



2025 CDBG Grant Administrator Workshop

Iowa Economic Development Authority

Agenda

- **9:00 – 11:45: CDBG Program Guidance**
 - General Updates
 - SHPO / Section 106
 - Environmental
 - GA vs TA/ Procurement
 - Construction Document Checklist
 - BABA
 - Contractor Clearance
 - Claims
 - Section 3
 - Close Out
- **11:45 – 1:15: Lunch on your own**
- **1:15 – 3:45: Program Specific Trainings:**
 - Track 1: Water, Sewer & Community Facilities
 - Track 2: Downtown Revitalization
- **3:45 – 4:00: Q/A Session & Closing**

General Updates

- Changes to CDBG & CDBG-DR Team
- CDBG Consolidated Plan
- 2024 Disaster Recovery Action Plan

General Updates

○ Administrator Training:

- Intent is to hold monthly virtual webinars;
- The trainings will follow the project lifecycle;
- For Admin supporting an Awarded City, mandatory attendance;
- Monthly events will provide a deeper dive on each subject;

○ Monitoring / Site Visits

- Adopting a 'clean as you go' mindset – more up-front data and less back-end collection;
- This will make Site Visits / Monitoring much easier for everyone;

General Updates

Contract Amendments:

1. New form required;
2. Grantee must formally request;
3. PM reviews & sends new form;
4. Grantee signs new form;
5. IEDA Director executes;
6. Iowa Grants can be updated;

Iowa Economic Development Authority
Community Development Block Grant (CDBG) Program
Contract Amendment

Contractor: City of Cedar Rapids
Contract number: 20-DRH-004
Contract Amendment number: 2
Amendment effective date: March 31, 2025

The Iowa Economic Development Authority (IEDA) hereby amends the above referenced Community Development Block Grant (CDBG) program contract by extending the contract end date.

The contract by and between IEDA and the City of Cedar Rapids is modified as of the date shown above, as follows:

MODIFICATION 1- All references to the end date in the Grant Agreement is changed to December 31, 2025, including all of the following references:

Amend the end date listed in the caption at the top of page 1;

Except as otherwise revised above, the terms, provisions and conditions of the Contract remain unchanged and are in full force and effect.

City of Cedar Rapids

BY: _____

ITS: City Manager

Date: _____

IOWA ECONOMIC DEVELOPMENT AUTHORITY:

BY: _____

Name: Deborah Durham
ITS: Director

General Updates

○ Risk Assessments:

- Current Risk Assessment process is not adequate to assess project risks;
- In 2026, Risk Assessments will be modified to be more encompassing;

○ DNR Permits

- Plan for 2026 applications to require secured DNR permit WITH the app;
- Too many projects are granted extensions due to poor planning/timing;
- Prevents CDBG apps from being applied for too soon;

General Updates

○ Affirmatively Furthering Fair Housing

- Under the current White House Administration, there are changes with this program:

- <https://www.federalregister.gov/documents/2025/03/03/2025-03360/affirmatively-furthering-fair-housing-revisions>

- § 5.151

- **Affirmatively Furthering Fair Housing: AFFH Certifications.**

"A HUD program participant's certification that it will affirmatively further fair housing is sufficient if the participant takes, in the relevant period, any action that is rationally related to promoting one or more attributes of fair housing as defined in section 5.150(a). Nothing in this paragraph relieves jurisdictions of their other obligations under civil rights and fair housing statutes and regulations."

General Updates

- ***2 CFR 200.501: Effective October 2024, threshold now \$1,000,000 for both forms of Audit:***

§ 200.501 Audit requirements.

(a) ***Audit required.*** A non-Federal entity that expends \$1,000,000 or more during the non-Federal entity's fiscal year in Federal awards must have a single or program-specific audit conducted for that year in accordance with the provisions of this part.

(b) ***Single audit.*** A non-Federal entity that expends \$1,000,000 or more in Federal awards during the non-Federal entity's fiscal year must have a single audit conducted in accordance with § 200.514 except when it elects to have a program-specific audit conducted in accordance with paragraph (c) or (d) of this section.

Section 106 - SHPO



Environmental Updates

- Formal intensive environmental training will occur at a later date.
- HUD cannot currently provide FFRMS floodplain-specific training; they are attempting to schedule trainings for all of Part 58 at some point this Spring/Summer.
- New HUD Part 58 templates will be posted on our website shortly.

