



Water, Sewer & Stormwater Program Guidelines

Version 2.0 | February 2026

Contents

Version History.....	ii
Program Summary	1
Purpose	1
Definitions	1
Administration	2
Available Funds	2
Maximum Award	2
Eligible Activities	2
Ineligible Activities	3
National Objectives.....	3
Eligible Applicants.....	3
Required Match	4
Exception Policy	4
Application for Assistance	5
Citizen Participation	5
Public Hearing Requirement.....	5
Application Workshop	6
Application Criteria.....	6
Project Costs	8
Grant Administration.....	8
Project Delivery.....	9
Selection	11
Scoring.....	11
Award	11
Grant Agreement.....	13
Terms and Conditions.....	13
Post Award First Steps	13
Section 106 of the National Historic Preservation Act	13
Release of Funds.....	14
Amendments and Extensions	14
Implementation.....	15
Timeliness and Project Completion	15
Claims.....	15

General Program Requirements 17

 Floodplain Requirement..... 17

 Procurement and Contracting 17

 Violence Against Women Act (VAWA) 17

 Buy America Build America (BABA) 17

 Section 3..... 18

 Davis Bacon..... 18

 Long-Term Sustainability 18

 Long-Term Maintenance..... 18

 Uniform Relocation Assistance 18

 Minimize Displacement..... 19

 Fair Housing and Civil Rights 19

 Internal Controls 19

 Audit Requirements 20

 Prevention of Fraud, Waste, and Abuse 20

 Financial Management 20

 Conflict of Interest..... 21

Monitoring 22

Closeout 23

 Records Management 23

 Document Retention 24

APPENDIX 25



Version History

Version	Date	Summary Description
1.0	January 2026	Original
2.0	February 2026	Revisions from Application Workshop applied

Program Summary

Purpose

The CDBG Water, Sewer, and Stormwater Program is designed to assist communities in addressing critical public infrastructure needs that protect health, safety, and environmental quality. The program provides funding for eligible projects that improve access to safe drinking water, upgrade wastewater systems, and enhance stormwater management to reduce flooding and contamination risks. By supporting these essential improvements, the program helps communities meet regulatory standards, promote resilience, and ensure long-term sustainability for residents—particularly in areas serving low- and moderate-income populations.

Definitions

Unit of General Local Government (UGLG)

Any city, county, town, township, parish, political subdivision of a state, or public agency that has the authority to undertake activities eligible for assistance under the Community Development Block Grant (CDBG) program.

Applicant

Unit of Local Government.

Subrecipient

A public or private nonprofit organization, or a public agency, that is designated by a Recipient to receive CDBG funds to carry out an eligible activity on behalf of the ULG. **The ‘Applicant’ becomes a Subrecipient from IEDA for any awarded funds.**

Grant Administrators

A Grant Administrator (GA) is an individual who has engaged with the Iowa Economic Development Authority (IEDA) for inclusion into the Certified Grant Administrator (CGA) Program for training and certification requirements necessary to administer Community Development Block Grant (CDBG) projects in Iowa. GAs are responsible for ensuring full compliance with federal and state regulations across all phases of a CDBG funded project. **Applicants can acquire a list of Certified Grant Administrators by contacting IEDA.** Please see [IEDAs CGA Policy and Training Resources](#) for details.

Grant Administration

Per HUD, Grant Administration is defined as "...reasonable administrative costs and carrying charges related to the planning and execution of community development activities assisted in whole or in part with CDBG funds..." ([CPD 23-07](#)). Essentially, all activities required to manage the grant award itself and ensure full compliance with federal and state regulations. These tasks are focused on the grant, not the physical project. Grant Administration must be performed by an IEDA-Certified Grant Administrator (CGA).

Project / Activity Delivery

Per HUD, Project / Activity delivery costs (ADCs) is defined as "...those allowable costs incurred for implementing and carrying out eligible CDBG activities. All ADCs are allocable to a CDBG activity, including direct and indirect costs integral to the delivery of the final CDBG-assisted activity. CDBG expenditures for activity delivery costs are not governed by 24 CFR 570.205 and 570.206..." ([CPD 23-07](#)). Generally, this refers to all activities required to implement and execute the eligible project, including technical, construction related, and beneficiary related tasks. These tasks are focused on the physical project and its delivery, not on grant compliance.

Entitlement Community

Principal cities of Metropolitan Statistical areas, cities with populations over 50,000 or urban counties with population over 200,000.

