Preservation Act

Recipients must comply with standards for treatment of historic properties, documentation and reporting requirements per Section 106 of the National Historic Preservation Act and programmatic agreement between IEDA and the State Historic Preservation Office. Recipients will retain qualified consultant(s) to prepare reports.

Tie-back to the Qualified Disasters

Watershed activities reasonably tie-back to the unmet recovery needs of the Qualified Disaster. The projects cover areas of the state impacted by declared disasters from 2011 and 2013, as specified below.

West Nishnabotna: flooding in 2011, DR-1998

East Nishnabotna: flooding in 2011, DR-1998

Raccoon: flooding in 2011 and 2013, DR-1977 and DR-4126

English River: flooding in 2013, DR-4119

Clear Creek: flooding in 2013, DR-4119 and DR-4126

Middle Cedar: flooding in 2013, DR-4126 and DR-4135

Upper Wapsipinicon: flooding in 2013, DR-4135

Upper Iowa: flooding in 2013, DR-4135

The following tie-back strategy is contained in individual Partner contract agreement – scopes of work:

The design and construction of built projects and conservation practices in the target watersheds will be implemented to have the greatest possible positive impact on the MID-URN areas through the reduction of future flooding and improved water quality during high-flow events. Built projects and conservation practices may take place outside of the MID-URN areas, but must take place in an eligible county as described below and must have a positive impact on a MID-URN area. Water quality and quantity data will be collected throughout the duration of the project to support the development of the hydrologic models used to inform the distribution of built projects, to monitor progress, and to evaluate the success of the implemented practices. This element of the project is critical in helping to support and inform the development of practices impacting the MID-URN areas and to evaluate the success of these projects.

NDR eligible counties in each of the target watersheds are described on the following pages.

ADDENDUM

Start to Finish Process for NDR Watershed Projects:

- Watershed forms a watershed management authority in adherence to Iowa Code chapter 466B.2.
- IEDA hires consultant to conduct Tier I environmental review for watershed.
- County/Watershed Management Authority (County) hires project coordinator.
- County, with assistance from the Iowa Flood Center, determines target HUC-12 watersheds for installation of watershed practices.
- County hires/develops watershed management plan.
- Iowa Flood Center conducts watershed data collection, assessment, and modeling services

- Iowa Flood Center installs and maintains water monitoring equipment and weather stations
- County/project coordinator promotes incentive program to landowners to site watershed projects.
- Landowners submit project application to county.
- Project coordinator visits interested landowners to site possible practices.
- County hires engineering firm to design watershed practices according to NRCS and Iowa Stormwater Management Manual specifications.
- Possible watershed practice sites entered into ArcGIS and provided to Iowa Homeland Security and Emergency Management (IHSEMD) for quality control.
- IHSEMD provides ArcGIS information for potential practice sites to Earthview Environmental for determination of need to conduct a Phase 1 archaeological site investigation.
- Earthview Environmental returns a determination by site and Phase I study is conducted, or is determined to not be needed, or site is deselected due to high possibility of archaeological issues.
- Selected watershed practice sites are designed by engineering firm.
- Project coordinator provides watershed practice final designs to Iowa Flood Center for end of watershed project final evaluation of impact of individual and overall watershed practices installed
- Project coordinator and grant administrator bundle groups of practices into a single bid packet.
- Grant administrator creates practice site inventory in www.iowagrants.gov. (known as “INV packet”)
- Grant administrator sends email to NDR Watershed Project Manager including the INV packet name and requests the INV packet be made “Active” in the iowagrants.gov system – **the following items can be completed simultaneously:**
 - Once the INV packet is Active, grant administrator completes and submits the Tier II/Section 106 form in iowagrants.gov
 - For NDR Watersheds – this will include the Site Specific Environmental Review including compliance mitigation, general environmental conditions, wetlands and floodplains, and toxic substances.
 - For NDR Watersheds – this will include all documentation required for Section 106 review such as scope of work, maps, location, finding/no finding, etc.

IEDA Historic Preservation Specialist reviews the submitted Tier II/Section 106 documents. If changes are needed the “negotiation/correction” feature in iowagrants.gov will be used until the Section 106 documents are final and acceptable. IEDA NDR Historic Preservation Specialist will “Approve” the Tier II/Section 106 form in iowagrants.gov. This review and approval process typically takes 2-4 weeks per property.
 - Grant administrator will submit Wage Rate Approval request, including Intent to Obligate Funds form.
 - IEDA Labor Standards Administrator reviews and approves the wage rate form. If the form is submitted without Intent to Obligate, it will be sent back to correcting status until form is uploaded and approvable.
 - IEDA Labor Standards Administrator notifies grant administrator and NDR Watershed Project Manager of wage rate approval.
 - Concurrent with the wage rate compliance form and the Intent to Obligate Funds form in www.iowagrants.gov, the grant administrator will initiate and submit a DOB compliance form in www.iowagrants.gov with signed Affirmation of Duplication of Benefits and Subrogation & Assignment form.
 - NDR Watershed Project Manager will enter amount for the “Total Need Prior to Assistance” into the already submitted DOB form, based off Iowa Flood Center provided watershed need estimate and updated as need diminishes.
 - Watershed project manager coordinates with IEDA DOB Administrator to ensure form is completed.
 - IEDA DOB Administrator and IEDA Project Manager review the DOB information to conduct DOB verification.
 - IEDA DOB Administrator approves DOB information and www.iowagrants.gov sends approval email to grant administrator.
- After Tier II/Section 106 is approved, completion of DOB information, and approval of wage rates, the county will follow procurement and go out for bid on the approved scope of work.
- Once a contractor is selected but before a contract is executed, grant administrator will conduct the contractor clearance review by checking the necessary websites and databases.

PLEASE NOTE: the county cannot enter into any construction contracts prior to the approval of Section 106, and DOB and documentation that contractor clearance has been conducted by the county.

- Grant administrator, project coordinator or engineer will conduct any necessary progress inspections, labor compliance, and change orders (may trigger modification to DOB and Section 106 as noted above), etc. during construction.

PLEASE NOTE: The county will only be able to draw down funds up to the DOB approved amount, so it is very important to notify IEDA if costs are expected to exceed the DOB approved amount.

- Once costs are incurred on a INV packet scope of work, the county will be able to claim funds. Grant Administrator (on behalf of the county) will initiate a claim in www.iowagrants.gov based on documentation provided by the county.
 - For NDR Watersheds – All Claims will need to break down grant administration, watershed planning, and construction (project coordinator, design, construction) costs by providing details in each claim broken down per INV packet.
- While the county may claim as many times as it would like on any INV packet, the total investment in that INV packet will be collected on the claim when that INV packet is marked with a “completion date” in www.iowagrants.gov. No further construction or project delivery should be drawn after a INV packet is marked “completed.”
- IEDA will run reports prior to the approval of each draw to verify that the requested construction cost (and the total requested-to-date) does not exceed the DOB award amount.
- County will complete a maintenance agreement with each landowner receiving financial assistance for installation of one or more watershed practice.

Parties Involved in the Above Process:

Hayley Crozier, IEDA (DOB Administrator): Hayley.Crozier@iowaEDA.com

Jeff Geerts, IEDA (NDR Watershed Project Manager): jeff.geerts@iowaeda.com

Ann Schmid, IEDA (Historic Preservation Specialist): ann.schmid@iowaeda.com

Dan Narber, IEDA (Labor Standards Administrator): dan.narber@iowaeda.com

Iowa Flood Center

Counties

Project Coordinators

Grant Administrators

Acquisition Policy – Watershed Projects

All Watershed Projects will have Maintenance Agreements. It is not the intent of the recipients (Counties) to acquire real property or provide lease/easement payments to landowners except in rare instances.

Maintenance Agreement Only

For watershed projects involving only a maintenance agreement and no acquisition of real property or lease agreement, the Uniform Relocation Assistance and Real Property Acquisition Policies Act (Uniform Act) does not apply.

Acquisition of Real Property or Lease

In certain circumstances acquisition or lease/easement payments may be necessary for high value sites or for other reasons. Prior to acquisition or lease/easement payments, the recipients will contact IEDA for approval. For watershed projects involving the acquisition of real property or a lease/easement all acquisition will be voluntary. Per the URA, to be considered voluntary acquisitions must meet all the following criteria:

1. No specific property needed for project, alternate sites exist. The watershed practices can be constructed on various sites within the identified MID-URN areas.
2. Property is not part of an area to be acquired in the future. The construction of watershed practices is funded with a grant that will end in 2021 with no future federal funding anticipated. Furthermore, the recipients (counties) do not have a program for constructing watershed practices on landowner farms.
3. Eminent Domain will not be used – even if negotiations fail. All recipients (counties) have agreed not to use their power of eminent domain to acquire property.

Once a landowner’s application for watershed practices is selected to receive assistance, the landowner will receive in writing by Certified Mail, or in person, a document to be signed by the landowner and documented in the project file, that acknowledges receipt of notification of the three criteria below:

1. That Eminent Domain will not be used.
2. The Fair Market Value (FMV) of the property or lease/easement
3. How the FMV estimate was determined depending on:
 - a. If the property value is greater than \$10,000 an appraisal is required. The file should include the appraisal.
 - b. If property value is less than or equal to \$10,000 and all parties are in agreement, the FMV estimate is to be made by a person with current, local real estate knowledge such as an appraiser, auctioneer, or real estate agent. The file should document the justification of the FMV. The property owner at any time can request an appraisal.

Clean Water Act Compensatory Mitigation Policy

December 2018

All projects implemented with HUD National Disaster Resiliency (NDR) funds through the Iowa Watershed Approach must document compliance with Clean Water Act, and most pertinent to this compliance is Section 404 of the Clean Water Act permitting process. Documentation of compliance is recorded on a project's Phased Environmental Assessment or Tier II checklist.

There are varying levels of review/permit requirements based on the implementing regulations of the Clean Water Act (33 CFR). Projects implemented in the program may be documented as:

- No Permit Required – not an action regulated by the Clean Water Act
- Exempt – Meets an exemption outlined in the regulations
- Falls under an applicable Nationwide or Regional Permit issued by the United States Army Corps of Engineers (USACE) (*Regional General Permit 33* or *Nationwide Permit 27* are common for these projects). This can result in two scenarios:
 - Falls under a Nationwide or Regional Permit and does not require compensatory mitigation
 - Falls under a Nationwide or Regional Permit and requires compensatory mitigation
- Individual Permit – project does not qualify for any of the above and must be individually permitted through consultation with the USACE.

For IWA projects, priority should be made for all projects that do not require compensatory mitigation to ensure the timely implementation of practices. IEDA authorization is required for all practices requiring compensatory mitigation. Both IEDA and the USACE encourage pre-application consultation for any practices.

Documentation:

If a project is identified as not needing a permit, is exempt, or falls under a Nationwide or Regional Permit and no USACE consultation is required, the project engineer must provide a written statement about how the project meets compliance with the Clean Water Act. This statement must identify the practice by the practice nomenclature and describe what exemption, Nationwide or Regional Permit the project complies with and how the project size, impact, etc. are within the parameters of the regulation/permit. This document will be uploaded in the Tier II form under the 404 Permit section.

If a project is identified as requiring USACE consultation, the engineer, working with the Watershed Coordinator and Grant Administrator, must submit all required documents to the USACE. All submittals should include the documents identified in the box to the right.

If a project is identified as requiring USACE consultation, and the engineer knows that Compensatory Mitigation will be required for the practice, the engineer, working with the Coordinator and Grant Administrator, must put together all required documents and submit to IEDA prior to USACE submittal. IEDA will review the practice and relevant submittal documents, determine if the site and the proposed mitigation are practicable within the terms of the NDR grant, and will then provide guidance to submit the project to the USACE for review/permitting.

Due to the limitations on utilizing federal funds to pay for Compensatory Mitigation (33 CFR 332.3(j)(2); which states, "(2) Except for projects undertaken by federal

All Submittals to the USACE must include:

- Standard Cover Letter language to link all NDR Iowa Watershed Approach Projects.
- Full practice engineered plans, details, maps, names, etc.
- Documentation of applicable Regional or Nationwide or Individual Permit request.
- Draft Mitigation Plan (if applicable) with detailed mitigation calculations and proposed mitigation activities (site, size, mitigation practice, etc.).

agencies, or where federal funding is specifically authorized to provide compensatory mitigation, federally funded aquatic resource restoration or conservation projects undertaken for purposes other than compensatory mitigation, such as the Wetlands Reserve Program, Conservation Reserve Program, and Partners for Wildlife Program activities, **cannot be used for the purpose of generating compensatory mitigation credits** for activities authorized by DA permits.”) at this time, there are three options for completing projects requiring Mitigation, which IEDA is pursuing.

Option one:

USACE needs a letter from HUD stating that the NDR funds can be used for mitigation. Unless HUD can say, in writing, that the money provided can specifically be used for compensatory mitigation purposes, USACE can't approve mitigation projects unless the funds come from a non-federal source.

IEDA has submitted a request to HUD and is currently working with them on further guidance. *UPDATE – See letter attached dated January 31, 2019 – HUD approved use of NDR funds for Compensatory Mitigation. Projects should continue to comply with the policy above, and provide a copy of this letter with each USACE consultation where NDR funds will be used for these costs.*

Option two:

Projects can be designed to be self-mitigating. For example: if a pond/wetland were to be created, there could be impacts requiring mitigation. However, if water quality improvements were installed immediately up and/or downstream of the impoundment as part of the same project, USACE could consider that those beneficial impacts offset the adverse impacts and thus making the project self-mitigating. Examples of this would be reconnecting floodplain upstream of the impounded area, creating riffle pool complexes or habitat improvement up and/or downstream of the impounded area, removing levees or other restrictive structures up and/or downstream of the impounded area and incorporating buffers along that same reach to the level that it offsets the credit requirements of the pond. There are many options but the main point is that if the WHOLE project site can be considered as one and the overall benefits outweigh the adverse impacts, USACE could consider the project self-mitigating and avoid any federal funding issues.

Option three:

Identify a non-federal funding source to pay for Compensatory Mitigation. These funds can come from private property owners, local municipalities, conservation organizations, etc. and must be committed in project documents submitted to IEDA & USACE.

Pre-Application Consultation

USACE contacts have indicated that they are available for pre-application consultations. This can be completed for any level of review/permitting. It is best to reach out sooner than later – so projects can be designed/engineered appropriately.

USACE contacts for this grant are:

Matt Zehr, Regulatory Project Manager, Matthew.A.Zehr@usace.army.mil 309-794-5369

Ward Lenz, Chief Regulatory, Gary.W.Lenz@usace.army.mil, 309-794-5370



OFFICE OF COMMUNITY PLANNING
AND DEVELOPMENT

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-7000

JAN 31 2019

Mr. G. Ward Lenz
Chief, Regulatory Branch
U.S. Army Corps of Engineers
Rock Island District
PO Box 2004 Clock Tower Building
Rock Island, IL 61207-2004

Dear Mr. Lenz:

The Department received a letter from the State of Iowa dated December 17, 2018, requesting clarification of the use of Community Development Block Grant National Disaster Resilience (CDBG-NDR) funds. The Department would like to thank you for the ongoing efforts of the U.S. Army Corps of Engineers (USACE) in working with the State of Iowa to implement the State's CDBG-NDR program. The State's CDBG-NDR activities of flood mitigation, water quality and resilience project design and installation of best practices include, but are not limited to, ponds, detentions basins, wetlands, terraces, floodplain restoration, streambank stabilization, bioreactors, saturated buffers, perennial crops, buffer strips, permeable pavements, bioretention systems, bioswales, infiltration basins, and infiltration trenches to mitigate existing or future flood risks from severe storm events. These improvements will be installed in most impacted and distressed areas resulting from previous disasters and as identified in the State's approved CDBG-NDR application. The installation of these improvements may require permits from the USACE and in some instances, compensatory mitigation in compliance with 33 CFR Part 332.

The Department has allocated a total of \$96,887,177 in CDBG-NDR funds to the State of Iowa under the Disaster Relief Appropriations Act, 2013 (Public Law (P.L.) 113-2). The State's CDBG-NDR award is subject to the provisions of P.L. 113-2, Title I of the Housing and Community Development Act of 1974, as amended (42 USC 5301 et seq.), regulations for the Community Development Block Grant (CDBG) at 24 CFR Part 570, and several *Federal Register* Notices governing CDBG-NDR awards.

CDBG-NDR recipients may fund a range of activities, including the 26 eligible activities described in 42 U.S.C. 5305(a) and as implemented by the CDBG program regulations and the waivers and alternative requirements provided pursuant to applicable *Federal Register* Notices. Furthermore, these CDBG-NDR funds may be used to fund both the CDBG-NDR eligible activity and mitigation expenses necessary for permitting or compliance, including compensatory mitigation that may be required for USACE permitting and Clean Water Act compliance.

This letter confirms that, in accordance with section 104(g) of the Housing and Community Development Act of 1974, as amended (42 U.S.C. 5304(g)), and HUD regulations at 24 CFR Part 58, the State or the State's subrecipient unit of local government (*i.e.*, a county) shall assume all federal responsibilities for the environmental review required pursuant to the National Environmental Policy Act (NEPA). Decision-making and action that would otherwise apply to the

www.hud.gov

espanol.hud.gov

Department under NEPA and all related environmental laws and authorities identified in 24 CFR section 58.5, is delegated to the subrecipient county. Under 24 CFR Part 58, State and local governments that receive CDBG-NDR funds assume the status of a "responsible entity" and act as the federal action agency for all necessary consultations and compliance measures under NEPA and the specified related laws and authorities. Acting as the federal agency with respect to CDBG-NDR funded activities, the county may also act as the lead agency where other federal agencies also participate in the activity.

If you have any questions regarding this matter, please do not hesitate to contact Claudette Fernandez, Director, Office of Block Grant Assistance, at (202) 708-3587.

Sincerely,

A handwritten signature in blue ink, appearing to read "Stanley Gimont".

Stanley Gimont
Deputy Assistant Secretary
for Grant Programs

Site Inventory Step-by-Step Process – NDR Watershed Projects

This is the step-by-step www.iowagrants.gov process to create a site inventory for development of watershed project INV packages and subsequent submittal of Tier II Environmental/Section 106, Wage Rate approvals, Duplication of Benefits documentation, and Claims.

Table of Contents:

Definitions	Page 67
Creating the Inventory	Pages 68-72
Tier II Environmental (Section 106)	Pages 73-80
Wage Rate Approval Request	Pages 81-87
Duplication of Benefits	Pages 88-94
Submitting a Claim	Pages 95-98
Inventory Management – Project Delivery	Page 99

Definitions:

Practice: The individual watershed management practice(s) that will be installed with NDR grant funds. The number of anticipated practices to be completed is documented in each IEDA/County contract and will be reported to HUD based on what is entered into the [iowagrants.gov](http://www.iowagrants.gov) inventory. The target number of practices in the contract was derived from the original HUD NDR application. For example: if you have a landowner with a site on which you design to install a pond along with four sediment control basins, the total number of practices at that site is five.

Inventory: [iowagrants.gov](http://www.iowagrants.gov) tool for documenting the bundling of multiple practices for TIER II environmental review and National Historic Preservation Act Section 106 review. Inventory information will also be used in the wage rate approval request process in [iowagrants.gov](http://www.iowagrants.gov).

CREATING THE INVENTORY

Step 1:

Login to www.iowagrants.gov

Step 2:

Click "Inventory"



The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". A "Back" button is also visible. The main content area is titled "Welcome" and contains a "Main Menu" section. The "Main Menu" includes a list of links: "Dashboard View", "People", "Organizations", "Distribution Lists", "Funding Opportunities", "Submitted Applications", "Reviewer Qualifications", "Review", "My Site Visits", "Final Approval", "Grant Tracking", "Inventory" (highlighted in yellow), "Reports", and "My Profile". There is also a "GEMS Reporting" link. A small note above the menu says "Click Help above to view instructions. Go to 'My Profile' to reset password."

Step 3:

Click "Add" on upper right portion of screen



The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". A "Back" button is also visible. The main content area is titled "Search Inventory" and contains a search form. The form includes the following fields: "Inventory Number:" (text input), "Status:" (dropdown menu with "All" selected), "Associated Grant Number:" (text input), "Associated Organization Name:" (text input), "Type:" (dropdown menu with "All" selected), "Program Area:" (dropdown menu with options: "CDBG - CDBG", "CDBG-NDR - CDBG - National Disaster Resiliency", and "DRc - Downtown Resource Center"), and "Title:" (text input). A "Search" button is located in the top right corner of the form area. An "Add" button is visible in the upper right portion of the screen.

Step 4a-4d:

- a. Choose “CDBG-NDR – CDBG – National Disaster Resiliency” for Program Area
- b. Insert Inventory Title using nomenclature below. Consider inventory packets like divisions or bundles of practices. They can be bid alone or in groups, but the inventory packet is the smaller connected group of practices for environmental review.

FOR WATERSHED PROJECTS:

INVENTORY PACKET NAMING: use: **Watershed Abbreviation – “INV” – ###** (CC-INV-001) Clear Creek = CC; English River = ER; East Nishnabotna = EN; Middle Cedar = MC; North Raccoon = NR; Upper Iowa = UI; Upper Wapsipinicon = UW; West Nishnabotna = WN

- c. Choose “Active” for Inventory Status
- d. Choose “Watershed” for Type
- e. Description field is optional, so you or may not include a description. Your choice.
- f. Click “Save” in upper right corner of screen

The screenshot shows the 'Inventory' form on IowaGrants.gov. The 'General Information' section contains the following fields:

- Program Area*: CDBG-NDR - CDBG – National Disaster Resiliency
- Inventory Title*: JG-INV-001
- Inventory Status*: Active
- Type*: Watershed
- Description: (Empty text area)

Navigation icons at the top include Menu, Help, Log Out, Back, Add, and Save.

Step 5:

Click “Return to Components”

The screenshot shows the 'Inventory' form on IowaGrants.gov after saving. The 'General Information' section displays the following information:

- ID: 330651
- Program Area: CDBG – National Disaster Resiliency
- Title: JG-INV-001
- Type: Watershed
- Description: (Empty text area)

A yellow button labeled 'Return to Components' is located at the top right of the form. The footer indicates 'Last Edited By: Jeffrey Geerts, 10/10/2019'.

Step 6:
Click "Edit"

Inventory: 330651

Title: JG-INV-001
Status: Active
Program Area: CDBG – National Disaster Resiliency

Watershed [Create New Version](#) | [Mark as Complete](#) | [Return to Components](#)

Activity*
Number of practices in this Inventory

Watershed Practice [Add](#)

Unique Practice ID	Type of watershed practice	Latitude	Longitude	Completed Date
--------------------	----------------------------	----------	-----------	----------------

Last Edited By:

Step 7:
Complete "Activity" and "Number of practices in this Inventory" information, then click "Save"

Inventory: 330651

Title: JG-INV-001
Status: Active
Program Area: CDBG – National Disaster Resiliency

Watershed

Activity* 173 - Watershed Projects

Number of practices in this Inventory 3

Watershed Practice

Unique Practice ID	Type of watershed practice	Latitude	Longitude	Completed Date
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[Return to Top](#)

Step 8:

Click "Add" to insert each watershed practice type and location information.

Inventory: 330646

Title: JG-INV-001
Status: Active
Program Area: CDBG – National Disaster Resiliency

Watershed [Create New Version](#) | [Mark as Complete](#) | [Return to Components](#)

Activity* 173 - Watershed Projects

Number of practices in this Inventory 3

Watershed Practice [Add](#)

Unique Practice ID	Type of watershed practice	Latitude	Longitude	Completed Date
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Last Edited By: Jeffrey Geerts, 10/10/2019

Step 9:

- Complete "Unique Practice ID" following nomenclature below
Watershed Abbreviation-###-LAND OWNER LAST NAME (CC-001-SMITH)
Clear Creek = CC; English River = ER; East Nishnabotna = EN; Middle Cedar = MC;
North Raccoon = NR; Upper Iowa = UI; Upper Wapsipicon = UW; West Nishnabotna = WN
- Select "Type of Watershed Practice"
- Complete Latitude and Longitude fields
- COMPLETED DATE WILL BE COMPLETED LATER. ONCE THE PRACTICE IS CONSTRUCTED, PLEASE REVISIT THIS PAGE AND FILL IN THE COMPLETED DATE
- Click "Save" in the upper right corner of screen

Inventory: 330646

Title: JG-INV-001
Status: Active
Program Area: CDBG – National Disaster Resiliency

Watershed Practice

Unique Practice ID* JG-001-SMITH

Type of watershed practice Perennial/Prairie Cover

Data Point of Practice

Latitude 42.1529 -92.0297
Latitude Longitude

Completed Date

[Return to Top](#)

Step 10:

Continue adding practices until the number of individual practices equals the number of practices you indicated in the “Number of Practices in this Inventory” field in Step 7. Then click “Return to Components” or “Menu.”

The screenshot shows the Iowa Grants website interface. At the top, there is a navigation bar with the Iowa logo and the text "Iowa Grants.gov". Below this is a secondary navigation bar with links for "Menu", "Help", "Log Out", "Back", "Print", "Add", "Edit", and "Cancel". The main content area is titled "Inventory" and shows details for an inventory item with ID 330646. The details include: Title: JG-INV-001, Status: Active, and Program Area: CDBG – National Disaster Resiliency. Below this is a "Watershed" section with the activity "173 - Watershed Projects" and a "Number of practices in this Inventory" of 3. There are links for "Create New Version", "Mark as Complete", and "Return to Components". A table titled "Watershed Practice" lists three practices: JG-001-SMITH (Perennial/Prairie Cover), JG-002-JONES (Oxbow Restoration), and JG-003-SCHMID (Prairie Strip). The table includes columns for Unique Practice ID, Type of watershed practice, Latitude, Longitude, and Completed Date. The last edited date is 10/10/2019 by Jeffrey Geerts.

Unique Practice ID	Type of watershed practice	Latitude	Longitude	Completed Date
JG-001-SMITH	Perennial/Prairie Cover	42.1529	-92.0297	
JG-002-JONES	Oxbow Restoration	42.1529	-92.0259	
JG-003-SCHMID	Prairie Strip	41.589769	-93.615628	

Step 11:

Send an email to jeff.geerts@iowaeda.com indicating that you have created a new inventory item in www.iowagrants.gov. Include the Inventory ### in the email.

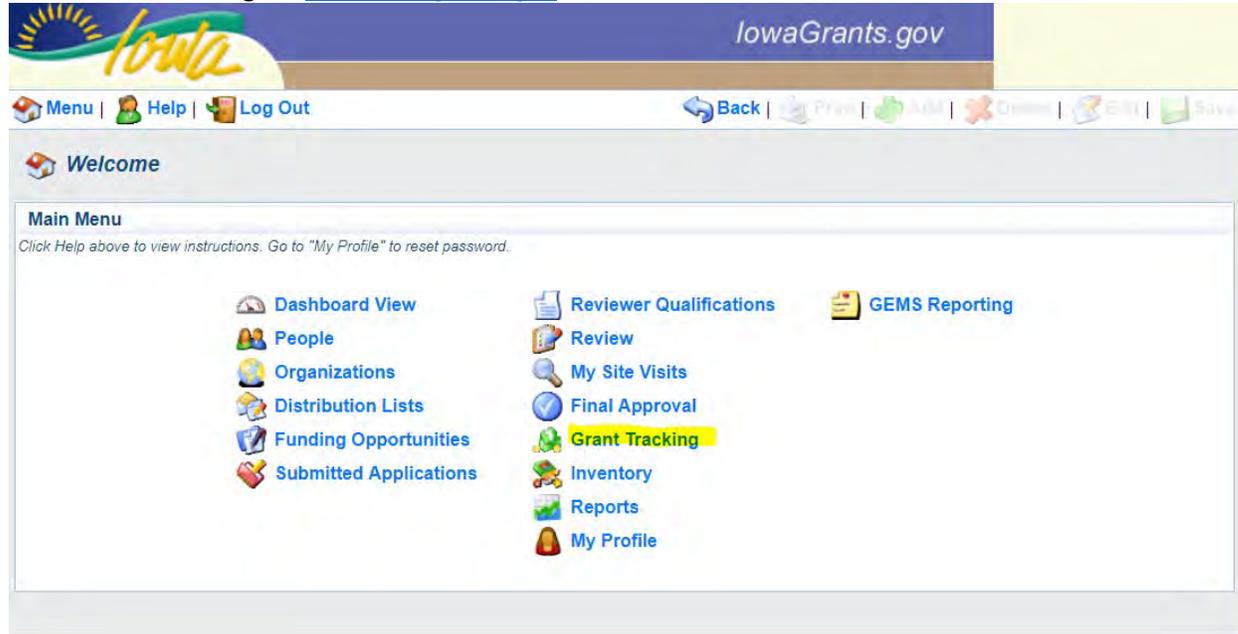
ONLY AFTER IEDA APPROVES THE NEW INVENTORY ITEM YOU MAY PROCEED TO STEP 12.

The above steps are completed each time a new inventory is created for a group of watershed projects.

SUBMITTING TIER II ENVIRONMENTAL AND SECTION 106 DOCUMENTATION

Step 12:

Click "Grant Tracking" at www.iowagrants.gov



The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". A secondary navigation bar contains "Back", "Print", "Add", "Delete", "Edit", and "Save" icons. The main content area is titled "Welcome" and features a "Main Menu" section. A note below the menu reads: "Click Help above to view instructions. Go to 'My Profile' to reset password." The menu items are arranged in two columns:

- Dashboard View
- People
- Organizations
- Distribution Lists
- Funding Opportunities
- Submitted Applications
- Reviewer Qualifications
- Review
- My Site Visits
- Final Approval
- Grant Tracking (highlighted in yellow)
- Inventory
- Reports
- My Profile
- GEMS Reporting

Step 13:

Enter your NDR contract number in "Grant / Project Number" field (ex. 13-NDRI-001)



The screenshot shows the "Search Grant/Projects" page on IowaGrants.gov. The page has a header with the Iowa logo and "IowaGrants.gov". Below the header, there are links for "Menu", "Help", and "Log Out", and a secondary navigation bar with "Back", "Print", "Add", "Delete", "Edit", and "Save" icons. The main content area is titled "Search Grant/Projects" and includes a "Search Sub-Components" section with links for "Claims", "Status Reports", "Contract Amendments", and "Site Visits". Below this, there is a "Search Grant/Projects" section with a "Search" button. A note reads: "Enter one or more search criteria below and click the Search link. You can search for sub-components directly by clicking on a component above." The "Search Fields" section contains the following input fields:

- Grant/Project Number:
- Status:
- Grantee's Last Name:
- Organization:
- Program Area:
CDBG-NDR - CDBG - National Disaster Resiliency
DRc - Downtown Resource Center
- Funding Opportunity:
- Title:
- Program Officer's Last Name:
- Grant/Project Year:

Step 14:

Click on your county name under "Grant Title" field



The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". On the right side of the navigation bar, there are icons for "Back", "Print", "Add", "Change", "Edit", and "Save".