Important Environmental Review Notes

- **Do not commit choice-limiting actions**
 - Choice-limiting actions are activities that limit, in any way, the potential alternatives for a project or project site during the environmental review period.
 - This includes, **but is not limited to**: buying materials, signing any contracts, purchasing property, rezoning, replatting, subdividing, anything that involves the creation of a legal agreement, anything that results in an expenditure of grant funds aside from administrative costs.
- The environmental review period extends from the date of application to the formal release of funds.
- Release of funds is given once the environmental review period is completed and no adverse environmental impacts have been found.

Important Environmental Review Notes (cont.)

- Once your environmental review period is completed, I will email you a release of funds letter. This signifies your completion of the environmental review.
- Utilize the previous trainings until we schedule a formal environmental training.
 - Link to training on IEDA website: [CDBG Training Resources | Economic Development & Finance Authority](#)
 - Link to recording of 2024 ER training: [2024 CDBG CGA 3 Environmental](#)

FFRMS Floodplain

- Federal Flood Standard Support Tool
(<https://floodstandard.climate.gov/tool>)
- Remember: Use CISA maps, not FEMA FIRMs.
 - 1) If no CISA data is available, utilize FEMA FIRMs that contain a mapped 500-year floodplain.
- Goal: Not to be in the FFRMS.
- If in the FFRMS:
 - 1) Determine if your project is a "substantial improvement" (cost of project is >50% of total property cost).
 - 2) Complete the 8-step process.

FFRMS Floodplain (cont.)

- Step 5 has been updated to include mitigation discussion. If you're in the FFRMS and your project is a substantial improvement, you will be required to complete floodplain mitigation.
- This is all very new and very confusing: please reach out to me with questions.
- If you have a question that I can't answer, I will reach out to HUD and get an answer.

Environmental Justice and Climate Change

- New Executive Orders have effectively nullified EO 12898 (environmental justice) and removed climate change-related subjects from federal processes.
- **You no longer have to complete Environmental Justice research for your environmental reviews.**
- **You no longer have to complete the Climate Change environmental assessment factor on EAs.**
- Because of these EOs, HUD has issued new environmental review templates that have removed the EJ and Climate Change portions of the document. They will be posted on our website shortly.
- Other similar changes may occur in the future; I will email everyone when they do.

Council on Environmental Quality (CEQ)

- Currently, a final rule proposing the removal of the CEQ from any involvement in the implementation of NEPA is receiving public comment.
- This does not mean NEPA is going away.
- CEQ is charged with regulating NEPA for the other federal agencies; this will remove their regulatory authority.
- Example: CEQ is responsible for requiring Environmental Impact Statements (EIS) on "problem projects". Under the new rules, CEQ's EIS are no longer a requirement for compliance.
- It is likely that regulation of NEPA will fall to the agencies responsible for the grants – HUD will create their own regulatory processes.

COG Environmental Responsibilities after Release of Funds

- IEDA has recently noticed an uptick in adverse environmental impacts after the environmental review period is complete.
- Release of funds does not mean environmental requirements no longer impact a project – adverse effects can still be incurred.
- Please keep watch over project activities as they move forward – specifically on historic buildings.
- Changes in scope and general progress should be reported to you by the development team/contractors/cities.
- If you notice something that might result in an adverse effect, contact your project manager or Robert Jonet.

Contact Information

- Robert Jonet – Environmental and Historic Preservation Specialist
- Robert.Jonet@IowaEDA.com
- 515-348-6205

Grant Administration or Technical Assistance?

- “Role of a Grant Administrator,” Management Guide, chapter 1
 - Ensure compliance with state and federal rules and regulations
 - Facilitate the documentation of the project in IowaGrants
 - Act as primary liaison between IEDA and the City (Recipient)
 - *Not actually executing the project*

Grant Administration or Technical Assistance?

- What Technical Assistance is... and is not
 - Any billable activity (i.e., “deliverable”) other than providing project management (i.e., “documentation”) for the project
 - Red flags: another consultant and/or licensed professional could do it or does regularly do it – this is likely “TA” and not “GA”
 - Examples...
- So what? Implications for: procurement, agreements, claims

Procurement Reminders

- Adopt and follow our Procurement Policy
 - Remember the methods and thresholds, but also,
 - There's a lot more to the policy than the methods and thresholds
- Bid notices, RFPs, and RFQs still get published in a newspaper
- Don't forget about Single Source Procurement approval
 - The Guide (not Appendix) outlines this process
 - Don't sign contracts without the approval
- If it wasn't procured, it shouldn't be part of the budget (not even match)... but you do still need contract language

Construction Documents / DBRA

- Wage rates will not be approved until the IEDA PM has reviewed the (final draft) ConDocs and concurred final project scope;
- IEDA will review ConDocs only for scope vs application, inclusion of current-year Federal language and correct co-funding alignments;
- IEDA will update the website with a checklist that has the necessary minimum contract elements,

Build America, Buy America Act

BABA requires that the following materials, in connection with infrastructure projects funded by Federal Assistance, must be produced in the United States:

- Iron and steel
- Construction materials
- Manufactured products

An infrastructure project includes buildings, housing and sewer and water

Compliance and Implementation

Contract language

- Specific contract language regarding BABA must be included in all contracts, including administration, engineering and construction.

