

COMMENTS / QUESTIONS PRESENTED IN THE 12/18/25 WEBINAR

I. General Comments:

1. **Location / Medium of Trainings / Workshops:**

- a. Please bring back in-person trainings.
- b. At least the application workshop in person.

IEDA Response: We will take this into consideration and attempt to host in -person Workshops as able. The driving factor for more virtual sessions is the limited IEDA capacity and meeting space availability.

2. **Timing of Workshops, Applications windows:**

- a. Having details prior to the application workshop would be helpful so we can be discussing projects (knowledgably) with our communities before the workshop, so the proper people attend.
- b. With all the items you want upfront for those programs, especially DTR, please do not have the application periods be too soon or too short. it takes time to procure services correctly and such (this relates to Liz's comment above also)
- c. I agree. This is A LOT of new information that we will likely need to send a notice out to our communities about so they can prepare accordingly for anything they might be interested in.
- d. A month prior to application is not enough time. Some communities only hold one council meeting a month.
- e. Why not just open the grant online the day of the workshop and have three months to work on it?
- f. A month is way too short of a window.
- g. It is funny how Community Catalyst has almost a six month total application period and CDBG almost always is two months, when these applications are so much more complicated and involve more steps and time-sensitive activities. I'd like IEDA to think about that, please.
- h. The September 1st date will require an IUP application submittal March 2, 2026. The IUP dates for the 6/1/2026 IUP application deadline have a IUP approval meeting on September 15, with the IUP effective date being October 1.....which doesn't work for the CDBG timing. If you could have put some thought into this, the CDBG deadline would have been October 1 to allow for another round of IUP applications. As it is, they might as well change the September 1st deadline to August 1st or even July 15, as it would have no effect on folks applying for SRF funding opportunities.
- i. So water/sewer applications have changed again for due date?? I had been told May 1 for the due date in August, which was different than what we were originally told (I believe it was March 1) and now its July 1?

IEDA Response: We recognize there have been progressive changes implemented, but this is preferable to one instance of change notification whereby all Recipients/CGAs are expected to adhere to change at one interval. Regarding timing of the Workshop and Application windows, we will take these comments into consideration and determine if longer windows will facilitate planning & readiness of potential applicants. IEDA makes every effort to coordinate with IDNR and the SRF program, but our secondary application window is for those attempting to re-apply from failed Spring applications - not for integration into IUP application intervals.

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II. Questions from the Webinar:

1. Are consulting firms eligible if there are different individuals working on the engineering/design and grant admin?

A: No, the same firm cannot be the Grant Administrator, as well as the one conducting the engineering/design scope of work. This would be considered a conflict because the company would be overseeing their own work even if they were different individuals.

2. COGs cannot do both ends?

A: Presuming this is in reference to a CGA and a Project Manager being required on more complex projects like housing construction, no – a CGA and a PM cannot be the same individual. The scope of work for a CGA is to oversee HUD compliance matters and is distinct from the scope of work expected by the Recipients' PM to oversee construction activity and provide more deliberate, proactive communication and coordination of all stakeholders.

If a CGA as an entity has a distinct contract for performing Project Management from the CGA contract, this is permissible provided that they are NOT the same individual performing those roles. A distinct contract with defined scopes of work must be shown to demonstrate that level of effort is being provided to the Recipient by different individuals.

3. Why do the CDBG tests ask questions that are not covered in the presentations? Why are they worded with tricky, "got ya" type language (like a driver's license written test)?

A. All test questions are from the materials covered in the training; the person presenting is the one writing those questions. The questions are being written to ensure that the CGA has a good understanding of the information to best represent the Recipient for compliance and risk reduction.