The main content area is titled "Grant/Project Tracking". It features a "Search Criteria" section with the following information:

- Program Areas: All
- Grant Number: 13-test-001

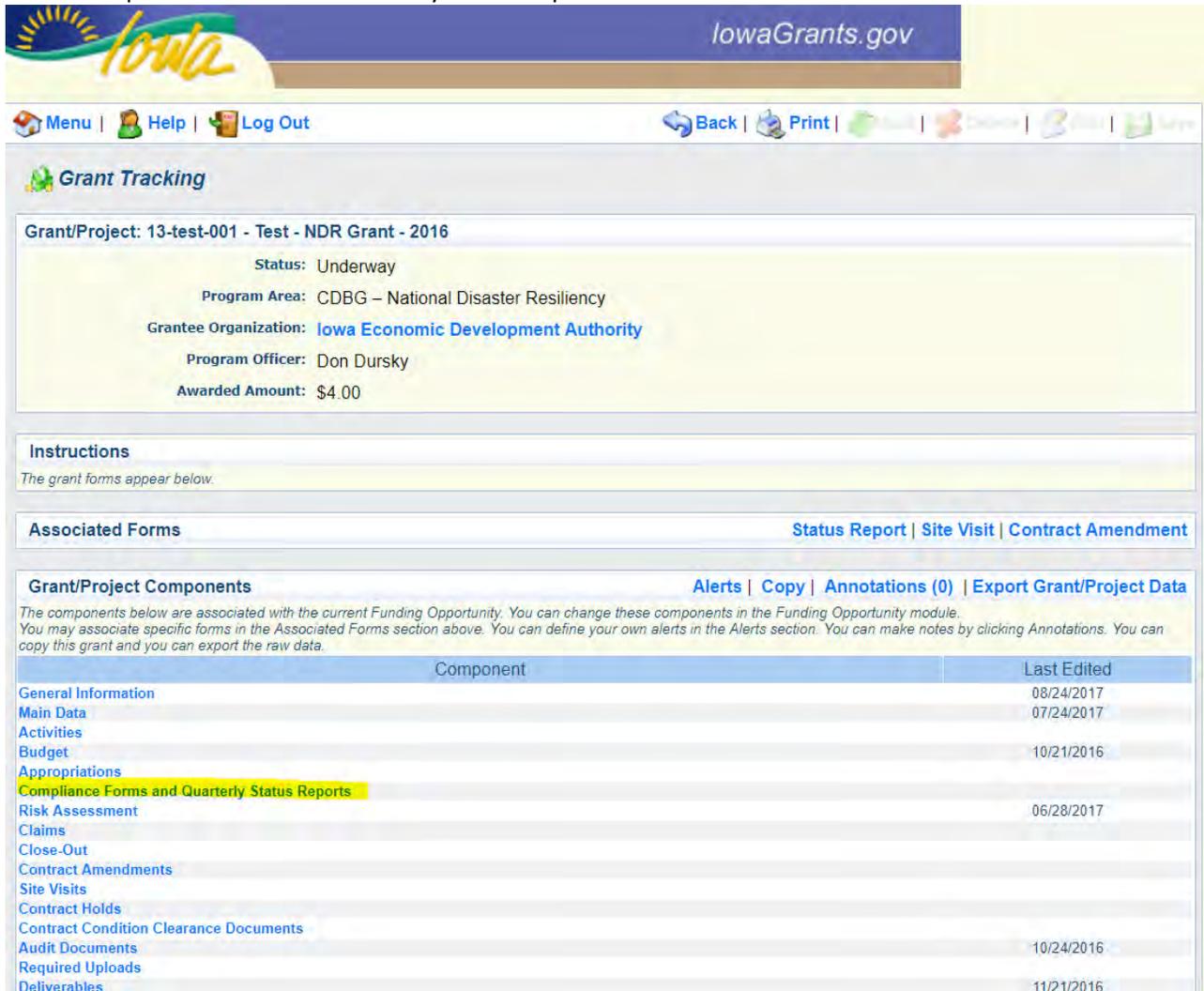
Below the search criteria, it indicates "Showing 1 - 1 of 1". The "Grant/Projects" section contains a table with the following data:

Grant Number	Status	Year	Grant Title	Program Area	Organization	Grantee	Program Officer	Funding Opportunity	Budget Total
13-test-001	Underway	2016	Test - NDR Grant	CDBG – National Disaster Resiliency	Iowa Economic Development Authority	Don Dursky2	Don Dursky	160575 - CDBG – National Disaster Resiliency	\$4.00

At the bottom right of the table, it says "Showing 1 - 1 of 1".

Step 15:

Click "Compliance Forms and Quarterly Status Reports"



The screenshot shows the IowaGrants.gov website interface for a specific grant. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". On the right side of the navigation bar, there are icons for "Back", "Print", "Add", "Change", "Edit", and "Save".

The main content area is titled "Grant Tracking". It features a section for "Grant/Project: 13-test-001 - Test - NDR Grant - 2016" with the following details:

- Status: Underway
- Program Area: CDBG – National Disaster Resiliency
- Grantee Organization: Iowa Economic Development Authority
- Program Officer: Don Dursky
- Awarded Amount: \$4.00

Below this, there is an "Instructions" section with the text: "The grant forms appear below."

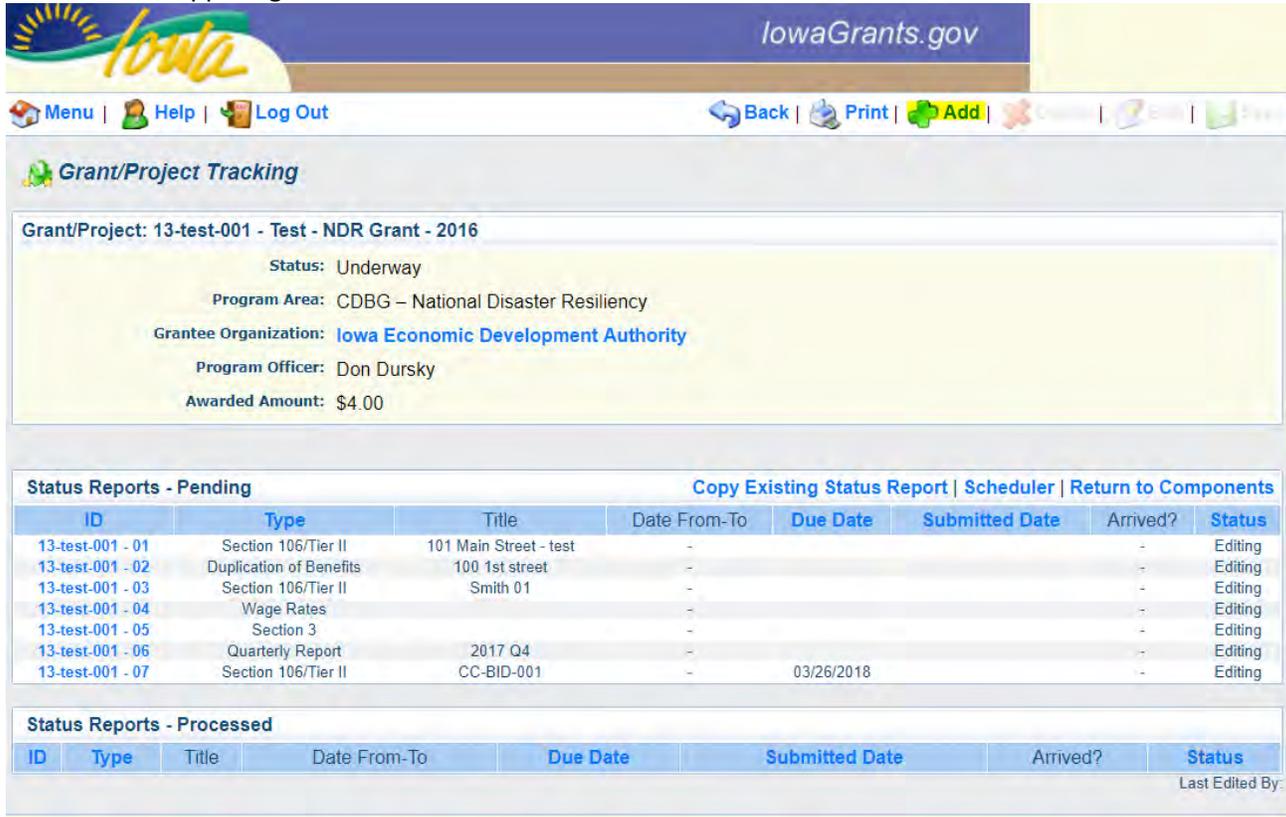
The "Associated Forms" section includes links for "Status Report", "Site Visit", and "Contract Amendment".

The "Grant/Project Components" section includes links for "Alerts", "Copy", "Annotations (0)", and "Export Grant/Project Data". Below this, there is a table with the following data:

Component	Last Edited
General Information	08/24/2017
Main Data	07/24/2017
Activities	
Budget	10/21/2016
Appropriations	
Compliance Forms and Quarterly Status Reports	
Risk Assessment	06/28/2017
Claims	
Close-Out	
Contract Amendments	
Site Visits	
Contract Holds	
Contract Condition Clearance Documents	
Audit Documents	10/24/2016
Required Uploads	
Deliverables	11/21/2016

Step 16:

Click "Add" in upper right of screen



The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". The main content area is titled "Grant/Project Tracking" and displays information for a specific grant: "Grant/Project: 13-test-001 - Test - NDR Grant - 2016". The status is "Underway", the program area is "CDBG - National Disaster Resiliency", the grantee organization is "Iowa Economic Development Authority", the program officer is "Don Dursky", and the awarded amount is "\$4.00". Below this information, there are two tables. The first table is titled "Status Reports - Pending" and has columns for ID, Type, Title, Date From-To, Due Date, Submitted Date, Arrived?, and Status. It lists seven pending reports. The second table is titled "Status Reports - Processed" and has the same columns, but it is currently empty. There are also links for "Copy Existing Status Report", "Scheduler", and "Return to Components".

Step 17:

- Select "Editing" from the "Status Report Status" drop down list when you first begin and then select "Submitted" from drop down list when ready for Section 106 information review by IEDA.
- Select "Section 106/Tier II" option from "Status Report Type" drop down list
- Fill in "Title" field using the **exact same nomenclature as the inventory** you are submitting this Section 106 documentation for
- Click "Save" in upper right corner



The screenshot shows the IowaGrants.gov website interface for the "Grant Tracking" section. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this, there are links for "Menu", "Help", and "Log Out". The main content area is titled "Grant Tracking" and displays a form for "General Information". The form includes a dropdown menu for "Status Report Status" set to "Editing", a "Due Date" field, a dropdown menu for "Status Report Type" set to "Section 106/Tier II", a "Title" field containing "JG-INV-001", and a "Report Period" section with "From Date" and "To Date" fields. There is a "Save" button in the upper right corner of the form area.

Step 18:

Click the Status Report you just created.

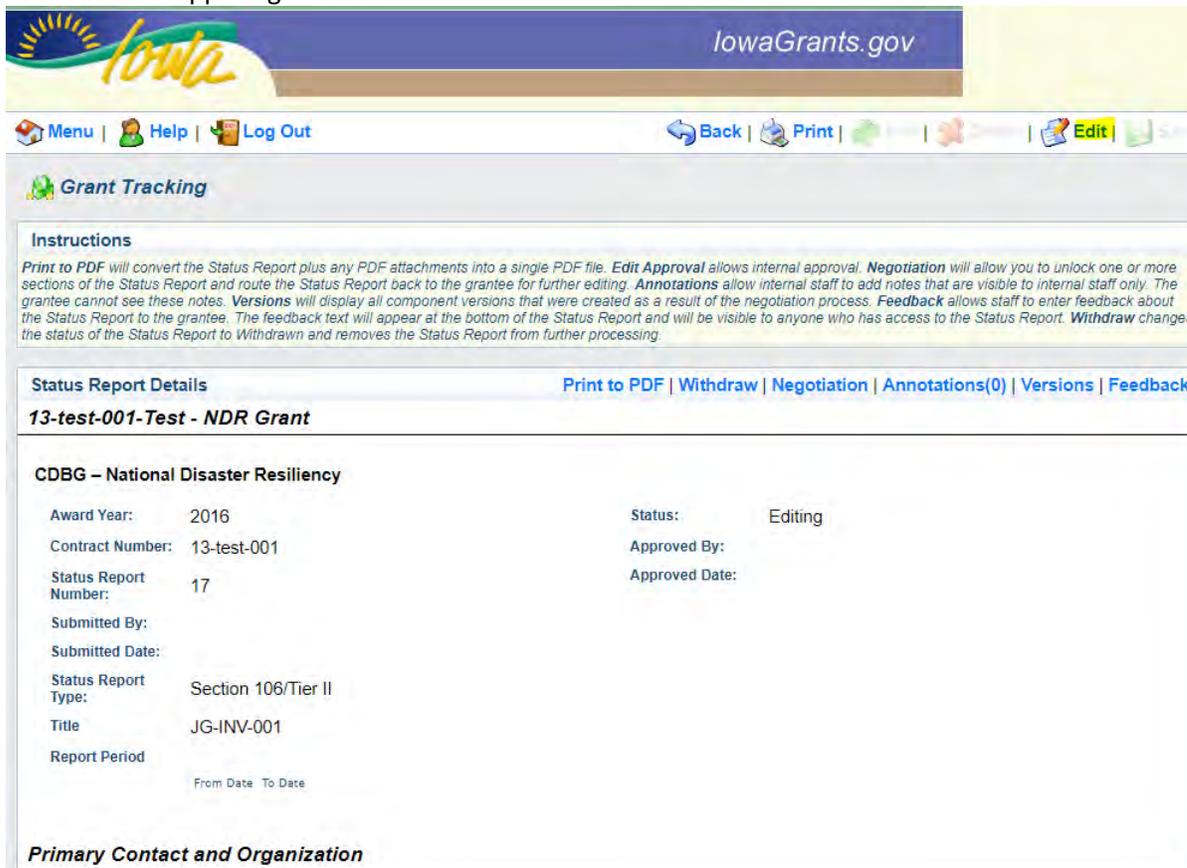


The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this is a secondary navigation bar with icons for Menu, Help, Log Out, Back, Print, Add, and other functions. The main content area is titled "Grant/Project Tracking" and displays details for a specific grant: "Grant/Project: 13-test-001 - Test - NDR Grant - 2016". The status is "Underway", the program area is "CDBG - National Disaster Resiliency", the grantee organization is "Iowa Economic Development Authority", the program officer is "Don Dursky", and the awarded amount is "\$4.00". Below this, there is a section for "Status Reports - Pending" with a table listing various reports. The table has columns for ID, Type, Title, Date From-To, Due Date, Submitted Date, Arrived?, and Status. The last row, "13-test-001 - 17", is highlighted in yellow and corresponds to the report mentioned in the instructions.

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
13-test-001 - 01	Section 106/Tier II	101 Main Street - test	-			-	Editing
13-test-001 - 02	Duplication of Benefits	100 1st street	-			-	Editing
13-test-001 - 04	Wage Rates		-			-	Editing
13-test-001 - 05	Section 3		-			-	Editing
13-test-001 - 06	Quarterly Report	2017 Q4	-			-	Editing
13-test-001 - 07	Section 106/Tier II	CC-BID-001	-	03/26/2018		-	Editing
13-test-001 - 08	Section 106/Tier II	CC-BID-001	-			-	Editing
13-test-001 - 09	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 10	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 11	Contractor Clearance	Smith ABC	-			-	Editing
13-test-001 - 13	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 14	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 15	Section 106/Tier II	CC-BID-003	-			-	Editing
13-test-001 - 16	Duplication of Benefits	MC-BID-001	-			-	Editing
13-test-001 - 17	Section 106/Tier II	JG-INV-001	-			-	Editing

Step 19:

Click "Edit" in upper right corner



The screenshot shows the IowaGrants.gov website interface for the "Grant Tracking" section. At the top, there is a navigation bar with the Iowa logo and the text "IowaGrants.gov". Below this is a secondary navigation bar with icons for Menu, Help, Log Out, Back, Print, and Edit. The main content area is titled "Grant Tracking" and displays "Instructions" for users. Below the instructions, there is a section for "Status Report Details" for the grant "13-test-001-Test - NDR Grant". The details include the award year (2016), contract number (13-test-001), status report number (17), submitted by, submitted date, status report type (Section 106/Tier II), title (JG-INV-001), and report period. The status is "Editing".

Instructions

Print to PDF will convert the Status Report plus any PDF attachments into a single PDF file. Edit Approval allows internal approval. Negotiation will allow you to unlock one or more sections of the Status Report and route the Status Report back to the grantee for further editing. Annotations allow internal staff to add notes that are visible to internal staff only. The grantee cannot see these notes. Versions will display all component versions that were created as a result of the negotiation process. Feedback allows staff to enter feedback about the Status Report to the grantee. The feedback text will appear at the bottom of the Status Report and will be visible to anyone who has access to the Status Report. Withdraw changes the status of the Status Report to Withdrawn and removes the Status Report from further processing.

Status Report Details [Print to PDF](#) | [Withdraw](#) | [Negotiation](#) | [Annotations\(0\)](#) | [Versions](#) | [Feedback](#)

13-test-001-Test - NDR Grant

CDBG - National Disaster Resiliency

Award Year: 2016 Status: Editing
Contract Number: 13-test-001 Approved By:
Status Report Number: 17 Approved Date:
Submitted By:
Submitted Date:
Status Report Type: Section 106/Tier II
Title: JG-INV-001
Report Period: From Date To Date

Primary Contact and Organization

Step 20:
Click "Tier II Environmental"

Grant Tracking

Status Report: 13-test-001 - 17

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Components [Preview](#) | [Submit](#)

Complete each component of the status report and mark it as complete. Click Submit when you are done.

Name	Complete?	Last Edited
Tier II Environmental	✓	10/10/2019

Step 21:
Click "Edit" in upper right corner of screen

Grant/Project Tracking

Status Report: 13-test-001 - 08

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Instructions

This form is designed to document all site-specific regulatory compliance. Please complete the relevant sections of this form as it pertains to your CDBG project.

For NDR Housing – Complete the entire form as this will be your only documentation of site-specific review.

For NDR Infrastructure – Complete this form as necessary based on the EA or Phased EA

For NDR Watersheds - ONLY complete the NHPA Section 106 section of this form. For Tier II compliance you MUST use the template sent to you by your project manager. When the template is complete, email it to Leslie Leager leslie.leager@iowaeda.com.

After adding information, please e-mail [Ann Schmid](mailto:Ann.Schmid@iowaeda.com)

Tier II Environmental Review [Create New Version](#) | [Mark as Complete](#) | [Go to Status Report Forms](#)

The following sections should be completed for all projects with tiered environmental review. Complete only the sections/uploads that are relevant to your project.

What type of NDR project is this?*

Complete this section for all projects

Step 22:

Complete Tier II Environmental Review Form. Choose "Watershed" for project type and select Inventory #.

Tier II Environmental Review

The following sections should be completed for all projects with tiered environmental review. Complete only the sections/uploads that are relevant to your project.

What type of NDR project is this?* **Watershed** ▼

Complete this section for all projects

Compliance Mitigation
All of the environmental compliance areas that are considered in Tier II review have the potential to require mitigation. Use this section to document any required mitigation for this specific site.

Is any mitigation required and will be implemented as a result of Tier II Environmental Review? ▼

Upload Tier II PEA checklist. **Choose File** No file chosen

Is a 401 or 404 permit required? ▼

Endangered Species Act (ESA)

Was the Endangered Species Act addressed in the Tier I Environmental Assessment (EA)? ▼

Federal Agency Determination of Affect: ▼

Property Address/Inventory Packet **330646 JG-INV-001** ▼

Were all practices within the APE reviewed in accordance with IEDA's archaeological process for NDR watersheds (probability modeling informs Phase I survey as needed): ▼

Were any new or previously recorded archaeological sites or standing structures identified within the APE: ▼

PA Exempt ▼

If this project IS PA Exempt, provide exempt date signed and PA Finding

Exempt Date Signed  ▼
Exempt Date Signed PA Exception

Exempt Form **Choose File** No file chosen

If this project IS NOT PA Exempt, please provide the finding and supporting documents in the section below.

Finding ▼
Finding

Step 23:

Click "Save" in upper right corner



IowaGrants.gov

Menu | Help | Log Out | Back | Print | Add | Delete | Edit | Save

Grant/Project Tracking

Status Report: 13-test-001 - 08

Grant: **13-test-001-Test - NDR Grant**

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: **Iowa Economic Development Authority**

Program Manager: Don Dursky

Instructions

This form is designed to document all site-specific regulatory compliance. Please complete the relevant sections of this form as it pertains to your CDBG project.

For NDR Housing – Complete the entire form as this will be your only documentation of site-specific review.

For NDR Infrastructure – Complete this form as necessary based on the EA or Phased EA

For NDR Watersheds - ONLY complete the NHPA Section 106 section of this form. For Tier II compliance you MUST use the template sent to you by your project manager. When the template is complete, email it to Leslie Leager leslie.leager@iowaeda.com.

After adding information, please e-mail [Ann Schmid](mailto:Ann.Schmid@iowaeda.com)

Tier II Environmental Review

The following sections should be completed for all projects with tiered environmental review. Complete only the sections/uploads that are relevant to your project.

What type of NDR project is this?* ▼

Step 24:

After you have saved the completed fields, you then “Add” the Section 106 uploads by clicking “Add” which will be in the lower section of the form, right hand side of screen. Here you should upload all your Section 106 support information Including:

- a. Section 106 Signature Authorization Form
- b. Earthview/Impact7G Site Specific Review for each practice in the inventory
- c. Engineering plans for each practice in the inventory
- d. Any additional archaeological review completed per practice (if applicable)
- e. Iowa Site Inventory Forms for any standing structures within APE (if applicable)

Project Manager Comments

NHPA Section 106 Supporting Documentation Add

For all submittals, please provide sufficient documentation to support the Responsible Entity's Finding (selected in the drop-down list above). Be sure that as necessary the following documents are provided in the uploads below. Please include all identification and evaluation documents, which, depending on the project may mean providing multiple uploads for some of the document types listed in the drop-down. Please also include the Signature Authorization Form to document the administrator can make determinations on behalf of the responsible entity. For any relevant documents that support the Section 106 packet but are not identified below, simply select "Other" and upload the supporting documentation.

Upload:

Archaeology

- 7.5 min Quad U.S.G.S. (1-mile radius) with quad name and APE outlined (maps on-line at <http://ortho.gis.iastate.edu/>)
- Site plan showing limits of proposed activities or general layout (engineering)
- Aerial photo: zoom to project area (photos on-line at <http://ortho.gis.iastate.edu/>)
- Description of width and depth of proposed excavation and current conditions of project area
- OSA site file search, Phase IA, or Phase I Archaeological Survey

Architecture

- Previous site information available (contact Iowa Site Inventory Coordinator)
- Location map (no bigger than 11x17) with APE clearly defined (Quad map or city plat map)
- Detailed description of proposed action, including copy of project specifications, if applicable
- Previous (no more than 5 years old) or new Iowa site Inventory Form (available online at www.iowahistory.org/preservation) form must include the following items scanned as a single upload:
 - Properly completed ISIF form with narrative description and statement of significance
 - Clear photos of property and surrounding area
 - Map showing the location of the home within the City
 - Copy of county or city assessor's card record or other appropriate property information
 - Historic photographs if available

Document	Document Description:	File
----------	-----------------------	------

Last Edited By:

Step 25:

Click “Mark as Complete” once you have completed the entire Tier II Environmental Review form including adding any supporting documentation.

Grant/Project Tracking

Status Report: 13-test-001 - 08

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Instructions

This form is designed to document all site-specific regulatory compliance. Please complete the relevant sections of this form as it pertains to your CDBG project.

For NDR Housing – Complete the entire form as this will be your only documentation of site-specific review.

For NDR Infrastructure – Complete this form as necessary based on the EA or Phased EA

For NDR Watersheds - ONLY complete the NHPA Section 106 section of this form. For Tier II compliance you MUST use the template sent to you by your project manager. When the template is complete, email it to Leslie Leager leslie.leager@iowaeda.com.

After adding information, please e-mail [Ann Schmid](mailto:Ann.Schmid)

Tier II Environmental Review [Create New Version](#) | [Mark as Complete](#) | [Go to Status Report Forms](#)

The following sections should be completed for all projects with tiered environmental review. Complete only the sections/uploads that are relevant to your project.

What type of NDR project is this?

Step 26:

Click “Submit” on middle right of screen. This will notify IEDA for review.

Grant Tracking

Status Report: 13-test-001 - 08

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Components [Preview](#) | [Submit](#)

Complete each component of the status report and mark it as complete. Click Submit when you are done.

Name	Complete?	Last Edited
General Information	✓	03/20/2018
Tier II Environmental		

SUBMITTING WAGE RATE APPROVAL REQUEST

Step 27: NOTE: This a separate process but can only be completed after IEDA approval of environmental review. Sequential numbering is used for convenience and to convey the entire process. Click "Compliance Forms and Quarterly Status Reports"

Grant Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Officer: Don Dursky

Awarded Amount: \$4.00

Instructions
The grant forms appear below.

Associated Forms [Status Report](#) | [Site Visit](#) | [Contract Amendment](#)

Grant/Project Components [Alerts](#) | [Copy](#) | [Annotations \(0\)](#) | [Export Grant/Project Data](#)

The components below are associated with the current Funding Opportunity. You can change these components in the Funding Opportunity module. You may associate specific forms in the Associated Forms section above. You can define your own alerts in the Alerts section. You can make notes by clicking Annotations. You can copy this grant and you can export the raw data.

Component	Last Edited
General Information	08/24/2017
Main Data	07/24/2017
Activities	
Budget	10/21/2016
Appropriations	
Compliance Forms and Quarterly Status Reports	
Risk Assessment	06/28/2017
Claims	
Close-Out	
Contract Amendments	
Site Visits	
Contract Holds	
Contract Condition Clearance Documents	
Audit Documents	10/24/2016
Required Uploads	
Deliverables	11/21/2016
Electronic Documents	
Monitoring Uploads	
Correspondence	
Opportunity	

Step 28:
Click "Add" in upper right of screen

Grant/Project Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Officer: Don Dursky

Awarded Amount: \$4.00

Status Reports - Pending [Copy Existing Status Report](#) | [Scheduler](#) | [Return to Components](#)

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
13-test-001 - 01	Section 106/Tier II	101 Main Street - test	-	-	-	-	Editing
13-test-001 - 02	Duplication of Benefits	100 1st street	-	-	-	-	Editing
13-test-001 - 03	Section 106/Tier II	Smith 01	-	-	-	-	Editing
13-test-001 - 04	Wage Rates		-	-	-	-	Editing
13-test-001 - 05	Section 3		-	-	-	-	Editing
13-test-001 - 06	Quarterly Report	2017 Q4	-	-	-	-	Editing
13-test-001 - 07	Section 106/Tier II	CC-BID-001	-	03/26/2018	-	-	Editing

Status Reports - Processed

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
Last Edited By:							

Step 29:

- Select "Editing" from the "Status Report Status" drop down list when you first begin and then select "Submitted" from drop down list when ready for Wage Rates information review by IEDA.
- Select "Wage Rates" option from "Status Report Type" drop down list
- Fill in "Title" field using the **sequence of bid letting** in the contract you are submitting this wage rates documentation for. **For example, JG-Bid Letting-001.**
- Leave "Report Period" fields blank (optional)
- Click "Save" in upper right corner

lowaGrants.gov

Menu | Help | Log Out | Back | Print | Add | Delete | Edit | Save

Grant Tracking

General Information
Use the drop down box to select the type of report that you want to submit. Then enter the period of time that the report will detail.

Status Report Status: * **Editing**

Due Date:

Status Report Type: * **Wage Rates**

Title: **JG-Bid Letting-001**

Report Period: From Date To Date

Step 30:

Click the Status Report you just created.

lowaGrants.gov

Menu | Help | Log Out | Back | Print | Add | Delete | Edit | Save

Grant/Project Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Officer: Don Dursky

Awarded Amount: \$4.00

Status Reports - Pending [Copy Existing Status Report](#) | [Scheduler](#) | [Return to Components](#)

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
13-test-001 - 01	Section 106/Tier II	101 Main Street - test	-			-	Editing
13-test-001 - 02	Duplication of Benefits	100 1st street	-			-	Editing
13-test-001 - 04	Wage Rates		-			-	Editing
13-test-001 - 05	Section 3		-			-	Editing
13-test-001 - 06	Quarterly Report	2017 Q4	-			-	Editing
13-test-001 - 07	Section 106/Tier II	CC-BID-001	-	03/26/2018		-	Editing
13-test-001 - 08	Section 106/Tier II	CC-BID-001	-			-	Editing
13-test-001 - 09	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 10	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 11	Contractor Clearance	Smith ABC	-			-	Editing
13-test-001 - 13	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 14	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 15	Section 106/Tier II	CC-BID-003	-			-	Editing
13-test-001 - 16	Duplication of Benefits	MC-BID-001	-			-	Editing
13-test-001 - 17	Section 106/Tier II	JG-INV-001	-			-	Editing
13-test-001 - 18	Wage Rates	JG-INV-001	-			-	Editing
13-test-001 - 19	Wage Rates	JG-Bid Letting-001	-			-	Editing

Step 31:

Click "Edit" in upper right corner

The screenshot shows the IowaGrants.gov website. At the top is the Iowa logo and the text "IowaGrants.gov". Below the header is a navigation bar with "Menu", "Help", and "Log Out" on the left, and "Back", "Print", and "Edit" on the right. The main content area is titled "Grant Tracking" and contains an "Instructions" section with detailed text about PDF conversion, approval, negotiation, annotations, versions, feedback, and withdrawal. Below the instructions is a "Status Report Details" section with a title "13-test-001-Test - NDR Grant" and a subtitle "CDBG – National Disaster Resiliency". To the right of the title are links for "Print to PDF", "Withdraw", "Negotiation", "Annotations(0)", "Versions", and "Feedback".

Step 32:

Click "Wage Rates"

The screenshot shows the IowaGrants.gov website. At the top is the Iowa logo and the text "IowaGrants.gov". Below the header is a navigation bar with "Menu", "Help", and "Log Out" on the left, and "Back", "Print", and "Delete" on the right. The main content area is titled "Grant Tracking" and contains a "Status Report: 13-test-001 - 09" section with the following details: Grant: 13-test-001-Test - NDR Grant, Status: Editing, Program Area: CDBG – National Disaster Resiliency, Grantee Organization: Iowa Economic Development Authority, and Program Manager: Don Dursky. Below this is a "Components" section with a "Preview | Submit" link. A table lists the components:

Name	Complete?	Last Edited
General Information	✓	03/20/2018
Wage Rates		

Step 33:
Click "Edit"

Grant/Project Tracking

Status Report: 13-test-001 - 09

Grant: 13-test-001-Test - NDR Grant

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Manager: Don Dursky

Wage Rates [Create New Version](#) | [Mark as Complete](#) | [Go to Status Report Forms](#)

To obtain a wage determination for your project, please visit the Department of Labor's (DOL) Wage Determinations Online.gov web site at <http://www.wdol.gov/dba.aspx>. Using the dropdown lists, select State, County, and Construction Type. After selecting the construction type, the "WD Number" will automatically populate. Click search and the current wage determination number will appear.

Step 34:
Complete all of Wage Rate form. **NOTE: You will select from up to 10 drop downs all the inventories included in the bid letting. No more than 10 inventories can be bid together.**

For instructions on completing this form, please download the instructions from <http://www.iowaeconomicdevelopment.com/community/downloads/HUDFORM4230AInstructions.doc>

Date Requested:

10-day Check for Modification:
Bid Opening Date must be less than or equal to this date. If not, you must re-check to insure the current wage determination is used.

Date Wage Rate Rechecked:
If the bid opening date is 10-days or greater than the 10-day Check for Modification, you must notify IEDA of the date wage determination was re-checked.

County where work to be performed:

Estimated Construction Value: \$0.00

Work Type:

Select each inventory (INV) packet included in this bid letting by using as many drop-downs as needed (one inventory packet per drop-down). bid lettings are limited to 10 inventory packets.

Inventory Packet (Watershed ONLY)

Packet 1 Packet 2 Packet 3 Packet 4 Packet 5

Packet 6 Packet 7 Packet 8 Packet 9 Packet 10

Estimated Dates:

Est. Advertising Date Est. Opening Bid Date Est. Contract Award Date Est. Const. Start Date

Step 35:

Remember to download and have signed the required Intent to Obligate Construction Funds verifying that the project’s engineering design is feasible. **NOTE: The Intent to Obligate Funds should reflect the total of all inventories included in the bid letting.**

Notes:		Add
Date:	Notes:	
<hr/>		
Wage Rate Supporting Documents		Add
<small>The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete and construction is feasible. The form must be submitted following the completion of final design and prior to release of the bid package. To satisfy this requirement, the form must be uploaded here. Click here to download the form.</small>		
<small>You must also upload the DOL wage verification form here.</small>		
Document Name/Description:	File:	

NATIONAL DISASTER RECOVERY PROJECT INTENT TO OBLIGATE CONSTRUCTION FUNDS
(To be provided prior to bidding a construction project)

National Disaster Resilience Competition Grant Requirements state the following (per page 36563 of FR Vol. 81, No. 109):

(8) Design. This notice amends the NOFA to clarify that prior to the Grantee’s obligation of funds for construction, the Grantee will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Grantee for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards.

Per the terms of a contract amendment between Iowa Economic Development Authority and the Recipient, the following contract clause must be met:

*(k) **DESIGN.** Prior to the Recipient’s obligation of funds for construction, the Recipient will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Recipient for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards (as applicable)."*

I certify that I have read the above requirements, reviewed the plans and specifications for the construction project(s) listed below, and confirm that the project(s) are found to feasible based on the engineering design completed.

Construction Project Name(s)/Description: _____

Date Design Completed: _____ Estimated Bid Date: _____

Engineers Estimate of Funds to be Obligated: _____

Engineering Review and Signature

Name of Design Engineer: _____ Organization: _____

Print Name: _____ Title: _____

Signature: _____ Date: _____

Local Official Review and Signature

Name of Authorized Official: _____ Organization: _____

Print Name: _____ Title: _____

Signature: _____ Date: _____

Step 36:

“Add” the signed Intent to Obligate Construction Funds form and then “Save”

Wage Rate Supporting Documents Add

The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete and construction is feasible. The form must be submitted following the completion of final design and prior to release of the bid package. To satisfy this requirement, the form must be uploaded here. [Click here](#) to download the form.

You must also upload the DOL wage verification form here.

Document Name/Description:	File:

IowaGrants.gov

Menu | Help | Log Out Back | Save

Grant Tracking

Status Report: 13-test-001 - 09

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Wage Rate Supporting Documents

The National Disaster Recovery Project Intent to Obligate Construction Funds form verifies that design is complete and construction is feasible. The form must be submitted following the completion of final design and prior to release of the bid package. To satisfy this requirement, the form must be uploaded here. [Click here](#) to download the form.