The Grantee must comply with the requirements of the Build America, Buy America (BABA) Act, 41 USC 8301 note, and all applicable rules and notices, as may be amended, if applicable to the Grantee's infrastructure project. Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver.

Compliance and Implementation

Is BABA Applicable?

Is your project a defined infrastructure project? > No? BABA does not apply

Is your project using a covered Federal program? > No? BABA does not apply

Does your project use iron, steel, defined construction materials and manufactured products? > No? BABA does not apply

Yes to all three? Congratulations! BABA applies to your project

Certifications

- Engineer / Architect supplies the list of BABA covered products
- The contractor submits the manufacturing certifications
 - Go directly to the OEM for the certifications
- Grant administrators will take the IEDA supplied spreadsheet and keep that updated throughout the project
 - List products, product costs and corresponding certifications
 - Track any change orders which require new products

Certifications

- **No construction activity claim will be approved without signed certification from contractor/engineer/architect that all products in that respective claim are BABA certified.**
- Signed certification is uploaded with claim documentation in Iowa Grants. Grant Administrators will supply this form for the contractor/engineer/architect to certify.
- We will be able to review updated BABA spreadsheet to insure there are manufacturer's certifications – however, we will review a random sampling of several products during monitoring.

Waivers

- There are three project/product specific waivers (which must be approved by HUD):
 - Public Interest
 - Non-Availability
 - Unreasonable Cost
- Grantee fills out waiver application and submits to IEDA. We send on to HUD


Waivers



- There are general waivers which require no formal request to HUD
 - De Minimis (most popular – use spreadsheet to track)
 - Small Grant (\$250,000 or less total project cost)
 - Exigent Circumstances (immediate need which protects life or property)

Bottom Line

- For project administration purposes, grantees must certify that all iron, steel, construction material and manufactured products used in your project are BABA certified.
 - No construction activity claim will be approved until we are satisfied that all appropriate products in your respective claim are BABA-compliant.
- Start with IEDA for any waiver request.
- Remember, this is still new. Please contact us with any questions, challenges or new experiences.

Changes to the Contractor Clearance



Contractor clearance is required for **ALL** contractors on a project including: administration, engineering, architectural, inspectors, construction, etc. However, it is only required once for each contractor on a project. The contractor does not need to be cleared for each property. If you have any questions, please contact your Project Manager.

Contract Award/Agreement Date*:

If this clearance is for subcontractor, the date entered here should be the date of the agreement between the general contractor and the subcontractor.

You **MUST** search the [SAM database](#) **PRIOR TO** the contract award/agreement date to insure the contractor is NOT debarred and excluded from Federal procurement and non-procurement programs. For more information, visit the [Office of Federal Contract Compliance Programs](#).

Clearance Date Checked*:

Opening Bid Date*:

If the contractor is directly contracted without a competitive solicitation (i.e. COG or Subcontractor), use 1/1/1900 as the Opening Bid Date.

Date of Contractual Substantial Completion:

Wage Determination Number, including modification number: Wage Rate Not Required (Internal Use ONLY)

Contract \$ Value:

WHAT IS CHANGING?

- The “Clearance Date Checked” will require that you upload the screenshot documenting your search for business & owner;
 - **MUST SHOW DATE**
 - **MUST MATCH CONTRACT SIGNATORY**
- Below the "Opening Bid Date" you will be required to upload the Contract/Agreement;
- Upload Insurance Certifications, Workforce Registration and Procurement Documentation.
- Procurement Documentation will include:
 - Affidavit of Publication,
 - Copy of the posting in the newspaper,
 - Plan Room/Clearing House Notification (Regular CDBG ONLY),
 - Bid packet (cost estimates, bid tabulation sheets & award letter.)

Contractor Clearance Continued...

Section 3

Is this a Section 3 business:

A Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:

- At least 51 percent owned and controlled by low- or very low-income persons;
- Over 75 percent of the labor hours performed for the business over the prior three-month period are performed by Section 3 workers; or
- A business at least 51 percent owned and controlled by current public housing residents or residents who currently live in Section 8-assisted housing.

Is this business working on an eligible Section 3 project site?:

A project site qualifies for Section 3 when it has received over \$200,000 in CDBG funds for demolition, construction, or rehabilitation activities. If you have questions about the project site for your program, contact your project manager.

