

IEDA Certified Grant Administrator Policy for CDBG & CDBG-DR Programs As of [2/16/2026](#)

Overview

Administration of a Community Development Block Grants (CDBG) and CDBG-Disaster Recovery (CDBG-DR), herein collectively referred to as “CDBG”, requires an in-depth knowledge of State and Federal requirements and regulations. Well-trained Grant Administrators are critical to the proper functioning of the State of Iowa’s CDBG programs. To ensure compliance at the State and local levels with all CDBG related requirements, the Iowa Economic Development Authority (IEDA) has developed a Certified Grant Administrator Program. Individuals wishing to administer an IEDA CDBG / CDBG-DR grant award must meet all requirements to become a Certified Grant Administrator (CGA), as described in this policy and determined by IEDA.

Communities receiving CDBG / CDBG-DR funding must have a CGA on staff or hire/procure a CGA to manage the state & federal compliance elements of the CDBG award. Iowa law permits local governments to obtain services from a Council of Governments through a Chapter 28E intergovernmental agreement, which is not subject to competitive procurement requirements applicable to private vendors. (<https://www.legis.iowa.gov/docs/ico/chapter/28E.pdf>)

IEDA will maintain a list of CGAs in the State of Iowa.

Definitions

- **Subrecipient:** Typically, a municipality, the contractual subrecipient of CDBG / DR funds from IEDA, so named in the applicable grant agreement.
- **Grant Administrator (“GA”):** Any Subrecipient staff member or contracted party that provides services to perform project compliance reporting for any portion of an open CDBG grant. May operate in a ‘conditional’ or ‘certified’ capacity as further defined in this policy.
- **Grant Administration:**
 - **CDBG:** Per HUD, Grant Administration is defined as “...reasonable administrative costs and carrying charges related to the planning and execution of community development activities assisted in whole or in part with CDBG funds...” ([CPD 23-07](#)). Essentially, all activities required to manage the grant award itself and ensure full compliance with federal and state regulations. These tasks are focused on the grant, not the physical project.
 - **CDBG-DR:** Per HUD, Program Administration Costs (PACs) for CDBG-DR are defined as “reasonable general costs (including carrying charges) of grant management that do not include staff and overhead costs directly related to carrying out other CDBG-DR eligible activities” ([CPD Notice 2023-06](#)). Under IEDA’s CDBG-DR model, these apply to IEDA

staff to administer the grant at the State level and NOT to certified grant administrators.

- Grant Administration includes, but is not limited to:
 - Performing general management, oversight, and coordination duties required by the award under 24 CFR 570.206(a).
 - **Maintaining the environmental review record.**
 - Establishing and maintaining required project files, policies, records, and reporting systems pursuant to 24 CFR 570.503(b).
 - Preparing and submitting reimbursement claims and supporting documentation consistent with Uniform Administrative Requirements at 2 CFR Part 200.
 - Ensuring compliance with procurement rules, civil rights requirements, fair housing, labor standards, Section 3, and LMI documentation consistent with 24 CFR Part 570 Subpart K.
 - Completing required performance reports, monitoring responses, closeout documentation, and maintaining retention of records in accordance with 2 CFR 200.334–200.337.
- **Project Delivery**
 - **CDBG:** refers to all activities required to **implement and execute the eligible project**, including technical, construction-related, and beneficiary-related tasks. These tasks are focused on the **physical project and its delivery**, not on grant compliance.
 - **CDBG-DR:** Per HUD, Activity Delivery Costs (ADCs) for CDBG-DR are defined as *“allowable costs incurred for implementing and carrying out eligible CDBG-DR activities. All ADCs must be allocable to a CDBG-DR activity and include direct costs integral to the delivery of the final CDBG-DR assisted activity”* ([CPD Notice 2023-06](#)) For CDBG-DR programs, Project / Activity Delivery refers to the implementation-level tasks required to carry out a specific CDBG-DR activity approved in the Action Plan and established in DRGR. Under IEDA’s CDBG-DR model, nearly all reimbursable work performed by external CGAs is classified as Project / Activity Delivery, **not Grant Administration**.
- Project Delivery includes, but is not limited to:
 - **Completing activity-level environmental review tasks and preparing Environmental Review Record documentation and coordinating the Request for Release of Funds consistent with 24 CFR Part 58.**
 - Conducting procurement support, contractor coordination, bid package preparation, and compliance checks in accordance with 2 CFR 200.317–200.327.
 - Performing Federal Labor Standards (Davis-Bacon) and Section 3 compliance activities required under 24 CFR 570.603 and 24 CFR Part 75.
 - Carrying out inspections, code compliance checks, construction oversight, and activity-specific project management consistent with eligible activity delivery costs