You must also upload the DOL wage verification form here.

Document Name/Description: *

File: No file chosen

Step 37:

Click “Save” in upper right corner

IowaGrants.gov

Menu | Help | Log Out Back | Save

Grant/Project Tracking

Status Report: 13-test-001 - 09

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Wage Rates

To obtain a wage determination for your project, please visit the Department of Labor's (DOL) Wage Determinations Online.gov web site at <http://www.wdol.gov/dba.aspx>. Using the dropdown lists, select State, County, and Construction Type. After selecting the construction type, the "WD Number" will automatically populate. Click search and the current wage determination number will appear.

Step 38:

Click “Mark as Complete” once you have completed the entire Wage Rates form including adding any supporting documentation.

Grant/Project Tracking

Status Report: 13-test-001 - 09

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Wage Rates [Create New Version](#) | [Mark as Complete](#) | [Go to Status Report Forms](#)

To obtain a wage determination for your project, please visit the Department of Labor's (DOL) Wage Determinations Online.gov web site at <http://www.wdol.gov/dba.aspx>. Using the dropdown lists, select State, County, and Construction Type. After selecting the construction type, the "WD Number" will automatically populate. Click search and the current wage determination number will appear.

Construction Type definitions: (Final determination of construction type will be made by IEDA)

- **RESIDENTIAL:** Includes the construction, rehabilitation and repair of single family houses, townhouses, and apartment buildings of no more than four (4) stories in height.
- **HIGHWAY:** Includes the construction, alteration, and repair of roads, streets, highways, runways, parking areas and most other paving work not incidental to building or nearby construction.
- **TREATMENT:** Construction of, or improvements to, water and sewage treatment facilities.
- **HEAVY:** A "catch-all" category which includes those projects which cannot be classified as Building, Residential, Highway or Treatment. Heavy construction is often further distinguished on the basis of the characteristics of particular projects such as dredging, water and sewer lines, dams, major bridges and flood control projects.
- **BUILDING:** Includes the construction, rehabilitation and repair of sheltered enclosures with walk-in access for the purpose of housing persons, machinery, equipment, or supplies.

Step 39:

Click “Submit” on middle right of screen. This will notify IEDA for review.

Grant Tracking

Status Report: 13-test-001 - 09

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Components [Preview](#) | [Submit](#)

Complete each component of the status report and mark it as complete. Click Submit when you are done.

Name	Complete?	Last Edited
General Information	✓	03/20/2018
Wage Rates		

SUBMITTING DUPLICATION OF BENEFITS (DOB) DOCUMENTATION

Step 40: NOTE: This a separate process to be completed in conjunction with wage rate approval process when going out to bid. Sequential numbering is used for convenience and to convey the entire process. Click "Compliance Forms and Quarterly Status Reports"

Grant Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Officer: Don Dursky

Awarded Amount: \$4.00

Instructions
The grant forms appear below.

Associated Forms [Status Report](#) | [Site Visit](#) | [Contract Amendment](#)

Grant/Project Components [Alerts](#) | [Copy](#) | [Annotations \(0\)](#) | [Export Grant/Project Data](#)

The components below are associated with the current Funding Opportunity. You can change these components in the Funding Opportunity module. You may associate specific forms in the Associated Forms section above. You can define your own alerts in the Alerts section. You can make notes by clicking Annotations. You can copy this grant and you can export the raw data.

Component	Last Edited
General Information	08/24/2017
Main Data	07/24/2017
Activities	
Budget	10/21/2016
Appropriations	
Compliance Forms and Quarterly Status Reports	
Risk Assessment	06/28/2017
Claims	
Close-Out	
Contract Amendments	
Site Visits	
Contract Holds	
Contract Condition Clearance Documents	
Audit Documents	10/24/2016
Required Uploads	
Deliverables	11/21/2016
Electronic Documents	
Monitoring Uploads	
Correspondence	
Opportunity	

Step 41:
Click "Add" in upper right of screen

Grant/Project Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Officer: Don Dursky

Awarded Amount: \$4.00

Status Reports - Pending [Copy Existing Status Report](#) | [Scheduler](#) | [Return to Components](#)

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
13-test-001 - 01	Section 106/Tier II	101 Main Street - test	-	-	-	-	Editing
13-test-001 - 02	Duplication of Benefits	100 1st street	-	-	-	-	Editing
13-test-001 - 03	Section 106/Tier II	Smith 01	-	-	-	-	Editing
13-test-001 - 04	Wage Rates		-	-	-	-	Editing
13-test-001 - 05	Section 3		-	-	-	-	Editing
13-test-001 - 06	Quarterly Report	2017 Q4	-	-	-	-	Editing
13-test-001 - 07	Section 106/Tier II	CC-BID-001	-	03/26/2018	-	-	Editing

Status Reports - Processed

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
Last Edited By:							

Step 42:

- Select "Editing" from the "Status Report Status" drop down list when you first begin and then select "Submitted" from drop down list when ready for DOB information review by IEDA.
- Select "Duplication of Benefits" option from "Status Report Type" drop down list.
- Fill in "Title" field using the **exact same nomenclature as the wage rate request form for bidding**.
- "Report Period" may be left blank.
- Click "Save" in upper right corner.

Grant Tracking

General Information

Use the drop down box to select the type of report that you want to submit. Then enter the period of time that the report will detail.

Status Report Status:* **Editing**

Due Date:

Status Report Type:* **Duplication of Benefits**

Title **JG-Bid Letting-001**

Report Period

From Date To Date

Step 43:

Click the Status Report you just created.

Grant/Project Tracking

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: **Iowa Economic Development Authority**

Program Officer: Don Dursky

Awarded Amount: \$4.00

Status Reports - Pending [Copy Existing Status Report](#) | [Scheduler](#) | [Return to Components](#)

ID	Type	Title	Date From-To	Due Date	Submitted Date	Arrived?	Status
13-test-001 - 01	Section 106/Tier II	101 Main Street - test	-			-	Editing
13-test-001 - 02	Duplication of Benefits	100 1st street	-			-	Editing
13-test-001 - 04	Wage Rates		-			-	Editing
13-test-001 - 05	Section 3		-			-	Editing
13-test-001 - 06	Quarterly Report	2017 Q4	-			-	Editing
13-test-001 - 07	Section 106/Tier II	CC-BID-001	-	03/26/2018		-	Editing
13-test-001 - 08	Section 106/Tier II	CC-BID-001	-			-	Editing
13-test-001 - 09	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 10	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 11	Contractor Clearance	Smith ABC	-			-	Editing
13-test-001 - 13	Wage Rates	CC-BID-001	-			-	Editing
13-test-001 - 14	Duplication of Benefits	CC-BID-001	-			-	Editing
13-test-001 - 15	Section 106/Tier II	CC-BID-003	-			-	Editing
13-test-001 - 16	Duplication of Benefits	MC-BID-001	-			-	Editing
13-test-001 - 17	Section 106/Tier II	JG-INV-001	-			-	Editing
13-test-001 - 18	Wage Rates	JG-INV-001	-			-	Editing
13-test-001 - 19	Wage Rates	JG-Bid Letting-001	-			-	Editing
13-test-001 - 20	Duplication of Benefits	JG-Bid Letting-001	-			-	Editing

Step 44:
Click "Edit"

Iowa Grants.gov

Menu | Help | Log Out | Back | Print | Edit

Grant Tracking

Instructions
Print to PDF will convert the Status Report plus any PDF attachments into a single PDF file. Edit Approval allows internal approval. Negotiation will allow you to unlock one or more sections of the Status Report and route the Status Report back to the grantee for further editing. Annotations allow internal staff to add notes that are visible to internal staff only. The grantee cannot see these notes. Versions will display all component versions that were created as a result of the negotiation process. Feedback allows staff to enter feedback about the Status Report to the grantee. The feedback text will appear at the bottom of the Status Report and will be visible to anyone who has access to the Status Report. Withdraw changes the status of the Status Report to Withdrawn and removes the Status Report from further processing.

Status Report Details [Print to PDF](#) | [Withdraw](#) | [Negotiation](#) | [Annotations\(0\)](#) | [Versions](#) | [Feedback](#)

13-test-001-Test - NDR Grant

CDBG – National Disaster Resiliency

Award Year: 2016 Status: Editing
 Contract Number: 13-test-001 Approved By:
 Status Report Number: 20 Approved Date:
 Submitted By:
 Submitted Date:
 Status Report Type: Duplication of Benefits
 Title: JG-Bid Letting-001
 Report Period: From Date: To Date

Primary Contact and Organization

Step 45:
Click "DOB"

Iowa Grants.gov

Menu | Help | Log Out | Back | Print | Delete

Grant Tracking

Status Report: 13-test-001 - 10

Grant: [13-test-001-Test - NDR Grant](#)
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky

Components [Preview](#) | [Submit](#)

Complete each component of the status report and mark it as complete. Click Submit when you are done.

Name	Complete?	Last Edited
General Information	✓	03/20/2018
DOB		

Step 46:

Click "Edit" in upper right of screen

IowaGrants.gov

Menu | Help | Log Out | Back | Edit

Grant/Project Tracking

Status Report: 13-test-001 - 10

Grant: 13-test-001-Test - NDR Grant
Status: Editing
Program Area: CDBG – National Disaster Resiliency
Grantee Organization: Iowa Economic Development Authority
Program Manager: Don Dursky

Instructions

NOTE: If you are an administrator for a county watershed project grant, please note that the purpose of this form is to document any additional funding received by the recipient (County). Therefore, if the county received any funding from FEMA, DNR SRF, Insurance, WIRB, or other sources, it should be noted in the appropriate section of this form. If the landowner received funding from any of these sources above, that assistance should only be reflected as landowner match in this form.

If you are an administrator for a city infrastructure project, please note that the purpose of this form is to document any additional funding received by the recipient (City). Therefore, if the City received any funding from FEMA, DNR SRF, Insurance, or other sources, it should be noted in the appropriate section of this form.

City/County Received the Following Assistance [Create New Version](#) | [Go to Status Report Forms](#)

Bid Packet (Watershed ONLY) 187672-CC-BID-Test-001

FEMA Assistance

FEMA No
Amount \$0.00
E-mail/Letter:
Date Reviewed

Step 47:

Complete all of Duplication of Benefits form. **NOTE: Do not forget to complete and upload the Affirmation of DOB for NDR Infrastructure/Watershed Projects under supporting documentation at the bottom of the form.**

IowaGrants.gov

Menu | Help | Log Out | Back | Save

Grant/Project Tracking

Status Report: 13-test-001 - 20

Grant: 13-test-001-Test - NDR Grant
Status: Editing
Program Area: CDBG – National Disaster Resiliency
Grantee Organization: Iowa Economic Development Authority
Program Manager: Don Dursky

Instructions

NOTE: If you are an administrator for a county watershed project grant, please note that the purpose of this form is to document any additional funding received by the recipient (County). Therefore, if the county received any funding from FEMA, DNR SRF, Insurance, WIRB, or other sources, it should be noted in the appropriate section of this form. If the landowner received funding from any of these sources above, that assistance should only be reflected as landowner match in this form.

If you are an administrator for a city infrastructure project, please note that the purpose of this form is to document any additional funding received by the recipient (City). Therefore, if the City received any funding from FEMA, DNR SRF, Insurance, or other sources, it should be noted in the appropriate section of this form.

City/County Received the Following Assistance

FEMA Assistance

FEMA
Amount \$0.00
E-mail/Letter: Choose File No file chosen
Date Reviewed

(Must be on City/County Letterhead)

**Affirmation of Duplication
of Benefits and Subrogation & Assignment
For National Disaster Resiliency
Infrastructure/Watershed CDBG Grant Project**

Iowa Economic Development Authority
Infrastructure/Watershed NDR Program
200 East Grand Ave
Des Moines, IA 50309

RE: Contract Number(s): _____

Recipient: (City, County): _____

The undersigned represents an administrative entity that receives disaster recovery grant funds from the Iowa Economic Development Authority under contract(s) described above.

The grant recipient (City/County) indicated above hereby affirms that no additional sources or amounts of matching funds beyond those indicated have been obtained or will be utilized for the project(s) indicated.

Additional funding sources would include any and all federal, state or local public or private sources of grants or loans, or insurance coverage.

The grant recipient (City/County) indicated above hereby affirms that the funded project is not part of its capital improvement budget as of the date of the disaster.

In the event there are subsequent proceeds in excess of the need amount, the City/County shall remit the full amount of additional funds available for the same purpose, to IEDA.

By signing below, I hereby certify that the above information given is true and correct as to the best of my knowledge.

Recipient:

CEO or Authorized Signatory

Date

Return to: INF: Joseph Bohlke at the above noted IEDA address.
WS: Jeff Geerts at the above noted IEDA address.

Step 48:

Click "Save" in upper right corner of screen

The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with the Iowa logo and the text 'IowaGrants.gov'. Below this, there are links for 'Menu', 'Help', and 'Log Out' on the left, and 'Back' and 'Save' on the right. The main content area is titled 'Grant/Project Tracking' and displays the following information:

- Status Report: 13-test-001 - 20
- Grant: 13-test-001-Test - NDR Grant
- Status: Editing
- Program Area: CDBG – National Disaster Resiliency
- Grantee Organization: Iowa Economic Development Authority
- Program Manager: Don Dursky

Below this information is an 'Instructions' section with two paragraphs of text. The first paragraph is for county watershed project grants, and the second is for city infrastructure projects. Below the instructions is a section titled 'City/County Received the Following Assistance' with a sub-section for 'FEMA Assistance' containing a dropdown menu.

Step 49:

Click "Mark as Complete" once you have completed the entire DOB form including adding any supporting documentation.

This screenshot shows the same IowaGrants.gov interface as Step 48, but with additional navigation options. In the top right corner, there are now links for 'Back', 'Print', 'Refresh', 'Close', 'Edit', and 'Save'. The 'Mark as Complete' link in the 'City/County Received the Following Assistance' section is highlighted in yellow. The main content area remains the same as in Step 48.

Step 50:

Click "Submit" on middle right of screen

Grant Tracking

Status Report: 13-test-001 - 10

Grant: [13-test-001-Test - NDR Grant](#)
Status: Editing
Program Area: CDBG – National Disaster Resiliency
Grantee Organization: [Iowa Economic Development Authority](#)
Program Manager: Don Dursky

Components [Preview](#) [Submit](#)

Complete each component of the status report and mark it as complete. Click Submit when you are done.

Name	Complete?	Last Edited
General Information	✓	03/20/2018
DOB	✓	03/20/2018
DOB	✓	03/20/2018

SUBMITTING A CLAIM

Step 51: NOTE: This is a distinct process available at any time. Sequential numbering is for convenience. Login to your contract on www.iowagrants.gov, and click "Claims"

The screenshot shows the Iowa Grants.gov interface. At the top, there is a navigation bar with "Menu", "Help", and "Log Out" options. Below this is a "Grant Tracking" section for the grant "13-test-001 - Test - NDR Grant - 2016". The grant details include: Status: Underway, Program Area: CDBG – National Disaster Resiliency, Grantee Organization: Iowa Economic Development Authority, Program Officer: Don Dursky, and Awarded Amount: \$4.00. Below the details is an "Instructions" section with the text "The grant forms appear below." and an "Associated Forms" section with links for "Status Report", "Site Visit", and "Contract Amendment". The main section is "Grant/Project Components", which includes a table of components and their last edited dates. The "Claims" component is highlighted in yellow.

Component	Last Edited
General Information	08/24/2017
Main Data	07/24/2017
Activities	
Budget	10/21/2016
Appropriations	
Compliance Forms and Quarterly Status Reports	
Risk Assessment	06/28/2017
Claims	
Close-Out	
Contract Amendments	
Site Visits	
Contract Holds	
Contract Condition Clearance Documents	
Audit Documents	10/24/2016
Required Uploads	

Step 52:

Click "Add" on upper right of screen

The screenshot shows the Iowa Grants.gov interface with the "Claims" section active. The navigation bar now includes an "Add" button. The "Grant/Project Tracking" section is identical to the previous screenshot. Below it is the "Claims" section with a table header and navigation links: "Copy Existing Claim", "Scheduler", "Annotations(0)", and "Return to Components".

ID	Type	Status	Date Submitted	Date Paid	Date From-To	Claim Amount
----	------	--------	----------------	-----------	--------------	--------------

Step 53:

Enter the date range for the claim and click “Save” in upper right corner of screen

Claim General Information
 To create a new Claim enter the starting date and the ending date of the Report Period. This is the period of coverage for this Claim

Claim Type:* Reimbursement
 Claim Status:* Editing
 Report Period: [From Date] [To Date]
 On Hold

Step 54:

Click on the claim you just added

Grant/Project: 13-test-001 - Test - NDR Grant - 2016

Status: Underway
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: Iowa Economic Development Authority
 Program Officer: Don Dursky
 Awarded Amount: \$4.00

ID	Type	Status	Date Submitted	Date Paid	Date From-To	Claim Amount
13-test-001 - 001	Reimbursement	Editing			-	\$3.00
13-test-001 - 002	Reimbursement	Editing			-	\$0.00
Submitted Amount						\$0.00
Approved Amount						\$0.00
Paid Total						\$0.00
Total						\$3.00

Last Edited By:

Step 55:

Click "Edit" on upper right corner of screen

The screenshot shows the Iowa Grants.gov interface. At the top, there is a navigation bar with the Iowa logo and the text "Iowa Grants.gov". Below this is a secondary navigation bar with links for "Menu", "Help", "Log Out", "Back", "Print", and "Edit". The main content area is titled "Grant Tracking" and contains a "Details" section for the claim "13-test-001-Test - NDR Grant". The details are organized into two columns. The left column lists: Award Year: 2016, Contract Number: 13-test-001, Claim Type: Reimbursement, Claim Number: 13-test-001 - 002, Submitted By, Submitted Date, Report Period (From Date To Date), and On Hold. The right column lists: Status: Editing, Approved By, Approved Date, Paid Date, Vendor Number, and Invoice Number. Below the details is a "Claim Approval" section with a table header: Level, Approved By, Approved Date, Approval, and Comments. At the bottom is an "Applicant and Organization" section.

Step 56:

Click "Status Detail"

The screenshot shows the Iowa Grants.gov interface. At the top, there is a navigation bar with the Iowa logo and the text "Iowa Grants.gov". Below this is a secondary navigation bar with links for "Menu", "Help", "Log Out", "Back", "Print", and "Edit". The main content area is titled "Grant Tracking" and contains a "Claim: 13-test-001 - 002" section with a "Grant Components" link. The claim details are: Grant: 13-test-001-Test - NDR Grant, Status: Editing, Program Area: CDBG - National Disaster Resiliency, Grantee Organization: Iowa Economic Development Authority, and Program Manager: Don Dursky. Below this is a "Components" section with a "Preview | Submit" link. A note reads: "Complete each component of the Claim and mark it as complete. Click Submit when you are done." A table follows with columns: Name, Complete?, and Last Edited. The table has four rows: "General Information" (Complete? checked, Last Edited: 03/21/2018), "Reimbursement", "Status Detail" (highlighted in yellow), and "GAX". Below the table is a "Claim Documents" link.

Step 57:

See "Status Detail (Watershed Only)" and click "Add" at far right

The screenshot shows the IowaGrants.gov website interface. At the top, there is a navigation bar with 'Menu', 'Help', and 'Log Out' on the left, and 'Back', 'Print', 'Refresh', 'Delete', and 'Edit' on the right. The main content area is titled 'Grant Tracking' and displays details for 'Claim: 13-test-001 - 004'. The grant information includes: Grant: 13-test-001-Test - NDR Grant, Status: Editing, Program Area: CDBG – National Disaster Resiliency, Grantee Organization: Iowa Economic Development Authority, and Program Manager: Don Dursky. Below this, there are two sections for 'Status Detail'. The first is 'Status Detail (Housing Grants Only)' with a table of columns: Activity, Address, Hard Costs (Construction/Rehab), Total Project Delivery, Total CDBG Funds, and Completion Date. The second is 'Status Detail (Watershed Only)' with a table of columns: Activity, Inventory Packet, Is this the first construction draw for the this Inventory Packet?, Construction Start Date, Percent construction complete, Expenses this period for this Inventory Packet, and Inventory completion date. An 'Add' button is visible at the top right of the Watershed Only section.

Step 58:

Complete the "Status Detail" form by selecting "Activity" 173 – Watershed Projects from the drop-down list, select the inventory this claim applies to and complete the rest of the fields. **NOTE: The "Inventory completion date" needs to be filled in when the entire scope of work for this specific inventory has been completed. In addition, a completion date needs to be filled in for each watershed practice back in your original inventory form.**

This screenshot shows the same IowaGrants.gov interface as Step 57, but with the 'Status Detail (Watershed Only)' form filled out. The 'Activity' dropdown is set to '173 - Watershed Projects' and the 'Inventory Packet' dropdown is set to '330646 JG-INV-001'. The 'Is this the first construction draw for the this Inventory Packet?' dropdown is set to 'No'. The 'Construction Start Date' field is empty. The 'Percent construction complete' field is set to '0%' with a note 'Cumulative percent complete'. The 'Expenses this period for this Inventory Packet' field is set to '\$0.00' with a note 'Include the requested amount during this claim period for this Bid Packet ONLY'. Below the form, there is a section titled 'Complete this field ONLY at Inventory Packet completion.' with a note: 'All practices in the inventory packet should be completed prior to entering a completion date here. The completion date for the Inventory Packet should only be entered once. Individual practice completion dates MUST also be entered into the Inventory module on the corresponding practice.' The 'Inventory completion date' field is empty. A 'Return to Top' link is at the bottom right.

Inventory Management – Project Delivery

Expenses taking place under **Activity #173, Project Delivery**, that are not hard construction costs tied to a specific bid packet must be identified as such in a claim. In order to determine if a claim is for actual construction costs that require prior environmental review processes to be completed versus non-construction costs such as the project coordinator, engineering, archaeology, appraisal, etc., IEDA is providing the following guidance for implementing this tracking.

1. Create Project Delivery Inventory
 - a. For each of your watersheds, please create a new inventory called “Project Delivery” using the same nomenclature for your watershed as you do for INV packets. Here’s what you should use. You only need to do this once.
 - i. Upper Iowa = UI-Project Delivery
 - ii. Upper Wapsi = UW-Project Delivery
 - iii. Middle Cedar = MC-Project Delivery
 - iv. Clear Creek = CC-Project Delivery
 - v. English River = ER-Project Delivery
 - vi. East Nishnabotna = EN-Project Delivery
 - vii. West Nishnabotna = WN-Project Delivery
 - viii. North Raccoon = NR-Project Delivery
2. Complete the Status Detail (Watershed Only)
 - a. Going forward please complete the “Status Detail (Watershed Only)” for each claim. You must complete the “Status Detail (Watershed Only)” for **every** claim of Activity 173 going forward **unless** the claim is only for administration (Activity 181) or planning costs (Activity 172). Do not complete any other status detail forms.
 - b. When completing the “Status Detail (Watershed Only)” you will be able to select “Project Delivery” from the drop-down list just as you can select individual bid packets. Please complete one “Status Detail (Watershed Only)” to identify only watershed project delivery costs such as project coordinator, engineering, archaeology, appraisal expenses, etc. Do not include a “Percent construction Complete” figure, as this is for Project Delivery only.
 - c. Complete additional “Status Detail (Watershed Only)” forms to identify construction costs and construction percent completed tied to each specific inventory packet. Therefore, you may have multiple Status Detail forms completed for one claim.
 - d. We don’t need to know which bid packet project delivery costs are linked to, but we do need to know which inventory packet actual construction costs are linked to.

Acquisition Procedure for CDBG-NDR - Funded Projects

For Purchase of Real Property and/or Permanent or Temporary Easements or Donations

Notes: IEDA highly recommends that Administrators lead the acquisition process for recipient CDBG-NDR awards.

- Property / Easements purchased (executed) prior to CDBG application submittal deadline are considered exempt from URA requirements below, and, of course, will be exempt from CDBG reimbursement.
- Contract(s) for appraisal services can be executed upon CDBG Award Letter issuance (considered administration).
- Option to Purchase may be executed prior to release of funds (ROF), however language must not be considered binding on either party.
- No Purchase Offer documents can be executed with property owner(s) until after (ROF) (no choice-limiting activities).

Voluntary Acquisitions / Easements / Maintenance Agreements

Step 1 Does Power of Eminent Domain Exist?

YES (Counties have eminent domain authority), proceed to Step 2

**Step 2 Power of Eminent Domain by County does exist.
Is Acquisition Voluntary or Involuntary?**

IEDA believes that voluntary should apply to ALL NDR county watershed projects.

To Be Considered Voluntary: Transaction must meet ALL the following criteria:

1. No specific property needed for project, alternate site(s) exist. (if no alternate exists, acquisition is involuntary)
2. Property is not part of an area to be acquired in the future.
3. Eminent Domain will not be used – even if negotiations fail.

If all the above true:

Recipient must notify property owner, either in writing by Certified Mail, or through a signed property owner statement, documented in file, that owner received notification of the 2 criteria below: (use VOLUNTARY ACQUISITION letter, Appendix 2 in CDBG Management Guide)

1. That Eminent Domain will not be used.
2. Fair Market Value (FMV) estimate with justification how estimate determined.
 - a. Estimate of FMV must be documented in file
 - b. Appraisal not required unless requested by property owner or value is >\$10,000* (*IEDA policy for NDR project)
 - i. If property value < \$10,000 and is an uncomplicated purchase, fair market value estimate by person with current, local real estate knowledge, with justification / waiver valuation of how estimate determined. If owner does not agree with valuation, an appraisal can be requested. If value is >\$10,000 compensation / appraisal required by licensed appraiser.

Then complete:

Written Option to Purchase, or if after ROF - a Purchase Offer

Donations of Land

Step 1 Landowner offers donation of land.

Step 2 County provides to landowner in writing “When a Public Agency Acquires Your Property” document from Appendix II of CDBG Management Guide.

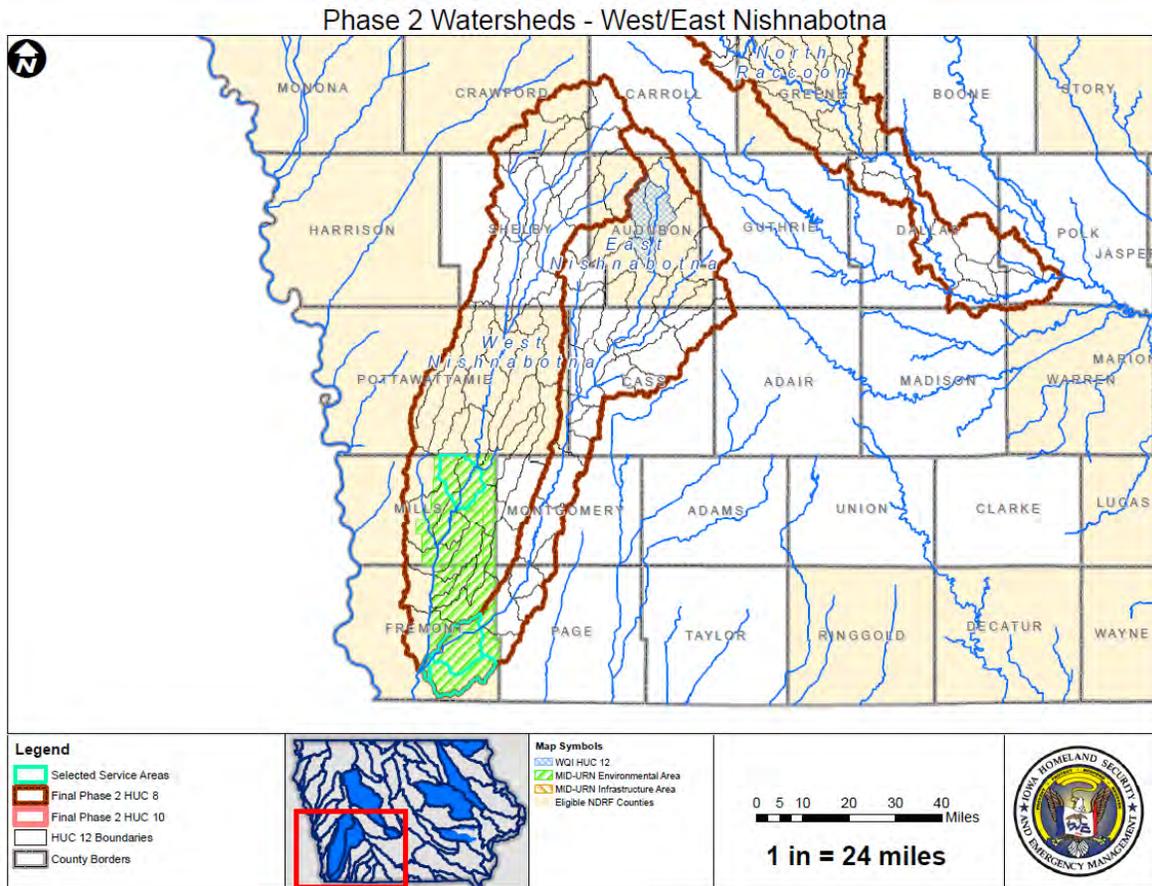
Step 3 County provides a modified voluntary acquisition letter (see example in Appendix 2 of CDBG Management Guide) to landowner that includes landowner has received written information on their rights, the landowner is willingly donating the land, and the agreed upon donation value.

Step 4 Modified acquisition letter is signed by landowner and county and kept on file for at least five years after county’s CDBG-NDR contract expires.

