



Non-Federal Match Program Guidelines

Version 1.0

January 2026

Contents

Version History ii

Non-Federal Match Program 1

 Purpose..... 1

 Administration 1

 Available Funds..... 1

 Eligible Activities 1

 Ineligible Activities 2

 National Objectives 3

 Eligible Applicants 4

 Eligible Areas 4

 Public Hearing Requirement..... 4

 Application for Assistance 5

 Disaster Tieback or Mitigation 7

 Mitigation Design..... 7

 Eligible Programs 7

 Matching Requirements10

 Award11

 Post Award First Steps.....11

 Grant Agreement.....12

 Exception Policy.....13

 Appeals13

 Timeliness14

 Environmental Review.....14

 Claims15

 Reporting16

 Procurement and Contracting.....16

 Flood Control Structures16

 Davis Bacon17

 Section 318

 Audit Requirements.....18

 Prevention of Fraud, Waste, and Abuse18



Financial Management18

Duplication of Benefits and Subrogation.....19

Uniform Relocation Assistance19

Conflict of Interest20

Long-Term Maintenance20

Monitoring20

Closeout.....21

Records Management22



Version History

Version	Date	Summary Description
1.0	January 2026	Original



Non-Federal Match Program

Purpose

The overarching goal of the program is to support local jurisdictions with infrastructure activities related to recovery. FEMA requires the state and local governments to pay a share of the cost of a project, called the “local share” or “match.” In the aftermath of a disaster, these match requirements can be burdensome on jurisdictions that have been overwhelmed by emergency and recovery work and further weakened by lost government revenues. The HMGP Non-Federal Match Program will help alleviate this burden.

In addition to providing the match, CDBG-DR grants may be used to fund improvements to Hazard Mitigation Grant Program (HMGP) Buyout projects that demonstrate an unmet recovery need remains, that other avenues for funding have been exhausted, and that the project is critical to restoring and making the community more resilient.

Administration

This program is administered by the Iowa Economic Development Authority (IEDA). IEDA is a state agency which administers Community Development Block Grant-Disaster Recovery (CDBG-DR) awards issued to the State of Iowa by the U.S. Department of Housing & Urban Development (HUD). Administrative activities are led by the IEDA Disaster Recovery Team Lead and members of both the Disaster Recovery and Federal Programs teams.

Available Funds

Program	Budget
FEMA Non-Federal Match	\$15,000,000

Eligible Activities

All activities must be CDBG-DR eligible and approved under a FEMA program. HCDA Section 105(a)1, 2, 4, 9 and 12 are the applicable eligible activities for the program and will include applicable waivers identified in the Allocation Announcement Notice (90 FR 4759) and Universal Notice (90 FR 1754).

Housing and Community Development Act of 1974 (HCDA) Eligible Activities for Match Program	
Section 105(a)(1)	<div>Acquisition of real property (including air rights, water rights, and other interests therein) which is</div> <div><div>A. blighted, deteriorated, deteriorating, undeveloped, or inappropriately developed from the standpoint of sound community development and growth;</div><div>B. appropriate for rehabilitation or conservation activities;</div><div>C. appropriate for the preservation or restoration of historic sites, the beautification of urban land, the conservation of open spaces, natural resources, and scenic areas, the provision of recreational opportunities, or the guidance of urban development;</div></div>

	<p>D. to be used for the provision of public works, facilities, and improvements eligible for assistance under this title; or</p> <p>E. to be used for other public purposes</p>
Section 105(a)(2)	Acquisition, construction, reconstruction, or installation (including design features and improvements with respect to such construction, reconstruction, or installation that promote energy efficiency) of public works, facilities (except for buildings for the general conduct of government), and site or other improvements.
Section 105(a)(4)	Clearance, demolition, removal, reconstruction, and rehabilitation (including rehabilitation which promotes energy efficiency) of buildings and improvements (including interim assistance, and financing public or private acquisition for reconstruction or rehabilitation, and reconstruction or rehabilitation, of privately owned properties, and including the renovation of closed school buildings).
Section 105(a)(9)	Payment of the non-Federal share required in connection with a federal grant-in-aid program undertaken as part of activities assisted under this title.
Section 105(a)(12)	<p>Activities necessary</p> <ol style="list-style-type: none"> 1. to develop a comprehensive community development plan, and 2. to develop a policy-planning-management capacity so that the recipient of assistance under this title may more rationally and effectively <ol style="list-style-type: none"> i. determine its needs, ii. set long-term goals and short-term objectives, iii. devise programs and activities to meet these goals and objectives, iv. evaluate the progress of such programs in accomplishing these goals and objectives, and v. carry out management, coordination
Waiver in Universal Notice (90 FR 1754) III.D.6.b.	The prohibition on assisting buildings for the general conduct of government at 42 U.S.C. 5305(a)(2) and associated regulations at 24 CFR 570.207(a) are waived for non-Federal match. This waiver allows grantees to use CDBG-DR funds as the non-Federal match on any other Federal program providing funds for the construction, reconstruction, and rehabilitation of public improvements or facilities for the general conduct of government. This waiver is subject to the following alternative requirements: grantees are prohibited from using CDBG-DR funds for buildings that do not provide services all year around and for buildings that are used exclusively as emergency operations centers.

Ineligible Activities

As per [24 CFR 570.207](#), IEDA will not fund the following activities through the FEMA Non-Federal Cost Share program:

- **General government expenses:** Expenses required to carry out the regular responsibilities of the unit of general local government are not eligible for assistance.



- **Political activities:** CDBG funds cannot fund the use of facilities or equipment for political purposes or to engage in other partisan political activities, such as candidate forums, voter transportation, or voter registration.
- **Purchase of equipment:** The purchase of equipment with CDBG funds is generally ineligible.
 - **Construction equipment:** The purchase of construction equipment is ineligible, but compensation for the use of such equipment through leasing or depreciation is eligible. The purchase of construction equipment for use as part of a solid waste disposal facility is eligible.
 - **Furnishings and personal property.** The purchase of equipment, fixtures, motor vehicles, furnishings, or other personal property not an integral structural fixture is generally ineligible.
 - **Fire protection equipment:** Fire protection equipment is considered to be an integral part of a public facility and thus, purchase of such equipment would be eligible.
- **Operating and maintenance:** Any expense associated with repairing, operating or maintaining public facilities, improvements and services is ineligible. Specific exceptions to this general rule are operating and maintenance expenses associated with public service activities, interim assistance, and office space for program staff employed in carrying out the CDBG program.
 - Examples of ineligible operating and maintenance expenses are:
 - Maintenance and repair of publicly owned streets, parks, playgrounds, water and sewer facilities, neighborhood facilities, senior centers, centers for persons with a disabilities, parking and other public facilities and improvements.
 - Payment of salaries for staff, utility costs and similar expenses necessary for the operation of public works and facilities.
- **Occupied Facilities / Rentals Units:** Facilities that have tenants will not be eligible for this program. IEDA will only reimburse the buyout and demolition of facilities that are vacant and do NOT contain occupants of any kind.