4. Can we have more clarification/details on requirements for LMI survey?

A: As cited in the Webinar, standard elements of an Income Survey Report are as follows:

- a. Purpose / Project Definition; Survey Universe Documentation; Sampling Methodology; Survey Instrument; Enumerator Procedures & Controls; Survey Results / Calculations; LMI Determination; Maps & Geographic Documentation; Compliance Statements; Appendices.*
- b. Depending on the size of the community, these sections might be brief, but the sections outline the common standard for Income Surveys.*
- c. References:*
 - a. eCFR :: 24 CFR 570.483 -- Criteria for national objectives.*
 - b. HUD CPD Notice 14-13*
 - c. COSCD A Presentation on Income Surveys*
 - d. CDBG Income Survey Toolkit - HUD Exchange*
 - e. Conducting a Low-and Moderate – Income Survey – <https://opportunityiowa.gov/community/community-infrastructure/cdbg-resources/cdbg-program-guidance-resources>*

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5. Can we have more clarification/details on requirements for Proof of Match?

A: As cited in the Webinar, acceptable examples are: Co-funding certificates/contracts of loans, grants, etc.; Evidence of Donations with donor list + values provided; Resolutions that cite in-kind cash match or Force Account work.

6. Can pocket parks be located in a 100 or 500 year flood plain?

A: HUD-funded Activities in a flood way are highly nuanced and require many questions to be answered regarding applicability to 24 CFR Part 55 & 58, HUDs updated floodplain guidance (FFRMS), 44 CFR Part 80 and FEMAs Model Deed Restrictions. IEDA recommends consulting with IEDA environmental staff with specific concepts prior to preparing an application for Pocket Parks or 2024 CDBG-DR programs.

7. The pocket park one said SMALL parks. Is there going to be further clarification on what is classified as a small park? Our small towns maybe already have a city park that needs updating rather than putting in a new "pocket park", would that be eligible?

A: For context, a common definition for a "pocket park" is ~ 0.25 – 0.50 acres in size; IEDA will provide specified size threshold guidance in the Program Guide for the Pocket Parks program very soon. City parks that exceed this common size definition will NOT be eligible.

8. For pocket parks - would they be able to use the city engineer as their professional service, or would they have to procure one?

A: If the City engineer is a licensed professional engineer and able to produce stamped plans, then in this instance yes that would be acceptable and procurement would not need to occur. If they are not able to produce stamped plans, then an A/E must be procured. Remember, if it is a city employee, forced account labor would need to be accounted for.

9. What is the role of the green infrastructure in the storm water program? It appears we can use this for more traditional or combo traditional and green.

A: The role in green infrastructure for Stormwater design in terms of any implications of IEDA\IFA transition to NGBS will be more detailed in the Program Guide – but we can say that the prior Green Streets will not be a requirement. However, generally IEDA will defer to IDNR's Stormwater Design standards, located on IDNR's website: Iowa Stormwater Management Manual | Department of Natural Resources.

10. Please define the term "community center" a bit more. That type of facility can be about anything, and I'll need to be able to tell my cities what kinds of buildings are eligible and what are not.

A: Per the Webinar, IEDA is prioritizing the following types of Community Facilities: Senior Centers / Community Centers; Facilities for disabled persons; Homeless Shelters; Daycare Centers & Physical /Mental Health Facilities / Clinics / Hospitals.

A common definition for 'Community Center' is: "A public place where community members gather for group events, social support, information sharing, and other communal purposes...". IEDA is not defining this further so as not to restrict applications, however please note social/recreational proposals will score lower than those offering medical / mental health aid or homelessness prevention to the communities.

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11. Roof replacement - when would interior lead-based paint be required to be remediated? And why is interior lead-based an issue for exterior only work?

A: For any adjoining parts of the roofline, such as the soffits, Gable, Eaves, Fascia, Underlayment, Sheathing etc., that may for some reason contain lead-based materials, IEDA is providing accommodation for this in the cost per unit and indicating this could be present for potential applicants. More detail on this can be discussed at the Application Workshop – please advise if more information is requested on this.