Mills County 13-NDRI-008

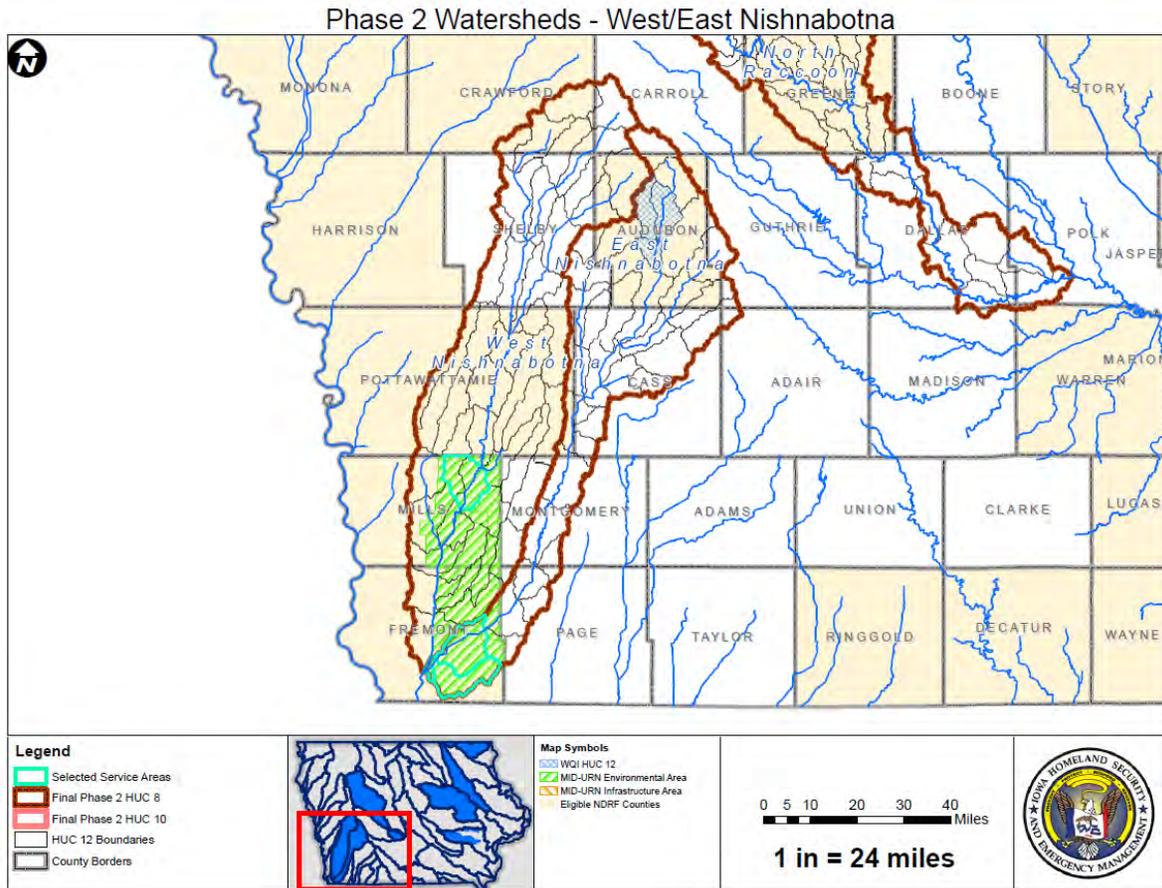
West Nishnabotna River Watershed

NDR Eligible Counties Include: Audubon, Crawford, Fremont, Mills, and Pottawattamie



Fremont County 13-NDRI-004
East Nishnabotna River Watershed

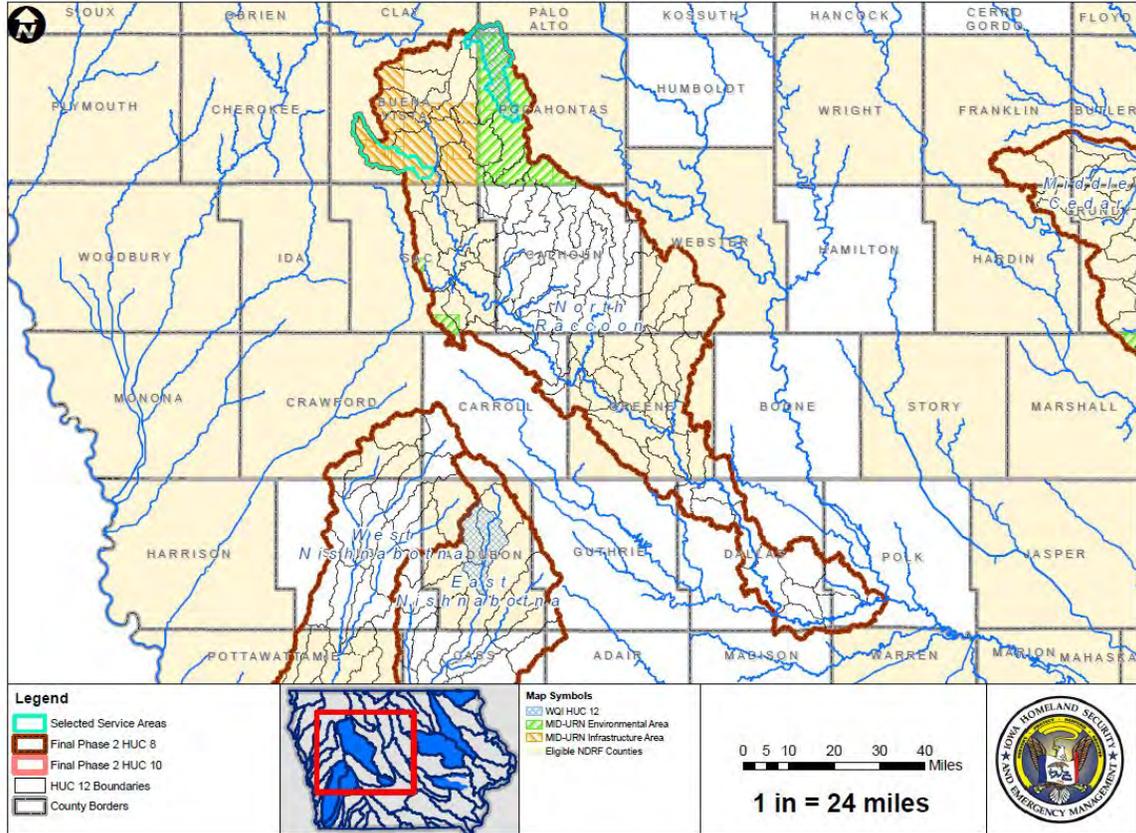
NDR Eligible Counties Include: Audubon, Fremont, and Pottawattamie



Buena Vista County 13-NDRI-003
 North Raccoon River Watershed

NDR Eligible Counties Include: Buena Vista, Clay, Greene, Palo Alto, Pocahontas, Sac, Warren, and Webster

Phase 2 Watersheds - North Raccoon

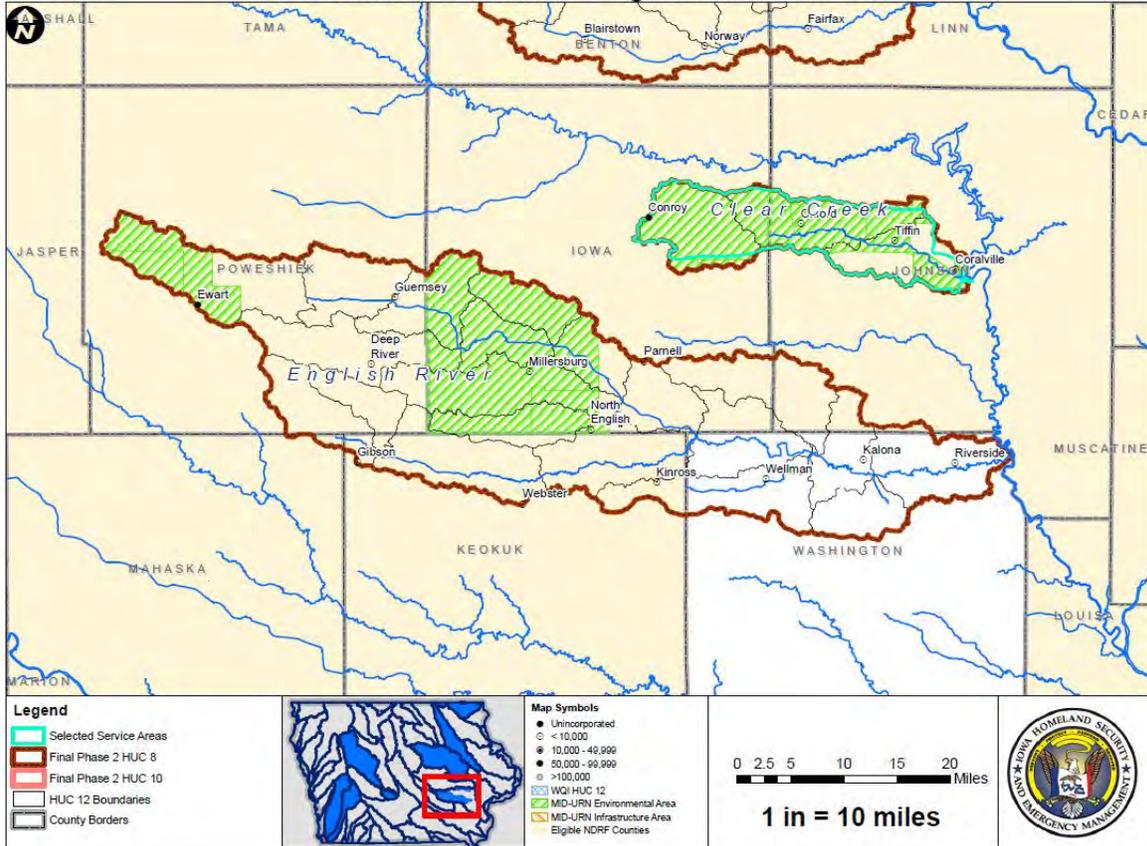


Iowa County 13-NDRI-006

English River Watershed

NDR Eligible Counties Include: Iowa, Johnson, Keokuk, Mahaska, and Poweshiek

Phase 2 Watersheds - English River/Clear Creek

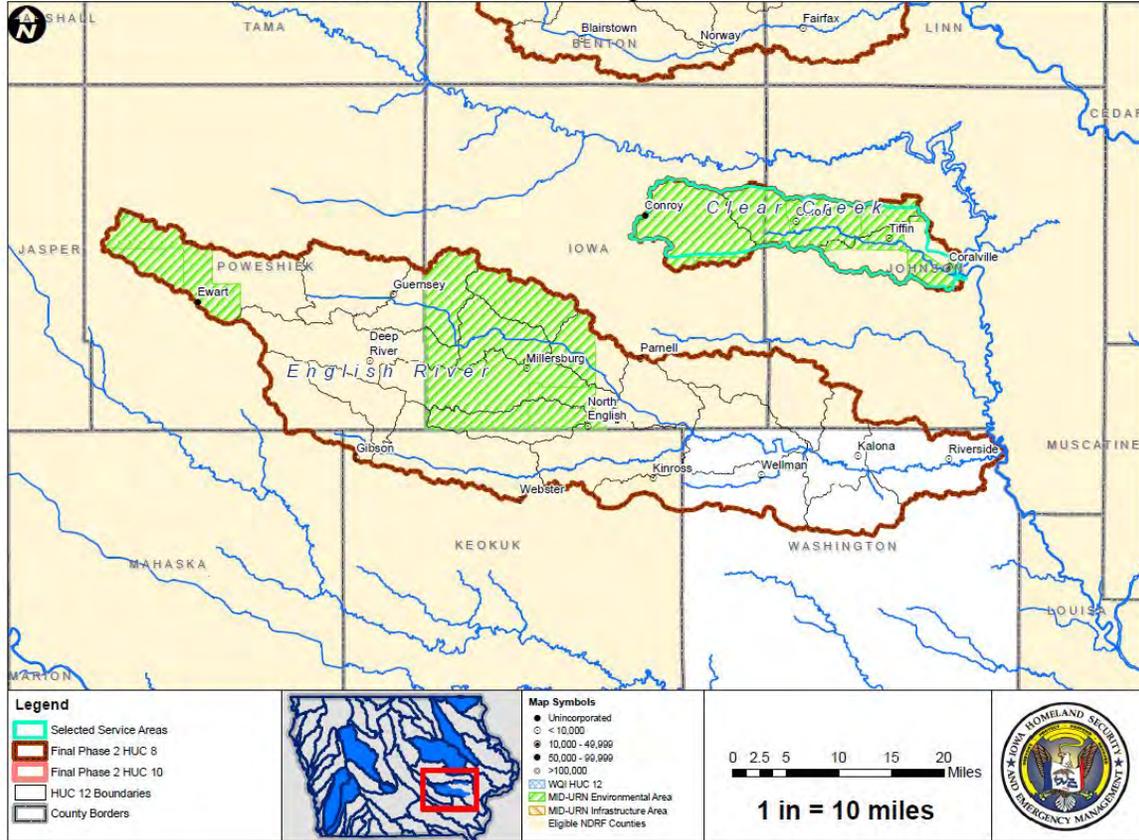


Johnson County 13-NDRI-007

Clear Creek Watershed

NDR Eligible Counties Include: Iowa and Johnson

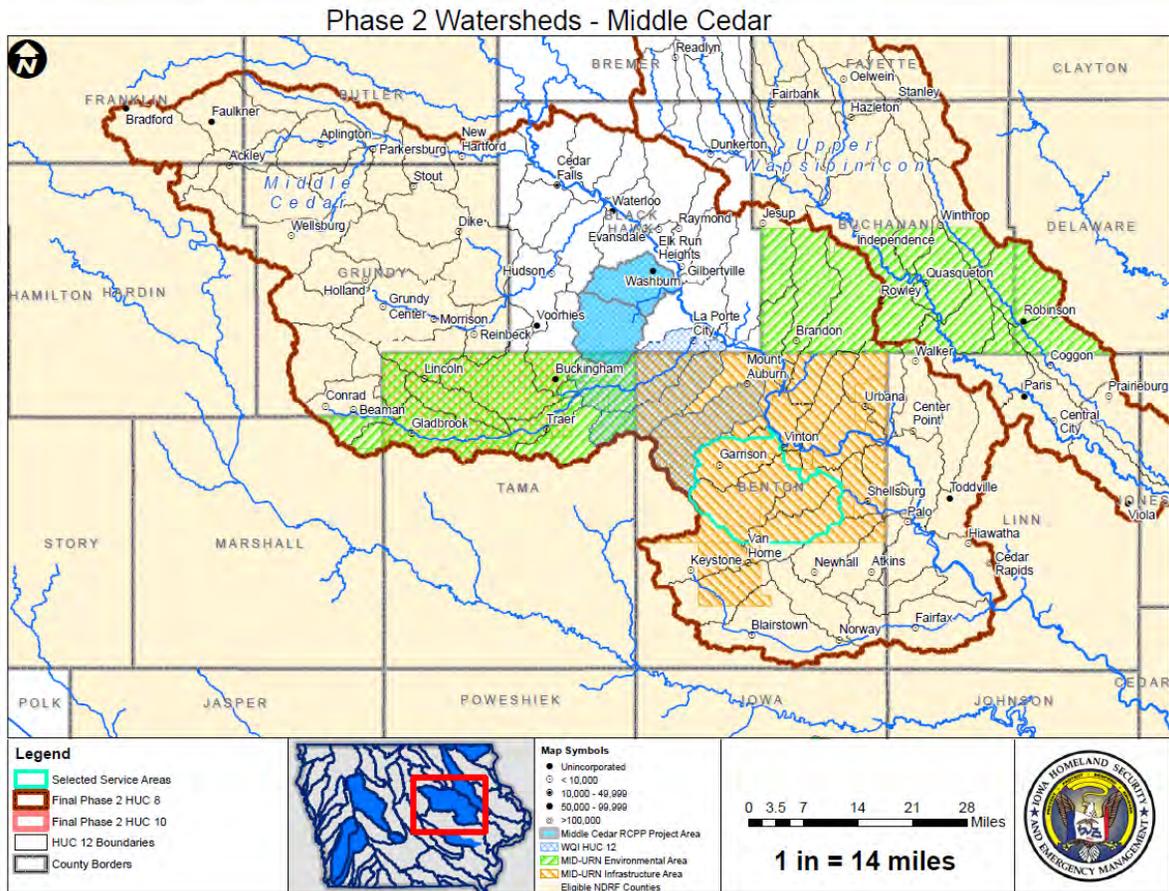
Phase 2 Watersheds - English River/Clear Creek



Benton County 13-NDRI-002

Middle Cedar River Watershed

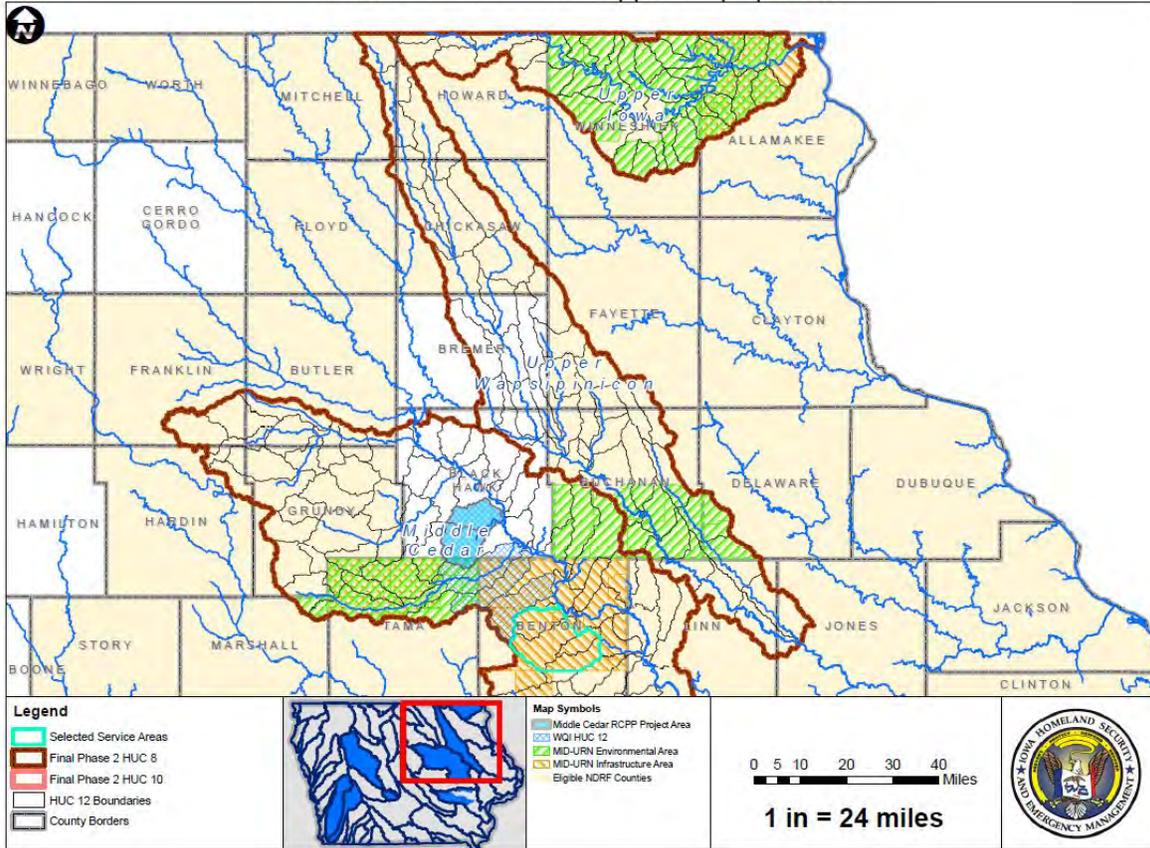
NDR Eligible Counties Include: Benton, Buchanan, Butler, Franklin, Grundy, Hardin, Linn, and Tama



Howard County 13-NDRI-005 Upper Wapsipinicon River Watershed

NDR Eligible Counties Include: Buchanan, Chickasaw, Delaware, Fayette, Floyd, Howard, Jones, Linn, and Mitchell

Phase 2 Watersheds - Upper Wapsipinicon

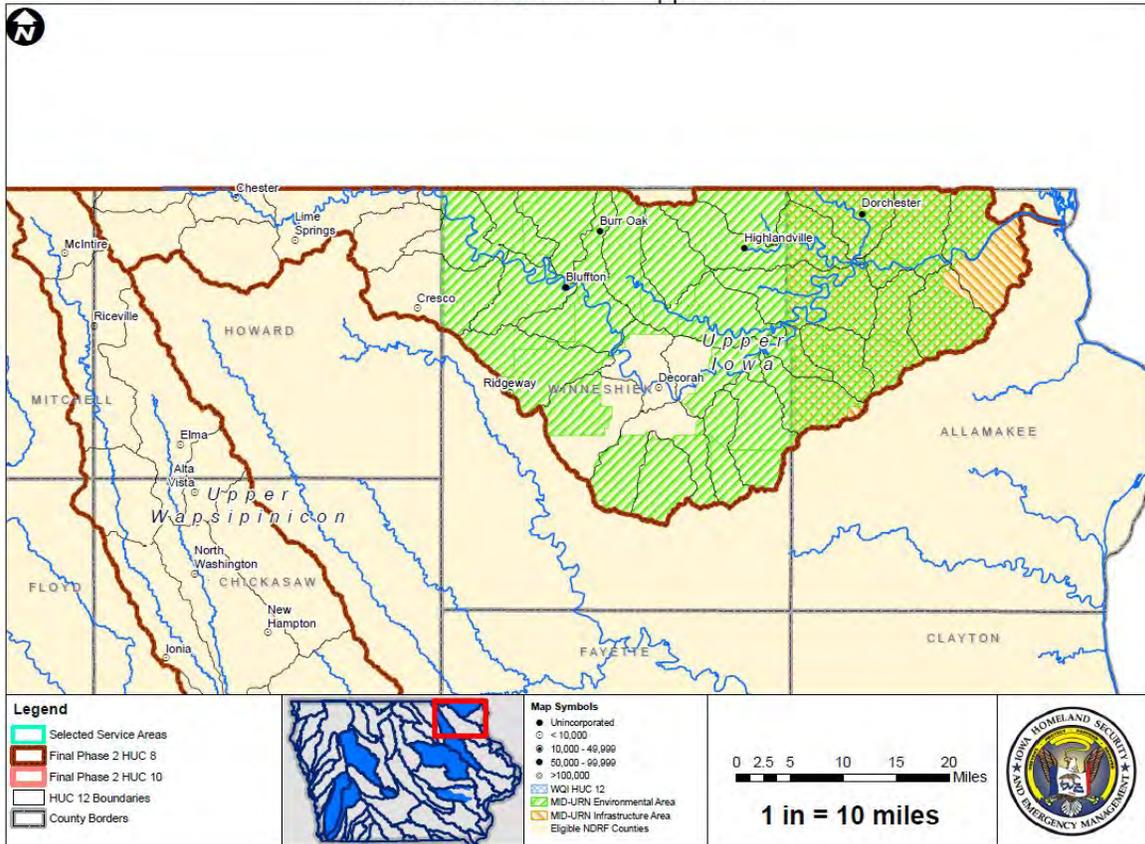


Winneshiek County 13-NDRI-009

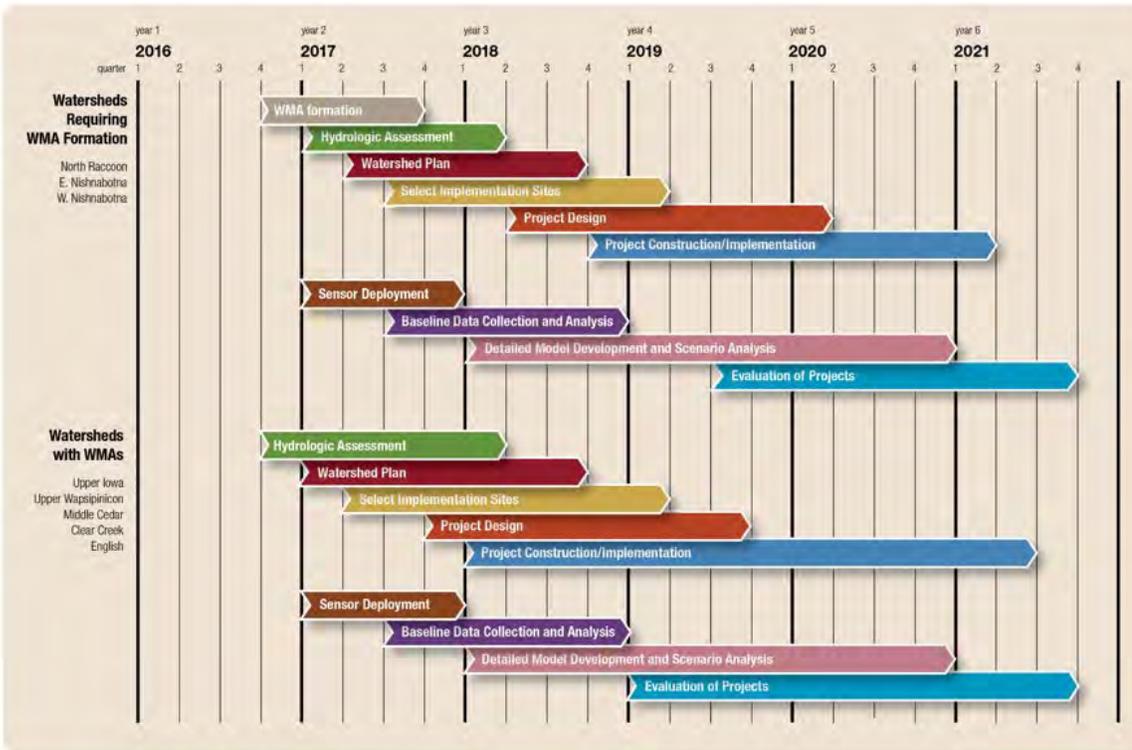
Upper Iowa River Watershed

NDR Eligible Counties Include: Allamakee, Howard, Mitchell, and Winneshiek

Phase 2 Watersheds - Upper Iowa



The Iowa Watershed Approach Project Time Lines



Community Development Block Grant - National Disaster Resilience (CDBG-NDR)

Iowa Watershed Approach Guidelines Planning Contracts:

University of Iowa 13-NDRP-013

Iowa Department of Natural Resources 13-NDRP-014

University of Northern Iowa 13-NDRP-015

Iowa State University 13-NDRP-016

Iowa Homeland Security and Emergency Management 13-NDRP-017

Iowa Department of Agriculture and Land Stewardship 13-NDRP-018

Scope of Grant Goals

The CDBG-NDR grant provides funding to accomplish six specific goals: 1) reduce flood risk; 2) improve water quality; 3) increase resilience; 4) engage stakeholders through collaboration and outreach/education; 5) improve quality of life and health, especially for vulnerable populations; and 6) develop a program that is scalable and replicable throughout the Midwest and United States.

National Objective

Planning activities are exempt from meeting a national objective.

Eligible Recipients

Planning partners were identified in the CDBG-NDR application and are comprised of state agencies and universities with roles that will benefit the Iowa Watershed Approach.

Watershed Planning Activities

The CDBG-NDR watershed planning activities support eight rural watersheds, as listed below, as well as the urban Bee Branch watershed in the City of Dubuque. The proposed activities reasonably tie-back to the unmet recovery of the Qualified Disaster. (See Tie-back section of guidelines)

The rural watershed districts include:

1. West Nishnabotna
2. East Nishnabotna
3. North Raccoon
4. Middle Cedar
5. Clear Creek
6. English
7. Upper Wapsipinicon
8. Upper Iowa

All activities funded through this program must comply with these guidelines, the contract executed with the project partner, and IEDA's most recent Community Development Block Grant Management Guide.

Funding Available

A total of \$13,328,578 is available for planning activities completed by the planning partners.

Reimbursement of Funds

The Iowa Economic Development Authority (IEDA) will reimburse funds in the form of a grant for actual costs incurred. Claims for reimbursement will be submitted by the recipient via the online www.iowagrants.gov system. The recipient shall maintain a file of all claim supporting documentation including claim documents, invoices, and payments. No claim will be processed if quarterly status reporting is not current. The IEDA Project Manager will notify the recipient if payment is withheld due to delinquent reporting.

All recipients must upload a signed GAX form to the claim request in iowagrants.gov. State agencies seeking reimbursement by IET must identify the Revenue Coding stream on the GAX form. For example:

Revenue Coding: Fund: 0001; Dept.: 542; Unit: 7517; Rev.: 0220

Because IEDA is an authority, the revenue source coding must be identified as 0220. Recipients with questions should contact the appropriate IEDA Project Manager.

Reporting

Recipient will report project progress at least quarterly via www.iowagrants.gov to IEDA outlining progress made toward milestones outlined in the recipient's contract with IEDA.

Recipient will report on tasks completed, project scheduling issues, anticipated activities for upcoming quarters and, if applicable, supporting leverage metrics. Work products, such as brochures or meeting agendas, will be uploaded to quarterly reports as needed to demonstrate performance. Work products are documents that support the final deliverables of the project.

Deliverables

Through the Deliverables tab in iowagrants.gov, Recipients will upload deliverables as completed. Deliverables are the primary end products for each partner are defined in their project contract. Each deliverable has an assigned target completion date and the date completed will be entered as the task is completed.

Outcome Values

Some partners are responsible for outcome values for the project and these obligations are contained in their project contract. Reporting through iowagrants.gov will be used to document progress towards achievement of the project outcome values including the following related to planning activities.

- Number of water management/flood plans completed;
- Number of disaster recovery plans completed;
- Number of mitigation plans completed;
- Percent of reduction in stream flow;
- Percent of reduction of watershed nitrate loading;
- Percent of reduction of watershed phosphorous loading; and
- Number of tons of soil lost per acre.

Supporting Leverage

Some partners are responsible for supporting leverage for the project and these commitments are contained in their project contract. Reporting through iowagrants.gov will be used to document progress towards fulfillment of supporting leverage commitments.

Monitoring

IEDA will use the following process to monitor the CDBG-NDR Iowa Watershed Approach program.

Desktop Monitoring

- IEDA Project Manager will review quarterly partner reports in www.iowagrants.gov; and
- IEDA Project Manager will identify performance and expenditure timeliness quarterly and contact partner to address any timeliness issues; and
- IEDA Project Manager may monitor claim documentation for completeness throughout the project.

On-site Monitoring

- A monitoring visit to the partner organization will be scheduled at least once during the project;
- The IEDA project manager will email the partner to set up the monitoring visit;
- Monitoring visit date information and forms will be completed in www.iowagrants.gov;
- The monitoring visit report will be uploaded to www.iowagrants.gov and sent to the partner;
- Project manager will instruct partner to upload any additional information identified as needed during the monitoring visit;
- Project manager will enter into www.iowagrants.gov the date requested additional information is received and approved.

Expenditure Monitoring

The IEDA Project Manager will track actual quarterly spending for each partner and compare this to the projected quarterly spending as listed in Attachment A of the project contract. The spending tracker worksheet will be stored in the iowagrants.gov Required Uploads tab, Quarterly Budget and Plan, for each partner and updated quarterly by the Project Manager. Deviation from the projected spending is anticipated, however, as the project nears completion the percent variation should decline. Allowable discrepancy limits are established in the table below.

Year	Budget Discrepancy Limit
1	40%
2	35%
3	30%
4	20%
4.5	10%
5	0%

If the spending differential is greater than the limit shown, the Project Manager will determine the reason for the spending discrepancy. The Project Manager will review current reporting narratives or metrics to determine if spending is reasonable in regard to the status of tasks and deliverables. The Project Manager may request additional information from the partner in order to complete this assessment. The Project Manager will also determine if delays in spending or the completion of deliverables/tasks can potentially result in a negative impact to the project.

If the discrepancy in spending or progress is deemed reasonable, the Project Manager will continue to monitor expenditures. The annotations function of iowagrants.gov will be used to note the findings of the status review.

If the Project Manager has concerns about the spending discrepancy or the status of project deliverables/tasks OR the partner has reported a spending discrepancy for 3 consecutive quarters, the Project Manager will confer with IEDA management. One of the following action items will result:

- Project Manager will continue to monitor the project status;
- A meeting with partner management will be held. Partner will submit revised quarterly budget projection and/or a plan to overcome progress delay;
- Terminate the agreement. IEDA will repurpose funds with HUD approval.

Correspondence related to quarterly budget discussions will be documented in the correspondence feature of iowagrants.gov. Notes regarding project status will be documented using the annotations function.

Procurement

Recipient shall follow the federal procurement requirements in 2 CFR 200 and the instructions for procurement provided by IEDA online at

<http://www.iowaeconomicdevelopment.com/userdocs/documents/ieda/InstructionsProcurementServicesCDBGprojects.pdf>.

Computers and supplies costing less than \$5,000 and purchased following state and federal procurement requirements may be purchased to support activities in the contract.

All contracts that are competitively procured must be reported in iowagrants.gov by completing the contractor clearance form prior to the contract start date. The Recipient must also complete a cost reasonable analysis prior to soliciting proposals and maintain a record of this analysis onsite. Entities must develop an independent price or cost estimate before receiving bids or proposals for services. The appropriate form of analysis should be based on the complexity of the procurement. Example methodologies include:

- Compare prior (historical) proposed prices and contract prices for the same or similar goods and services
- Compare competitively published catalog prices, published market prices, or similar indices

Section 3 compliance

Section 3 of the Housing and Urban Development Act of 1968 [12 U.S.C. 1701u and 24 CFR Part 135] does not pertain to the planning partners.

Environmental Requirements for CDBG-NDR Funding

Planning activities are exempt from environmental review under 24 CFR 58.34(a)(1).

Tie-back to the Qualified Disasters

Planning activities reasonably tie-back to the unmet recovery needs of the Qualified Disaster. The projects cover areas of the state impacted by declared disasters from 2011 and 2013, as specified below.

West Nishnabotna: flooding in 2011, DR-1998

East Nishnabotna: flooding in 2011, DR-1998
Raccoon: flooding in 2011 and 2013, DR-1977 and DR-4126
English River: flooding in 2013, DR-4119
Clear Creek: flooding in 2013, DR-4119 and DR-4126
Middle Cedar: flooding in 2013, DR-4126 and DR-4135
Upper Wapsipicon: flooding in 2013, DR-4135
Upper Iowa: flooding in 2013, DR-4135

The following tie-back strategies are contained in individual Partner contract agreement – scope of work:

University of Northern Iowa

This project supports decision making and proper implementation of tall prairie grass and other native plantings on lands directly impacting the MID-URN areas.

University of Iowa

Advisory Board Meetings, Watershed Coordinator Training: The watershed coordinator training events will improve their ability to support the activities directly impacting the MID-URN areas.

Hydrologic Assessment: It is a necessary first step in this project as it establishes existing conditions and hydrologic context to support the selection of the type and location of constructed projects in the MID-URN areas.

Hydrologic Network: Deployment of the hydrologic network is a necessary early step in this project as it establishes existing conditions and hydrologic context, provides data to inform and validate models used to help select best locations for built structures, and provides data to monitor the success of constructed projects and conservation practices in the MID-URN areas.

Resilience Programming: The community resilience programming will directly benefit the MID-URN areas through the development of tailored activities that measure and subsequently improve resilience to flooding in those areas and the completion of a flood resilience action plan to help guide future priorities to increase flood resilience.

Evaluation and Assessment: The CEA will provide feedback and survey results to the team and to IEDA on a regular basis. Their activities tie back to the MID-URN areas as their feedback will directly inform programmatic improvements to help maximize programmatic impact in those areas.

Iowa State University

Iowa Nutrient Research Center nutrient practices: These projects directly tie to the MID-URN areas as the results will be used to refine hydrologic modeling in the target watersheds, to finesse the best selection of built projects and conservation practices and locations, and to monetize the cost benefit of practices implemented in the MID-URN areas.

Watershed Planning ISU Extension and Outreach: ISU Extension and Outreach activities will directly impact the MID-URN areas through the development and delivery of science-based content to inform stakeholders and decision makers at all levels. These activities will especially help landowners in the MID-URN area who are participating in the program to select the most appropriate projects/practices to maximize the potential impact on downstream water quantity and quality.

Iowa Water Center Soil Loss: Activities by the Iowa Water Center at ISU will directly impact the MID-URN areas in the target watersheds through the contribution of their data to the hydrologic models (leading to selection of the most appropriate projects and project sites), evaluation of the impacts of projects on water runoff and erosion, and contribution of content to public programming, especially to stakeholders in the MID-URN areas.