National Objectives

For HMGP Buyout:

Low-to moderate income limited clientele (LMC) or Low- to moderate-income area benefit (LMA). To qualify for the LMC national objective, the HMGP buyout program will be limited to LMI persons and acquiring their property for more than fair market value.

For FEMA PA:

Low- to moderate-income area benefit (LMA) and Urgent Need (UN) national objectives. The Urgent Need national objective will only be used when an LMI national objective cannot be achieved through the project, but the project has demonstrable recovery or mitigation of public infrastructure benefits within the HUD- or grantee-identified MID.

For all instances with an LMI National Objective is used, the Income Survey Report will be required to be provided at the time of application to demonstrate the legitimacy of the LMI / LMA status.

Urgent Need (UN) national objective may be used when the HMGP buyout activity addresses conditions that pose a serious and immediate threat to the health or welfare of the community, the conditions originated from the declared disaster, and the grantee demonstrates that no other financial resources are available to meet the need. The UN national objective will only be applied when the project cannot feasibly meet an LMI national objective, but the buyout provides measurable, disaster-related risk reduction, public safety



benefits, or mitigation outcomes within the HUD- or grantee-identified Most Impacted and Distressed (MID) areas.

Eligible Applicants

All entities that are eligible for FEMA PA and FEMA HMGP may be eligible for the FEMA Non-Federal Match Program. These entities include, but are not limited to:

- Local governments
- State agencies and authorities
- Public schools (K-12)
- Universities

Other local program applicants eligible to receive federal recovery funds, including eligible private nonprofit organizations.

Eligible Areas

CDBG-DR funding will be provided to HUD-identified MID areas: Cherokee County, Clay County, Sioux County and Woodbury County. The State-identified MID Areas are Buena Vista, Lyon and Pottawattamie Counties. As needs are identified, IEDA may provide funding to other state-identified MID areas that were also impacted.

Public Hearing Requirement

According to IEDAs Action Plan and Citizen Participation Plan, applicants are required to solicit public feedback on the projects for which they are applying for funding by holding a public hearing. According to Iowa Code 362.3, the notice of the public hearing should be published or posted for review no less than 4 days and no more than 20 days prior to the hearing. If awarded, applicants will be required to host an additional public hearing before closing out the project.

Public hearings can be held in conjunction with other public meetings. The meeting notice should be posted in a newspaper of general circulation. The public hearing must include discussion of the following:

- How the need for the activities was identified;
- How the proposed activities will be funded and the sources of funds;
- The date the CDBG application will be submitted;
- The requested amount of federal funds;
- The estimated portion of federal funds that will benefit low-and moderate-income persons;
- Where the proposed activities will be conducted;
- Plans to minimize displacement and the unit of general local government's anti-displacement and relocation plans required under § 570.488;
- Plans to assist persons actually displaced; and
- The nature of the proposed activities.

Applicants will be required to provide proof of the public hearing in the application including:

- A copy of the public hearing notice;
- Meeting minutes, including comments and responses;

During the project construction, the applicant must conduct at least one status of funded activities (SOFA) hearing that covers the following minimum points:

- A general description of accomplishments to date;
- A summary of expenditures to date;
- A general description of the remaining work;
- A general description of changes made to the project budget, performance targets, activity schedules, scope, location, objectives or beneficiaries.

Application for Assistance

Eligible entities will firstly apply to FEMA/HSEM through an application process for funding to the Hazard Mitigation Planning Grant (HMGP) Program or FEMA-Project Assistance (FEMA-PA) Program for the 75% base funding. The portion of funds applied as CDBG-DR 25% match for any project must meet CDBG-DR eligibility requirements in addition to the requirements of the federal and state agency administering the HMGP or FEMA-PA programs.

Entities will then apply to IEDA via <https://www.iowaGrants.gov> for up to the 25% CDBG-DR non-federal share match for FEMA PA and HMGP. Applications for Match funding will be open cycled, reviewed, and approved as submitted to IEDA.

Application Workshops & Application Windows

HMGP / Buyout - Demo Grants

- Application Workshop scheduled for January 15th 2026;
- Application Window schedule for Round #1 will be 2/04/26 – 6/01/26

FEMA-PA / Infrastructure Grants

- Application Workshop scheduled for March 12th 2026;
- Application Window schedule for Round #1 will be 5/01/26 – 8/01/26

Application Priorities

LMI communities will be prioritized for funding, as 70% of all funding must be allocated to LMI beneficiaries in the disaster-affected area. During the review of projects, IEDA will assess projects on the following criteria:

- National Objective: use of the LMI benefit national objective criteria.
- HUD Requirements: determine if the costs can be made HUD eligible.
- Funding Threshold: determine if the match amount is worth pursuing.
- Funding Leverage: other available funding options for local match.
- Benefit: document the needs stated by the impacted community.
- Quality Control: assess the quality of documentation to justify the local match.
- Commitment: determine if the final Project Worksheet (PW) amount and project cost is settled.
- Resiliency Measures: assess if there are mitigation activities being undertaken.

Required Application Documentation

Only applications that have been coordinated with HSEM will be reviewed and awarded. Additionally, HUD requires that communities demonstrate compliance with the various plans and citations to Iowa's [Action Plan for this Disaster # 4796](#). To accomplish this, IEDA has reorganized the Monitoring process by front-loading many data collection efforts to streamline the project administration & implementation post-award. In addition to the HMGP or FEMA-PA applications, the following uploads are required for successful submission:

Standard CDBG & CDBG-DR Application Documents required for scoring:

- Notification of Funding Availability (NOFA):
 - *Affidavit of Public Hearing, Public Hearing Minutes with 9 Points, Reso Authorizing the CDBG App*
- HUD Form 2880 – Applicant Disclosures;
- Federal Assurances form;
- Required Acknowledgement of Environmental Review Requirements;
- Residential Anti-Displacement & Relocation Assistance Plan ('RARA');
- Excessive Force Resolution;
- Equal Opportunity Policy;
- Fair Housing Policy;
- Code of Conduct;
- Procurement Policy;
- 2 CFR 200 Competition Certification of Compliance;
- **Project Budget and Match Worksheet;**
- **LMI Income Survey Report (as applicable);**
- **Project Team Detail;**
- **Project Delivery Staffing Plan;**

Buyout – Demo Program Specific Application Documents Required for scoring:

- **Full HMGP Application;**
- Approved Land Use Plan;
- Approved Long Term Maintenance Plan;
- Property Owner Voluntary Participation Form;
- Duplication of Benefits (DOB) Worksheet;
- Title and Ownership Documentation;
- Appraisal and Just Compensation Documents;
- Summary Table of Participating Properties & Disaster Areas Risk Reduction Map;

FEMA-PA / Infrastructure Specific Application Documents Required for scoring:

- **Full FEMA-PA Application;**
- Engineer of Record Preliminary Engineering Report / Facilities Plan;
- Iowa DNR Preliminary Engineering Report / Facilities Plan;
- Iowa DNR Construction Permit Application;
- Copy of municipal utility rates / ordinances;
- Detailed cost estimates, with FEMA concurrence (BCA);
- Proposed Plans & Specifications (if available);
- Capital Improvement Plan (if available);
- Asset Management Plan (if available);
- Map of utility service area, to include flood locations;

Disaster Tieback or Mitigation

The CDBG-DR funds will reimburse projects with a tie-back to disaster or projects that mitigate needs associated with the disaster as identified in the Action Plan.

The HMGP & FEMA-PA programs require clear documentation showing a direct disaster related impact as a prerequisite for entry into the program. Using FEMA project worksheets, IEDA assumes that if the eligible applicant received funding and support through the HMGP & FEMA-PA programs, then the project has a tie to the declared disaster.

Additionally, the HMGP & FEMA-PA programs fund projects that reduce, or mitigates, future disaster losses in communities. IEDA assumes that if the eligible applicant received funding and support through the HMGP or FEMA-PA programs, then the project serves a mitigation benefit.

Mitigation Design

All infrastructure will be designed to increase resilience to disasters or eliminate the long-term risk of loss of life, injury, damage to and loss of property, and suffering and hardship by lessening the impact of future disasters.

FEMA encourages the restoration of disaster-damaged, publicly owned facilities and the protection of these damaged facilities from future incidents. IEDA will support this effort with program funds that may be used to rehabilitate damaged systems and/or build new systems that will help protect life and property and reduce suffering and hardship by lessening the impact of future disasters. Any approved grants that involve systems must be brought up to current applicable codes and local ordinances.

Eligible Programs

FEMA HMGP

Hazard mitigation is defined as any sustained action taken to reduce or eliminate long-term risk to people and property from natural hazards and their effects. FEMA's Section 404 funding can be used to fund structural and non-structural projects, and a facility does not need to be damaged to use these funds. The funding can be combined with 406 PA funding where appropriate. Section 406 hazard mitigation funding is used to provide protection to the parts of a facility that were damaged and Section 404 hazard mitigation funding is used to provide protection to the undamaged parts of the facility.

Iowa is eligible for Hazard Mitigation Grant Program (HMGP) funds under Section 404 of the Stafford Act, as amended. The Iowa HSEM, the applicant for these funds, is inviting applications from eligible sub-applicants, State agencies, local governments, special districts, and federally recognized tribes.

The State and/or eligible sub-applicants may leverage FEMA HMGP funds with CDBG-DR for the following eligible Activity categories:

- Property acquisition of parcels located in hazard-prone areas to permanently convert to perpetual greenspaces;
- Demolition of structures to reduce health and safety risk to residents;

- *Project Delivery / Administration* for Certified Grant Administrators to implement grant administration activities in IowaGrants and coordinate with IEDA;

The property must be in the floodplain or floodway. HSEM will calculate the financial offer for each property acquisition based on pre-disaster fair market value and appraisal documentation. The subrecipient will proceed with real estate closings and procure contractor(s) for demolition. Subrecipients will follow the HSEM process. After acquisition and demolition the property will be deed restricted in perpetuity, according to the subrecipients' [Urban Renewal Plan \(Iowa Code Chapter 403\)](#) for a use that is compatible with open space, recreational, floodplain and wetlands management practices, or other disaster-risk reduction practices.

FEMA PA

FEMA's Public Assistance Program (PA) provides grants to State, tribal, territorial, and local governments, and certain types of private nonprofits so that communities can respond to and recover from major disasters quickly. Section 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act also allows FEMA to fund the hardening of these damaged facilities against future events by providing assistance for hazard mitigation measures during the recovery process, known as Section 406 Mitigation. In Iowa, Iowa Homeland Security and Emergency Management (HSEM) manages the FEMA PA program. Together with FEMA, HSEM evaluates eligibility for FEMA PA. Through the PA Program, FEMA provides grant funding for:

- Emergency protective measures and debris removal (Emergency Work); and
- Permanent restoration of damaged facilities, including cost-effective hazard mitigation to protect the facilities from future damage (Permanent Work).

To facilitate the processing of PA funding, FEMA separates Emergency Work into two categories (A and B) and Permanent Work into five categories (C – G) based on general types of facilities. Category A is eligible under Section 407 for removing debris or wreckage from publicly or privately-owned lands and waters. Category B is eligible under Section 403(a)(3) to address immediate threats to life and property resulting from a major disaster. Categories C – G are eligible under Section 406(a)(1)(A) for the repair, restoration, reconstruction, or replacement of a public facility damaged or destroyed by a major disaster. These categories are shown below and aligned with HUD eligible activities.

FEMA Category	PA Scope	HUD Eligible Activity	Funded?
Category A	Debris Removal	Section 105(a)(4)	Yes
Category B	Emergency Protective Measures	Section 105(a)(9)	Yes
Category C	Roads/ Bridges	Section 105(a)(2)	Yes
Category D	Water control facilities	Section 105(a)(2)	Yes
Category E	Building/equipment	Waiver in Universal Notice (90 FR 1754) III.D.6.b.	Yes, government buildings, no to equipment unless integral to project
Category F	Utilities	Section 105(a)(2)	Yes