under 24 CFR 570.201–570.205.

- Conducting DR-specific activities such as demolition oversight, appraisal coordination, lien development, and participation in mortgage closings for housing programs.
 - Ensuring activity-specific documentation is prepared and maintained to demonstrate compliance and eligibility for reimbursement.
- **Conditional Certification:** A GA that has completed the CDBG Grant Administration Basics webinar (initial training course) and has achieved a knowledge check score of at least 80% will be given a conditional certification until they have demonstrated completion of the other cross-cutting requirements and IowaGrants training modules.
 - **Certified Grant Administrator (“CGA”):** a GA that has completed the CDBG Grant Administration Basics webinar with an 80% score or higher and has also completed the interval of cross-cutting compliance and IowaGrants trainings during the monthly “Third Thursday” trainings, each with a score of at least 80% or higher.
 - **Mandatory Participant:** CGAs that have active CDBG or DR projects will be required to attend the monthly trainings to ensure that they are equipped with the most recent regulatory and funding agency guidance for each training module. Notifications will be promulgated from IEDA to all CGAs so they are aware that they must attend trainings.
 - **Non-Mandatory Participant:** CGAs that are not on an active list of CDBG / DR projects may still attend trainings, but they must register for these as IEDA will not require that they participate. Knowledge checks will not be required subsequent to trainings for Non-mandatory Participants.
 - **Councils of Government (“COG”):** Councils of Government, identified by Iowa Code 28H, establishes the COGs as an extension of the local government

Administrator’s Responsibilities

A CGA is responsible for assisting a Subrecipient (typically, a local government) with grant administration and project delivery of a CDBG funded project.

A CGA’s responsibilities include:

- Effective Planning – on behalf of the Subrecipient to achieve grants that are able to successfully achieve the stated National Objective within the grant agreement period of performance;
- Compliance Sustainment - the projects integrity must remain compliant with all State and Federal requirements;
- Environmental Review- Correctly completing/ submitting environmental/ Section 106 related documents;
- Release of Funds- Assisting recipients with all documents/ policies necessary prior to release of funds;



- Procurement- Ensuring State / Federal procurement policy is followed, and Federal contract language is included in all CDBG related contracts;
- Contract Administration - CGAs should assist recipients with collecting, executing and submitting any contract support documents, contract extensions or contract amendments;
- Labor Standards Compliance- Completing, reviewing and submitting all necessary documents;
- Section 3 Compliance- Collecting, reviewing, and submitting information regarding Section 3 compliance;
- Civil Rights/ Fair Housing- Ensuring recipients conduct all required and elective Fair Housing activities and comply with Federal requirements;
- Reporting- Preparing and submitting all project reports to IEDA;
- Reimbursements- Ensuring recipients submit timely and accurate requests for reimbursement for both a CDBG activity and grant administration, as required in the CDBG grant agreement;
- Project Monitoring- Participating in and working with IEDA staff through HUD-required project monitoring to acquire and properly file all necessary documents or data;
- Income Verification/Survey-Ensuring proper documentation and procedures are followed as applicable to document compliance with an LMI National Objective;
- Close Out- Ensuring projects are closed by the project end date and all reimbursement requests are submitted and processed according to the governing grant agreement;
- Other General Compliance- Assisting Subrecipients with providing additional information required for compliance and any program-specific requirements unique to each funding opportunity/grant;

