

CITIZEN PARTICIPATION AND AMENDMENTS TO HUD

Responsible personnel or unit: IEDA Disaster Recovery Team

Citizen Participation Plan

In consideration of the citizen participation requirements of 24 CFR Section 91.115, but pursuant to the Secretaries' Waiver documented in Federal Register Notice published February 9, 2018 and subsequent relevant notices, the State of Iowa's Economic Development Authority (IEDA), set forth the following requirements as it relates to the CDBG-DR Program funded by the Department of Housing and Urban Development (HUD).

1. Action Plan. In accordance with the Federal Register Notice published February 9, 2018, the streamlined requirements for Citizen Participation do not mandate public hearings but do require the grantee to provide a reasonable opportunity (at least 14 days) for citizen comment and ongoing citizen access to information about the use of grant funds.
 - a. The IEDA will generate a draft action plan and post it on the IEDA website for no less than a 15-day comment period.
 - b. The IEDA will send notification of the posting of the action plan and request for public comment through electronic mailings and press release.
 - c. The IEDA will host at least one citizen participation hearing within the identified MID eligible area.
 - d. The IEDA will document all citizen participation efforts in the final Action Plan.
2. Substantial Amendments. After the Action Plan has been approved by HUD, should Substantial Amendments be required, provide at least 15-day citizen comment and ongoing citizen access to information about the proposed amendment and the continued use of grant funds.
3. Nonsubstantial Amendment. A nonsubstantial action plan amendment does not require public comment, but will provide notification to HUD at least 5 business days before amendment becomes effective.
4. Website. The topic of disaster recovery is navigable by citizens from IEDA website homepage. Action Plan Drafts, followed by the HUD approved Action Plan, the DRGR Action plan, action plan amendments and performance reports are available on the website.
5. 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.
6. 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.
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.

Substantial Amendments Definition

All amendments must comply with provisions of the Federal Register published January 2020 (85 FR 4681). That notice references the August 2018 notice (83 FR 40314). On page 40318, the August notice states and IEDA adopts:

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 Accountant 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 by IEDA's Reimbursement Coordinator, a team member of the Internal Controls and Compliance Team. 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 CDBG-DR grant, the activity description, the total CDBG-DR 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

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