12. A little confused on the housing roof only program. Roofs should only cost \$10 to 15k.

A: IEDA has not stipulated a limit for the size of the structure for which the roof could be repaired / replaced; thus, the range is higher for these first rounds of this program to see what is going to be a more accurate average per unit. We did not want to restrict this cap for the initial roll-out of this program in light of comparative costs for performing this work under the federal requirements and higher anticipated costs.

13. If a food pantry received a Covid CDBG would they be eligible for the new program?

A: Per the Webinar, Applicants must demonstrate a NEW or EXPANDED level of service for the Homelessness or Food Pantry Programs. If an applicant has been a recipient of prior IEDA-funded programs, they will likely score much lower than those who have not received any assistance. This will be detailed further in the Program Guides & Application Workshops that are forthcoming.

14. For homeless shelters, it said no new construction. There are very few, if any shelters in or near our region. Can it be used to start a program in an existing building? We've had cities interesting in starting a program

A: The Public Services Fund / Homeless Shelter Program is intended for Operations Costs only. However, the Community Development Fund / Community Facilities Program will fund construction of facilities or rehab/refit of existing facilities. For new start-ups, extended pro forma on sources of funding, operations plans, LMI surveys of prospective clientele, etc. are required in the application. Please contact IEDA for a specific consult for a more detailed discussion on any particular concepts to applications such that they can contain all necessary details.

15. The streetscape program requires the community to have completed a DTR project. Does the Streetscape project need to be in the same target area as the closed DTR or just in the same community?

A: Ideally, from a planning perspective the targeted Streetscape area would be the same as the area impacted positively by participation in the DTR program, increasing the overall impact to the community. We will make a point to include more guidance on this during the Application Workshop.

16. Would a County-owned rehab facility be eligible for a community facility grant?

A: A County is an eligible applicant, but the National Objective criteria must still be met for the coverage / service area:

- *At least 51% LMI must be documented via survey of clientele;*

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- ***Exception A: hospitals/clinics & community centers may be able to use area data (“LMA”);***
- ***Exception B: seniors, persons experiencing homelessness, and persons with severe disabilities are assumed to be LMI “(LMC”) and do not need documentation;***

17. Can press releases be sent again for funding awards? Those were nice to get to know what was being funded state-wide.

a. *I don't think I've even see a notice of projects not being funded come through for my last round of applications...*

A: We can absolutely resume press releases for all funding rounds.

18. In “Addendum V: Reference data for clearing houses / plans rooms for MWBE solicitations to meet best effort goals. a. Construction Bids Only”. The list is clearly out of date and the information included is not usable for most of the listed organizations.

b. *Are we still to use this?*

c. *Or can we use our best judgement?*

d. *Many of the addresses/emails/phone numbers/websites are out of date or do not work on the list provided and mail comes back regularly from the ones listed.*

A: Thank you for the notification; this has been updated, please see the revised version on the “CDBG Management Guide” web page here:

<https://opportunityiowa.gov/media/7276/download?inline>

19. For the authorized signatory form/CEO change. Does this really need to be uploaded on each draw? If it is uploaded once, can't it be found in the electronic documents? Also, the mayor is allowed to sign documents under Iowa Code, why is there a need to have a form that says the same thing? This seems redundant.

e. *I concur with this. If the CEO changed, we would have submitted a CEO Change form. If we do not, the CEO is presumably the same.*

A 1: Although this adds an extra step for claim preparers, it actually helps reviewers by keeping all required documentation in one place within the claim, rather than having to leave the claim to search electronic documents. This streamlines the review process and reduces delays.

A 2: While Iowa Code does allow the mayor to sign documents, federal and state grant compliance requires us to maintain a current authorized signatory form. This ensures that the individual signing is still the authorized official at the time of the claim and provides an auditable record for monitoring and closeout.

20. Why are cancelled checks needed for draws? Most cities do not have the funds to cover these expenses, for smaller final admin amount some may be able to cover this but; what if the final CDBG draw was for the contractor retainage in the 10s of thousands of dollars. This would require interim financing, which is an additional cost and expense for already proven LMI communities.