Eligibility

In order to be eligible for the CGA program, the proposed grant administrator (GA):

- If a member of a *for-profit consulting firm*, the proposed CGA must demonstrate that they are NOT performing roles of a design professional (e.g., the project Architect / Engineer of record) and must have a distinct contract for grant administration / project delivery duties apart from any other services – this ensures that an entity is not self-performing compliance checks against itself;
 - *If extenuating circumstances are experienced by a Subrecipient in acquiring a CGA, the Subrecipient may formally request a waiver;*
- Evidence that the proposed GA has not had any past Decertification's from IEDA's CGA Policy or has at least gone 1-year from the time of a Decertification to requesting participation in the CGA Program;
- Has signed the 'CGA Acknowledgment' form and appended the same to the agreement between the CGA and the Subrecipient to affirm the acceptance of all CGA Duties & Responsibilities;

Conditional Certification

A proposed grant administrator will be deemed 'Conditionally Certified' once they have:

- Signed the aforementioned CGA Acknowledgement Form and has included this as an addendum to the Subrecipient-Grant Administration Agreement;
- If requesting CGA status after 9/01/2025, has completed the "CDBG Basics" course and passed all four modules with at least an 80% score;

Once these two conditions are met by a new grant administrator, they will be given the ‘conditional certification’ status and placed on the roster for the monthly training as a Mandatory Participant. The monthly training serves to add depth to the grant administrators’ knowledge in smaller, more digestible sessions on topics that are more prone to regulatory or policy shifts on an annual basis.

Mandatory vs Non-Mandatory Training Requirements

IEDA maintains a list of GA’s that are both ‘active’ CDBG administrators (administering projects currently in implementation) and those that are merely retaining up-to-date knowledge of the CDBG policies and procedures. Those GA’s that are actively supporting *any part of a CDBG project* (such as Labor Standards Compliance, Claims requests, Income Verifications, etc.) are considered ‘Mandatory’ for continuing training requirements and those that are not ‘active’ will be designated as ‘Non-Mandatory’ for tracking training progression and Certification.

Recurring Training Events

All individuals, not employed by the State, who administer CDBG funded awards in Iowa, per the definition noted above, must receive certification & maintain currency in the CGA program. Certification is accomplished by attending a full cycle of training(s) and successfully completing an online quiz/knowledge assessment. This will be provided by IEDA at the completion of any proctored training event. Individuals who do not successfully complete the training(s) and the quizzes will not be certified and will be given only (2) opportunities to perform retakes. Individuals who do successfully pass the quizzes will be notified by IEDA that they are certified in that knowledge area. Per the definition cited above, “Certified Grant Administrator” will refer to those that have attended all available trainings in a cycle and passed the knowledge checks. Training and knowledge checks will cover, but are not limited to, the following topics:

- Environmental & Section 106 Reviews;
- Procurement Requirements;
- Contract Administration;
- Build America, Buy America (BABA);
- Section 3 Requirements;
- Federal Labor Standards;
- Civil Rights/ Fair Housing Requirements;
- Acquisition and Relocation;
- Financial Management (Claims, Audits);
- Project Monitoring;
- Risk Assessments;
- Housing Unit Verifications;
- Green Building Standards;
- Other Administrative Procedures (reporting, closeouts, etc.);

Training will be conducted primarily by IEDA staff. However, IEDA may also utilize consultants to conduct some portions of certification training. Consultants will have experience with the CDBG & CDBG-DR programs and conducting related training. Training may be offered in person and/or virtually. Training

will typically be offered virtually at least once per month, via the 'Third Thursdays with CDBG'. IEDA may require CGAs to attend additional training throughout the year to focus on specific topics, new rules promulgated by regulatory agencies, policies or guidelines as required to ensure all stakeholders are caught up with any emerging requirements. IEDA will inform conditional and certified GAs well in advance when a workshop or training is required to maintain certification. If a CGA is unable to attend a mandatory training session, the CGA must inform IEDA prior to the training. In this instance, IEDA will provide the CGA with materials to be covered and will require an exam or quiz on the material covered at the mandatory training.