WHAT IS CHANGING?

- Upload the “Section 3 Business Certification” form;
- Upload the signed “Intent to Comply with Section 3” form;
- If **APPLICABLE**, there will now be a question asking, “ Does this contract require adherence to Lead-Based Paint Regulations?”
- If **yes**, you will be required to upload the contractors “State of Iowa Certification” form.

Contractor Clearance Continued...

Business Name:

Contractor/Officer Name:

Contractor Address:

Contractor Type:

Trade Type:

Contractor Registration Number:

Contractor Tax ID:

Contractor MBE:

2CFR Chapter I Part 25 requires an active SAM registration.
Don't have a UEI (Unique Entity Identifier)? Visit www.SAM.gov for more information.

UEI (Unique Entity Identifier):

Contractor WBE:

Hispanic:

Brief Description of Contract
(50 characters max.):

WHAT IS CHANGING?

- The only additional item on this page is adding the “Owner’s Name” if the contractor is a business entity;
- “Misc. Documents” section remains for additional details;

Claims

- Every 6-months a claim is required.
- Use correct GAX – 2025 / with our correct address
- Original signatures
 - Is there a signature authorization form?
- Did you submit your signed BABA certification form?
- Are invoices from same fiscal year?

Claims

- Download latest GAX from IG:

GAX Form

Named Attachment	Required	Description	File Name	Type	Size	Upload Date
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Please download the [GAX](#) and complete all sections. Please be sure to sign the GAX before uploading with the claim.

- Is report numbered correctly?
- Are yellow sections filled out?
- Is the amount accurate?
 - Is it the same as what's requested in IG?
- Claims can take up to 3 weeks to get approved / paid.

BUDGET FY 2025		General Accounting Expenditure					DOCUMENT NUMBER									
		DATE 3/24/2025	ACCTG PERIOD (mm/yy)													
VENDOR CODE			AGENCY NAME													
VENDOR NAME AND ADDRESS			BILL TO ADDRESS (ORDERING AGENCY)		SHIP TO ADDRESS											
			Iowa Economic Development Authority 1963 Bell Avenue, Suite 200 Des Moines, Iowa 50315													
TERMS		FOB	ORDER APPROVED BY		GOODS RECEIVED/SERVICES PERFORMED											
					DATE INITIALS											
QUANTITY		VENDOR'S INVOICE NUMBER														
ORDERED	RECEIVED	UNIT OF MEASURE				UNIT PRICE	TOTAL PRICE									
			Request for Payment under CDBG Contract Number: _____													
			Report Number: _____													
DOCUMENT TOTAL																
CLAIMANT'S CERTIFICATION				AGENCY CERTIFICATION												
I CERTIFY THAT THE ITEMS FOR WHICH PAYMENT IS CLAIMED WERE FURNISHED FOR STATE BUSINESS UNDER THE AUTHORITY OF THE LAW AND THAT THE CHARGES ARE REASONABLE, PROPER, AND CORRECT, AND NO PART OF THIS CLAIM HAS BEEN PAID.				I CERTIFY THAT THE ABOVE EXPENSE WERE INCURRED AND THE AMOUNTS ARE CORRECT AND SHOULD BE PAID FROM THE FUNDS APPROPRIATED BY:												
DATE				CODE OR CHAPTER SECTION(S)												
TITLE																
CLAIMANT'S SIGNATURE				AUTHORIZED SIGNATURE												
See Invoice for Signature																
THE FOLLOWING FIELDS ARE FOR STATE ACCOUNTING USE ONLY																
DOC TYPE (GAX) GAX	DOC NUMBER	DOC DATE	ACCTG PRD	BUDGET FY 2025	ACTION NEW/MOD	PO SHIP INSTR	GAX TYPE 1	INT IND	INT SELLER FUND	INT SELLER AGCY						
VENDOR CODE	ADDR OVERRIDE	F/A INDICATOR	REF INCL	TEXT -po's only (Y/N)	TEXT (po's only)											
			Y													
REF DOC TYPE	REF DOC NUMBER	REF DOC LINE	COM LN	VEND INVOICE #	COMMODITY CODE	GS CONTRACT										
LINE	FUND	AGCY	ORG	SUB ORG	ACTV	FUNC	OBJT	SUB OBJT	JOB NUMBER	REP CAT	QUANTITY / UNITS	ID	DESCRIPTION	AMOUNT	ID	P/F
01	0340	269	4610				4125									
02																
03																
04																
05																
06																
07																
DOCUMENT TOTAL																
GAX		WARRANT #		AUDITED BY		PAID DATE										