Iowa Department of Natural Resources

The IDNR will offer technical assistance with a goal of building local capacity to efficiently target resources to high-priority locations in the MID-URN areas.

Iowa Department of Agriculture and Land Stewardship

The activities proposed by IDALS directly support the project MID-URN areas by providing training, tools, forms, and other technical assistance to the project coordinators and others who will be helping to manage the implementation of constructed projects and conservation projects benefiting the MID-URN areas.

Homeland Security and Emergency Management

GIS technical support is necessary for the development of flood risk data sets. These will be integrated into the local hazard mitigation and disaster resilience planning products. HAZUS runs will be required for the development of this data. The planning flood risk assessment will be used to identify potential risk reduction activities, funding sources, and timelines for implementation. This project identification data pushes forward flood resiliency for these MID-URN communities.

Capacity Building will include the activities and training necessary to inform emergency management personnel and local leaders on disaster resiliency best practices in their communities. These activities include the integration of several planning activities from the IDNR, IDALS, IFC, and others into emergency management planning and implementation work. This comprehensive approach to disaster resiliency at the local level will benefit the MID-URN areas by increasing the capacity and efficiency of services delivered by emergency management stakeholders and partners.

The Flood Mitigation Board has dedicated funding for flood resilient solutions at the local level. These investments in structural solutions will benefit the MID-URN areas and can also be leveraged for future state investment to build resiliency in the most impacted and distressed areas.

Watershed Counties – planning activities

The design and construction of built projects and conservation practices in the target watersheds will be implemented to have the greatest possible positive impact on the MID-URN areas through the reduction of future flooding and improved water quality during high-flow events. Water quality and quantity data will be collected throughout the duration of the project to support the development of the hydrologic models used to inform the distribution of built projects, to monitor progress, and to evaluate the success of the implemented practices. This element of the project is critical in helping to support and inform the development of practices impacting the MID-URN areas and to evaluate the success of these projects.

Monitoring Policy

Responsible personnel or unit: IEDA Project Managers

STATEMENT OF PURPOSE

The purpose of monitoring, both during a site visit and from an office desktop, is to provide technical assistance, determine the status of grant funded activities, review the Recipient's grant management systems, evaluate compliance with state and federal rules and regulations and to verify the accuracy of the information provided by the applicant. While all project managers will actively conduct day-to-day management of NDR grants including Compliance Monitoring as documented in Section 3. (C) of this document, Monitoring, both on-site and desk will be formally recorded in iowagrants.gov as a component of the contract.

RISK BASED ASSESSMENT

IEDA will conduct a risk based assesment annually per NDR contract. While each of the NDR activities will be monitored on-site at least once during the life of the grant, the risk based assessment will assist project managers in determining the timing and frequency of documented monitorings.

The Risk based assessment will be conducted through iowagrants.gov as a component titled "Risk Assessment." This form will be filled out once a year by the project manager, and based on the outcome score, the project manager will determine when the next monitoring is required. Per 200.331(b), IEDA will evaluate each Recipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate level of monitoring, the risk based assessment will include:

- Financial Risk – how large is the grant
- Submitted Draws – are claims on schedule as outlined in contract
- Program Management/Capacity – is administrator familiar with CDBG and attended training
- Program Income – has the contract generated program income
- QPR Tracking – is the program reasonably on track
- Deliverables – are deliverables provided on time

In addition, increased monitoring as outlined in the monitoring section includes:

- Up front training of grant administrators. First training will occur prior to first draw of funds.
- Desk monitoring (required uploads to IowaGrants.gov) review and confirm procurement standards have been adopted by the Recipient.
- Financial Management – project managers will desk audit 2-3 early draws including invoices, payment dates etc.

Also, see Section III, On-Site Monitoring of Recipients for order of monitoring

MONITORING

Project Managers shall complete the relevant fields in the Site Visit component form in www.iowagrants.gov for each monitoring. Monitoring can be documented either in-person on-site with the subrecipient, or from the Project Manager's desk top. Each monitoring will be recorded in iowagrants.gov and dated to differentiate monitorings. Monitoring will be occurring at various points in time throughout the NDR Funding process. Monitoring can assess one, multiple or all of the areas of review, however, each Monitoring must minimally complete the **National Objective / Project Progress** form, to document what is being included in the particular monitoring.

Specific areas of review include, as appropriate, the following forms:

- National Objective / Project Progress
- Citizen Participation
- Environmental
- Financial Management
- Procurement
- Administration
- Contract Management (Architectural/Engineering)
- Contract Management (Professional Services)
- Contract Management (Construction)
- Labor Standards

- Housing Review
- Civil Rights (Section 3, EEO, Fair Housing, MBE/WBE)
- Acquisition and Relocation

While both On-site and Desk monitoring will look the same in iowagrants.gov, project managers will ensure the following policies are applied to the different types of reviews.

Desk Monitoring

Desk monitoring, or sometimes referred to as off-site monitoring, does not substitute the requirement to conduct at least one on-site monitoring per NDR activity during the life of the grant. Desk monitoring should be conducted on an ongoing basis and may include general review of project activities and communications to determine if the project is on track and the rules and regulations are being followed. Project managers may request from the Recipient or Grant Administrator supporting documentation to be emailed or uploaded into iowagrants.gov to allow for the review of items such as: draw requests to evaluate project progress, bid packet documents to review procurement compliance, samples of wage rates and time sheets for Davis Bacon review, etc. All desk monitoring should be sufficiently documented through iowagrants.gov as a site visit.

On-Site Monitoring

On-site monitored will be conducted at least once per activity prior to grant closeout. When conducting on-site monitoring visits, Project Managers shall make every attempt to monitor at the grant recipient's office, most often this is City Hall. The Chief Elected Official and the City Administrator/City Clerk shall be invited, along with the grant administrator. Project Managers shall reserve time following a comprehensive on-site review to go over any deficiencies discovered during the monitoring visit with the City/County staff and grant administrator. The Project Manager shall provide advice for corrective action. Following this wrap-up meeting, there should be no surprises when the grant recipient receives the follow-up letter. During the on-site review the project will also be visually inspected.

Monitoring Follow-Up

A follow-up correspondence shall be sent following every on-site monitoring visit. Project Managers shall send this letter no later than two months following an on-site review. Included in the follow-up letter shall be a list of activities the recipient is doing well, areas for improvement, as well as corrective action needed. If the monitoring letter has significant Findings, the letters will also go to the Division Coordinator and/or Division Administrator of the Community Development Division for review prior to mail-out. If the Findings also include a requirement for penalties or repayments, the letters will be reviewed by top Management (Director or Deputy Director) prior to mail-out.

Any deficiencies included in the follow-up letter shall provide information on how to cure any such deficiencies. Typically, recipients shall have 30 calendar days to cure deficiencies or face non-compliance status.

Recipient Non-Compliance

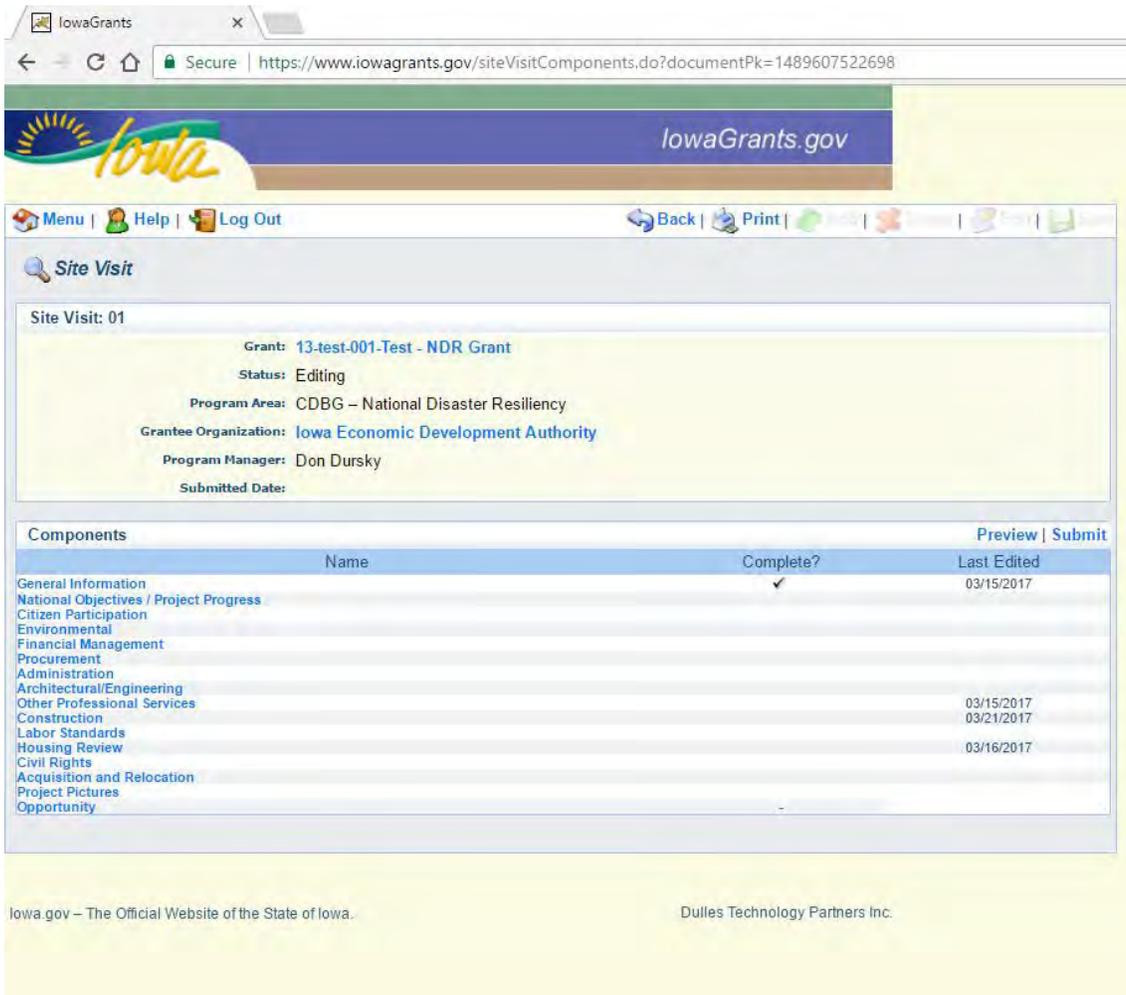
If repeated attempts by the Project Manager to cure areas of non-compliance are unsuccessful, the Project Manager shall work with the Division Coordinator to formally notify the grant recipient that corrective action is necessary, or face penalties, which could include, but not limited to, delay of payment of remaining funds, ability to secure future IEDA grants, or repayment of existing grant funds.

If there is still no action taken on behalf of the grant recipient to cure the outstanding deficiencies, the Division Coordinator and Division Administrator shall determine the consequences for such inaction. The consequences shall be based on the severity of the deficiency, the state and federal rules and regulations governing the area(s) of non-compliance, the impacts to the community, and consequences to IEDA. The grant recipient shall be notified of the decision by the Division Administrator by official letter.

The grant recipient shall have the ability to appeal the decision by the Division Administrator to the Director of the Iowa Economic Development Authority. The Director shall have the authority to reverse any previous decision and make the final decision on the penalty, if any, to be enforced.

Monitoring Templates

The Site Visit templates used for monitoring in the www.iowagrants.gov database are shown on the following pages.



The screenshot shows the IowaGrants.gov website. The browser address bar displays the URL: https://www.iowagrants.gov/siteVisitComponents.do?documentPk=1489607522698. The page header includes the Iowa logo and the text "IowaGrants.gov". Navigation links for Menu, Help, Log Out, Back, and Print are visible. The main content area is titled "Site Visit" and displays the following information:

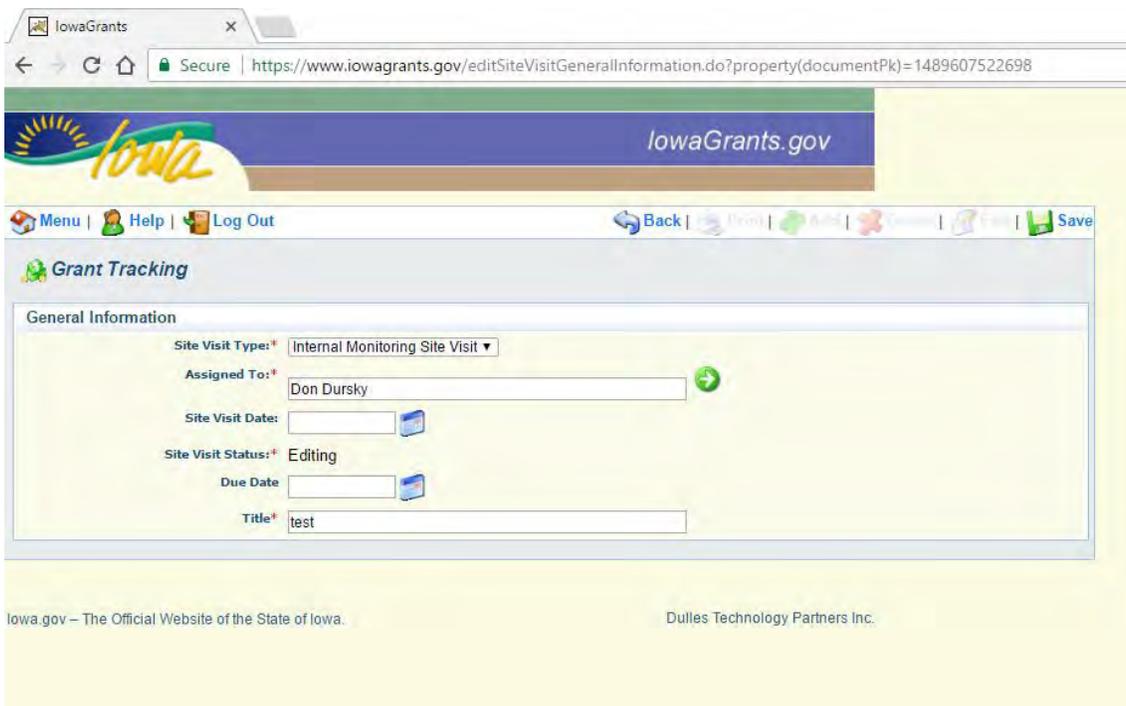
- Site Visit: 01
- Grant: 13-test-001-Test - NDR Grant
- Status: Editing
- Program Area: CDBG – National Disaster Resiliency
- Grantee Organization: Iowa Economic Development Authority
- Program Manager: Don Dursky
- Submitted Date:

Below this information is a table of components:

Components	Name	Complete?	Last Edited
General Information		✓	03/15/2017
National Objectives / Project Progress			
Citizen Participation			
Environmental			
Financial Management			
Procurement			
Administration			
Architectural/Engineering			03/15/2017
Other Professional Services			03/21/2017
Construction			03/16/2017
Labor Standards			
Housing Review			
Civil Rights			
Acquisition and Relocation			
Project Pictures			
Opportunity			

At the bottom of the page, there are footer links for "Iowa.gov – The Official Website of the State of Iowa" and "Dulles Technology Partners Inc."

EXAMPLE: iowagrants.gov – Site Visit – list of Components



The screenshot shows the IowaGrants.gov website. The browser address bar displays the URL: https://www.iowagrants.gov/editSiteVisitGeneralInformation.do?property(documentPk)=1489607522698. The page header includes the Iowa logo and the text "IowaGrants.gov". Navigation links for Menu, Help, Log Out, Back, and Save are visible. The main content area is titled "Grant Tracking" and displays the following information:

General Information

- Site Visit Type: Internal Monitoring Site Visit
- Assigned To: Don Dursky
- Site Visit Date:
- Site Visit Status: Editing
- Due Date:
- Title: test

At the bottom of the page, there are footer links for "Iowa.gov – The Official Website of the State of Iowa" and "Dulles Technology Partners Inc."

EXAMPLE: iowagrants.gov – Site Visit – General Information

lowaGrants x

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=1489

 Iowa IowaGrants.gov

Menu | Help | Log Out Back | Save

Site Visits

Site Visit: 01

Grant: [13-test-001-Test - NDR Grant](#)
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky
 Submitted Date:

National Objective / Project Progress

Describes what is being monitored/reviewed at this time? (500 character max.)

Person(s) Interviewed:

Monitoring Notification Date:

Site Visit Final Report Date:

Notification Type: E-mail ▼

Original Signatures on documents, including amendments? Yes ▼

National Objective of the project: ▼

If project benefits LMI how was it determined: ▼

If other, please specify:

Do project files include adequate documentation to support LMI determination: ▼

Is the project complete: Yes ▼

If no, what is the project progress and estimated completion date:

Project Progress

Number of individual housing rehab projects completed:

Number of individual housing rehabilitation projects currently under construction:

Number of applications for assistance pending:

Number of Water Practices Installed:

General Monitoring comments

Missing Components

Subject	Missing Component	Due Date:	Status	Cleared Date:	Comments
Return to Top					

Iowa.gov – The Official Website of the State of Iowa. Dulles Technology Partners Inc.

EXAMPLE: iowagrants.gov – Site Visit – National Objective / Project Progress

lowaGrants x

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=1489607522698&propertyt

 [lowaGrants.gov](https://www.iowagrants.gov)

Menu | Help | Log Out | Back | Save

Site Visits

Site Visit: 01

Grant: [13-test-001-Test - NDR Grant](#)
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky
 Submitted Date:

Citizen Participation

Have you (recipient) conducted a public hearing on the status of funded activities?

Public Hearing:
Date Time

Date the notice of the public hearing published or posted?

Publication/Location where notice of public hearing was posted?

Where did recipient conduct CDBG-related public hearings and meetings?

Is this location accessible to persons with disabilities?

If necessary, the recipient must make reasonable accommodations to enable persons with disabilities to participate in public meetings. If not requested, mark Not Applicable.

Reasonable accommodations made?

The recipient should provide translation services for non-English speaking persons who requested them in order to participate in public meetings. If not requested, mark Not Applicable.

Translations services provided?

Did the recipient provide citizens the name and address of a CDBG contact person?

Does the recipient have a process for providing written responses to complaints and grievances within 15 days of receipt?

Additional Comments:

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Iowa.gov – The Official Website of the State of Iowa. | Dulles Technology Partners Inc.

EXAMPLE: lowagrants.gov – Site Visit – Citizen Participation

lowaGrants x

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=1489607522698&property(componentDefPk

 IowaGrants.gov

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Site Visits

Site Visit: 01

Grant: [13-test-001-Test - NDR Grant](#)
Status: Editing
Program Area: CDBG – National Disaster Resiliency
Grantee Organization: [Iowa Economic Development Authority](#)
Program Manager: Don Dursky
Submitted Date:

Environmental

Did recipient set up an environmental file?

Are all components present, including original signatures?

Release of Funds letter in file:

If mitigation was necessary, is it complete?

What did they need to mitigate (section 106 MOA, wetlands, floodplain, etc)

Additional comments:

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lowa.gov – The Official Website of the State of Iowa. Dulles Technology Partners Inc.

EXAMPLE: lowagrants.gov – Site Visit – Environmental

lowaGrants x

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=148

 IowaGrants.gov

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Site Visits

Site Visit: 01

Grant: 13-test-001-Test - NDR Grant
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: Iowa Economic Development Authority
 Program Manager: Don Dursky
 Submitted Date:

Financial Management

Document responses by spot-checking financial transactions and recording information on Draw Review form.

Does the recipient maintain an adequate financial management system? Yes

Is the system in compliance with all requirements outlined in the CDBG Management Guide? Yes

Are local effort funds incorporated into budget and accounting records? Yes

Are expenditures made according to the CDBG/local effort ratio shown in the contract? Yes

Does the recipient disburse funds within 10 working days of receipt? Yes

Does the recipient provide for adequate internal control and segregation of duties? Yes

Who is responsible for receiving funds?

Who is responsible for approving bills?

Who is authorized to sign checks?

Who is the bookkeeper?

Who reconciles the bank statements?

Was program income received? Yes

What was the source of program income?

Was it recorded as a receipt in program records? Yes

Was it spent on current program activities before additional CDBG funds were requested? Yes

If land was part of the local effort, how was the value of the land determined?

Is force account labor being used? Yes

If yes, do time sheets document time allocated to the CDBG program? Yes

Are all CDBG records being maintained in compliance with 2CFR part 200.333? Yes

Is the recipient maintaining original signatures on claim forms? Yes

Does the recipient have original signatures on Alternate Signatory forms? Yes

Additional comments:

Misc. Financial Documents

To attach documents, please save the form, click Add. Save the form again, then click the "+".

Download the Draw Review form.

Description	File
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EXAMPLE: iowagrants.gov – Site Visit – Financial Management

lowaGrants X

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=1489607522698&property(componentDefPk)

 **lowaGrants.gov**

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Program Area: CDBG – National Disaster Resiliency
Grantee Organization: [Iowa Economic Development Authority](#)
Program Manager: Don Dursky
Submitted Date:

Procurement

Does the recipient have written procurement procedures? Yes Date Adopted:

Does the recipient have a written code of conduct? Yes Date Adopted:

Has the recipient verified the eligibility of ALL contractors, including Architectural, Professional Services, Engineering, Construction, etc.? Yes

Additional comments:

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lowa.gov – The Official Website of the State of Iowa. Dulles Technology Partners Inc.

EXAMPLE: iowagrants.gov – Site Visit – Procurement

lowaGrants x

Secure | https://www.iowagrants.gov/editComponent.do?property(documentPk)=14

 IowaGrants.gov

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 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: Iowa Economic Development Authority
 Program Manager: Don Dursky
 Submitted Date:

Administration

Did the recipient contract for administrative services? Yes ▾

Did the recipient use the small purchase method of procurement for services, supplies and other property costing in the aggregate not more than \$100,000? ▾

If so, were price or rate quotations obtained from a number of qualified sources? ▾

Admin Procurement

Did the recipient solicit proposals for administrative services? ▾

Date when proposals were solicited: 

How was the RFP publicized

Was the Section 3 clause included in the bid documents? ▾

Were an adequate number of proposals solicited through a Request for Proposals? ▾

Were proposals evaluated on established criteria? ▾

Sole Source Procurement

Did the recipient receive approval for any sole source procurement? ▾

If yes, which of the following criteria was used:

1. Was the necessary good or service available from only a single source? ▾
2. The public emergency that exists will not permit a delay resulting from competitive solicitation? ▾
3. The awarding agency authorized the non-competitive proposal method? ▾
4. A number of sources were solicited but competition was determined to be inadequate? ▾

IF IEDA approved a sole source procurement, was a cost analysis performed? ▾

If IEDA approved a sole source procurement AND the contract value for the sole source transaction was \$25,000 or more, did the recipient receive a formal approval letter from IEDA? ▾

Did the recipient send bid notification to the clearinghouses for minority-and women-owned businesses? ▾

If no, what other actions did the recipient take to solicit participation?

EXAMPLE: iowagrants.gov – Site Visit – Administration

Cost Reasonableness

Was the selected bid cost reasonable?
(within 10% of original cost estimate)

Was a cost or price analysis performed to determine cost reasonableness?

a. Independent estimate prior to receipt of bids or proposals?

b. Cost analysis performed for professional, consulting, or architectural engineering services contract?

c. Adequate price competition lacking?

d. Contract modifications/change orders?

If yes to any of the above, provide specific information related to the transaction:

Contract

If the recipient contracted for administrative services, name of entity:

Date of executed contract for administrative services:

What is the contract maximum or not to exceed amount?

Does the contract include all required language including:

Access to pertinent records by recipient and government agencies?

Providing for maintenance of records for five years after project close-out?

Title VI (1964), Title VIII (1688) of the Civil Rights Act?

Executive order 11063 as amended by EO 12259 (Equal Opportunity Housing)?

Iowa Civil Right Act of 1965 (EO 34 and Iowa code Chpt 19B.7)?

Section 109 of the Housing and Community Development Act of 1974?

Age Discrimination Act of 1975, as amended (42 U.S.C. 1601 et seq.)

Section 504 of the Rehabilitation Act of 1973?

Americans with Disabilities Act?

Section 3 of the Housing and Urban Development Act of 1968, as amended (42 U.S.C. 5309) including full Section 3 clause?

Termination clauses?

Certification concerning restriction on lobbying?

Lead Safe housing Regulations 24 CFT part 35 et al.?

Section 6002 of the Resource conservation and Recovery Act (RCRA) 42 U.S.C. 6962 as it applies to procurement of items designated in Subpart B of 40 CFR part 247 (if contract is > \$10,000)?

Executive Order 11246 (if contract is greater than \$10,000)?

Section 306 of the Clean Air Act (contracts greater than \$100,000)?

Section 508 of the Clean Water Act (contracts greater than \$100,000)?

Executive Order 11738 regarding the Clean Air Act and required clauses (contracts greater than \$100,000)?

Federal labor Standards Provisions (verbatim)

Davis-Bacon and Related Acts (for construction contracts > \$2,000 where labor standards apply)?

Contract Work Hours and Safety Standard Act (for construction contracts > \$2,000 where labor standards apply)?

Copeland Anti-kickback Act (for construction contracts > \$2,000 where labor standards apply)?

EXAMPLE: lowgrants.gov – Site Visit – Administration Continued

Copeland Anti-kickback Act (for construction contracts > \$2,000 where labor standards apply)?

Does the contract include the appropriate wage rate determination?

Had the recipient verified the eligibility of the contractors and subcontractors?

Was the general contractor cleared for eligibility before the contract was executed by the City?

Are the terms of the contract appropriate (not a percentage of costs or cost plus percentage of costs type of contract)?

Does the contract specify an hourly rate?

Does the contract provide for optional services at additional costs (hourly, lump sum or actual)?

Additional comments:

Misc. Documents

File	Description
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EXAMPLE: lowagrants.gov – Site Visit – Administration Continued

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Site Visits

Site Visit: 01

Grant: 13-test-001-Test - NDR Grant
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: Iowa Economic Development Authority
 Program Manager: Don Dursky
 Submitted Date:

Instructions
 Not applicable for housing contracts.

Architectural/Engineering
 Did the recipient contract for architectural/engineering services?

A/E Procurement
 Did the recipient solicit qualifications for engineering/architectural services?
 Date when proposals were solicited:
 How was the RFQ/RFP publicized?
 Was the Section 3 clause included in the advertisement for RFP/RFQ?
 Were an adequate number of qualifications solicited through a Request for Qualifications or proposals?
 Were qualifications evaluated on established criteria?
 Did the recipient negotiate fair and reasonable compensation with selected engineer/architect if using the RFQ process?

Sole Source Procurement
 Did the recipient receive approval for any sole source procurement?
 If yes, which one of the following criteria was used?
 1. Was the necessary good or service available from only a single source?
 2. The public emergency that exists will not permit a delay resulting from competitive solicitation
 3. The awarding agency authorized the noncompetitive proposal method
 4. A number of sources were solicited but competition was determined to be inadequate
 If IEDA approved a sole source procurement, was a cost analysis performed? YES
 If IEDA approved a sole source procurement AND the contract value for the sole source transaction was \$25,000 or more, did the recipient receive a formal approval letter from the IEDA?
 Did the recipient send bid notification to the clearinghouses for minority and women-owned businesses?
 If no, what other actions did the recipient take to solicit participation?

EXAMPLE: iowagrants.gov – Site Visit – Architectural and Engineering Review

Cost Reasonableness

Was a cost or price analysis performed to determine cost reasonableness?

- a. Independent estimate prior to receipt of bids or proposals?
- b. Cost analysis performed for professional, consulting, or architectural engineering services contract?
- c. Adequate price competition lacking?
- d. Contract modifications/change orders?

If yes to any of the above, provide specific information related to the transaction:

Contract

With whom is the contract for architectural/engineering services?

What is the executed date of the contract for architectural/engineering services?

What is the contract maximum or "not to exceed" amount?

Does the contract include all required language including:

- Access to pertinent records by recipient and government agencies?
- Providing for maintenance of records for five years after project close-out
- Title VI (1964), Title VII (1968) of Civil Rights Act?
- Exec. Order 11063 as amended by EO 12259 (Equal Opportunity Housing)?
- Iowa Civil Rights Act of 1965 (EO 34 and Iowa code Chpt 19B.7)?
- Section 109 of the Housing and Community Development Act of 1974?
- Age Discrim. Act of 1975, as amended (42 U.S.C. 1601 et seq.)?
- Section 504 of the Rehabilitation Act of 1973?
- Americans with Disabilities Act?
- Section 3 of the Housing and Urban Development Act of 1968, as amended (42 U.S.C. 5309) including full Section 3 clause?
- Termination clauses?
- Certification concerning restriction on lobbying?
- Lead Safe Housing Regulations 24 CFR Part 35 et al.?
- Section 6002 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6962) as it applies to procurement of items designated in Subpart B of 40 CFR Part 247 (if contract is > \$10,000)?
- EO 11246 - Equal Employment Opportunity signed Sept. 4, 1965; Amended by EO 11478, 12086, 12107, 13279, 13665, 13672.
- Section 306 of the Clean Air Act (contracts greater than \$100,000)?
- Section 508 of the Clean Water Act (contracts greater than \$100,000)?
- Executive Order 11738 (contracts greater than \$100,000), and required clauses?
- Federal Labor Standards provisions (verbatim)?
- Davis-Bacon and Related Acts (for construction contracts >\$2,000 where labor standards apply)?
- Contract Work Hours and Safety Standard Act (for construction contracts > \$2,000 where labor standards apply)?

EXAMPLE: lowagrants.gov – Site Visit – Architectural and Engineering Review Continued

copeland Anti-kickback Act (for construction contracts > \$2,000 where labor standards apply)?

Are the terms of the contract appropriate (not a percentage of cost or cost plus percentage of cost type of contract)?

Does the contract specify an hourly rate?

Does the contract provide for optional services at additional costs (hourly, lump sum or actual)?

Does the contract include the appropriate wage rate determination?

Has the recipient verified the eligibility of the contractors and sub contractors? Yes

Was the general contractor cleared for eligibility before the contract was executed by the City?

Additional comments: Arch. Comments

Misc. Documents

File	Description
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EXAMPLE: lowagrants.gov – Site Visit – Architectural and Engineering Review Continued

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Grant: [13-test-001-Test - NDR Grant](#)
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky
 Submitted Date:

Other Professional Services

Did the recipient contract for any other professional services?

Did the recipient use the small purchase method of procurement for services, supplies and other property costing in the aggregate not more than \$100,000?

If so, were price or rate quotations obtained from a number of qualified sources?

Procurement

Did the recipient solicit proposals for other professional services?

Date when proposals were solicited:

How was the RFP publicized?

Was the Section 3 clause included in the bid documents?

Were an adequate number of proposals solicited through a Request for Proposals?

Were proposals evaluated on established criteria?

Sole Source Procurement

Did the recipient receive approval for any sole source procurement?

If yes, which one of the criteria was used:

1. Was the necessary good or service available from only a single source?
2. The public emergency that exists will not permit a delay resulting from competitive solicitation
3. The awarding agency authorized the noncompetitive proposal method
4. A number of sources were solicited but competition was determined to be inadequate

If IEDA approved a sole source procurement, was a cost analysis performed?

If IEDA approved a sole source procurement AND the contract value for the sole source transaction was \$25,000 or more, did the recipient receive a formal approval from the IEDA?

Did the recipient send bid notification to the clearinghouses for minority and women-owned businesses?

If no, what other actions did the recipient take to solicit participation?

EXAMPLE: iowagrants.gov – Site Visit – Other Professional Services

Cost Reasonableness

Was a cost or price analysis performed to determine cost reasonableness?

- a. Independent estimate prior to receipt of bids or proposals?
- b. Cost analysis performed for professional, consulting, or architectural engineering services contract?
- c. Adequate price competition lacking?
- d. Contract modifications/ change orders?

If yes to any of the above, provide specific information related to the transaction:

Contract

With whom is the contract for professional services?

What is the executed date of the contract for professional services?

What is the contract lump sum or price per house maximum or "not to exceed" amount?