Category G	Parks, recreational, and other facilities	Section 105(a)(2)	Yes
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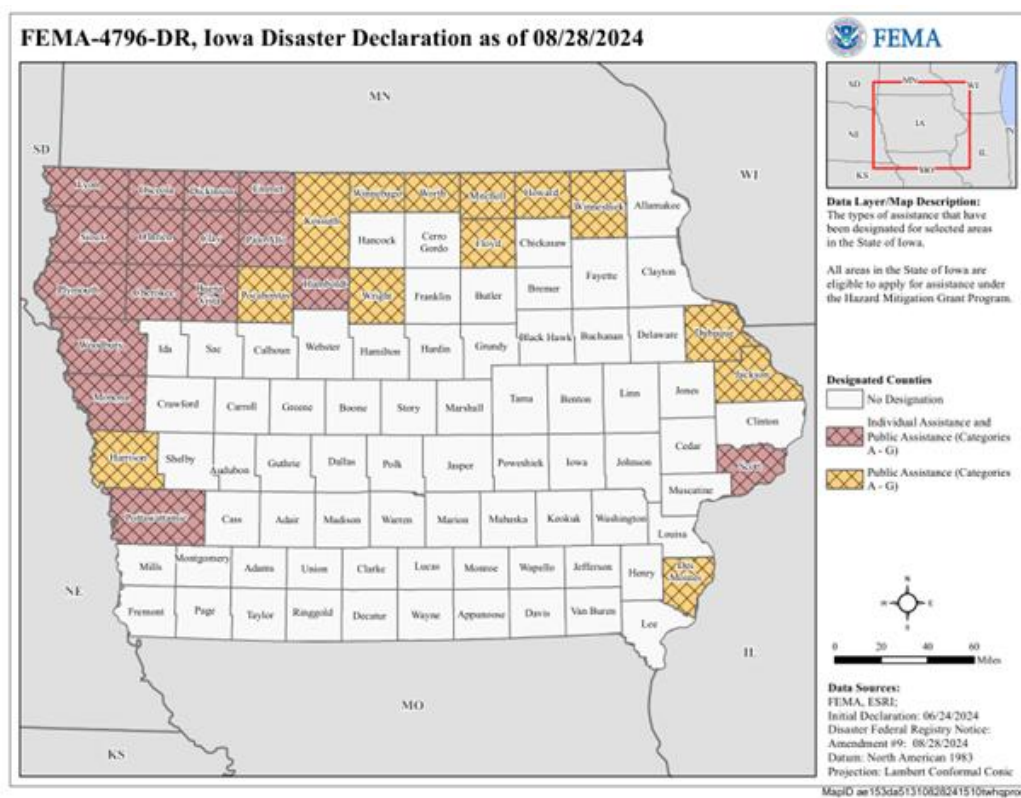
Of these eligible FEMA-PA category types, the CDBG-DR funds will be prioritized to Categories “D” and “F” for first rounds of funding in 2026. Based on residual funding availability, other categories may be funded under subsequent application rounds that become announced to all eligible communities.

[IEDA’s Action Plan](#) has made federal funding available to affected government agencies and organizations for emergency work and the repair or replacement of disaster-damaged facilities in the following counties:

- Buena Vista, Cherokee, Clay, Lyon, Pottawattamie, Sioux, Woodbury

As other unmet needs are identified in other communities, IEDA may add additional eligible communities to the State MID list for inclusion.

Figure 2: FEMA-4796-DR, Iowa Disaster Declaration as of 08/28/2024



Project Worksheets (PWs)

A project worksheet (PW) is a compilation of forms used by the FEMA PA Applicant and FEMA to develop projects¹. The PW package is usually compiled in a set order to ensure uniformity and facilitate efficient review and processing. Some of the forms included are listed below:

¹ FEMA Disaster Assistance Fact Sheet – [Elements of a Project Worksheet](#)

- **Project Worksheet Cover:** the primary form used to identify the location, damage description and dimensions, scope of work, and cost estimate for each project.
- **Damage Description and Scope of Work Continuation Sheet:** used to expand on damage quantities and description, scope of work, and cost extensions.
- **Cost Estimating Continuation Sheet:** used to calculate damage costs for large permanent work projects.
- **Special Considerations Questions²:** form asks questions about insurance, floodplain, repair/reconstruction, and environmental concerns as it pertains to a facility
- **Time / Equipment records³:**
 - Force Account Labor Summary Record ([FEMA Form 90-123](#))
 - Force Account Equipment Summary Record ([FEMA Form 90-127](#))
 - Material Summary Record ([FEMA Form 90-124](#))
 - Rented Equipment Summary Record ([FEMA Form 90-125](#))
 - Contract Work Summary Record ([FEMA Form 90-126](#))
 - Fringe Benefit Rate Sheet ([FEMA Form 90-128](#))
- Cost Estimating Format - Large Project Report⁴
- Cost Estimating Format [Spreadsheet](#)

IEDA will review each project worksheet to determine at a minimum the national objective, HUD eligible activity, potential cost(s) that can be funded by CDBG-DR, compliance requirements that will be triggered, and the non-federal share amount. CDBG-DR funds may not be used to expand a project beyond what is approved by FEMA in a PW⁵.

Matching Requirements

The Non-Federal Cost Share Match Program is guided by the [Stafford Disaster Relief and Emergency Assistance Act, USC 5121](#), the Code of Federal Regulations Title 44 Parts [13.36](#), [13.37](#) and [13.40](#), and the [FEMA Disaster Assistance Guidance 9500 Series](#).

From Section 408(g)(2) of the Stafford Act, Cost Sharing, the language states that the Federal share of the costs eligible to be paid using assistance provided (e.g., FEMA) will be 75 percent and the non-Federal share shall be paid from funds made available by the State.

The updated Universal Notice (90 FR 1754) also states that grant funds may be used to satisfy a match requirement, share, or contribution for any other Federal program when used to carry out an eligible CDBG-DR activity. This includes programs or activities administered by the FEMA.

For all match activities, grantees must document that CDBG-DR funds have been used for the actual costs incurred for the assisted project and for costs that are eligible, meet a national objective, and meet other applicable CDBG requirements.

² [Special Consideration Questions – FEMA Form 90-120](#)

³ FEMA Public Assistance – [Project Formulation SOP](#)

⁴ [Cost Estimating Format \(CEF\) For Large Projects Standard Operating Procedure \(SOP\)](#)

⁵ [Sample FEMA Project Worksheet](#) – FEMA Form 90-91 (June 2020)



Flexible Match

Flexible Match looks to streamline the process and minimize the administrative costs related to using CDBG-DR funds to satisfy the local match requirement of the FEMA PA Program. With flexible match, IEDA can choose to apply the CDBG-DR funding to distinct facilities or sites within a FEMA PA project and meet local match requirements at a PW level (see table below using a 75/25 split). All the sites and facilities must still comply with FEMA PA requirements, but only the CDBG-DR assisted portion of the project must comply with CDBG-DR requirements. Applying the Flexible Match concept can reduce the number of facilities or sites within the subaward that must comply with both federal grant program requirements.

IEDA will consider the following questions as they review project worksheets:

- What types of projects and type of work are included in the project?
- What is the project amount and the local match requirement?
- How much CDBG-DR funding is available for match?
- What is the eligible activity for CDBG-DR?
- What national objective is being met?
- Which contracts cover the activity associated with the CDBG-DR assisted portions of the project?
- How will cross-cutting requirements apply to the CDBG-DR assisted portions of the project worksheet?