Claims – What we're looking for

- Does each invoice have an appropriate, approved contractor clearance?
- Are the appropriate required uploads in place?
 - Fully executed contract
 - Procurement policy
 - Signed certification of compliance
 - Release of funds
 - Approved DNR permit

Claims – what we're looking for

- Is the claim for an eligible expense?
- Are any activities in the expense documentation overdrawn?
- Is the local match amount accurate?
- Ensure no more than 60% of total admin costs are drawn until the project reaches 50% drawn

Section 3 Qualitative Efforts

- Qualitative Efforts are still required on all projects that are not meeting required benchmarks
 - At least 25% of workers are considered section 3 (those making at or below 80% AMI according to HUD's database)
 - AND 5% of targeted workers (targeted workers are defined as those within a 1- mile radius or a 5,000 - person radius depending on which is larger)
- If you feel that you are not going to hit these benchmarks it is better to start your effort soon rather than later.
 - You can always reach out for guidance on this as well to your project manager or myself

Section 3 Qualitative Efforts

○ Common Qualitative Efforts

- Job advertisement for contractor or subcontractor
- Partnership with IowaWorks or other local organization to provide career development training
- Advertisement of scholarships or apprenticeships in partnership with a local educational institution
- Job fair hosted by the contractor or the local community
- Any effort you or the local community may find to meet the description of "helping to improve the section 3 workforce within the area"

Section 3 Qualitative Efforts

- Most important part of the qualitative efforts is the outreach
- Should be posted in 2 to 3 locations physically. Such as:
 - City Hall
 - Post Office
 - Food Pantry
 - Library
 - Bank/Grocery Store/Church
- Should be posted in 1 to 2 locations virtually. Such as:
 - City Facebook
 - City Website
 - Local Job Board

Job Fair

Local Jobs & Resources

Hiawatha!™

Attention all Low to Moderate Income persons looking to learn about local jobs and resources, join Kirkwood Community College, Linn County LIFTS and the City of Hiawatha to learn more about admissions, job openings and career services.

September 18, 2024

1pm - 3pm

City Hall Community Room
101 Emmons St., Hiawatha, IA 52233

Questions? Call 319-393-5556

*Educational opportunity provided in collaboration with the City of Hiawatha and ECICOG as part of Section 3 compliance for 23-WS-020

Project Close Outs

○ IEDA Contract Definitions:

- **END DATE.** "End Date" means the date the Contract ceases to be in force and effect. The Contract expires upon the occurrence of one of the following:
 - a) the Recipient fulfills the conditions and Project activities agreed to.
 - b) the Contract is terminated by the Authority due to any default due to material misrepresentation, noncompliance, and/or misspending.
 - c) the Contract is terminated in accordance with provisions regarding for cause, for convenience or due to reduction or termination of CDBG funding.
- **DISBURSEMENT OF LESS THAN THE TOTAL AWARD AMOUNT.** If the total award amount has not been requested by the Recipient within sixty (60) days after the End Date, then the Authority shall be under no obligation to honor any other reimbursement requests.
- **TIME OF PERFORMANCE.** The services of the Recipient are to commence as of the Effective Date and shall be undertaken in such a manner as to assure they will be completed on or before the contract END DATE.
- **DETERMINATION OF CONTRACT PERFORMANCE.** The Authority has the final authority to assess whether the Recipient has met their performance targets by the End Date. The Authority shall determine completion according to the performance targets set forth in the "Budget Activity".

Project Close Outs

- REMINDERS:

- On or before the Contract End Date, ALL documents should be submitted so the project can be closed out. This includes the following:

- All work must be completed.
- All Compliance Documents should be in “APPROVED Status”. (Environmental Reviews, Section 106, Contractor Clearances, 3D forms, Easements, Housing Unit Verifications form(if applicable), Annual Section 3 forms, Additional Classification and Wage Rates, Wage Rates, and/or Wage Restitution.)
- The “Final” Section 3 form should be submitted and approved.
- All Contract Amendments should have been met.
- A Site Monitoring should be cleared and submitted. If an item was missing at the time of the monitoring and it could not be provided, it will be marked as “Not Available.” This could affect future applications.
- All audits should be uploaded, unless the current year has not yet been completed.

- 60 days is ONLY to allow the Recipient time to submit the final claim.

Additional Resources

- Website migration!
 - <https://opportunityiowa.gov/community/community-infrastructure/cdbg-resources>
- CDBG Management Guide (updated annually)
- Previous trainings – slides and recordings
- “CDBG Program Guidance and Related Resources”

Questions?





THANK YOU

Iowa Economic Development Authority