Also, is this a HUD rule or an IEDA rule?

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A: This is an IEDA rule, as HUD rules are very nebulous and they are left to the States / Entitlements to determine more detailed rules that will enhance the efficacy of specific programs. To that end, it has become substantially ineffective for IEDA to not require proof of payment on Federally funded programs. IEDA, as stewards of all of our collective Federal tax dollars, will require proof of payment either at the time of a Claim remittance, or upon subsequent Claim submittals as cited in the Webinar. This will mitigate risks imposed by the bad actors that are less swift in paying vendors or being transparent in fiscal management.

From the Webinar, there are (2) acceptable methods for Claims remittance:

- 1) Cancelled check provided at time of Claim submission (per the stated details);*
- 2) Bank Statement – with stipulated transaction details and format;*

Temporary methods:

- 3) Minutes / Resolution that specifically cite the expenses attributable to the CDBG project, and the authorization to obligate CDBG funds;*
 - The next Claim must contain copies of the canceled checks from the prior Claim before being approved by IEDA.*

For Final Claims, we cited in the Webinar that those projects that were in or nearing Closeout would be given a grace period from 10/01/2025 – 3/01/2026 to produce certified Minutes / Resolutions as noted above and after that date proof of payment will be required. See response to #21 below regarding concerns for lines of credit fees.

21. Do cities need a line of credit for CDBG funds?

- a. If so, why? Is this a HUD rule or IEDA rule/policy?*
- b. This will increase expenses for already proven LMI.*

A: It is strongly recommended that Applicants acquire full financial capacity to complete the project such that the Federal grant funds can be expedited for reimbursement. If a City needs to acquire a line of credit, the interest for such is an eligible expense category for reimbursement.

Best practices for maintaining accurate records for credit expenses:

- Demonstrate that the line of credit was used to finance eligible CDBG activities pending reimbursement.*
- Show that interest and fees are reasonable, supported by lender documents or market comparisons.*
- Track these costs within your accounting under “administrative costs”, ensuring that they do not exceed the statutory administrative cap as defined in § 570.489.*
- Maintain records of the borrowing, associated costs, repayment plan, and how these costs were allocated to the CDBG program.*

22. For proof of payment requirement, does the vendor have to provide documentation of received payment, or does only the city have to provide their proof of payment to vendor?

- f. I also agree with this. If we submit a copy of a check or Minutes/claims list approving a payment, why is that not acceptable?*

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A: IEDA is only looking for the Recipient to provide proof of payment to their vendors.

23. So do we not need to do the change in CEO form anymore? I thought that is what let IEDA know that there was change

A. With the updated process requiring an Authorized Signatory Form for every draw, the CEO Change Form is not needed unless a change has occurred. Previously, the CEO Change Form documented leadership changes between draws, but now the recurring signatory form ensures we always have the current authorized official on record. This approach simplifies compliance and eliminates an extra step.

24. For authorized signatory form, you said it needs to show that the mayor is the SOLE SIGNATORY. So now the city clerk/administrator and the Mayor Pro Tem can NOT be an authorized signatory? This is a significant issue if this is the case.

A. IEDA has not precluded a mayor pro-term from being a signatory; the statement was intended only for situations where the mayor is the only authorized signatory. If your city designates multiple authorized signatories—such as the city clerk/administrator or Mayor Pro Tem—that is completely acceptable. In that case, the Signatory Authorization Form should list all authorized individuals. The “sole signatory” language applies only when the mayor is the single person authorized to sign.

25. Since council approval is obvious when there is a cleared check for something, do you need minutes of the council approving the claims/invoices, or is just the CDBG GAX form?

A: Please see #20 above.

26. Regarding uploading a signature authorization form with every draw, wouldn't it be more efficient to just ask if the mayor has changed, then require upload of a new signature form if there has been a change?