Certification Knowledge Checks

Certification quizzes will be given at the end of each training event to assess knowledge retention. Quizzes will be open-note and the slides from the training event will be provided after quiz completion. Attendees are encouraged to take good notes for each training event. To pass the knowledge check quiz, attendees must score at least 80%; if an attendee does not pass the quiz, one 'retest' is allowed. If the attendee does not pass the 'retest', the attendee will not be certified as a CGA and will need to retake the certification training before taking another quiz. IEDA will maintain and post on its website a list of CGAs. **CGA certification is specific to the individual, not the agency for who the CGA is employed by.**

Recertification

CGAs must attend monthly training to remain 'current' in their certification. If a CGA misses more than (3) live "Third Thursdays with CDBG Trainings" without contacting IEDA for the videos and taking the quizzes, they default on their certification. If this occurs the GA will not be allowed to administer CDBG projects until they complete required training and knowledge checks to receive recertification notification from IEDA. Recertification training may be offered in person and/or virtually. To be recertified, a CGA must be in good standing at the time the CGA attends recertification training. Please refer to the section below for the definition on 'Good Standing'.

Good Standing

To maintain certification, CGAs must maintain Good Standing. Good Standing means:

1. The administrator has completed and submitted the environmental review documents to IEDA within (6) months of the contract start date AND environmental review documents are complete upon submittal and are completed correctly.
 - a. *Note: some programs may require longer environmental reviews, but the expectation is that most will be complete in 6 months or less for properly planned applications to achieve an Activity Claim within 6 months of Award.*
2. Forms submitted to IEDA for review and approval including claims, status reports, compliance forms, etc. are filled out fully and accurately with minimal errors. Forms should not need to be sent back-and-forth repeatedly for corrections for the same errors and omissions.
3. The administrator has resolved all Findings and Corrective Actions identified in HUD-Required Monitoring Site Visits within (45) days of IEDA's Site Visit Final Report.
4. The CGA is timely in responding to IEDA staff with information requests, project updates, and other materials requested by IEDA for Subrecipient compliance.

5. The CGA has submitted Claim requests within the first six months after grant award, and subsequently according to the governing grant agreement, for each activity and for each CDBG project.
6. The CGA has provided all final project claim materials to IEDA OR has requested a contract extension according to the details of the governing grant agreement.
7. The CGA completes HUD-Required Monitoring activities (i.e., Site Visits) with no findings/issues OR any such issue is minor and can be easily remediated.
8. The CGA has not received more than (3) negative Risk Assessment scores within a (2) year period. A 'negative' score is defined as Medium Risk, High Risk or Very High Risk.
9. The CGA has not committed any action that would lead IEDA to initiate decertification.
10. The CGA attends mandatory CDBG trainings.

Risk Assessments

The IEDA Program Manager is required to perform a Risk Assessment on the project, which covers the performance of both the Subrecipient and the CGA. The Risk Assessment covers criteria includes, but is not limited to:

- Grant Administrator Management Capacity:
 - Training Currency & CGA Policy provisions
- Financial Risks:
 - Funding Amount
 - Match Funding (Annual CDBG only)
 - Program Income
 - Claims (Draws)
 - Claims (Documentation)
- Project Compliance:
 - Project Timeline/Expenditure Progress
 - Quarterly Status Update (CDBG-DR ONLY)
 - Construction Compliance (Grant Administrator, Subrecipient)
 - Planning Compliance (Grant Administrator, Subrecipient)
 - Compliance (Developer, Contractor)
 - Complaints

If a Subrecipient and/or CGA are rated negatively on a Risk Assessment (see definition in 'Good Standings' item #8 above), a formal memo will be provided to the Subrecipient and the CGA citing the risks that are of noted concern.