LMI Community

A Low and Moderate Income (LMI) Community is a geographic area—usually a Census block group, Census tract, or other defined service area—in which at least 51% of the residents are low and moderate income persons, defined as those whose household incomes are at or below 80% of Area Median Income (AMI). This definition is tied directly to the Community Development Block Grant (CDBG) program and HUD’s national objective to benefit LMI persons. Core HUD standard: An area is considered LMI if 51% or more of the residents have incomes at or below 80% of AMI

Recipient

Iowa Economic Development Authority (IEDA), as the receiving entity of the HUD program funds on the behalf of the state of Iowa.

Vendor

Any contractor or consultant hired by the Applicant / ULG or the Subrecipient to perform services or provide products to support the proposed project.

Additional definitions can be found in the CDBG Management Guide.

Administration

This program is administered by the Iowa Economic Development Authority (IEDA). IEDA is a state agency which administers Community Development Block Grant (CDBG) awards issued to the State of Iowa by the U.S. Department of Housing and Urban Development (HUD). Administrative activities are led by the IEDA CDBG team.

Available Funds

Program	Budget
Water, Sewer and Stormwater	\$10,409,717

Maximum Award

The maximum assistance available is \$500,000 per project.

Eligible Activities

All activities must comply with applicable federal requirements under the Housing and Community Development Act (HCDA), the Code of Federal Regulations (CFR), CDBG regulations, and local codes. The statutory authorities below establish the eligible activity framework for the program is as follows:

24 CFR 570.201(c)

Public facilities and improvements. Acquisition, construction, reconstruction, rehabilitation or installation of public facilities and improvements, except as provided in [§ 570.207\(a\)](#), carried out by the recipient or other public or private nonprofit entities.

Ineligible Activities

As per [24 CFR 570.207](#), IEDA will not fund the following activities through the General Infrastructure program.

General government expenses

Expenses required to carry out the regular responsibilities of the unit of the 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.

Operating and maintenance

Any expense associated with repairing, operating or maintaining public facilities, improvements and services is ineligible. 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 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.

National Objectives

Activities funded under the CDBG Water, Sewer, and Stormwater Program must meet HUD's **Low- and Moderate-Income (LMI) Area Benefit (LMA)** national objective, as outlined under **24 CFR § 570.208(a)(1)(i)**. To qualify, projects must serve a delineated service area—such as a water district, sewer service region, or stormwater management zone—and at least **51% of the residents in that area must be LMI**. This ensures that essential infrastructure improvements directly benefit communities with the greatest financial need, supporting both environmental equity and public health priorities.

Eligible Applicants

Non-Entitlement Units of general local government (UGLGs) are eligible applicants for these funds. All applicants must work with an IEDA Certified Grant Administrator to submit the application and conduct grant administration.

Required Match

Match is not required for this program if CDBG funds requested are sufficient to complete the proposed project. However, if requested CDBG funds are NOT sufficient to complete the project, Applicants are required to demonstrate that the remaining Gap Funding is committed at the time of application.

- **Gap Funding** refers to the minimum non-CDBG funds **required to fully finance a project** when total costs exceed the CDBG award. These funds are required to demonstrate project feasibility and are evaluated as an eligibility threshold.

All forms of Match must be:

- Committed (not speculative);
- Available within the project timeframe;
- Legally authorized;
- Not double counted; -counted;
- Allowable under all co-funding sources;

If the Gap Funding is coming from sources other than the SRF program or USDA (i.e., WTFAP, Donations, etc.) fully executed grant or loan, or formal approval letters documenting committed funds are required.

IEDA reserves the right to concur with co-funding partners regarding the status of the Applicants' readiness as part of a threshold and/or competitive scoring criteria. Applications that do not reflect accurate status as affirmed by co-funding partners may not be scored.

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 of 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.

Application for Assistance

IEDA will open an application window for eligible applicants to apply to the program. Applications will be available on IowaGrants. The applications will be reviewed competitively and evaluated to ensure that the proposed projects meet the minimum criteria outlined in these Program Guidelines. If all funds are not obligated, future rounds will be established, at no less than two rounds per year, until the funds in this program are fully expended. After evaluation, the scoring will be forwarded onto IEDA leadership for the award. IEDA will identify awardees and notify selected and non-selected applicants in writing. Selected awardees will then enter into a grant agreement with IEDA that will formalize conditions of the grant.