A. Unfortunately, Iowa Grants does not provide a way to ask whether the mayor has changed within the Claim workflow and Cities & CGAs do not typically volunteer this information – if they are also aware of the change. Because of this limitation, we will need to continue requiring the signatory authorization form to be uploaded with every draw request to ensure compliance such that all of the individual in the Claim review workflow can conduct their due diligence checks and have all necessary data at-hand. This simple inclusion keeps the Claims process flowing much more expediently. If the CEO has changed, then the new form is still needed to be provided in IowaGrants. Both forms are available on IEDA's website under 'CDBG Management Guide'.

27. Do you know your 2027 water/sewer application due dates yet?

A. The 2027 Workshop and Funding rounds will be announced in December 2026.

28. For postings of bids, RFPs and Qs and the Section 3 Qualitative Efforts, many small cities do not have websites. What options can be used?

A: Per the webinar, acceptable sources are: Newspaper; City Website and / or League of Cities; A/E of Record Website; Contractor Plan Rooms.

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If other sources are proposed, please reach out to IEDA first (prior to bid letting) so we can provide any needed affirmation of acceptable mediums/methods to help enhance the Recipients' bid coverage and mitigate instances of noncompliance.

29. Are DNR construction permits required at the time of application for water/sewer CDBGs?

A: IDNR construction permits are not required at this time for CDBG applications; however, those applications WITH permits at time of application will score significantly higher for 'readiness' than those that do not. IEDA and SRF/IDNR have experienced exceedingly long delays with projects that apply for funding that are not yet ready to be implicated in a contractual period of performance – in particular those drinking water projects with new water sources that require more detailed review with IDNR. Infrastructure projects at large will have to demonstrate readiness to expeditiously complete environmental review and proceed to bidding upon successful CDBG or CDBG-DR awards.

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2026 CDBG PROPOSED PROGRAM APPLICATION SCHEDULE

Date	Program (REGULAR CDBG)	Details
February 4	New Programs + Water/Sewer	Application Workshop (Virtual)
March 2	New Programs + Water/Sewer	Application window opens in IowaGrants
May 1	New Programs + Water/Sewer	Application window CLOSES – apps due
June 3	Old Programs (incl. Water/Sewer)	Application Workshop (Virtual)
July 1	Old Programs (incl. Water/Sewer)	Application window opens in IowaGrants
July 15	New Programs + Water/Sewer	(City) Recipient Workshop (Virtual)
July 16	New Programs + Water/Sewer	Grant Administrator Workshop (in-person)
September 1	Old Programs (incl. Water/Sewer)	Application window CLOSES – apps due
November 4	Old Programs (incl. Water/Sewer)	(City) Recipient Workshop (Virtual)
November 5	Old Programs (incl. Water/Sewer)	Grant Administrator Workshop (in-person)

Date	Program (CDBG-DR)	Details
January 20	2024 DR Buyout / Demolition	Application Workshop
February 4	2024 DR Buyout / Demolition	Application window opens in IowaGrants
March 12	2024 DR Housing & Infrastructure	Application Workshop
April 1	2024 DR Buyout / Demolition	Application window CLOSES – apps due
May 1	2024 DR Housing & Infrastructure	Application window opens in IowaGrants
August 1	2024 DR Housing & Infrastructure	Application window CLOSES – apps due

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2026 CGA TRAINING SCHEDULE

Date	Topic
January 22	Risk Assessments; Monitoring
February 19	Audits; URA; National Green Building Standards
March 19	Housing Unit Verification; LMI Surveys; 3D Forms
April 16	IowaGrants; Citizen Engagement
May 21	Contract Amendments; Close Outs (END OF FIRST CYCLE)
June 18	Environmental/Section 106 Historic Review
[JULY]	[Skip – Award Workshops instead]
August 20	BABA; Labor Standards
September 17	Procurement; Contractor Clearance; Grantee Contracts/Subcontracts;
October 15	Claims; Section 3
[NOVEMBER]	[Skip – Award Workshops instead]
[DECEMBER]	[Skip – Program Updates instead]