Project	FEMA Assistance	CDBG-DR Assistance	Total Budget
Project Cost #1	\$42,500	\$57,500	\$100,000
Project Cost #2	\$50,000	\$0	\$50,000
Project Cost #3	\$80,000	\$0	\$80,000
TOTAL	\$172,500	\$57,500	\$230,000

Award

The CDBG-DR award will be based on the applicant's requested amount for a percentage (at least 25%) of the cumulative cost FEMA PA or HMGP projects. HSEM will conduct any DOB calculations prior to determining the final acquisition amount.

Once award amounts are determined for local governments and entities, IEDA will notify successful applicants which is a preliminary offer to enter into a grant agreement. Execution of a grant is contingent on both parties' agreement of the terms and conditions, including project scope, budget, state and federal construction and financial rules and regulations, and timeliness, and other program details described in greater detail in this policy.

Post Award First Steps

All funded projects will be required to comply with all federal and state requirements. By signing the federal assurances, the subrecipient (city, county, or tribe) acknowledges and accepts these requirements. By passing a resolution of support and executing a contract with IEDA, the subrecipient assumes the responsibility of enforcing these requirements as the HUD-designated Responsible Entity (RE) in accordance with 24 CFR Part 58.

The following steps will be required after award:

1. IEDA will enter into contract with the city/county/tribe for the award amount
2. The subrecipient will enter into a contract for project delivery (if a non-entitlement city)
3. IEDA Coordinates with HSEM/FEMA for necessary Environmental Review compliance steps
4. Release of Funds will be issued by IEDA
5. IEDA evaluates subrecipient vendor contracts prior to execution for eligible costs

Project Delivery

As part of the application process, the municipality must retain the services of a grant administrator , who must be in Good Standings per [IEDA's Certified Grant Administrator Policy](#) with demonstrated Disaster Recovery experience, sourced from either a council of government (COG) or a consultant. If a consultant, then the applicant must procure this service via an RFQ/RFP that includes the state & federal language requirements. CDBG-DR will provide up to 10% per award for project delivery, not to exceed \$60,000 total cost cap per unit. Project Delivery must be substantiated by documentation of costs incurred and cannot be duplicated by another federal funding source. Activities performed and funded under FEMA funds may not be additionally claimed to a CDBG-DR grant.

Project Delivery may include but is not limited to:

- Compiling the Environmental Review Record documentation from FEMA (see section on Environmental Review below)
- Participant Income Verification
- Demolition oversight and coordination
- Appraisal costs
- Lien Development and Filing
- Participation in individual mortgage closing
- Financing/Interest incurred for project implementation
- Housing / Infrastructure Codes & Standards Inspections
- Project Management
- Auditor

Please see [IEDA's Training Resources website](#) for more details.

Grant Agreement

After completing the application process, applicants must sign and execute the IEDA Grant Agreement before any grant funds are released. At a minimum, the agreement will include the following provisions (in accordance with 24 CFR 570.503(b)):

- Statement of Work, detailing the activities to be completed
- Milestones with Timelines
- Budget
- Record and Reports Requirements
- Program Income Guidance
- Suspension and Termination Rules
- Recapture of Funds Guidance
- Prohibition of Religious Activities
- Uniform Administrative Requirements to comply with federal and financial standards



Should any legitimate program additions or deletions be required, IEDA modify the terms of the subrecipient grant agreement.

Amendments

FEMA reviews and verifies the accuracy of the actual costs and evaluates and reconciles any cost overruns or underruns. If the information is extensive, such as payroll records or trip tickets, FEMA selects and reviews a representative sample of the documents. If FEMA successfully validates the sample, it considers all of the records to be correct. However, if FEMA identifies errors it works with the grant recipient to correct the errors and reviews a larger sample. If necessary, based on the number or significance of the errors, FEMA may return the final claim for correction and resubmittal.

For projects with funding changes, FEMA prepares a project amendment and obligates additional funds or reduces funding based on actual costs. Because of possible changes to FEMA's obligation, CDBG-DR funds could inadvertently be expended for costs that could be charged to FEMA. IEDA staff will run regular verification of PWs targeted for match to ensure that CDBG-DR funding does not trigger duplication of benefits concerns. FEMA's obligation will determine how much local match is needed. There is a risk that local match requirement is reduced after CDBG-DR funds are expended. When CDBG-DR funds are over-disbursed based on a reduction to the local match requirement it may result in a recoupment of CDBG-DR funds.

Should any legitimate program additions or deletions be required, IEDA may modify the terms of the subrecipient grant agreement upon review of the formal request. Subrecipients may request a grant amendment to extend the period of performance, for scope changes, or for budget changes that affect the CDBG-DR grant award. IEDA will review the submission and determine whether a grant amendment is warranted. Subrecipients must submit the request for a grant amendment as soon as the need is identified, **but not less than 90 days prior to the grant agreement period of performance expires.**

Exception Policy

IEDA will consider exceptions to the program guidelines on a case-by-case basis. All exceptions must be submitted in writing with the application and include a justification. Exceptions should enhance the benefit to LMI households or areas. Exceptions cannot violate federal, state, or local laws or regulations. Exceptions must still meet HUD's requirements for necessary and reasonable, comply with federal accessibility standards, and accommodate a person with disabilities if applicable. A written response will be authorized in writing to the applicant upon approval or denial of the application requesting an exception.

Appeals

All appeal requests related to program activities are processed and reviewed by IEDA. Appeal requests to IEDA must be postmarked within sixty (60) calendar days of the date of service on the original correspondence communicating the decision to be appealed. Appeals must be submitted in writing to:

Robert Wick, CDBG Team Lead
Iowa Economic Development Authority
1963 Bell Ave., Suite 200
Des Moines, IA 50315
robert.wick@iowaeda.com



The applicant's written request should contain the following information:

- Applicant's name,
- Application number
- Project site location,
- Applicant's mailing address,
- Applicant's telephone number,
- Email address (if available),
- The reason(s) the decision or action is being appealed,
- Documentation that supports the request to overturn the decision

If appropriate, IEDA may contact the applicant to allow the applicant to provide additional documents to address any deficiency or incomplete information, or to be interviewed to determine the merits of the applicant's appeal. If the action or decision is overturned, notification will specify the corrective action to be taken. The applicant shall be notified of the final determination in writing via certified mail.

Timeliness

IEDA standard awards are for a **three-year period of performance**. Therefore, projects funded must be completed within 3 years from the date of grant agreement execution. Based on data submitted in applications, IEDA will in turn develop projections based on each quarters expected performance. Those projections will be made available on [IEDA's 2024 disaster recovery website](#). IEDA will work closely with subrecipients and HSEM to be monitor expenditures and outcomes against these projections with every claim voucher submitted for payment.