Does the contract include all required language including:

- Access to pertinent records by recipient and government agencies?
- Providing for maintenance of records for five years after project close-out?
- Title VI (1964), Title VII (1968) of Civil Rights Act (Fair Housing Act)?
- Executive Order 11063 as amended by EO 12259 (Equal Opportunity Housing)?
- Iowa civil Rights Act of 1965 (EO 34 and Iowa code Chpt 198.7)?
- Section 109 of the Housing and Community Development Act of 1974?
- Age Discrimination Act of 1975, as amended (42 U.S.C. 1601 et al.)?
- Section 504 of the Rehabilitation Act of 1973?
- Americans with Disabilities Act?
- Section 3 of the Housing and Urban Dev. Act of 1968, as amended (42 U.S.C. 5309), including full Section 3 clause?
- Termination clauses?
- Certification concerning restriction on lobbying?
- Lead Safe housing Regulations 24 CFR Part 35 et al.?
- Section 6002 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6962) as it applies to the procurement of items designated in Subpart B of 40 CFR Part 247 (if contract is > \$10,000)?
- Executive Order 11246 - Equal Employment Opportunity signed Sept. 24, 1965; Amended by EO 11478, 12086, 12107, 13279, 13665, 13672.
- Section 306 of the Clean Air Act (contracts greater than \$100,000)?
- Section 508 of the Clean Water Act (contracts greater than \$100,000)?
- Executive Order 11738, and required clauses (contracts greater than \$100,000)?
- Federal Labor Standards provisions (verbatim)
- Davis-Bacon and Related Acts (for construction contracts > \$2,000 where labor standards apply)
- Contract Work Hours and Safety Standard Act (for construction contracts > \$2,000 where labor standards apply)?
- Copeland Anti-kickback Act (for construction contracts > \$2,000 where labor standards apply)?

EXAMPLE: lowagrants.gov – Site Visit – Other Professional Services Continued

Are the terms of the contract appropriate (not a percentage of cost or cost plus percentage of cost type of contract)?

Does the contract include the appropriate wage rate determination?

Has the recipient verified the eligibility of the contractors and subcontractors?

Was the general contractor cleared for eligibility before the contract was executed by the City?

Does the contract specify an hourly rate?

Does the contract provide for optional services at additional costs (hourly, lump sum or actual)?

Additional comments:

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EXAMPLE: lowagrants.gov – Site Visit – Other Professional Services Continued

Site Visit: 01

Grant: 13-test-001-Test - NDR Grant

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: Iowa Economic Development Authority

Program Manager: Don Dursky

Submitted Date:

Construction

Construction Procurement

Did the recipient use competitive sealed bids? Yes

Date of publication for bids

Name of the paper where the bid was publicized:

Was the Section 3 clause included in the bid documents?

Is the 2 CFR 200.322 compliance memo in the procurement file?

Is HUD CPD Green building checklist in the file (Housing ONLY)?

How many contractors bid on projects?

Were all bids itemized? Yes

Was the lowest responsible bidder selected? Yes

Sole Source Procurement

Did the recipient receive approval for any sole source procurement? Yes

If yes, which one of the following criteria was used:

1. Was the necessary good or service available from only a single source? Yes

2. The public emergency that exists will not permit a delay resulting from competitive solicitation? Yes

3. The awarding agency authorized the noncompetitive proposal method? Yes

4. A number of sources were solicited but competition was determined to be adequate? Yes

If IEDA approved a sole source procurement, was a cost analysis performed? Yes

If IEDA approved a sole source procurement AND the contract value for the sole source transaction was \$25,000 or more, did the recipient receive a formal approval letter from the IEDA? Yes

Did the recipient send bid notification to the clearinghouses for minority- and women-owned businesses? Yes

If no, what other actions did the recipient take to solicit participation? Yes

Cost Reasonableness

Was bid selected cost reasonable (within 10% of the original cost estimate)? Yes

Was a cost or price analysis performed to determine cost reasonableness?

a. Independent estimate prior to receipt of bids or proposals? Yes

b. Cost analysis performed for professional, consulting, or architectural engineering services contract? Yes

c. Adequate price competition lacking? Yes

d. Contract modifications/change orders? Yes

If yes to any of the above, provide specific information related to the transaction:

EXAMPLE: lowagrants.gov – Site Visit – Construction Contract Review

Contract

With whom is the construction contract?
Address:
Date of executed contract:
What is the contract amount?

The next fields apply to Housing Contracts ONLY

LBP Hazard reduction cost (Housing ONLY):
Date of pre-construction conference (Housing ONLY):
Start date of construction (Housing ONLY):
Is a copy of the contractor's insurance in the file (Housing ONLY)?
Was it current during construction (Housing ONLY)?
Did the contract have any change orders (Housing ONLY)?
Are lien waivers including partial waivers in the file (Housing ONLY)?
How often are work-in-progress inspection conducted (Housing ONLY)?
Are inspection reports available in the file (Housing ONLY)?
Did the recipient retain a percentage of the contract until final inspection and acceptance (Housing ONLY)?
What percentage is held until final payment (Housing ONLY)?
Date the administrator conducted the final inspection with the homeowner (Housing ONLY):
Date the homeowner and recipient signed the acceptance of work completed (use the latter date if two different dates) (Housing ONLY):
Date of final payment, including retainage to the contractor (Housing ONLY):
Does the contractor offer guarantee/warranty on work (Housing ONLY)?
If no, explain how recipient is guaranteeing work and for how long (Housing ONLY):

Does the contract include all required language, including:

Access to pertinent records by recipient and government agencies
Providing for maintenance of records for five years after project close-out?
Title VI (1964), Title VII (1968) of Civil Rights Act (Fair Housing Act)?
Executive Order 11063 as amended by EO 12259?
Section 109 of the Housing and Community Development Act of 1974?
Age Discrim Act of 1975, as amended (42 U.S.C. 1601 et seq.)?
Section 504 of the Rehabilitation Act of 1973?
Americans with Disabilities Act?
Section 3 of the Housing and urban Development Act of 1968, as amended (42 U.S.C. 5309), including Section 3 clause
Termination clauses?
Certification concerning restriction on lobbying?
Lead Safe Housing Regulations 24 CFR Part 35 et al.7
Section 6002 of the Resource Conservation and Recovery Act (RCRA) (42 U.S.C. 6962) as it applies to the procurement of items designated in Subpart B of 40 CFR Part 247 (if contract > \$10,000)?

EXAMPLE: lowagrants.gov – Site Visit – Construction Contract Review Continued

Executive Order 11246 - Equal Employment Opportunity signed Sept. 24, 1965; Amended by EO 11478, 12086, 12107, 13279, 13665, 13672. (if contract is > \$10,000)?

Copeland Anti-kickback Act (contracts greater than \$2,000)?

Are the terms of the contract appropriate (not a percentage of cost plus percentage of costs type of contract)?

Davis-Bacon and Related Acts (contracts > \$2,000)?

Contract Work Hours and Safety Standard Act (contracts > \$2,000)?

Section 306 of the Clean Air Act (contracts greater than \$100,000)?

Section 508 of the Clean Water Act (contracts > \$100,000)?

Executive Order 11738 regarding the Clean Air Act and required clauses (contracts > \$100,000)?

Federal Labor Standard provisions (verbatim)

Payment Bonds (100%)

Additional comments:

Does the contract include the appropriate wage rate determination?

Has the recipient verified the eligibility of contractors and subcontractors?

Was the general contractor cleared for eligibility before the contract was executed by the City?

Was the Duplication of Benefits processed prior to construction commencing?

Also Include State requirements:

Iowa Civil Right Act of 1965 (EO 34 and Iowa code Chpt 19B.7)

Do recipient construction records include the following (in compliance with CDBG limits):

Bid guarantees (5%)

Performance Bonds (100%)

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EXAMPLE: lowagrants.gov – Site Visit – Construction Contract Review Continued

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Site Visits

Site Visit: 01

Grant: 13-act-001-Test - NDR Grant
 Status: Editing
 Program Area: CDBG - National Disaster Resiliency
 Grants Organization: Iowa Economic Development Authority
 Program Manager: Don Dursky
 Submitted Date:

Instructions
Not applicable for recovery projects.

Labor Standards

Does work being reviewed trigger Labor Standards compliance?

If yes, project(s) triggering Labor Standards:

Recipient's Labor Standards Compliance Officer:

Does the recipient have a labor standards enforcement file for each construction activity?

Have contractor payrolls been submitted weekly?

Are payrolls signed by CEO or designee?

If no, is there a letter of authorization provided?

Were deductions not required by law specified correctly or provided with employee's signed voluntary willingness for the deductions (i.e., personal contributions to insurance, pension etc.)?

Were there any self-employed subcontracting owners?

If yes, were their payrolls correctly executed and certified?

Was a classification provided for each employee in compliance with the labor standards and wage determinations?

Has Compl. Officer reviewed and accepted payrolls?

Were employee interviews cross-referenced with the applicable weekly payroll?

Did the recipient conduct interviews for a broad cross-section of contractors and construction activities?

Are fringe benefits being paid according to the wage rate determination and in compliance with labor standards?

Is overtime computed on the basic hourly rate shown on the wage rate determination?

Describe any wage discrepancies/violations of labor standards and how they were resolved.

Are any contractors or subcontractors using apprentices?

If yes, does the recipient have on file the required Certificate of Labor Bureau of Apprenticeship and Training Certifications for each apprentice?

Additional comments:

Payroll Form Review	Contractor/Subcontractor Name	Payroll Number	Date of Payroll	Comments
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EXAMPLE: lowagrants.gov – Site Visit – Labor Standards Review

Housing Review	Preview Component
<p>Program Area: CDBG – National Disaster Resiliency Module: Site Visit Form Type: Standard</p>	
Housing Program Review	
How has the grantee advertised the availability of its housing rehabilitation activity?	
Advertised Activity	<input type="text"/>
Describe:	<div style="border: 1px solid black; height: 60px;"></div>
Difficulty in obtaining qualified applicants?	<input type="text"/>
If yes, please describe:	<div style="border: 1px solid black; height: 60px;"></div>
Does the recipient have a process for verifying application details?	<input type="text"/>
Does application include information on female head-of-household status?	<input type="text"/>
Who enters applications into IowaGrants.gov?	<input type="text"/>
Describe how applicants are determined eligible and the process for approving an applications:	<div style="border: 1px solid black; height: 60px;"></div>
Is recipient consistent with the Administrative Plan for the housing program	<input type="text"/>
Are standard specification and/or performance used in preparing the work write-ups/project specifications?	<input type="text"/>
Who prepares work write-up/project specifications?	<input type="text"/>
Who prepares cost estimates?	<input type="text"/>
Are cost estimates reviewed by someone else prior to contractor procurement?	<input type="text"/>
General Housing Program Comments	<div style="border: 1px solid black; height: 60px;"></div>

EXAMPLE: lowagrants.gov – Site Visit – Housing Review

 IowaGrants.gov

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Grant Tracking

Site Visit: 01

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 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky
 Submitted Date:

File Review

Homeowners Address*

Is the application complete

Is the application form signed and dated?

Did the unit household meet the 80% LMI requirement?

Or, for multi-family did 51% of the units meet the 80% LMI requirement?

Was income verification completed by recipient?

Did the recipient contact 3rd party for income verification?

What was the applicant's gross annual income?

List source documents verifying applicant's income:

Date of LMI Chart used?

Is personal financial information maintained in a separate file with adequate security for the data?

What is the total amount of forgivable loan to applicant?

Date of loan agreement or promissory note signed by owner:

Date mortgage lien was recorded with amount of forgivable loan?

Initial Inspection / Construction

Is a copy of the signed (initialed in ink) initial inspection form in the file?

What is the date of initial inspection?

Contractor's name, Company Name and Address

EXAMPLE: lowagrants.gov – Site Visit – Housing File Review

Registration number from Iowa Dept. of Public Health:

Was the general contractor cleared for eligibility before the contract was executed by the City?

Was the Duplication of Benefits processed prior to construction commencing?

Is the DOB verification in the file?

Date of pre-construction conference:

State date of construction:

Original contract amount:

Hard construction cost:

LPB Hazard Reduction cost:

Is a copy of the contractor's insurance in the file?

Was it current during construction?

Is there documentation of contractor clearance certification?

Is there a record of the dates and amounts of disbursements to the contractor(s) in the file?

Does the grantee have effective methods for approving and controlling change orders?

Were there cost adjustments with the change orders?

Are the change orders numbered and properly executed?

Are lien waivers, including partial waivers, in the file?

How often are work-in-progress inspections conducted?

Who conducts the inspections?

Are inspection reports available in the file?

Did the recipient retain a percentage of the contract until final inspection and acceptance?

What percentage is held until final payment?

Date the administrator conducted the final inspection with the homeowner:

Date the homeowner accepted the work and signed the acceptance of work completed:

Date of the construction completion and/or acceptance:

Date of final payment, including retainage, to the contractor:

EXAMPLE: lowgrants.gov – Site Visit – Housing File Review Continued

Does the contractor offer guarantee/warranty on work?

If no, explain how recipient is guaranteeing work and for how long:

Did this project trigger labor Standards

Did this project require relocation?

Lead Based Paint

Was this specific rehab project evaluated for applicability of the Lead Safe Housing Rule (pre Jan 1, 1978) [24 CFR 35.115]

What is the date the homeowner received the EPA pamphlet or IDPH pamphlet-Acknowledgement of Receipt?

Was a Visual Risk Assessment of Lead Based Paint Hazards Used?

Was a XRF machine used to assess Lead Based Paint Hazards?

Was notification that LBP or LBP hazards are presumed to be present and Notification of a visual Risk Assessment provided?

Was a notification of LBP inspection and risk assessment provided?

Date the State of Iowa Notification Prior to Renovation, Remodeling or Repainting:

Were interim controls used?

Were abatement controls used?

If yes, name of abatement contractor:

Registration number from Iowa Dept of Public Health:

Was temporary relocation assistance provided?

Date of temporary relocation provided:

Name of lab where samples were sent:

Date of clearance from lab:

Date written notification of LBP Hazard reduction completion and final visual risk assessment and clearance testing results to homeowner:

Summary of description of work completed and final visual risk assessment:

EXAMPLE: lowagrants.gov – Site Visit – Housing File Review Continued

Environmental (per property)

Are there any Environmental or Tier II Conditions on this project?

If yes, have the conditions been met?

Comments:

Property Inspection

Are all rehab work items eligible under the program?

Does the site inspection confirm that the work was done according to the work write-ups and the construction contract specifications (including change orders)?

Does the unit meet the decent, safe and sanitary test?

Does the site inspection confirm reasonable costs, including change orders?

Does the site inspection reveal professional quality work, including the change orders?

Comments:

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Site Visits

Site Visit: 01

Grant: [13-test-001-Test - NDR Grant](#)
 Status: Editing
 Program Area: CDBG – National Disaster Resiliency
 Grantee Organization: [Iowa Economic Development Authority](#)
 Program Manager: Don Dursky
 Submitted Date:

Civil Rights

Is the recipient maintaining beneficiary demographic data? Yes ▾

Is the recipient maintaining Section 3 records in order to prepare and submit the Opportunities for Low-income Persons with Assisted Projects form at program completion? Yes ▾

Have program contractors hired local, low-income persons to work specifically on program activities? Yes ▾

Has the recipient made contractors aware of Section 3 requirements? Yes ▾

Have any project area businesses been utilized by the recipient or contractors? Yes ▾

Does the recipient have a current Equal Employment Opportunity Policy? Yes ▾

Date policy adopted?

Does the policy prohibit discrimination on the bases of race, sex, color, national origin, age, religion, disability and familial status? Yes ▾

How was the policy made public?

Name of local official responsible for implementation of the EEO policy:

How does the recipient advertise job vacancies?

Do job advertisements contain equal employment opportunity language? Yes ▾

Does the recipient have 15 or more employees? Yes ▾

If yes, does the recipient have a current workforce analysis? Yes ▾

Does the recipient have an affirmative action plan? Yes ▾

Is the recipient meeting affirmative action goals? Yes ▾

EXAMPLE: lowagrants.gov – Site Visit – Civil Rights

Is the recipient meeting affirmative action goals? Yes ▾

If any employment discrimination complaints were filed against the recipient in the last 5 year period, have they been satisfactorily resolved? Yes ▾

Has the recipient adopted an Affirmative Fair Housing Policy? Yes ▾

Is the recipient a member of a Fair Housing Authority? Yes ▾

Other actions recipient has taken to further affirmative fair housing:

Minority Business Enterprise/WomenBusiness Enterprise (MBE/WBE)

a.) have any contracts been awarded to MBE and/or WEB firms? Yes ▾

b.) List the specific actions taken by the recipient to advertise for, attract or otherwise demonstrate a good-faith effort to utilize MBE/ WBE firms.

Does the recipient use Equal Opportunity language and logos in handbooks, manuals, advertisement of jobs, etc.? Yes ▾

Additional comments:

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Site Visits

Site Visit: 01

Grant: [13-test-001-Test - NDR Grant](#)

Status: Editing

Program Area: CDBG – National Disaster Resiliency

Grantee Organization: [Iowa Economic Development Authority](#)

Program Manager: Don Dursky

Submitted Date:

Instructions

Not applicable for Housing or DTR projects.

Acquisition and Relocation

Did the recipient acquired any real property, including temporary and permanent easements?

Complete this section only if Volunatry Acquisition

Did the recipient advise property owners of their rights under the Uniform Act either by certified return receipt mail or hand delivery?

Did the recipient meet all the qualifying criteria to use a voluntary transaction?

Did the recipient notify seller in writing that the property would not be taken through condemnation if negotiations fail?

Was notification of fair market value provided prior to the signing of a purchase offer?

If not, was the seller allowed to withdraw from the purchase agreement once notified of the fair market value?

Complete this section only if Property Donated

Did the recipient advise property owners of their rights under the Uniform Act either by certified return receipt mail or hand delivery?

EXAMPLE: iowagrants.gov – Site Visit – Acquisition and Relocation

Did the recipient advise property owners of their rights under the Uniform Act either by certified return receipt mail or hand delivery?

Was an appraisal conducted?

If no, did the recipient get an approved waiver of appraisal statement from property owners?

Complete this section only if Involuntary Acquisition

Did the recipient advise property owners of their rights under the Uniform Act either by certified return receipt mail or hand delivery?

Was the property appraised by a qualified appraiser prior to negotiations?

Date the appraisal conducted: 

Date the review appraisal conducted: 

What appraisal method was used?

Were appraisal standards followed?

If no appraisal, was property valued at less than \$10,000 or \$25,000 if the recipient obtained an approved waiver of appraisal statement from property owners?

Did the recipient provide the property owner a written Notice of Just Compensation (written purchase offer) for each acquisition taking into account the value of allowable damages or benefits to any remaining property?

Was the written offer equal to the appraised fair market value?

Was a summary statement issued with the written offer?

Was the written offer greater than the appraised fair market value?

Was there documentation of an administrative settlement (proof that offer does not exceed the cost of taking property by eminent domain) in the recipient's file?

Was the offer negotiated after the offer to purchase was made?

Did the recipient exercise its power of eminent domain to acquire the property?

Was the purchase payment made prior to the property owner transferring the property to the agency?

EXAMPLE: lowagrants.gov – Site Visit – Acquisition and Relocation Continued

Is there a final closing cost summary sheet showing the recipient reimbursed property owner for:

recording fees, transfer taxes, title opinions, etc.?

prepayment penalty on a mortgage

the pro rata share of property taxes?

litigation expenses?

Was the acquired property vacant?

If the vacant structures acquired were determined occupiable to low- and moderate-income persons, did the recipient follow its adopted Residential Anti-displacement and Relocation Plan?

Did the recipient inform the occupant of the basic eligibility requirements and relocation benefits?

Was notification hand delivered or mailed by certified/return receipt mail?

Did the relocatee receive:

a fixed payment for moving expenses?

actual moving expenses?

a housing payment (rental assistance payment of up to \$5,250 for 90-day tenants or owner-occupants or replacement housing payment of up to \$22,500 for 180-day owner-occupants)?

a payment equal to or less than property relocation costs for direct losses of personal property as a result of moving or discontinuing a business or farm operation, equal to the average annual earnings not less than \$1,000 and not more than \$20,000?

a payment for actual reasonable expenses in searching for a replacement business or farm?

a re-establishment payment for expenses of re-establishing the business not to exceed \$10,000?

Did the recipient determine that the displacee was eligible for alternative assistance (under Section 104(d) of the Uniform Act)?

What was the type of assistance provided?

What was the level of assistance?

If the recipient provides Relocation Assistance Advisory Services are they adequate (Describe)?

If the recipient provided

If relocation was carried out under a third-party contract, how was it done?

Additional comments:

EXAMPLE: lowagrants.gov – Site Visit – Acquisition and Relocation Continued

Appendices

Appendix A

Attachment A, updated below, reflects all requested changes to date to the original agreement.

NDR Projects	CDBG-NDR Funds	Direct Leverage	Supporting Leverage
Dubuque Healthy Homes	\$8,427,665	\$400,000	-
Dubuque Infrastructure	\$23,100,000	\$21,600,000	-
Coralville Infrastructure	\$1,834,800	\$611,600	-
Storm Lake Infrastructure	\$6,474,750	\$2,158,250	-
Watershed Projects	\$39,112,471		-
			-
Planning and General Administration*	\$17,937,491		-
Supporting Leverage			
Iowa Dept of Ag & Land Stewardship - 9 projects	-	-	\$1,461,228
Water Quality Initiative – 4 projects	-	-	\$112,000
City of Storm Lake - 2 projects	-	-	\$883,060
Iowa Dept of Natural Resources - 14 projects	-	-	\$3,218,333
City of Coralville - 2 projects	-	-	\$9,148,228
Dubuque - 4 projects	-	-	\$38,219,000
TOTAL	\$96,887,177	\$24,769,850	\$53,041,849

Appendix B – HUD Oblig Expended Report As of June 1, 2019



C.D.B.G. - NDR Funding - IowaGrants.gov

HUD Obligations / Expended Amount

B-13-DS-19-0001	Budget	Obligated	Remaining to Obligate	Disbursed	Remaining to Disburse
Admin	\$4,608,913	\$4,608,913	\$0	\$2,192,022	\$2,416,891
State Admin	\$2,332,658	\$2,332,658	\$0	\$839,053	\$1,493,605
Benton County	\$213,109	\$213,109	\$0	\$94,278	\$118,831
Buena Vista County	\$68,532	\$68,532	\$0	\$28,307	\$40,225
Coralville	\$29,066	\$29,066	\$0	\$29,066	\$0
Dubuque	\$472,500	\$472,500	\$0	\$459,081	\$13,419
Dubuque	\$157,500	\$157,500	\$0	\$71,040	\$86,460
EarthView Environmental	\$253,950	\$253,950	\$0	\$184,510	\$69,440
EOR Iowa, LLC	\$173,590	\$173,590	\$0	\$173,590	\$0
Fremont County	\$32,209	\$32,209	\$0	\$11,624	\$20,585
Howard County	\$76,939	\$76,939	\$0	\$28,610	\$48,329
Iowa County	\$105,560	\$105,560	\$0	\$47,961	\$57,599
Iowa Homeland Security &	\$347,400	\$347,400	\$0	\$76,094	\$271,306
Johnson County	\$77,217	\$77,217	\$0	\$59,325	\$17,892
Mills County	\$101,769	\$101,769	\$0	\$22,171	\$79,598
Storm Lake	\$60,000	\$60,000	\$0	\$30,925	\$29,075
Winnebago County	\$106,914	\$106,914	\$0	\$36,387	\$70,527
Housing	\$8,427,665	\$8,427,665	\$0	\$1,978,575	\$6,449,090
Dubuque	\$8,427,665	\$8,427,665	\$0	\$1,978,575	\$6,449,090
Infrastructure	\$70,522,021	\$70,522,021	\$0	\$19,971,851	\$50,550,170
Benton County	\$10,655,450	\$10,655,450	\$0	\$1,352,690	\$9,302,860
Buena Vista County	\$3,426,575	\$3,426,575	\$0	\$313,698	\$3,112,877
Coralville	\$1,834,800	\$1,834,800	\$0	\$1,834,800	\$0
Dubuque	\$23,100,000	\$23,100,000	\$0	\$10,153,141	\$12,946,859
Fremont County	\$1,610,457	\$1,610,457	\$0	\$129,187	\$1,481,270
Howard County	\$3,846,969	\$3,846,969	\$0	\$418,866	\$3,428,103
Iowa County	\$5,277,990	\$5,277,990	\$0	\$610,044	\$4,667,946
Johnson County	\$3,860,846	\$3,860,846	\$0	\$495,778	\$3,365,068
Mills County	\$5,088,462	\$5,088,462	\$0	\$469,838	\$4,618,624
Storm Lake	\$6,474,750	\$6,474,750	\$0	\$3,646,927	\$2,827,823
Winnebago County	\$5,345,722	\$5,345,722	\$0	\$546,982	\$4,798,740
Planning	\$13,328,578	\$13,328,578	\$0	\$8,076,143	\$5,252,435
Benton County	\$300,000	\$300,000	\$0	\$234,995	\$65,005
Buena Vista County	\$200,000	\$200,000	\$0	\$26,914	\$173,086
Dubuque	\$35,753	\$35,753	\$0	\$35,753	\$0
Fremont County	\$200,000	\$200,000	\$0	\$185,949	\$14,051
Howard County	\$225,000	\$225,000	\$0	\$185,000	\$40,000
IDALS	\$266,347	\$266,347	\$0	\$103,376	\$162,971
Iowa County	\$100,000	\$100,000	\$0	\$97,907	\$2,093
Iowa Department of Natural	\$576,000	\$576,000	\$0	\$404,034	\$171,966
Iowa Homeland Security &	\$1,827,352	\$1,827,352	\$0	\$1,025,854	\$801,498
Iowa State University	\$2,112,500	\$2,112,500	\$0	\$987,767	\$1,124,733
Johnson County	\$175,000	\$175,000	\$0	\$174,369	\$631
Mills County	\$200,000	\$200,000	\$0	\$186,008	\$13,992
University of Iowa	\$6,471,876	\$6,471,876	\$0	\$4,067,428	\$2,404,448
University of Northern Iowa	\$438,750	\$438,750	\$0	\$195,789	\$242,961
Winnebago County	\$200,000	\$200,000	\$0	\$165,000	\$35,000
TOTAL	\$96,887,177	\$96,887,177	\$0	\$32,218,591	\$64,668,586

*Includes claims in the paid and approved statuses

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HUD Obligations / Expended Amount

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Appendix C
2CFR 200 Requirement vs. State Policy Requirement

2 CFR 200 Reference	Requirement	State Policy Reference	Requirement
<p>2 CFR 200.317</p> <p>Procurement by States</p>	<p>When procuring property and services under a Federal award, a state must follow the same policies and procedures it uses for procurements from its non-Federal funds. The state will comply with §200.322 Procurement of recovered materials and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. All other non-Federal entities, including subrecipients of a state, will follow §§200.318 General procurement standards through 200.326 Contract provisions.</p>	<p>IAC 11.117.1(2) & 11.118.2(8A)</p>	<p>The department and agencies shall follow procurement policies regardless of the funding source supporting the procurement. However, when these rules prevent the state from obtaining and using a federal grant, these rules are suspended to the extent required to comply with the federal grant requirements.</p> <p>“IEDA” is the economic development authority created in 2011 Iowa Acts, House File 590. It is a public instrumentality and agency of the state exercising public and essential governmental functions and undertaking programs which implement economic development policy in the state. IEDA follows state procurement standards for goods and services. IEDA may procure goods up to \$50,000. Procurement of goods over \$50,000 is carried out by the Iowa Department of Administrative Services. Services are procured by IEDA. Procurement under \$5,000 is exempt from competitive bid. Procurement between \$5,000 to \$49,999 may be by informal or formal bid process. Procurement of \$50,000 and greater is by formal bid.</p> <p>Iowa Department of Natural Resources (DNR), Iowa Department of Agriculture and Land Stewardship (IDALS), and Iowa Homeland Security and Emergency Management (HSEMD) are state agencies and follow the state’s procurement policy as interpreted by their respective agencies.</p> <p>Iowa State University (ISU), University of Iowa (UI), and University of Northern Iowa (UNI) are considered state agencies and are governed by the Board of Regents, State of Iowa. Purchasing authority is delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds</p>
<p>2 CFR 200.322</p>	<p>A non-Federal entity that is a state agency or agency of a political subdivision of a state and</p>	<p>IAC 11.117.12(2)</p>	<p>"Recycled content and products. When appropriate, specifications shall include requirements for the use of recovered materials and products. The</p>

Procurement of recovered materials	its contractors must comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.		specifications shall require, at a minimum that all responses to a solicitation include a product content statement that describes the percentage of the content of the item that is reclaimed material. The department shall revise specifications developed by agencies if the specifications restrict the use of alternative materials, exclude recovered materials, or require performance standards that exclude products containing recovered materials unless the agency seeking the product can document that the use of recovered materials will impede the intended use of the product. Specifications shall support the following procurements: a. Products containing recovered materials, including but not limited to lubricating oils, retread tires, building insulation materials, and recovered materials from waste tires. b. Bio-based hydraulic fluids, greases, and other industrial lubricants manufactured from soybeans in accordance with Iowa Code section 8A.316."
2 CFR 200.326 Appendix II to Part 200 (A)	Contracts for more than the simplified acquisition threshold currently set at \$150,000, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.	IAC 11.119.4(8,8 A)	IEDA contracts addresses through Compliance with the Law and Miscellaneous Contract Administration provisions. DNR, IDALS, and HSEMD follow the state's policies as interpreted by their respective agencies. ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.
2 CFR 200.326 Appendix II to Part 200 (B)	All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.	IAC 11.119.4(4)	IEDA contracts address through Termination clause(s) provisions. DNR, IDALS, and HSEMD follow the state's policies as interpreted by their respective agencies. ISU, UI, and UNI follow purchasing authority as delegated from the Board of

			Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.
2 CFR 200.326 Appendix II to Part 200 (C)	Equal Employment Opportunity. Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."	IAC11.121.1; 216 and; section 19B.7	<p>IEDA contracts address through Compliance with EE0/AA Provisions.</p> <p>DNR, IDALS, and HSEMD follow the state's policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds</p>
2 CFR 200.326 Appendix II to Part 200 (D)	Davis-Bacon Act, as amended (40 U.S.C. 3141-3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141-3144, and 3146-3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction		<p>IEDA will not be awarding construction contracts. However, IEDA includes Davis-Bacon Act provisions in an attachment for Additional Requirements for Federally-funded Agreements in all agreements.</p> <p>DNR, IDALS, and HSEMD will not be awarding construction contracts. They follow the state's policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI will not be awarding construction contracts. They follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.</p>
2 CFR 200.326	Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in		IEDA will not be awarding contracts in excess of \$100,000 that involve the employment of mechanics or laborers and compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part

Appendix II to Part 200 (E)	excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5).		<p>5). However IEDA includes Fair Labor Standards Act (29 U.S.C. 201 et seq.) and implementing regulations provisions in an attachment for Additional Requirements for Federally-funded Agreements in all agreements.</p> <p>DNR, IDALS, and HSEMD will not be awarding contracts in excess of \$100,000 that involve the employment of mechanics or laborers. They follow the state’s policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI will not be awarding contracts in excess of \$100,000 that involve the employment of mechanics or laborers. They follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds</p>
2 CFR 200.326 Appendix II to Part 200 (F)	Rights to Inventions Made Under a Contract or Agreement. If the Federal award meets the definition of “funding agreement” under 37 CFR §401.2 (a) and the recipient or subrecipient wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that “funding agreement,” the recipient or subrecipient must comply with the requirements of 37 CFR Part 401, “Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements,” and any implementing regulations issued by the awarding agency.		<p>IEDA contracts address through Federal Government Rights in an attachment for Additional Requirements for Federally-funded Agreements.</p> <p>DNR, IDALS, and HSEMD follow the state’s policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.</p>
2 CFR 200.326 Appendix II to Part 200 (G)	Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all		<p>IEDA does not anticipate itself awarding of procurement contracts excess of \$150,000. However, IEDA includes Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended in an attachment for Additional Requirements for Federally-funded Agreements in all agreements</p>

	applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401-7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251-1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).		DNR, IDALS, and HSEMD follow the state's policies as interpreted by their respective agencies. ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.
2 CFR 200.326 Appendix II to Part 200 (H)	Mandatory standards and policies relating to energy efficiency which are contained in the state energy conservation plan issued in compliance with the Energy Policy and Conservation Act (42 U.S.C. 6201).		Currently the State of Iowa does not have a state energy plan. However, the state is in process of developing a state energy plan. Once the plan has been adopted and implemented by the state IEDA will develop appropriate language as applicable. DNR, IDALS, and HSEMD follow the state's policies as interpreted by their respective agencies. ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.
2 CFR 200.326 Appendix II to Part 200 (I)	Debarment and Suspension (Executive Orders 12549 and 12689)—A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.	IAC 117.18(8A)	IEDA: Formal Request for Proposals bidders are required to sign a certification the contractor nor any of its principals: (a) are presently or have been debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by a Federal Agency or State Agency; (b) have within a three year period preceding this Proposal been convicted of, or had a civil judgment rendered against them for commission of fraud, a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction, violation of antitrust statutes; commission of embezzlement, theft, forgery, falsification or destruction of records, making false statements, or receiving stolen property; (c) are presently indicted for or criminally or civilly charged by a government entity (federal, state, or local) with the commission of any of the offenses enumerated in (b) of this certification; and (d) have not within a three year period preceding this Proposal had one or more public transactions (federal, state, or local) terminated for cause. In addition contracts address through Use of Debarred,

			<p>Suspended, or Ineligible Contractors or Recipients in an attachment for Additional Requirements for Federally-funded Agreements.</p> <p>DNR, IDALS, and HSEMD follow the state’s policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.</p>
<p>2 CFR 200.326</p> <p>Appendix II to Part 200 (I)</p>	<p>Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.</p>		<p>IEDA contracts address through Certification Regarding Government-Wide Restriction on Lobbying in an attachment for Additional Requirements for Federally-funded Agreements.</p> <p>DNR, IDALS, and HSEMD follow the state’s policies as interpreted by their respective agencies.</p> <p>ISU, UI, and UNI follow purchasing authority as delegated from the Board of Regents through the Universities in accordance with the statutes and administrative rules of the State of Iowa and the procedures of the Board of Regents. All University purchases are made in accordance with University Policy, regardless of source of funds.</p>

Sample Document: PROCUREMENT CHECKLIST

Description: This document is provided for Community Development Block Grant Disaster Recovery (CDBG-DR) grantees looking for an example of a procurement checklist.