- A '*Medium Risk*' score will require the IEDA Program Manager to conduct a Site Visit once per the contract as required by their Policies and Procedures and to set up a schedule for Technical Assistance to be provided within 3 months following the Risk Assessment.
- A '*High Risk*' score will require the IEDA Program Manager to conduct a Site Visit within the next 6 months OR set a meeting to provide Technical Assistance within the following 2 months.
- A '*Very High Risk*' Score will require a Site Visit within 6 months or prior to the next claim, whichever comes first. The next claim will be held until Technical Assistance is provided within the next month. A hold will be placed on the contract until the Site Visit or TA are complete.

Probation

The CDBG Team Lead or designated IEDA staff, with the concurrence from the Chief Community Vitality Programs Officer, may place a CGA on administrative probationary status for a period of up to one year if the CGA has accumulated three (3) Good Standing violations within a two (2) year period. The designated IEDA staff will document reasons for the probationary status and provide a formal memo detailing such to the CGA's leadership and the Subrecipient. After one year of the start of the probationary period, the CGA holder may be fully reinstated if there are no further documented Good Standing violations within that period. If other Good Standing violations are documented, the probationary period will be terminated, and decertification will be implemented. The CGA, while on probation, may be allowed to participate in required training and take quizzes.

Causes of Decertification

IEDA may at its sole discretion immediately decertify a CGA after determining whether any of the following has occurred:

1. The CGA consistently circumvents Federal or State policies and regulations;
2. The CGA fails to disclose a Conflict of Interest the administrator has with the CDBG project;
3. The CGA takes inappropriate actions that result in de-obligation or refund of CDBG grant funds;
4. IEDA has received multiple written, substantiated complaints from a Subrecipient regarding the CGA (employee or elected official);
5. The CGA has engaged in any conduct that is significantly prejudicial to the administration of the CDBG program;
6. The CGA routinely allows other staff that are not CGAs to carry out administrative or compliance duties associated with a CDBG project;
7. IEDA reserves the right, with cause, to add to this list any actions deemed detrimental to the efficient conduct and timely execution of the grant award attributable to the performance of a CGA;

Decertification Process

Decertification shall begin with a written notice from the CDBG Team Lead (or designated IEDA staff), with approval from the Chief Community Vitality Programs Officer, notifying the CGA that IEDA is seeking Decertification. The Decertification notice will include:

- (1) a citation of the reasons for the proposed decertification;
- (2) a duration for which the Decertification is in effect for;
- (3) a copy of the CGA Policy, as amended and
- (4) a statement that the CGA is entitled to an appeal by the IEDA Director or Director's designee on the matter.

Upon receipt of the Decertification Notice, the CGA may request an appeal on the proposed Decertification making such a request in writing to the IEDA CDBG Team Lead. Such appeal requests must be received within 15 days of the date of the Decertification Notice.

Upon IEDA's receipt of the CGA's appeal, the IEDA Director (or Director's designee) will make a request for information from the CDBG team on all evidence that demonstrates support for Decertification. Within (30) days, the IEDA Director (or Director's designee) will contact the CGA and request what data

they have in support of the Decertification appeal. Failure to respond to written Decertification Notices from the IEDA Director will result in immediate Decertification.

Once requested appeal information is received from the CGA, the IEDA Director (or Director's designee) will review the information and make a final determination regarding Decertification. Upon Decertification, any projects managed by the CGA must be transferred to another CGA who is in Good Standing. If a new CDBG application is submitted with a Decertified GA listed, the applicant will be notified subsequent to application scoring regarding the matter and that they must select a new CGA prior to an award being eligible. Once IEDA is provided evidence of a CGA in Good Standing being part of the applicants Administrative Plan, then an award is possible. The applicant may choose to withdraw their application and reapply when they have acquired an approved CGA and applications are again reopened.