Environmental Review

The Universal Notice (90 FR 1754) in Section III.B.10.c. allows recipients of CDBG-DR funds to adopt another Federal agency's environmental review. The notice states that *"...recipients of CDBG-DR funds that supplement other Federal assistance may adopt, without review or public comment, any environmental review, approval, or permit performed by a Federal agency, so long as the actions covered by the existing environmental review, approval, or permit and the actions proposed for the CDBG-DR supplemental funds are substantially the same. Such adoption shall satisfy the responsibilities of the recipient with respect to such environmental review, approval, or permit. Projects originally funded by another agency that are later supplemented with CDBG-DR do not have to supplement the other agency's environmental review with any HUD environmental requirements that differ from the originating agency. If the activity is modified so the other agency's environmental review no longer covers the activity, the grantee is required to reevaluate and supplement the other agency's environmental review to comply with all applicable HUD environmental regulations in 24 CFR part 58..."*

IEDA will coordinate with HSEM and FEMA on the applicants behalf to ensure all Environmental Review elements are affirmed before IEDA will approve the release of funds:

1. An electronic or paper copy of the Federal agency's review. The review must become part of the subrecipient's environmental review record.
2. A memo stating that the scope of work completed by the Federal agency's review is substantially the same as the CDBG-DR match project.
3. Submit a RROF (HUD-Form 7015.15) that another agency review is being used, including the



name of the other Federal agency, the name of the project, and the date of the project's review as prepared by the other Federal agency.

Claims

Projects in the HMGP & FEMA-PA systems will have been vetted by HSEM through due diligence and reviewed again by IEDA staff for potential reimbursement to prevent Duplication of Benefits (DOB). IEDA will reimburse funds in the form of a grant for actual costs incurred. The CDBG-DR grant agreements and documents incorporated by reference will explain the roles and responsibilities, identify the project(s) to be funded with non-federal match (i.e., CDBG-DR funds), the total budget, the grant milestones, and the requirements for the use of CDBG-DR funds.

Claims for reimbursement will be submitted by the subrecipient's Certified Grant Administrator (CGA) via the online www.iowagrants.gov system. The subrecipient shall maintain a file of all claim-supporting documentation including claim documents, invoices and payments. NO claim will be processed if the following conditions are present:

- Proof of payment is not present;
- A Contract Clearance does not exist for vendors included in the Claim;
- Any required compliance reporting is not present or up-to-date;
- Quarterly status reporting is not current or other compliance forms are missing.

Claims are due within 6 months of the grant agreement execution, and every 90 days thereafter. The IEDA Project Manager will notify the recipient if payment is withheld due to delinquent reporting. Once funds requests are approved by project staff, IEDA Fiscal sends payment to each subrecipient ACH.

Recapture of funds

There are situations that may trigger duplication of benefits and require IEDA to reduce the amount of CDBG-DR funding used on a project. In addition, failure of a subrecipient to ensure that the use of CDBG-DR funding follows HUD regulations could also trigger a reduction in funding. When necessary, IEDA staff will notify a subrecipient to reconcile overpayment or eligibility issues before requesting the subrecipient to repay back funds to the program.

NOTE: If a project fails to meet the National Objective specified in the Application, the subrecipient will, at a minimum, be required to return ALL expended grant funds back to IEDA so they can be re-allocated to address needs in other communities. Awarded subrecipients who have been identified for recapture of program funding will not be able to close out of the program until all funds have been repaid to the state.

Program Income

Program income is the gross income received by IEDA or any of its subrecipients that is directly generated from the use of CDBG-DR funds. Information regarding how program income may be generated and used is available at 24 CFR 570.489 and 24 CFR 570.504, as well as on HUD's website. IEDA does not anticipate generating program income through the FEMA Non-Federal Cost Share program. If program income is generated, it will be transferred from the subrecipient to IEDA. Program income will be expended before drawing funds from HUD.



Reporting

Subrecipients will report project progress at least quarterly in IowaGrants. This report will outline progress made toward milestones outlined in the subrecipient's contract with IEDA. Reports will be due by January 5, July 5, October 5, and December 5 for the prior quarter. Progress on the following deliverables will be reported:

- Percentage of work completed
- Actual costs incurred to date of quarterly report submission
- Estimate timeline remaining to complete construction
- Progress narrative of work completed
- Any risks to the project

IEDA will use information from subrecipients reports in IowaGrants to enter information in the DRGR system on a quarterly basis as part of the submission of the Quarterly Performance Reports to HUD. The information in DRGR and the performance reports must contain sufficient detail to permit HUD's review of IEDA's data and performance to allow HUD to assess compliance and risk.

Procurement and Contracting

Subrecipients shall follow the state of Iowa procurement requirements in Iowa Code 26.3 and 362.3 and federal procurement requirements in 2 CFR Part 200 as required by FEMA and IEDA. All projects must be cost reasonable. IEDA will determine project cost reasonableness through the competitive application comparison, review, and selection processes and may obtain third-party verification on a case-by-case basis. As such, application budgets must be thorough and accurate for evaluation.

All contractors and contract data must be submitted for Contractor Clearance in IowaGrants. All work for construction must be recorded in a written, executed contract. All contractors must be registered to work in the State of Iowa.

Flood Control Structures

The Universal Notice (90 FR 1754) in Section III.D.6.d. details requirements for Flood control structures (i.e., dams and levees). CDBG-DR can't be used to enlarge a dam or levee beyond the original footprint of the structure that existed before the disaster event, without obtaining pre-approval from HUD and any Federal agencies that HUD determines are necessary based on their involvement or potential involvement with the levee or dam. Grantees that use CDBG-DR funds for levees and dams are required to: (1) register and maintain entries regarding such structures with the USACE National Levee Database or National Inventory of Dams; (2) ensure that the structure is admitted in the USACE's PL 84-99 Rehabilitation Program (Levee Rehabilitation and Inspection Program); (3) ensure the structure is accredited under the FEMA National Flood Insurance Program (NFIP); (4) enter the exact location of the structure and the area served and protected by the structure into the DRGR system; and (5) maintain file documentation demonstrating that the grantee has conducted a risk assessment before funding the flood control structure and documentation that the investment includes risk reduction measures.

Long-term sustainability

All newly constructed infrastructure that is assisted with CDBG-DR funds must be designed and constructed to withstand extreme weather events. To satisfy this requirement, IEDA must identify, implement and report on resilience performance metrics that will protect the public from any risks

identified in the action plan. IEDA will review projects to determine which metrics are suitable for reporting to HUD through the DRGR system. Examples of resilience performance metrics include:

- Number of non-residential buildings constructed
- Number of public facilities
- Number of fewer outages of critical facilities and utilities
- Number of linear feet of public improvement
- Number of properties with access above 100 year or 500 year flood level
- Number of residents protected from future flooding

For purposes of this requirement, an infrastructure activity includes any activity or group of activities (including acquisition or site or other improvements), whether carried out on public or private land, that assists the development of the physical assets that are designed to provide or support services to the general public in the following sectors:

- Surface transportation, including roadways, bridges, railroads, and transit; aviation; ports, including navigational channels;
- Water resources projects;
- Energy production and generation, including from renewable, nuclear, and hydro sources;
- Electricity transmission;
- Broadband;
- Pipelines;
- Stormwater and sewer infrastructure;
- Drinking water infrastructure;
- Schools, hospitals, and housing shelters; and
- Other sectors as may be determined by the [Federal Permitting Improvement Steering Council](#).