Source of Document: This document was excerpted from an actual Procurement Checklist used by the [City of XXX], ND for its CDBG-DR funded flood recovery program. This document is not an official HUD document and has not been reviewed by HUD counsel. It is provided for informational purposes only.

How to use this document: Chapter 3 of the CDBG-DR Procurement Toolkit addresses the pricing, executing and awarding contracts and Chapter 5 lays out a Road Map for the general procurement process. This checklist can be used for a variety of the purchasing methods, including Small Purchase, Sealed Bids, Competitive Bids and Non-Competitive Bids.

The regulations concerning competitive bids for all non-State grantees and for State's that have elected to follow 2 CFR Part 200 procurement regulations, specifically 2 CFR 200.318 through 200.326.

How to use this example: A grantee could use this checklist as a guide to the steps in different types of contract award and execution.

For More Information

This resource is part of the *Community Development Block Grant Disaster Recovery (CDBG-DR) Toolkits*. View all of the Disaster Recovery Toolkits here: <https://www.hudexchange.info/programs/cdbg-dr/toolkits/>.

Community Development Block Grant Disaster Recovery (CDBG-DR) Toolkits are designed to provide general guidance across all types of disasters (e.g. hurricanes, floods; tornadoes; earthquakes; etc.). CDBG-DR Toolkits are NOT disaster specific. CDBG-DR grant funding for a disaster or group of disasters is governed by CDBG requirements and any modifications contained in one or more Federal Register Notices (FRN) applicable to the disaster. Grantees subject to the Disaster Relief Appropriations Act of 2013 (Public Law 113-2) should review all footnotes for additional applicable citations and guidance. In addition to the FRN, Toolkit users should review applicable Federal cross-cutting requirements. The FRN, as well as cross-cutting requirements, are available on the Department's website.

For additional information about disaster recovery programs, please see your HUD representative.

Project Title _____
[City of XXX] Project # _____
Grant Name and Number _____
Type of Solicitation Advertisements for Bids
 RFP RFQ
Approved By: _____
Reviewed By: _____

Procurement Checklist

This document must be utilized for all Federal procurement and is the responsibility of the department head, engineer, or program administrator. This checklist provides guidance on Federal procurement regulations. It does not address all procurement issues the City of [INSERT NAME] may experience. Use of the checklist provides a tool to cover most requirements experienced within Federal procurement. Please note each agency has different requirements and the responsibility will fall upon the official conducting the procurement to obtain individual grant requirements before soliciting. The Finance Department will maintain a project file and will need all pertinent documentation and a copy of this checklist forwarded (electronically if possible) upon execution of an award or modification. The Internal Auditors and/or Accountants will review this document during the life of the project to ensure all requirements are being completed and documented appropriately.

Pre Solicitation- Responsibility of Engineer and/or Department Head and Program Administrator if applicable.	
<input type="checkbox"/>	<p>Independent Cost Estimate (must be completed before bids are opened) --The City of [INSERT NAME] must perform a cost or price analysis for every procurement action, including contract modifications. The engineer's cost estimate will meet this requirement for formal sealed bids. This must be a detailed cost breakdown for the overall estimate providing the elements, such as labor and materials, of the total cost. Cost estimates must be documented and placed in the applicable procurement folder. Any e-mails and/or written documentation concerning cost estimates should be retained in the procurement folder. (See next line and section below regarding architects or engineers (A/E) or professional services procurement.)</p>
<input type="checkbox"/>	<p>A cost analysis and documentation is required for a RFQ or RFP (competitive negotiations). Cost analyses are used when there is no price competition or when price competition is not the only evaluation factor, such as in procuring A/E, professional, consulting, or program administrator services. A cost analysis must be completed before awarding the contract and placed in the procurement file. Cost analysis is the evaluation of separate elements (e.g. labor, materials, etc.) that make up a contractor's total cost proposal or price to determine if they are allowable, directly related to the project and ultimately, reasonable. To prepare a cost analysis 1) Obtain a detailed breakdown of the contractor's proposed cost and verify the accuracy of the cost and pricing information submitted and evaluate. An analysis contains the following elements: 1) Is the cost reasonable, which means is it allowable under the grant; is it allocable (are costs logically related to, or required in the performance of the contract); and is the cost reasonable? 2) Is the cost necessary? 3) Compare costs proposed by the offeror with actual costs previously incurred by the same contractor for the same or similar work; compare costs of the same or similar work performed by other contractors; compare previous costs estimates from the offeror or other offerors for the same or similar items; compare the methods proposed by the offeror with the requirements of the solicitation; compare with the City's cost estimate prepared with the City Fee Schedule.</p>

<input type="checkbox"/>	Are there any potential conflicts of interest? A conflict of interest could arise if the employee, officer or agent; any member of his/her immediate family; his/her partner; or an organization which employs or is about to employ any of the above, has a financial or other interest in the firm selected for award. Document to the right if no conflict exists with a description of how this was determined. If a conflict of interest was found, include the determination and resolution of the investigation to the right.	
<input type="checkbox"/>	Were prospective respondents allowed a reasonable amount of time to respond? Sealed bids are to be advertised for XX consecutive weeks with the first advertisement being XX days before the date of the opening of bids.	
<input type="checkbox"/>	Does solicitation contain a clear and accurate description of the technical requirements for the material, product or services, and scope of work (SOW)?	
<input type="checkbox"/>	Specifications and solicitation must not contain features that unduly restrict competition such as unreasonable or unnecessary experience or bonding requirements. A "brand name or equal" description may be used to define the performance or other important requirements of the procurement such as procurement of equipment to integrate with a particular brand of equipment.	
For competitive negotiation (Request for Proposal (RFP) or Request for Qualifications (RFQ)) such as for architectural or engineering (A/E) or program administrator (PA) contracts; are the below requirements contained in the solicitation?		
<input type="checkbox"/>	Were proposals solicited from an adequate number of qualified sources, and was the solicitation adequately publicized to achieve sufficient competition? Per Must solicit proposals from at least three qualified sources.	
<input type="checkbox"/>	Does the RFP or RFQ contain a detailed list of tasks in the proposed scope of work expected to be accomplished?	
<input type="checkbox"/>	Did the solicitation identify all significant evaluation factors or selection criteria, including the corresponding point system to be used to rate the proposals/qualification statements? These factors include past performance, the ability of professional personnel, willingness to meet time and budget requirements if applicable, related experience on similar projects, and recent and current work for the City.	
<input type="checkbox"/>	Is this a solicitation for architectural/engineering (A/E) professional services? A/E professional services must be solicited with a RFQ. The method where price is not used as a selection factor, can only be used in procurement of A/E professional services.	
<input type="checkbox"/>	If this is not a solicitation for A/E professional services, does the RFP contain cost as an evaluation factor? Request for proposals for services other than A/E, shall always include cost and at least one non-cost qualitative evaluation factor such as experience with like projects	
<input type="checkbox"/>	Document the City of [INSERT NAME's] efforts in hiring minority-owned business enterprises and women-owned business enterprises in this solicitation.	
<input type="checkbox"/>	Solicitation requirements obtained from the grant originator and incorporated into the solicitation and included in the bid requirements. Each funding agency could have differing clauses to be included in solicitations and contracts. Please check with the grant originator to obtain requirements.	
The below items are required by the City of [INSERT NAME'S] Federal Grant Procurement Policy and must be included in solicitations with clauses included in the bid requirements.		
<input type="checkbox"/>	Notice of use of funding agency funds.	
<input type="checkbox"/>	Davis Bacon labor requirements. Applicable for construction projects > \$2,000.	
<input type="checkbox"/>	Section 3 clause, if funded by the Department of Housing and Urban Development (HUD). The Section 3 program requires recipients of certain HUD financial assistance, to the greatest extent possible, provide job training, employment, and contract opportunities for low- or very-low income residents in connection with projects and activities in their neighborhoods.	
<input type="checkbox"/>	Nondiscrimination, affirmative action, and equal employment opportunity in employment.	

<input type="checkbox"/>	Scope of work	
<input type="checkbox"/>	Requirement of affirmative efforts to hire women business enterprises and minority business enterprises.	
<input type="checkbox"/>	Debarment certification	
	Bid, RFP, or RFQ Documents--Responsibility of the Engineer, Department Head, or Program Administrator	
<input type="checkbox"/>	Solicitation (Advertisement for Bids, RFP, or RFQ). Include a copy of the newspaper advertisement in the file plus the solicitation included in the bid documents.	
<input type="checkbox"/>	If a construction contract > \$2,000, was a wage rate included in the bid documents?	
<input type="checkbox"/>	Was the rate checked 10 days before bid date? Document this by printing the 1st page of the wage rate with the date checked on the bottom of the web-page. If no change was made hand write on the page and place in the file.	
<input type="checkbox"/>	If the rate changed was it updated by addendum sent to all holders of the bid documents? This is documented by the addendum to be placed in the file.	
<input type="checkbox"/>	List of proposed bidders and suppliers receiving copies of the bid documents if available.	
<input type="checkbox"/>	Are there adequate number of responses documented? Three (3) for small purchase and competitive negotiation (RFP or RFQ).	
<input type="checkbox"/>	CAUTION! When only one bid is received in response to a competitive bid solicitation, you do not have price competition. If you decide to award on the basis of a single submitted bid price, without negotiation, you must: 1) justify the price is fair and reasonable; 2)compare the bid price to your own in-house estimate or engineers estimate and past prices paid for the same or substantially similar item(s) in the past; 3)obtain information from the marketplace; 4) obtain a complete cost breakdown; 5) perform a cost analysis of the proposed price and ; 6) document the rationale for the award decision and place in the procurement file.	
<input type="checkbox"/>	Copy of all bid proposals included in the file.	
<input type="checkbox"/>	Notes from Pre-Bid Conference(s) if held, included in the file.	
<input type="checkbox"/>	Did the bid response include a 5% bid bond if for a construction or facilities improvement project?	
<input type="checkbox"/>	Record of respondents rejected as not responsible or not responsive and rejection reasoning documented in the file.	
<input type="checkbox"/>	A price analysis is required for every sealed bid procurement. The tabulations of bids with date and time of bid opening notated; along with any evaluations of the proposals documented will meet this requirement. Price analysis is essentially price comparison. It is the evaluation of a proposed price (i.e., lump sum) without analyzing any of the separate cost elements it is composed of. Price analyses are used to compare lump sum prices (not estimates) received from contractors in a competitive pricing situation (when sealed bids are obtained).	
<input type="checkbox"/>	Were there any disputes regarding the procurement?	
<input type="checkbox"/>	Were the disputes handled, resolved, and disclosed?	
<input type="checkbox"/>	Was a protest appropriately filed?	
<input type="checkbox"/>	Did the City of [INSERT NAME] disclose information regarding the protest to the awarding agency?	
<input type="checkbox"/>	Were all protest requirements met by the City of [INSERT NAME]?	
<input type="checkbox"/>	Was the protest resolved within X days after filing?	
<input type="checkbox"/>	Documentation of reason for rejecting any and or all bids must be kept in the procurement file.	
<input type="checkbox"/>	Were any bids or offers rejected or otherwise excluded from the competitive range notified promptly in writing by the procurement officer. The notice shall state the basis for the determination and a proposal revision will not be considered.	
<input type="checkbox"/>	If the procurement was a competitive negotiation, were unsuccessful offerors notified in writing within ten working days of contract award with the protest and debriefing	

	procedures sent with the notification. (City of [INSERT NAME] current procedure is to include an award of bid notice with the items for the Mayor to sign. After the Mayor signs the form, the respective departments are given the bid notice to be sent out the unsuccessful bidders.)	
	Contract/Agreement Documents--Responsibility of the Engineer, Department Head, and Program Administrator.	
<input type="checkbox"/>	Has the contractor's debarment check been completed before recommendations are made to Committee to award the contract? This will be completed by accessing the System for Award Management (SAM) Web site at https://www.sam.gov , search records. The printed page from the SAM Web site with the date of the check must be included in the procurement file.	
<input type="checkbox"/>	If the contractor has been found to be suspended, debarred, proposed for debarment, or declared ineligible as of the bid opening date was the contractor's bid rejected, and the next lowest eligible bidder checked for debarment?	
<input type="checkbox"/>	Is there a notice of contract award included in the file?	
<input type="checkbox"/>	Award--does the award document (contract or agreement) contain the below required clauses?	
<input type="checkbox"/>	Breach of contract terms including administrative, contractual, or legal remedies when contractors violate or breach contract terms, and providing such sanctions and penalties as may be appropriate?	
<input type="checkbox"/>	Termination for cause and for convenience by the City of [INSERT NAME]? (Contracts > \$10,000)	
<input type="checkbox"/>	Compliance with Executive Order 11246, Equal Employment Opportunity? (All construction contracts and subcontracts > \$10,000)	
<input type="checkbox"/>	Compliance with Copeland "Anti-Kick-Back" Act? (All construction contracts and subcontracts > \$10,000)	
<input type="checkbox"/>	Compliance with the Davis-Bacon Act? (All construction or repair contracts or subcontracts > \$2,000)	
<input type="checkbox"/>	Was the correct wage rate included in the agreement documents?	
<input type="checkbox"/>	Compliance with Sections 103 and 107 of the Contract Work Hours and Safety Standards Act. (All construction or repair contracts or subcontracts > \$2,000, and > \$2,500 for other contracts which involve the employment of mechanics or laborers.) Procurement Policy Page 10 (vi)	
<input type="checkbox"/>	Notice of the awarding agency requirements and regulations pertaining to reporting. (All contracts.)	
<input type="checkbox"/>	Notice of the City of [INSERT NAME] and awarding agencies requirements and regulations pertaining to patent rights, copyrights, and rights in data? (All contracts.)	
<input type="checkbox"/>	Access to any books, documents, papers, or records of the project by the City of [INSERT NAME], Federal agencies, and the Comptroller General of the United States?	
<input type="checkbox"/>	Records must be maintained for five years after the City of XXXX formally closes out each program? Records Management Schedule found on the City of [INSERT NAME'S] Web site.	
<input type="checkbox"/>	Compliance with the Clean Air Act, Clean Water Act, and EPA regulations. (All contracts, subcontracts, and sub grants in amounts > \$10,000)	
<input type="checkbox"/>	Recognition of mandatory standards and policies relating to energy efficiency contained in the State Energy Conservation Plan?	
<input type="checkbox"/>	Does the contract contain a clause allowing the City of [INSERT NAME] and Federal Agencies to be permitted to require changes, remedies, changed conditions, access and record retention, and suspension of work clauses approved by the governing body?	
<input type="checkbox"/>	If the procurement was a competitive negotiation, where price is not the only factor, was a cost ceiling clearly established in the contract which may not be exceeded without a contract modification?	
<input type="checkbox"/>	If the procurement was a competitive sealed bid procurement, was a firm fixed price contract (either lump sum or unit price) awarded to the responsible bidder whose bid is	

	lowest in price and conforms to all the material terms and conditions of the advertisement for bids.	
<input type="checkbox"/>	If the contract was not awarded to the lowest bidder in the case of a competitive sealed bid procurement, was a justification for awarding included in the file with the approval of the Committee and Council? Include the minutes from the Council meeting.	
<input type="checkbox"/>	Prohibited contracts--Agreements and/or contracts must not contain "cost plus percentage of cost" and "percentage of construction costs" pricing structures.	
<input type="checkbox"/>	Contractor Section 3 Plan with applicable tables must be included in the procurement file for HUD funded projects. 24 CFR 135	
<input type="checkbox"/>	List of subcontractors must be included for the procurement file. Per contract requirements	
<input type="checkbox"/>	The general contractor is responsible for checking debarment of their subcontractors. This clause is usually found in the General Conditions from the Bid Documents, which are usually part of the contract documents.	
<input type="checkbox"/>	Subcontractors must be required to adhere to the requirements pertinent to the funding agency and type of agreement. For example, the contractor must include requirements in subcontractor agreements such as affirmative action, Section 3, and equal opportunity. General Conditions of the Bid Documents	
<input type="checkbox"/>	Performance bond for 100% of the contract if required, must be included in the file.	
<input type="checkbox"/>	Payment bond for 100% of the contract if required, must be included in the file.	
<input type="checkbox"/>	Insurance certificates in the amount required in the bid documents must be included in the file. Per contract documents	
Contract/Agreement Execution		
<input type="checkbox"/>	Is the contract/agreement signed and dated by both parties? The contract/agreement must be signed after the council's approval. Documentation of council's approval must be kept in the file.	
<input type="checkbox"/>	Is the proper date placed on the contractual document after it is signed by the Mayor?	
<input type="checkbox"/>	Is the proper date contained within the actual contractual document, if the document contains this language?	
Change Orders, Amendments, or Modifications To Agreements--Responsibility of Engineer, Department Heads, or Program Administrator		
<input type="checkbox"/>	Is there a copy of each approved change order placed in the procurement file?	
<input type="checkbox"/>	Change orders are normally not approved by City Council or signed by the Mayor. At times amendments and modifications are sent to Council for approval and to the Mayor for signature. If this is the case, the Council must approve before the Mayor signs the documents. Include the Committee and Council minutes to document approval before signature.	
<input type="checkbox"/>	Is the proper date placed on the change order, amendment, or modification after it is signed by the approving official?	
<input type="checkbox"/>	Is the proper date contained within the actual change order, amendment, or modification documents, if the document contains this language?	
<input type="checkbox"/>	Justification for the change order (why is it necessary after the bidding process) with explanation of how the change order relates to the original scope of the contract and to the National Objective (if a HUD project) for the project must be prepared and kept in the file.	
<input type="checkbox"/>	Cost analyses for change orders must be completed and placed in the procurement file. To complete a cost analysis 1) obtain a detailed breakdown of the contractor's proposed cost; 2) verify the accuracy of the cost and pricing information submitted; 3) evaluate the reasonableness of proposed costs by ensuring they meet these three critical tests: are the costs allowable, are the costs allocable (are they logically related to or required in the performance of the contract), are the costs reasonable; 4) are the costs necessary and justifiable to the CDBG-DR activity (should be evaluated by the engineers or other technical personnel) 5) Compare costs with: a. actual costs previously incurred by the same contractor for the same or similar work; b. actual costs of previous of the same or similar work by other contractors; c. previous cost estimates from the offeror or other	

	offerors for same or similar items; d. do the costs reflect the technical approach proposed and the work required? and e. compare to the cost estimate from the engineer, or staff. Copies of subsequent modified cost estimates must be kept with the original with some explanation why they changed it after the bid process. Keep documentation of cost estimates, comparisons, and worksheets to attach to the cost analysis as backup.	
	Additional Funding Agency Requirements--Responsibility of Engineer, Department Heads, or Program Administrators--List Below	
<input type="checkbox"/>		
<input type="checkbox"/>		
<input type="checkbox"/>		
	Miscellaneous Correspondence - list below	
<input type="checkbox"/>		
<input type="checkbox"/>		
	Project Completion--Responsibility of Engineer, Department Heads, or Program Administrator	
<input type="checkbox"/>	Council approval of final billing and closure of the project including memo to committee.	
<input type="checkbox"/>	Contractor final lien waivers. City of [INSERT NAME] requirement	
<input type="checkbox"/>	Subcontractor final lien waivers. City of [INSERT NAME] requirement	

Appendix D

Infrastructure DOB Process

The DOB iowagrants.gov compliance form should be completed prior to commencing construction.

While the DOB will be completed once per infrastructure contract, the **Intent to Obligate Construction Funds** form should be completed by the City and uploaded in the Wage Rate compliance form in iowagrants.gov prior to each bidding, and processed prior to construction commencing.

1. The Grant Administrator should initiate and submit a DOB compliance form in iowagrants.gov with signed Affirmation of Duplication of Benefits and Subrogation & Assignment form.
2. IEDA Project Manager will enter "Total Need Prior to Assistance" into the already submitted DOB form using the total need demonstrated by the NDR application.
3. Project Manager coordinates with IEDA DOB Administrator to ensure form is completed.
4. IEDA DOB Administrator and IEDA Project Manager review the DOB information to conduct DOB verification.

DOB form in Iowa Grants:

FEMA - no funds were provided, IEDA will upload letter from HSEMD

INS - *not applicable*

Direct Leverage - Coralville: \$611,600 (amount from budget in Iowa Grants)
Dubuque: \$21,600,000 (amount from budget in Iowa Grants)
Storm Lake: \$1,777,500 & \$380,750 (amount from budget in Iowa Grants)

Other Sources - if applicable, IEDA will verify with source

Calculation of Award:

Total Need Prior to Assistance:	\$0	<i>Engineering Estimate of Need (amount found in NDR Application)</i>
<u>minus</u> Duplication of Benefits:	\$0	<i>FEMA, SRF, INS, DL & other sources</i>
Remaining Unmet Need:	\$0	<i>Total Need <u>minus</u> DOB's</i>

Maximum Award Amount:	\$0	<i>NDR Award Amount</i> *Award must be less than or equal to Remaining Unmet Need
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Watershed DOB Process

The DOB iowagrants.gov compliance form should be completed prior to each construction contract bid letting, however must to be processed prior to commencing construction.

Prior to starting the DOB, the **Intent to Obligate Construction Funds** form should be completed by the County and uploaded in the Wage Rate compliance form in iowagrants.gov prior to bidding, and processed prior to construction commencing.

1. At the same time the Grant Administrator submits a wage rate compliance form with the Intent to Obligate Funds form in iowagrants.gov they should initiate and submit a DOB compliance form in iowagrants.gov with signed Affirmation of Duplication of Benefits and Subrogation & Assignment form (be sure to title both the wage rate form and the DOB form in a way that they are easily associated).
2. IEDA Labor Standards Administrator reviews and approves the wage rate form. If the form is submitted without Intent to Obligate, it will be sent back to correcting status until form is uploaded and approvable.
3. IEDA Labor Standards Administrator notifies Project Manager of wage rate approval.
4. Once wage rate is approved IEDA Project Manager will enter amount for the "Total Need Prior to Assistance" into the already submitted DOB form, based off the flood center email and updated as need diminishes.
5. Project Manager coordinates with IEDA DOB Administrator to ensure form is completed.
6. IEDA DOB Administrator and IEDA Project Manager review the DOB information to conduct DOB verification.

DOB form in Iowa Grants:

FEMA - IEDA will upload email from HSEMD

SRF - IEDA will upload email

INS - *not applicable*

EQUIP - *not applicable - counties are not eligible to receive assistance*

WQI - IEDA will upload email

Landowners - recipient will list any funds landowner has received (may include EQUIP funds)

Other Sources - if applicable, IEDA will verify with source

Calculation of Award:

Total Need Prior to Assistance:	\$0	<i>Amount from Flood Center (IEDA will upload email)</i>
<u>minus</u> Duplication of Benefits:	\$0	<i>FEMA, SRF, WIRB, Landowner & other sources</i>
Remaining Unmet Need:	\$0	<i>Total Need <u>minus</u> DOB's</i>
Maximum Award Amount:	\$0	<i>NDR Award Amount (IEDA enters the total dollar amount awarded to the design and construction line item [Activity 173] in the County's NDR contract) This amount is the same on all watershed DOBs for that NDR contract and is not cumulative or summative.</i>

***Award must be less than or equal to Remaining Unmet Need**

***NOTE:** The Total Need on subsequent DOB forms will equal the Remaining Unmet Need calculated on the first DOB form.

NATIONAL DISASTER RECOVERY PROJECT INTENT TO OBLIGATE CONSTRUCTION FUNDS
(To be provided prior to bidding a construction project)

National Disaster Resilience Competition Grant Requirements state the following (per page 36563 of FR Vol. 81, No. 109):

(8) Design. This notice amends the NOFA to clarify that prior to the Grantee's obligation of funds for construction, the Grantee will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Grantee for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards.

Per the terms of a contract amendment between Iowa Economic Development Authority and the Recipient, the following contract clause must be met:

(k) DESIGN. Prior to the Recipient's obligation of funds for construction, the Recipient will demonstrate that the engineering design for a Project is feasible, prior to obligation of funds by the Recipient for construction. This demonstration is satisfied if a registered professional engineer (or other design professional) certifies that the design meets the appropriate code or industry design and construction standards (as applicable)."

I certify that I have read the above requirements, reviewed the plans and specifications for the construction project(s) listed below, and confirm that the project(s) are found to feasible based on the engineering design completed.

Construction Project Name(s)/Description: _____

Date Design Completed: _____ Estimated Bid Date: _____

Engineers Estimate of Funds to be Obligated: _____

Engineering Review and Signature

Name of Design Engineer: _____ Organization: _____

Print Name: _____ Title: _____

Signature: _____ Date: _____

Local Official Review and Signature

Name of Authorized Official: _____ Organization: _____

Print Name: _____ Title: _____

Signature: _____ Date: _____

(Must be on City Letterhead)

**Affirmation of Duplication
of Benefits and Subrogation & Assignment
For National Disaster Resiliency
Infrastructure/Watershed CDBG Grant Project**

Iowa Economic Development Authority
Infrastructure/Watershed NDR Program
200 East Grand Ave
Des Moines, IA 50309

RE: Contract Number(s): _____

Recipient: (City, County): _____

The undersigned represents an administrative entity that receives disaster recovery grant funds from the Iowa Economic Development Authority under contract(s) described above.

The grant recipient (City/County) indicated above hereby affirms that no additional sources or amounts of matching funds beyond those indicated have been obtained or will be utilized for the project(s) indicated.

Additional funding sources would include any and all federal, state or local public or private sources of grants or loans, or insurance coverage.

The grant recipient (City/County) indicated above hereby affirms that the funded project is not part of its capital improvement budget as of the date of the disaster.

In the event there are subsequent proceeds in excess of the need amount, the City/County shall remit the full amount of additional funds available for the same purpose, to IEDA.

By signing below, I hereby certify that the above information given is true and correct as to the best of my knowledge.

Recipient:

CEO or Authorized Signatory

Date

Return to: INF: Joseph Bohlke at the above noted IEDA address.
WS: Jeff Geerts at the above noted IEDA address.

DBQ-NDR HOUSING REPAIR/REHAB DOB PROCESS MANUAL

Unit or Responsible Personnel: IEDA DOB Coordinator, City of Dubuque

CDBG-NDR

Step 1:

- ❖ The City of Dubuque will determine an applicant is eligible and obtain documentation of need, a Consent and Release Form, Subrogation Agreement and an Insurance Affidavit.

Step 2:

- ❖ The City of Dubuque will fill out the Iowa Grants DOB form and upload the following signed documents for each applicant – see Table 1. If the City has not yet obtained the bid document, do not fill out the *bid amount* field at this time.
 - **PLEASE NOTE:** If the applicant did not own the home at the time of the disaster, do not fill out the fill out the *flood insurance, home insurance, SBA and additional funds* sections.
 - Inspectors Estimate
 - Estimate of total rehab costs to bring the property in compliance with local housing standards.
 - Subrogation of Assignment Agreement
 - Signed by the applicant(s), this form states that the applicant agrees to cooperate with the distributor of funds should funds need to be returned.
 - Consent and Release Form
 - Signed by the applicant(s), this form authorizes IEDA to request, access, review, disclose, release and share any and all information received with respect to the applicant's application. This form does not need to be signed by a notary public.
 - Insurance and Other Funds Sources Affidavit
 - Signed by the applicant(s), this form is used to report any insurance policies held by the applicant during the time of the disaster. If the applicant held an active policy at the time of the disasters, the Affidavit states that they are required to provide Insurance Declaration pages for their policy as well as any communication pertaining to claim information that they received.

Step 3:

- ❖ Once complete, the City will submit the DOB form so that IEDA is notified to begin the DOB check.

Step 4:

- ❖ The IEDA DOB Coordinator is notified that a DOB file has been submitted in Iowa Grants and can begin Step 5 of the DOB process. At this time, the DOB Coordinator will send the form back in "correcting" status.
 - Once the bid documentation has been received, the City will edit the form to add the "Bid Amount" under "Calculation of Bid/Award Amount" and upload the Selected Bid Document under Supporting Documentation below.

Table 1:

General Information

Use the drop down box to select the type of report that you want to submit. Then enter the period of time that the report will detail.

Status Report Status:*

Due Date: 

Status Report Type:*

Title

Report Period  
From Date To Date

Duplication of Benefits

Owner Name

Disaster Affected Address*

Was the applicant the owner of the property in July 2011?

If no, please enter the current documentation of need amount from the inspector's whole house estimate, as under "Supporting Documentation" below as the Documentation of Need/Inspector's Estimate of Total Need the form and send back to "editing" status. Once the bid documentation has been received, please edit this "Calculation of Bid/Award Amount" and upload the Selected Bid Document under Supporting Documentation

Calculation of Unmet Need

Current documentation of need
Inspector's Estimate of total rehab costs to bring the property in compliance with local housing standards.

Calculation of Bid/Award Amount

Bid Amount

Flood Insurance

Was Disaster-Affected Home covered by Flood Insurance?

If yes, name of insurance carrier:

Policy Number

Were any claims paid?

If a claim was paid, amount of claim:

Internal Use Only

IEDA Review 
Date Completed Comments

Verification Documentation No file chosen

Homeowners Insurance

Was Disaster-affected home covered by homeowners insurance?

If yes, name of insurance carrier:

Policy Number

Were any claims paid?

If a claim was paid, amount of claim:

Internal Use Only

IEDA Review 
Date Sent


Date Received

Comments

Verification Documentation No file chosen

SBA Assistance

Was disaster recovery assistance received from the SBA?

If yes, what is the amount of the loan?

If no, was an application submitted for an SBA loan?

If an applicant was submitted but no assistance was received, did the applicant decline the loan?

Approved amount of the loan?

If the loan was approved but not accepted, please explain why: (500 character max.)

IEDA Review 
Date Sent


Date Received

Comments

Verification Documentation No file chosen

Additional Funds

Was any additional funding provided for flood recovery?

If additional funding was received, what was the source of funding?

If additional funding was received, what was the amount of funding received?

Purpose of the additional funding: (500 character max.)

Internal Use Only

Add Funding IDEA Review Sent  
Date Sent Date Received Comments

Verification Documentation No file chosen

Supporting Documentation

Signed Insurance Affidavit No file chosen
[Dursky Test.txt](#)  Delete

Signed Consent and Release Form No file chosen
[Dursky Test2.txt](#)  Delete

Signed Subrogation Agreement No file chosen
[Dursky Test2.txt](#)  Delete

Documentation of Need/
Inspector's Estimate of Total Need No file chosen
[Dursky Test2.txt](#)  Delete

Selected Bid Documentation No file chosen

Step 5:

- 1) **A) Verify DOB form is filled out correctly**
 - DOB Coordinator will review the DOB form and the uploaded documents. If any information/documentation is missing or incomplete, DOB Coordinator will unlock the DOB file allowing Dubuque to make the necessary changes. Once complete, Dubuque will re-submit the DOB file.

