State of Iowa (IEDA)
Community Development Block Grant (CDBG) Monitoring Policy

Statement of Purpose: Monitoring CDBG funded projects provides IEDA with the opportunity to provide technical assistance, determine the status of grant funded activities, review the recipient's grant management system, and evaluate compliance with state and federal rules and regulations.

It is IEDA policy to conduct at least one monitoring during every CDBG project prior to close-out. Monitoring can be documented either in-person on-site with the Recipient, virtually from the Project Manager's desktop or a combination of both methods.

Monitoring will occur no later than the project reaching the 50% drawdown threshold. This threshold was established to make certain the project is at a state of readiness by having many of the monitoring performance measures be underway or completed.

Specific areas of review include, as appropriate, but not limited to:

- General Information
- National Objective/ Project Progress
- Citizen Participation
- Environmental
- Financial Management
- Procurement
- Contract Management (Administration)
- Contract Management (Architectural/Engineering)
- Contract Management (Professional Services)
- Contract Management (Construction)
- Labor Standards
- Civil Rights (EEO, Fair Housing, Minority Business Enterprise/Women Business Enterprise (MBE/WBE))
- Acquisition and Relocation
- Project Photos
- Housing File Review (If Applicable)
- Section 3

Each monitoring will be recorded in IowaGrants and dated as to when it was submitted as complete. For certain types of programs, and at the discretion of the Project Manager, an on-site monitoring may not be required. In these instances, an off-site or desk monitoring will be conducted instead.

Off-Site/ Desk Monitoring

Off-site monitoring, sometimes referred to as a desk monitoring, if conducted, will occur once during the project prior to grant closeout. The Project Manager will notify the Grant

Administrator and the City by email that it is now time to schedule a monitoring. The email will list the documents that either the city or grant administrator must upload to the Site Visit tab in IowaGrants and a date to have it completed by.

The Project Manager will review the uploaded documents for accuracy and completeness. This process will also include a general review of project activities and communications to determine if the project is on track and the rules and regulations are being followed. Reviewing draw requests to evaluate project progress, running reports on financial activity or inactivity of the grant recipient, evaluating steps taken by the recipient to ensure compliance with environmental reviews, and day to day correspondence with personnel involved with the grant project to list a few. A Project Manager may need to view certain documents through a Zoom or Teams meeting and may also have further questions about what has been presented.

On-Site Monitoring
On-site monitoring, if conducted, will occur once during the project prior to grant closeout. The Project Manager will contact the City and Grant Administrator by email that it is now time to schedule a monitoring. The email will provide a list of documents that either the city or the Grant Administrator must be upload to the Site Visit tab in IowaGrants.gov prior to the visit.

Monitorings will take place at the grant recipient's office, most often City Hall. The Chief Elected Official and the City Administrator/ Clerk shall be invited, along with the Grant Administrator. Other city officials that may be able to provide information necessary to complete the monitoring visit should be invited as well (i.e. Community Development Director, Deputy Clerk, Finance Director, etc.)

The Project Manager will have reviewed the uploaded documents, and all other information provided throughout the grant prior to attending the monitoring. During the monitoring, the Project Manager will go through the report and ask pertinent questions regarding the topics listed earlier.

There will be time reserved at the end of the monitoring to go over any deficiencies discovered with city representatives and the Grant Administrator and provide advice for corrective action.

During the on-site review, the project manager should visit the project site.

Monitoring Follow-Up

A final report shall be generated from the Jasper reporting system and uploaded into IowaGrants.gov following every monitoring. Project Managers will prepare and upload this report no later than 30 days after the monitoring. Once uploaded, the project manager will email the Chief Elected Official, community representatives and Grant

Administrator to inform them the report is available.

The final monitoring report will list compliance or concerns in the areas of:

- Meeting a national objective/ project progress
- Citizen participation
- Environmental review
- Financial management
- Procurement
- Administration
- Architectural/engineering
- Other professional/ technical services
- Construction
- Labor Standards
- Civil Rights
- Acquisition/relocation

The report will describe any deficiencies, areas of non-compliance or corrective action needed. Any additional comments necessary to supplement the report should be itemized and included within the text of the email sent to the community and administrator with the report.

The report will include any additional information or documentation needed from the grant recipient and will establish a timeframe for providing this information. Typically, recipients will have 30 days to provide additional information requested.

Recipient Non-Compliance

If repeated attempts by the Project Manager to cure areas of non-compliance are unsuccessful, the Project Manager will inform the Team Lead. The Team Lead will notify the grant recipient in writing that corrective action is necessary, or the recipient could face penalties, which could include, but is 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 Team Lead and/or Chief Programs Officer 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 either the Team Lead or Chief Programs Officer.

Monitoring Not Required

In rare cases, in which the grant project never proceeds, and/or no funds have been drawn down, a project will be closed out and no monitoring will be required.

Also, planning grants are not required to have a monitoring. As these grants are short term between 9 to 12 months, all the few required attachments are reviewed up front and prior to any claim reimbursements. No National Objective needs to be met.