For purposes of this requirement, an activity that falls within this definition is an infrastructure activity regardless of whether it is carried out under sections 105(a)(2), 105(a)(4), 105(a)(14), another section of the HCDA, or a waiver or alternative requirement established by HUD.

Davis Bacon

On March 21, 2025⁶, DOL granted HUD's request for a waiver of retroactive Davis Bacon and Related Acts (DBRA) applicability for certain CDBG-DR projects including the 2025 allocations for projects where CDBG-DR funds are used as non-federal match for other federal grant programs. The waiver allows:

- **No DBRA applicability if:** All construction work on a project *was completed before* the date the CDBG-DR *grant agreement* was signed by HUD, and CDBG-DR funds are used *only to reimburse those completed project costs*;
- **DBRA applies prospectively if:** Construction began *after* the date HUD signed the CDBG-DR grant agreement, or Construction began before the grant agreement date but was *still ongoing* as of that date;

⁶ HUD's Office of Disaster Recovery Division, CDBG-DR Guidance: Davis-Bacon and Related Acts (DBRA) Applicability and Department of Labor Waiver Provisions, HUD, 2025.



The waiver applies to all projects funded by CDBG-DR grants **used as non-federal match for public facilities and improvements, including infrastructure**, whether *contracted by the grantee directly or through subrecipients*.

Section 3

All projects receiving more than \$200,000 in HUD assistance at a project site are required to comply with the Section 3 rule, as detailed in 24 CFR Part 75. This includes the tracking of all labor hours on the project sites, including projects not subject to Davis Bacon, and qualitative efforts undertaken to demonstrate compliance. See IEDA's Section 3 guidance for more information.

Audit Requirements

As per the provisions of [2 CFR 200, Subpart F](#), Audit Requirements, grantees that expend \$1 million or more during their fiscal year in Federal awards must have a single or program-specific audit conducted for that year. Subrecipients must also have a single or program-specific audit if they meet the \$1 million expenditure threshold.

If IEDA is disbursing grant funds to subrecipients, IEDA is required by [2 CFR 200.331](#) to ensure that subrecipients comply with Subpart F. IEDA will verify that subrecipients, if applicable, have prepared financial statements (including the schedule of expenditures of Federal awards), that there are no significant findings in the Single Audit that impact the use of CDBG-DR funding, and if there are findings that the subrecipient has taken corrective action.

Prevention of Fraud, Waste, and Abuse

IEDA has zero tolerance for the commission or concealment of acts of fraud, waste, or abuse. Subrecipient and grant administrator staff will attend HUD OIG fraud training when provided. Any instances of fraud, waste, or abuse should be reported to the HUD OIG at 1-800-347-3735 or hotline@hudoig.gov. All instances of fraud, waste, and abuse discovered by IEDA will be reported to the HUD OIG.

Financial Management

Subrecipients must insure that they have policies and procedures for expending and accounting for all CDBG-DR funds received and to maintain adequate source documentation to demonstrate that CDBG-DR funds are used in compliance with all the terms and conditions of the CDBG-DR award, only spent for reasonable and necessary costs, and not used for general expenses to carry out other responsibilities of State and local governments. The financial policies will also ensure the following are met:

1. The subrecipient will charge to the CDBG-DR award only allowable costs incurred during the period of performance and any authorized pre-award costs.
2. When grant funds are transferred to subrecipients, the subrecipient will minimize the time elapsing between the receipt of funds from the state and the transfer of funds to contractors.
3. If applicable, subrecipients will disburse funds available from program income or send it to the state, before requesting additional grant funding.
4. For any changes made to the approved budget, scope, or objectives, subrecipients will notify IEDA of the changes and any substantial changes will be approved by IEDA.

5. Subrecipients will submit to HUD mandatory quarterly progress reports for IEDA's review of program progress.

Duplication of Benefits and Subrogation

Because the costs for FEMA PA projects can fluctuate based on scope of work, IEDA will ensure that a duplication of benefit (DOB) is not triggered. The Stafford Act prohibits any person, business concern or other entity from receiving financial assistance from CDBG Disaster Recovery funding with respect to any part of a loss which they have already received financial assistance under any other program, from insurance, or any other sources. To prevent a Duplication of Benefits, matching funds from other sources (i.e., local funds or grants) are considered before IEDA allocates funding.

IEDA & HSEM will perform a duplication of benefits analysis for each project that includes:

- 1.) assess applicant's total need;
- 2.) identify total assistance;
- 3.) exclude non-duplicative amounts;
- 4.) exclude funds for a different purpose;
- 5.) exclude funds for the same purpose, different allowable use;
- 6.) identify a final DOB amount (if any) and calculate the award; and
- 7.) reassess unmet need when necessary.

HSEM in conjunction with IEDA will verify that subrecipients did not have other local or state funds designated or planned for the activity or budgeted.

Applicants must agree to subrogate (commit to the State) any future payments they may receive after the award amount is determined from sources that represent a potential DOB. The subrogation agreement requires the entity to notify the State if additional funds are received and to assist the State in collecting any amounts owed to the entity from these sources.

Uniform Relocation Assistance

The Uniform Relocation Assistance and Real Property Acquisition Act of 1970, as amended (the URA) and its implementing regulations at 49 CFR 42, establish minimum standards for federally funded programs and projects requiring the acquisition of real property or displaced persons from their homes or businesses. The URA applies broadly to all planned or intended federally funded projects, funded in part or in whole where acquisition, rehabilitation or demolition occurs in any phase. For applications, properties impacted will indicate on their application if the property is owner-occupied or tenant occupied. The project must consider potential impacts to tenants⁷. If an identified project results in tenants leaving their homes involuntarily (being displaced), the tenants may be eligible for Tenant Relocation Assistance under the URA. These requirements apply to the relocation of any displaced person as defined at 49 CFR § 24.2(a)(9). Displaced persons under this definition must be fully informed of their rights and entitlements to relocation assistance and payments provided by the URA and its implementing regulations. For more information, refer to 49 CFR 24, Subpart C. The cost of relocation will be allocated in the HSEM budget for the project and those cost are eligible for CDBG-DR match.