B) Identify/Verify sources of assistance

➤ NFIP Verification

- Log onto the NFIP Data Exchange by entering https://lookup.nfipstat.fema.gov/ibi_apps/WFServlet?IBIF_ex=DataExchange
 - One of two results will appear:
 - A text box containing a message stating no results were found. The applicant has no NFIP policy and therefore there is no DOB. This portion of the DOB verification process is complete, **OR**
 - A list of addresses matching the search criteria will appear. If the applicant doesn't appear in this list, they do not have an NFIP policy and therefore there is no DOB. This portion of the DOB verification process is complete.
 - If the applicant's address **does** appear, click 'CLM' under 'Detail Data'. This will give you a screen similar to the one below detailing the applicant's claim information. Focus on the section highlighted below, specifically the 'Bldg Paid', 'Cont Paid', and 'ICC Paid' fields. This will indicate how much, if anything, was paid to the applicant, as well as the purpose of funds. The 'ICC Paid' field can be disregarded; however, **if there is an amount listed under the Building ('Bldg Paid') or Contents ('Cont Paid') fields, it will be a potential DOB.**
 - Once information has been obtained, the DOB Coordinator will then compare that information against the purpose of the program in order to determine whether or not a Duplication of Benefits has occurred. Once this has been determined, document the results in the Iowa Grants.
-

➤ Homeowners Insurance Verification

- If the applicant **does** indicate there was a policy, the DOB coordinator must verify the information the applicant has provided with the insurance company they listed on the Affidavit.
 - Using all information provided by the applicant with the Affidavit, the DOB coordinator will complete a portion of a spreadsheet providing applicant details that will then be sent to the appropriate insurance company to be completed accordingly.
 - Once information has been obtained from the insurance company, the DOB Coordinator will then compare that information against the purpose of the program in order to determine whether or not a Duplication of Benefits has occurred. **If there is an amount listed under "Amount Paid (Structure)" and the source of damage is 'flood', it will be a potential DOB.** Once this has been determined, document the results in Iowa Grants.
-

➤ FEMA Verification

- HSEMD offered verification to IEDA that Federal Individual Assistance was not available to the City of Dubuque for major disaster declaration FEMA-4018-DR. See letter from HSEMD dated April 14, 2016.
 - HSEMD offered verification to IEDA that Federal Public assistance funding was not provided to the City of Dubuque for the same purpose as the funds to be provided by CDBG-NDR funding. See letter from HSEMD dated April 14, 2016.
-

➤ **SBA Verification**

2) ****Note- HUD does not require applicants to apply for SBA assistance as a prerequisite to receiving CDBG-NDR assistance.***

- Send an email to Jorge Villareal, Cynthia Steed and Sarra James at SBA with a short message inquiring whether the applicant received SBA assistance. Include homeowner's names and address.
- SBA will complete their review and send a response letting IEDA know whether applicants on the list have an approved SBA loan and identify applicants with SBA applications.
 - To obtain additional information on applicants with SBA applications, provide a copy of the Consent and Release form to SBA.
- Once information has been obtained, the DOB Coordinator will then compare that information against the purpose of the program in order to determine whether or not a Duplication of Benefits has occurred. **If SBA funds were provided for the purpose of rehabilitation for the severe storms and flash flooding in July 2011, it will be a potential DOB.** Once this has been determined, document the results in Iowa Grants.
- If an applicant has been approved for an SBA loan and voluntarily declines the assistance, the following steps should be taken. **Note- HUD will not require applicants who have applied for and been offered SBA assistance to accept the SBA assistance as a prerequisite to receiving CDBG-NDR assistance.*
 - Determine why the applicant declined the SBA loan offer. This information will be collected through the application process.
 - Demonstrate that providing CDBG-NDR assistance to the applicant is necessary and reasonable and establish why it is appropriate.
 - Describe what circumstances and/or facts, such as applicant's decision to decline the SBA loan, let the grantee to determine the CDBG-NDR support is a necessary and reasonable recovery expense.
 - *Acceptable*
 - *The total amount of need is greater than the approved loan amount from SBA.*
 - *Income has decreased (e.g. lost job); therefore, the applicant could not afford to take out a loan.*
 - *Similar circumstances that justify an unmet need. Will determine on a case by case basis.*
 - *Unacceptable*
 - *LMI household and therefore could not afford to take out a loan. SBA did underwriting (e.g. financials) to determine if the applicant could afford a loan.*
 - A Determination Form explaining why the award of CDBG-NDR assistance is necessary and reasonable must be uploaded to the applicants file.

Sample Determination Form

The [insert grantee name] has determined that the following reasons establish that the CBDG DR award to the applicant is necessary and reasonable given that the applicant declined a SBA loan offer: [insert circumstances or facts].		
Based on my review of [insert applicant name]'s file, I have determined that the award is necessary and reasonable as defined above:		<input type="checkbox"/> Yes <input type="checkbox"/> No
If no, provide an explanation: _____		
[insert name/title of grantee staff]	[insert signature]	[insert date]

➤ Additional Funds Verification

- If the applicant indicated that they did **not** receive any additional funding for the purpose of rehabbing their flood damaged home, then this portion of the DOB verification process is complete.
- If the applicant **does** indicate that there were additional funds received, the DOB coordinator must verify the information that the applicant has provided by contacting the source that is listed on the Affidavit.
 - Using all information provided by the applicant with the Affidavit, the DOB coordinator will contact the source in order to verify the amount of funding and the purpose of funding.
 - Once information has been obtained, the DOB Coordinator will then compare that information against the purpose of the program in order to determine whether or not a Duplication of Benefits has occurred. **If additional funds were provided for the purpose of rehabilitation for the severe storms and flash flooding in July 2011, it will be a potential DOB.** Once this has been determined, document the results in Iowa Grants.

Step 6:

A) Identify CDBG-NDR Need

- ***This step cannot be completed until the City has resubmitted the applicant's DOB file with the bid amount field filled out and the bid document uploaded.***
1. Housing Project Manager will review the inspectors estimate of total need submitted as part of the Section 106 review to determine eligible or non-eligible items. Items determined to be non-eligible will be subtracted from the estimate.
 2. DOB Coordinator will verify Section 106 has been approved in Iowa Grants. If not approved, contact Housing Project Manager.
 3. DOB Coordinator will verify that the amount entered in the Bid Amount field matches the amount show on the selected bid documentation uploaded to the Iowa Grants DOB form. If the Contractor Bid Document total does not match, DOB Coordinator will work with the Housing Project Manager to determine why (change to scope of work, etc.).

Step 7: Calculate the Award

Duplication of Benefits		Create New Version Mark as Complete
Owner Name	Joe Smith	
Disaster Affected Address*	188228-1000 E. Grand Ave.	
Was the applicant the owner of the property in July 2011?	If no, please enter the current documentation of need amount from the inspector's whole house estimate, and under "Supporting Documentation" below as the Documentation of Need/Inspector's Estimate of Total Need. Upload the form and send back to "editing" status. Once the bid documentation has been received, please edit this form to "Calculation of Bid/Award Amount" and upload the Selected Bid Document under Supporting Documentation below.	
Calculation of Unmet Need		
Current documentation of need	\$50,000.00	Inspector's Estimate of total rehab costs to bring the property in compliance with local housing standards.
Less DOB Deductions	\$13,250.00	Includes amount reimbursed for Flood Insurance, Homeowners Insurance, SBA Loan, and additional funding
Remaining Unmet Need	\$36,750.00	
Calculation of Bid/Award Amount		
Bid Amount	\$2,000.00	
Plus Additional actual need	\$1.00	As shown below in Modified Documentation of Need
Bid/Award Amount	\$2,001.00	

PLEASE NOTE: FEMA did not perform cost estimates for the homes to be rehabbed in Dubuque; therefore, there is no post-disaster estimate from 2011. For the purpose of Repair/Rehab, the *Current Documentation of Need* will be determined by the inspectors estimate of total rehab costs to bring the property in compliance with local housing standards.

Step 8: Issue Verification Form

- ❖ Once the review is completed, the DOB Coordinator will generate the DOB verification form which will state the Bid/Award Amount. This verification form will be a .pdf document generated from IEDA and uploaded to the submitted DOB form in lowagrants.gov. The DOB Coordinator will add all necessary review notes in the form and "Approve" the DOB form in the lowagrants.gov system.

Step 9: Inform City of Completion

- ❖ DOB Coordinator will email the City of Dubuque to inform them of the approval and that the verification form has been uploaded and is available for them to view in lowagrants.gov.

Verification Form:



C.D.B.G. Funding - IowaGrants.gov

Duplication of Benefit Verification

Report Criteria:

IEDA has approved CDBG-NDR funding for the following applicant under the Bee Branch Healthy Homes Resiliency Program. The remaining unmet need is based on current documentation of need. IEDA has conducted a Duplication of Benefits check based on the information provided on the Insurance and Other Funds Sources Affidavit. The amount of NDR funds spent on the property cannot exceed the bid/award amount as amended by any cost reasonable change orders.

<p>Applicant Identification</p> <p>Joe Smith 1000 E. Grand Ave. Dubuque, Iowa 50309</p> <p>Residential Multi-Family # of Units: 2 Inventory ID: 188228 Year Built: 1920</p>	<p>Form Information</p> <p>DOB Report: 13-test-001-02 Version: Approved Date: Submitted Date:</p>												
<p>Flood Insurance</p> <p>Disaster-affected property covered by flood insurance? Yes If yes, name of ins. carrier: Fidelity National Policy number: 4000013067 Were any claims paid? No If yes, amount of claim: \$0 IEDA Review Date: 02/13/2017</p>	<p>SBA Assistance</p> <p>Disaster recovery assistance received from SBA? Yes If yes, amount of the loan: \$10,000 If no, was an application submitted: Was the loan declined? Approved amount of loan: \$10,000 IEDA Review Date: 02/13/2017</p>												
<p>Homeowners Insurance</p> <p>Disaster-affected property covered by homeowners ins.? Yes If yes, name of ins. carrier: Cincinnati Policy number: NPP6003587 Were any claims paid? Yes If yes, amount of claim: \$2,500 IEDA Review Date: 02/13/2017</p>	<p>Additional Funds</p> <p>Any additional funding provided for flood recovery? Yes If yes, what was the source:: Project Concern Amount of funding received: \$750 IEDA Review Date: 02/13/2017</p>												
<p>Supporting Documentation</p> <p>Signed Insurance Affidavit: 02/01/2017 Signed Consent and Release Form: 02/01/2017 Signed Subrogation Agreement: 02/01/2017 Documentation of Need/Inspector's Estimate of Total Need: 02/01/2017 Selected Bid Documentation:</p>	<p>Calculations</p> <p>Calculation of Unmet Need</p> <table style="margin-left: 20px;"> <tr><td>Current documentation of need:</td><td style="text-align: right;">\$ 50,000</td></tr> <tr><td>Less DOB deductions:</td><td style="text-align: right;">- 13,250</td></tr> <tr><td>Remaining unmet need:</td><td style="text-align: right;"><u>\$ 36,750</u></td></tr> </table> <p>Calculation of Bid/Award Amount</p> <table style="margin-left: 20px;"> <tr><td>Bid Amount:</td><td style="text-align: right;">\$ 2,000</td></tr> <tr><td>Plus additional actual need:</td><td style="text-align: right;">+ 1</td></tr> <tr><td>Bid/Award Amount:</td><td style="text-align: right;"><u>\$ 2,001</u></td></tr> </table>	Current documentation of need:	\$ 50,000	Less DOB deductions:	- 13,250	Remaining unmet need:	<u>\$ 36,750</u>	Bid Amount:	\$ 2,000	Plus additional actual need:	+ 1	Bid/Award Amount:	<u>\$ 2,001</u>
Current documentation of need:	\$ 50,000												
Less DOB deductions:	- 13,250												
Remaining unmet need:	<u>\$ 36,750</u>												
Bid Amount:	\$ 2,000												
Plus additional actual need:	+ 1												
Bid/Award Amount:	<u>\$ 2,001</u>												

A Duplication of Benefits review was conducted for the above named applicant with the understanding that all IowaGrants data is correct and up-to-date. If the recipient is unsure of any data for this client, they should contact their CDBG-NDR Program Manager for further instructions.



STATE OF IOWA

TERRY E. BRANSTAD
GOVERNOR

KIM REYNOLDS
I.T. GOVERNOR

IOWA HOMELAND SECURITY AND
EMERGENCY MANAGEMENT DEPARTMENT
MARK J. SCHOLTEN, HOMELAND SECURITY ADVISOR
AND EMERGENCY MANAGEMENT DIRECTOR

April 14, 2016

Timothy Waddell
Administrator, Community Development Division
Iowa Economic Development Authority
200 East Grand Avenue
Des Moines, Iowa 50309

Dear Mr. Waddell,

A Presidential declaration of a major disaster for the State of Iowa (FEMA-4018-DR), dated August 30, 2011 provided Public Assistance funding to designated areas within the State.

Dubuque County of the State of Iowa was designated as adversely affected by this major disaster and was eligible for Public Assistance. This declaration did not provide Federal Individual Assistance funding.

Based on the facts above, Iowa Homeland Security and Emergency Management offers verification to Iowa Economic Development Authority that Federal Individual Assistance was not available to the City of Dubuque for major disaster declaration FEMA-4018-DR.

Sincerely,



Patrick J. Hall
Administrator - Recovery Division

Appendix E - Excerpts from Recipient Contracts

Recipient Record Keeping Requirements. Recipient Contract, Affirmative Covenants, Infrastructure Contract, Article 8.1(c), 8.1(d), Housing Contract, Article 9.1(c), 9.1(d).

(c) RECORDS. The Recipient shall maintain books, records, documents and other evidence pertaining to all costs and expenses incurred and revenues received under this Contract in sufficient detail to reflect all costs, direct and indirect, of labor, materials, equipment, supplies, services and other costs and expenses of whatever nature, for which payment is claimed under this Contract, including all costs of acquisition. The Recipient shall maintain all records of Tenant Income Verifications. The Recipient shall maintain books, records and documents in sufficient detail to demonstrate compliance with the Contract and shall maintain these materials for a period of five (5) years beyond the date upon which the final audit of the Project is accepted by IEDA or December 31, 2026, whichever is later. Records for non-expendable property acquired under this Contract shall be retained for a five (5) year period after the final disposition of property. Records shall be retained beyond the prescribed period if any litigation or audit is begun or if a claim is instituted involving the Grant or agreement covered by the records. In these instances, the records shall be retained until the litigation, audit or claim has been finally resolved.

(d) ACCESS TO RECORDS/INSPECTIONS. The Recipient shall, without prior notice and at any time, permit HUD or its representatives, the General Accounting Office or its representatives, and the Authority, its representatives or the State Auditor to examine, audit and/or copy (i) any plans and work details pertaining to the Project, (ii) all of the Recipient's books, records and accounts, and (iii) all other documentation or materials related to this Project; the Recipient shall provide proper facilities for making such examination and/or inspection.

Appendix F - Excerpts from Recipient Contracts

Recipient Audit Requirements, Attachment C – General Provisions, Audit Requirements

2.0 AUDIT REQUIREMENTS.

- (a) SINGLE AUDIT. The Recipient shall ensure that an audit is performed in accordance with the Single Audit Act Amendment of 1996; OMB 2 CFR part 200, subpart E; and OMB 2 CFR part 200, subpart F, as applicable, and the Iowa CDBG Management Guide.
- (b) ADDITIONAL AUDIT. As a condition of the grant to the Recipient, the Authority reserves the right to require the Recipient to submit to a post Project completion audit and review in addition to the audit required above.

Appendix G - Tie-Back to Disaster Summary

Partner Organization	Tie-Back to Disaster
University of Northern Iowa	This project supports decision making and proper implementation of tall prairie grass and other native plantings on lands directly impacting the MID-URN areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.
University of Iowa	<p>Advisory Board Meetings, Watershed Coordinator Training: The watershed coordinator training events will improve their ability to support the activities directly impacting the MID-URN areas.</p> <p>Hydrologic Assessment: It is a necessary first step in this project as it establishes existing conditions and hydrologic context to support the selection of the type and location of constructed projects in the MID-URN areas.</p> <p>Hydrologic Network: Deployment of the hydrologic network is a necessary early step in this project as it establishes existing conditions and hydrologic context, provides data to inform and validate models used to help select best locations for built structures, and provides data to monitor the success of constructed projects and conservation practices in the MID-URN areas.</p> <p>Resilience Programming: The community resilience programming will directly benefit the MID-URN areas through the development of tailored activities that measure and subsequently improve resilience to flooding in those areas and the completion of a flood resilience action plan to help guide future priorities to increase flood resilience.</p> <p>Evaluation and Assessment: The CEA will provide feedback and survey results to the team and to IEDA on a regular basis. Their activities tie back to the MID-URN areas as their feedback will directly inform programmatic improvements to help maximize programmatic impact in those areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.</p>
Iowa State University	<p>Iowa Nutrient Research Center nutrient practices: These projects directly tie to the MID-URN areas as the results will be used to refine hydrologic modeling in the target watersheds, to finesse the best selection of built projects and conservation practices and locations, and to monetize the cost benefit of practices implemented in the MID-URN areas.</p> <p>Watershed Planning ISU Extension and Outreach: ISU Extension and Outreach activities will directly impact the MID-URN areas through the development and delivery of science-based content to inform stakeholders and decision makers at all levels. These activities will especially help landowners in the MID-URN area who are participating in the program to select the most appropriate projects/practices to maximize the potential impact on downstream water quantity and quality.</p> <p>Iowa Water Center Soil Loss: Activities by the Iowa Water Center at ISU will directly impact the MID-URN areas in the target watersheds through the contribution of their data to the hydrologic models (leading to selection of the most appropriate projects and project sites), evaluation of the impacts of projects on water runoff and erosion, and contribution of content to public programming, especially to stakeholders in the MID-URN areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.</p>
Iowa Department of Natural Resources	The IDNR will offer technical assistance with a goal of building local capacity to efficiently target resources to high-priority locations in the MID-URN areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.
Iowa Department of Agriculture and Land Stewardship	The activities proposed by IDALS directly support the project MID-URN areas by providing training, tools, forms, and other technical assistance to the project coordinators and others who will be helping to manage the implementation of constructed projects and conservation projects benefiting the MID-URN areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.
Homeland Security and Emergency Management	<p>GIS technical support is necessary for the development of flood risk data sets. These will be integrated into the local hazard mitigation and disaster resilience planning products. HAZUS runs will be required for the development of this data. The planning flood risk assessment will be used to identify potential risk reduction activities, funding sources, and timelines for implementation. This project identification data pushes forward flood resiliency for these MID-URN communities.</p> <p>Capacity Building will include the activities and training necessary to inform emergency management personnel and local leaders on disaster resiliency best practices in their communities. These activities include the integration of several planning activities from the IDNR, IDALS, IFC, and others into emergency management planning and implementation work. This comprehensive approach to</p>

	<p>disaster resiliency at the local level will benefit the MID-URN areas by increasing the capacity and efficiency of services delivered by emergency management stakeholders and partners.</p> <p>The Flood Mitigation Board has dedicated funding for flood resilient solutions at the local level. These investments in structural solutions will benefit the MID-URN areas and can also be leveraged for future state investment to build resiliency in the most impacted and distressed areas. The project covers areas of the state impacted by declared disasters from 2011 and 2013.</p>
Watershed Counties	<p>The design and construction of built projects and conservation practices in the target watersheds will be implemented to have the greatest possible positive impact on the MID-URN areas through the reduction of future flooding and improved water quality during high-flow events. Water quality and quantity data will be collected throughout the duration of the project to support the development of the hydrologic models used to inform the distribution of built projects, to monitor progress, and to evaluate the success of the implemented practices. This element of the project is critical in helping to support and inform the development of practices impacting the MID-URN areas and to evaluate the success of these projects. The projects cover areas of the state impacted by declared disasters from 2011 and 2013.</p> <p>West Nishnabotna: flooding in 2011, DR-1998 East Nishnabotna: flooding in 2011, DR-1998 Raccoon: flooding in 2011 and 2013, DR-1977 and DR-4126 English River: flooding in 2013, DR-4119 Clear Creek: flooding in 2013, DR-4119 and DR-4126 Middle Cedar: flooding in 2013, DR-4126 and DR-4135 Upper Wapsipinicon: flooding in 2013, DR-4135 Upper Iowa: flooding in 2013, DR-4135</p>
City of Coralville	<p>The City of Coralville experienced repeated flooding in the MID-URN area, including the floods of 2013. Modifications to two storm water pump stations, the weak links in a new flood protection system, are the final step to protect more than 178 acres of businesses and multi-family residences in a vulnerable LMI area. The area was impacted by disasters DR-4119 and DR-4126 in 2013.</p>
City of Storm Lake	<p>The City of Storm Lake experienced repeated flooding in the MID-URN area, including the floods of 2011 and 2013. A series of 8 projects will upgrade the wastewater treatment plant and conveyance system to reduce sewer backups into homes and avoid release of untreated wastewater into the environment. The area was impacted by disasters DR-1977 and DR-4126 in 2011 and 2013.</p>
City of Dubuque, infrastructure	<p>The <i>City of Dubuque</i> experienced severe flooding in July 2011, causing substantial damage, especially in the historic Bee Branch Creek Watershed. Dubuque’s unmet infrastructure needs as a result of the flooding include three storm water management projects to safely convey water. The area was impacted by disaster DR-4018 in 2011.</p>
City of Dubuque, housing	<p>The City of Dubuque experienced severe flooding in July 2011, causing substantial damage, especially in the historic Bee Branch Creek Watershed. The Bee Branch Healthy Homes Resiliency Program addresses unmet recovery needs from the 2011 flooding event. The area was impacted by disaster DR-4018 in 2011.</p>

Appendix H - Overview of the Environmental Review Process NDR watershed grants to counties

Programmatic Environmental Assessments:

EA 1 to include:

- West Nishnabotna South Watersheds (HUC-8) and the following (HUC-12's):
 - South half of Mud Creek Sub-watershed (only the portion in Mills Co)
 - Willow-Slough Creek Sub-watershed.
 - Four Sub-watersheds to be determined (no determination as of 08.30.17)
- East Nishnabotna South Watersheds (HUC-8) and the following (HUC-12's):
 - Mill Creek Sub-watershed
 - Ledgewood Creek Sub-watershed

EA 2 to include:

- North Raccoon River watershed (HUC-8) and the following (HUC-12's):
 - Outlet Creek Watershed
 - Headwaters Creek Watershed

EA 3 to include:

- Lower Iowa: English River watershed (HUC-8) and the following (HUC-12's):
 - Headwaters North English River Sub-watershed
 - Middle North English River Sub-watershed
 - Middle English River Sub-watershed
 - Gritter Creek Sub-watershed
- Lower Iowa: Clear Creek watershed (HUC-8) and the following (HUC-12's):
 - Middle Clear Creek Sub-watershed
 - Upper Clear Creek Sub-watershed
 - Lower Clear Creek Sub-watershed

EA 4 to include:

- Upper Wapsipinicon River watersheds (HUC-8) and the following (HUC-12's):
 - Smith Creek-Wapsipinicon River Sub-watershed
 - Dry Creek-Wapsipinicon River Sub-watershed
 - Sand Creek Sub-watershed
 - Nugents Creek-Buffalo Creek Sub-watershed
- Upper Iowa River (HUC-8) and the following (HUC-12's):
 - Canoe Creek Sub-watershed
 - North Canoe Creek Sub-watershed
 - Ten Mile Creek Sub-watershed
 - Coon Creek-Upper Iowa River Sub-watershed1

EA 5 to include:

- Middle Cedar River watersheds (HUC-8) and the following (HUC-12's):
 - Hinkle Creek Sub-watersheds
 - Mud Creek Sub-watershed
 - Opossum Creek Sub-watershed
 - Wildcat Creek Sub-watershed
 - Lime Creek Sub-watershed
 - Bear Creek-Cedar River Sub-watershed
 - Twelvemile Creek Sub-watershed
 - Devils Run-Wolf Creek Sub-watershed

However, each of the regional programmatic environmental assessments will include an overarching review of cumulative direct and indirect impacts for the entire NDR funded Iowa Watershed Approach. The EA's will follow CEQ guidance on the use of programmatic NEPA reviews.

Once the sites are identified for each watershed, a Tier II review will be done for each specific location.

The programmatic Environmental Assessments will be completed by a consultant hired by IEDA that will work closely with the designated lead federal agency (county) and IEDA. All individual county recipients will still be responsibility entities and make their own Finding of No Significant Impact as well as publish their own Request of Release of Funds.

As part of the programmatic Environmental Assessments, an archaeology firm will be procured separately to conduct phase 1A archeological studies for section 106.

The Tier II reviews will be completed by the locally hired grant administrator.

Appendix I – Homeowners HUD Green Building Retrofit Checklist Certification

National Disaster Resilience Housing (NDRH) Program

General Information		
Homeowner Name:	Homeowner Address:	ID #:
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
Contractor Name:	Contractor Address:	NDRH Project Manager:
Click or tap here to enter text.	Click or tap here to enter text.	Click or tap here to enter text.
<p>PURPOSE: To provide guidance and best practices to achieve a healthy, durable, sustainable and resilient home rehabilitation project.</p> <p>INSTRUCTIONS: Applicant should complete or provide this form to their Contractor to fill in the necessary information as construction work progresses to ensure that the home is meeting the requirements of the HUD Green Building Retrofit Checklist. All items that do not apply or are not being replaced should be marked as <i>not applicable</i> on this form.</p> <p>Contractor will be required to provide a signed copy of the HUD Green Building Retrofit Checklist to the NDRH Program Project Manager prior to the NDRH project final inspection.</p> <p>Contractor will be required to certify that the materials and or products installed, as itemized in their project bid meet the Green Building Retrofit Checklist.</p> <p>Contractors are required to collect any material and or product specification sheets, to support meeting the Green Building Standards. Contractors should maintain these records for a period of five (5) years after the date of the NDRH program's final inspection approval.</p> <p><i>The Contractor's signature below certifies that all items itemized in his/her bid have been repaired or replaced, at the designated property, according to the requirements of the attached HUD Green Building Retrofit Checklist.</i></p>		
Contractor Name:	Contractor Signature:	Date:
NDRH Project Manager:	NDRH Project Manager Signature:	Date:

Water and Energy Conservation Measures

1	<p>Water-Conserving Fixtures. Install or retrofit water conserving fixtures in any unit and common facility, use the following specifications: Toilets- 1.28 gpf; Urinals- 0.5 gpf; Showerheads- 2.0 gpm; Kitchen faucets- 2.0 gpm; and Bathroom faucets- 1.5gpm. [gpf = gallons/flush; gpm = gallons/minute]</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2	<p>ENERGY STAR Appliances. Install ENERGY STAR-labeled clothes washers, dishwashers, and refrigerators, if these appliance categories are provided in units or common areas.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3	<p>Air Sealing: Building Envelope. Seal all accessible gaps and penetrations in the building envelope. If applicable, use low VOC caulk or foam.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4	<p>Insulation: Attic. (If applicable to building type). For attics with closed floor cavities directly above the conditioned space, blow in insulation per manufacturer's specifications to a minimum density of 3.5 Lbs. per cubic foot (CF). For attics with open floor cavities directly above the conditioned space, install insulation to meet or exceed IECC levels. Air seal attic prior to installing insulation to prevent moisture migration from living space to attic.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5	<p>Insulation: Crawl Spaces. (If applicable to building type). Install a 10-mil poly vapor barrier on ground in crawl space and up foundation walls to the top of the masonry leaving an inspection gap of 3 inches between the lowest wood component and the plastic. Fasten the plastic to the masonry wall with mechanical fasteners and large washers and seal the plastic to the masonry with Low VOC caulking rated to adhere plastic. Overlap seams in the plastic by 6 inches and seal the seams with fiberglass mesh tape and mastic. The end product will provide a water and air tight seal between the interior of the crawl space and the walls and floor of the crawl space and all penetrations including, but not limited to those created by plumbing, electrical and HVAC equipment, will be sealed tight. After the plastic vapor barrier has been inspected and approved by the Housing Rehabilitation Specialist responsible for this property, install a minimum of Dow 2" of extruded polystyrene foam board on the outside walls of the crawl space sealing the seams between the boards with foil tape approved by the foam board manufacturer. The layer of insulation shall be complete without voids and any gaps shall be sealed with polyurethane foam sealant. Follow <i>Builder's Guide to Cold Climates</i>, figure 2.20, pages 198-201.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6	<p>Duct Sealing. In buildings with ducted forced-air heating and cooling systems, seal all penetrations of the air distribution system to reduce leakage in order to meet or exceed ENERGY STAR for Homes' duct leakage standard.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
7	<p>Air Barrier System. Ensure continuous unbroken air barrier surrounding all Conditioned space and dwelling units. Align insulation completely and continuously with the air barrier.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
8	<p>Energy Star Rated Windows. When replacing windows, follow manufacturer's installation instructions. Follow <i>Builder's Guide to Cold Climates</i>, figure 2.20, page 82. Install geographically appropriate ENERGY STAR rated windows.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
9	<p>Sizing of Heating and Cooling Equipment. When replacing, size heating and cooling equipment in accordance with the Air Conditioning Contractors of America (ACCA) Manuals, Parts J and S, or 2012 ASHRAE Handbook--HVAC Systems and Equipment or most recent edition. If replacing ducts, size duct</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

	system per ACCA Manual D.	
10	Domestic Hot Water Systems. When replacing domestic water heating system(s), ensure the system(s) meet or exceed the efficiency requirements of ENERGY STAR for Homes' Reference Design. Insulate pipes by at least R-4.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
11	Efficient Lighting: Interior Units. For all permanently installed lighting fixtures, install high-efficacy lighting LEDs per the International Code Council. Recessed light fixtures (recessed cans): If recessed light fixtures are used anywhere in the project, install ENERGY STAR-qualified LED lamps. All recessed light fixtures must be Insulation Contact Air-Tight (ICAT) models.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
12	Efficient Lighting: Common Areas and Emergency Lighting (if applicable to building type). Building common spaces must use LED bulbs and be controlled by occupancy sensors or automatic bi-level lighting controls. Any new exit signs shall consume 5 watts or less. Fixtures located above stairwell doors and other forms of egress shall contain a battery backup feature. Photoluminescent exit signs may be used.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
13	Efficient Lighting: Exterior. 100% of outdoor lighting must use LED bulbs, and lamps must be ENERGY STAR-certified when that certification is available for the product category. All exterior lighting must be a Dark-Sky-approved "Friendly Fixture" and have motion sensor controls, integrative photovoltaic cells, photosensors or astronomic time-clock operation. Note: Exterior emergency lighting and lighting required by code for health and safety purposes are exempt.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
In-Door Air Quality Measures		
1	Air Ventilation: Single Family and Multifamily (three stories or fewer). Install an in-unit ventilation system capable of providing adequate fresh air per ASHRAE 62.2 requirements.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
2	Air Ventilation: Multifamily (four stories or more). Install apartment ventilation systems that satisfy ASHRAE 62.2 for all dwelling units and common area ventilation systems that satisfy ASHRAE 62.1 requirements. If economically feasible, consider heat/energy recovery for 100% of corridor air supply.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
3	Composite Wood Products that Emit Low/No-Formaldehyde. Composite wood products must be certified compliant with California 93120. If using a composite wood product that does not comply with California 93120, all exposed edges and sides must be sealed with low-VOC sealants.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
4	Environmentally Preferable Flooring. When replacing flooring, use environmentally preferable flooring, including the Floor Score certification. Any carpet products used must meet the Carpet and Rug Institute's Green Label or Green Label Plus certification for carpet, pad, and carpet adhesives.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
5	Low/No VOC Paints and Primers. All interior paints and primers must be less than or equal to the following VOC levels: Flats--50 g/L; Non-flats--50 g/L; Floor-100 g/L. [g/L = grams per liter; levels are based on a combination of the Master Painters Institute (MPI) and GreenSeal standards.]	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
6	Low/No VOC Adhesives and Sealants. All adhesives must comply with Rule 1168 of the South Coast Air Quality Management District. All caulks and sealants must comply with regulation 8, rule 51, of the Bay Area Air Quality Management	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A

	District.	
7	Clothes Dryer Exhaust. Vent clothes dryer directly to the outdoors using rigid-type ductwork.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
8	Combustion Equipment. When installing new space and water-heating equipment, specify power-vented or direct vent combustion equipment.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
9	Mold Inspection and Remediation. Inspect the interior and exterior of the building for evidence of moisture problems. Document the extent and location of the problems and implement the proposed repairs according to the Moisture section of the EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
10	Mold Prevention: Water Heaters. Provide adequate drainage for water heaters that include drains or catch pans with drains piped to the exterior of the dwelling.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
11	Mold Prevention: Surfaces. When replacing or repairing bathrooms, kitchens, and laundry rooms, use materials that have durable, cleanable surfaces.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
12	Mold Prevention: Tub and Shower Enclosures. When replacing or repairing tub and/or shower enclosures, use non-paper-faced backing materials such as cement board, fiber cement board, or equivalent in bathrooms.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
13	Integrated Pest Management. Seal all wall, floor, and joint penetrations with low-VOC caulking or other appropriate sealing methods to prevent pest entry. If applicable, provide training to multifamily building facility staff.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
14	Lead-Safe Work Practice. For properties built before 1978, if the project will involve disturbing painted surfaces or cleaning up lead contaminated dust or soil, use certified renovation or lead abatement contractors and workers using lead-safe work practices and clearance examinations consistent with the more stringent of EPA's Renovation, Repair, and Painting Rule and HUD's Lead Safe Housing Rule.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
15	Radon Testing and Mitigation. Test for radon using the current edition of American Associations of Radon Scientists and Technologists (ARRST)'s Protocol for Radon Measurements in Homes Standards for Single-Family Housing or Duplexes, or ARRST's Protocol for Conducting Radon and Radon Decay Product Measurements in Multifamily Buildings. To install radon mitigation systems in buildings with radon level of 4 pCi/L or more, use ASTM E 2121 for single-family housing or duplexes, or AARST's Radon Mitigation Standards for Multifamily Buildings. For new construction, use AARST's Reducing Radon in New Construction of 1 & 2 Family Dwellings and Townhouses, or ASTM E 1465.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A
16	Mold Remediation. Inspect the interior and exterior of the building for evidence of moisture problems. Document the extent and location of the problems, and implement the proposed repairs according to the Moisture section of the EPA thy Indoor Environment protocols for Home Energy Upgrades.	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A