⁷ HUD's [Tenant Assistance, Relocation and Real Property Acquisition Handbook](#) (1378.0)

Conflict of Interest

No persons who is an employee, agent, consultant, officer, or elected official or appointed official of the recipient, or of any designated public agencies, or of sub-recipients that are receiving funds under this part who exercise or have exercised any functions or responsibilities with respect to CDBG-DR activities assisted under this part, or who are in a position to participate in a decision making process or gain inside information with regard to such activities, may obtain a financial interest or benefit from a CDBG-DR assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-DR assisted activity, or with respect to the proceeds of the CDBG-DR -assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.

Long-Term Maintenance

Subrecipients are expected to be able to maintain all infrastructure projects as well as green space created as a result of the FEMA funded project and provide a Long-Term Maintenance Plan. This plan must be adopted by the municipal board by resolution to demonstrate a commitment to long term sustainment and investment

Additionally, for projects involving repairs / replacements to infrastructure in special districts (e.g., drinking water district projects, wastewater treatment district projects, stormwater district projects, etc.) will also be required to produce a Capital Improvement Plan and an Asset Management Plan that has been adopted by the municipal board by resolution to demonstrate a commitment to long term sustainment and investment. The development of these deliverables shall be included in engineering scopes of work for contracts that are funded with CDBG-DR funds. IEDA and HSEM will work with subrecipients to review operation and maintenance plans.

Monitoring

Monitoring will be conducted via multiple methodologies throughout the project. One method is the Risk Assessment that IEDA will conduct annually per CDBG-DR contract. Each activity will have either a virtual desktop or on-site Site Visit at least once during the life of the grant, per the CDBG Management Guide. The Risk Assessment will assist project managers in determining the timing and frequency of documented Site Visits. The Risk Assessment will be conducted through IowaGrants once per year by the project manager, and based on the outcome score, the project manager will determine if / when a subsequent Site Visit is required. Per 200.331(b), IEDA will evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and terms and conditions of the subaward for the purposes of determining the appropriate level of monitoring. The risk based assessment will include:

- Financial Risk- how large is the grant
- Submitted Draws- are claims on schedule as outlined in contract, and contain required backup documentation
- Timeliness – has the project progressed according to plans or suffered preventable delays
- Program Management/Capacity – is the administrator in compliance with IEDA's CGA Policy
- Program Income- has the contract generated program income
- Compliance Reporting – are all cross-cutting compliance requirements met
- Complaints – are there any citizen complaints or conflicts with the Citizen Participation Plan
- QPR Tracking- is the program reasonably on track



IEDA will schedule a Site Visit with the subrecipient upon the expenditure of at least 50% of the CDBG-DR award by a subrecipient, or upon 50% construction. The project manager will email the subrecipient and grant administrator to schedule the visit. Site Visit information and forms will be made available and completed in IowaGrants. The project manager will instruct grant administrators to provide any additional information identified as needed during a Site Visit. After the Site Visit, a report will be uploaded to IowaGrants and sent to both the subrecipient and grant administrator. IEDA reserves the right to perform monitoring assessments the project at any point in time based on its assessment of project risk or other considerations.

Closeout

Activity

Upon project completion, FEMA and its grant recipients are required to close out the award in accordance with [2 CFR 200.343](#) and [200.344](#). To close the FEMA PA grant award, FEMA and the PA recipient must conduct a financial and program reconciliation.

FEMA publishes the [Hazard Mitigation Assistance \(HMA\) Grant Closeout Field Guides and Closeout Checklists](#) to provide all FEMA staff, recipients, and subrecipients with a consistent process for the closeout of HMA mitigation activities. The field guides and checklists have been designed as a reference tool to explain the roles and processes needed to implement grant closeout activities for non-disaster and post-disaster HMA grants funded after the publication of the [2015 Hazard Mitigation Assistance Guidance](#). The field guides and checklists are applicable to HMA grant programs such as the Pre-Disaster Mitigation (PDM) Program, the Hazard Mitigation Grant Program (HMGP), and the Building Resilient Infrastructure and Communities (BRIC).

IEDA will ‘piggyback’ on FEMA’s closeout and perform a similar review to ensure projects can be closed out for HUD. In addition to the things FEMA reviews, IEDA may also review documents related to monitoring and audits completed, verify that specific HUD requirements are met or not triggered, verify that costs charged to the CDBG-DR grant are eligible, and verify that costs were allocated correctly.

Contract

As mentioned above, FEMA will verify compliance with procurement and contracting for closeout. IEDA staff will perform another review to ensure procured contracts comply with HUD standards. IEDA will document that a contract can be closed when all applicable invoices have been received, compliance is met, and no further activity is needed.

Program

To close out the FEMA Non-Federal Cost Share program, IEDA staff will verify the following:

- Projects:
 - ☐ Confirm that all program activities are complete.
 - ☐ Confirm final beneficiary numbers.
 - ☐ Confirm compliance with all contracts funded through the program.
- Financials:
 - ☐ Confirm the total reimbursement through the program and verify that the accounting is accurate.

- ☐ Confirm final reimbursement request has been made.
- ☐ Confirm that the program is not overspent against the Action Plan budget.
- Administrative
 - ☐ Confirm documentation is retained for any critical decisions made or policies developed (for future audits).
 - ☐ Closeout applicant files and make sure files are consistently organized.
 - ☐ Closeout individual activities and the FEMA Non-Federal Cost Share program in DRGR.

The program will be ready for closeout when the conditions are met:

- All eligible activities are completed.
- All funds are expended in full or remaining funds are planned to be returned to IEDA.
- All reporting requirements were completed.
- Any specials conditions of the program were met.
- All audit and monitoring issues were resolved.

Records Management

File Management

Below is a list of supporting documentation that IEDA staff may review as part of the review to validate the CDBG-DR match disbursement. This is not an exhaustive list and not all documentation listed will be required for a single match request. Applicant specific documentation will be pulled and reviewed when applicable.

- PW (cost, scope, maps, etc.)
- Procurement files (including bids, contracts, etc.)
- SAM verification
- Payroll records, justification, and reports
- MOU or Subrecipient Agreement
- Award Letter
- Eligibility of the activity
- Evidence of having met a national objective
- FEMA progress payments
- Budget, expenditure information, CDBG-DR Draw down requests
- Source documentation (purchase orders, invoices, canceled checks)
- Applicable environmental review records
- Applicable monitoring and audit reports

Document Retention

The subrecipient must retain all documentation of this project for three years **after the entire 202 CDBG-DR grant between IEDA and HUD is closed**. IEDA grant closeout with HUD is anticipated in 2031. Subrecipients should expect to retain all documentation through at least 2034. IEDA will notify all subrecipients when documentation retention is no longer required. Subrecipients may also contact IEDA's Community Development and/or Disaster Recovery divisions to inquire about document retention times for 2024 CDBG-DR grant.