Citizen Participation

All applicants, including Units of Local Government and Subrecipients, must ensure meaningful access to program information and services for individuals with Limited English Proficiency (LEP) in accordance with Title VI of the Civil Rights Act of 1964 and HUD's LEP Guidance (72 FR 2732). This obligation is reinforced through IEDA's own planning documents. The State of Iowa Citizen Participation Plan, which is incorporated into the State's Consolidated Plan, requires that program materials and public hearings be made accessible to non-English speakers, including by providing translators and written translations upon request and ensuring that approved Consolidated Plan documents are available "in a manner accessible to non-English speakers or those with disabilities." In addition, IEDA maintains a formal Language Access Plan, which describes the reasonable steps required under HUD's LEP framework—such as the Four Factor Analysis—and affirms that both IEDA and its subrecipients must provide meaningful language assistance so LEP individuals can access CDBG funded programs and services. **Applicants may either adopt IEDA's Language Access Plan or develop their own HUD compliant Language Access Plan that meets Title VI and Executive Order 13166 requirements.** -English speakers, including by providing translators and written translations upon request and ensuring that approved Consolidated Plan documents are available "in a manner accessible to non-English speakers or those with disabilities." In addition, IEDA maintains a formal Language Access Plan, which describes the reasonable steps required under HUD's LEP framework—such as the Four-Factor Analysis—and affirms that both IEDA and its subrecipients must provide meaningful language assistance so LEP individuals can access CDBG-funded programs and services. **-compliant Language Access Plan that meets Title VI and Executive Order 13166 requirements.**

- IEDA Citizen Participation Plan: <https://opportunityiowa.gov/media/6807/download?inline>
- IEDA Language Access Plan: <https://opportunityiowa.gov/media/6834/download?inline>

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 on the Notice of Funding Availability (NOFA). Additionally, 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 must 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 Affidavit of Publication and the actual public hearing notice;
- Meeting minutes, including comments and responses;

During 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 funding of the proposed activity and sources of funds;
- A summary of expenditures to date;
- A general description of the remaining work;
- The location of the proposed activity;
- A general description of changes made to the project budget, performance targets, activity schedules, scope, location, objectives, or beneficiaries.

Application Workshop

Applications will be submitted via <https://www.iowaGrants.gov> using the guidance provided in this document and in the CDBG Management Guide.

Application Workshops & Application Windows

- Application Workshop scheduled for [February 12, 2026](#);
- Application Window schedule for [Round #1](#) will be [3/03/26 – 5/01/26](#)
- Application Window schedule for [Round #2](#) will be [7/01/26 – 9/01/26](#)

Application Criteria

For this program, LMI communities will be prioritized for funding. During the review of projects, IEDA will assess projects on the following criteria:

- Applicant must have an active SAM.gov account.
 - ***If awarded, SAM.gov account must be kept active through the life of the grant agreement.***
- The project description is complete and clearly describes the need for the project;
- The project will be considered public infrastructure;
- There is clear evidence that there are mechanisms in place to ensure long-term maintenance of the project;
- The project is ready to proceed and the applicant includes timelines with milestones;
- The other sources of funding are well documented;
- The other sources of funding are available at the time of application;
- The budget is comprehensive and reasonable for the project scope;
- The designs and plans demonstrate that future hazards will be mitigated;
- The project is based on engineered plans and cost estimates;
- The project aligns with other projects and long-term planning efforts;
- The applicant demonstrates the capacity to manage the grant funding;

Required Application Documentation

To be scored, applications must include:

Standard CDBG Application Documents required for scoring:

- Notification of Funding Availability (NOFA):
 - **Affidavit and copy of Public Hearing, Public Hearing Minutes with 9 Points, Resolution Authorizing the CDBG Application**
- [HUD Form 2880 – Applicant Disclosures](#);
- [HUD Form 424-B Federal Assurances form](#);
- [Required Acknowledgement of Environmental Review Requirements](#);
- [Residential Anti-Displacement & Relocation Assistance Plan \('RARA'\)](#);
- [Prohibition of Excessive Force Policy](#);
- [Equal Opportunity Policy](#);
- [Code of Conduct](#);
- [Procurement Policy](#);
- [2 CFR 200 Competition Certification of Compliance](#);
- [Affirmative Fair Housing Policy](#);
- Community Development Housing Needs Assessment;
 - **Must be current to within the last year & presented at a public meeting.**
- Language Access Plan;
- Project Budget and Match Worksheet;
- LMI Income Survey Report (if no ACS data demonstrates LMI/LMA status);
- Project Team Identification (See below);
- Project Delivery / Administration Staffing Plan, that identifies all participating GA members;

Infrastructure Program-Specific Application Documents:

- Proof of procurement for grant administration and A/E services;
- Site control documentation;
- IDNR Construction Permit / evidence of permit application;
- Preliminary Engineering Report / Facilities Plan;
- IDNR Approval of PER / Facilities Plan;
 - Project Cost Estimates;
 - Project Design Documents (Site Plan, Rendering, Concept, etc.);
 - Map of project location;
- Floodplain Map;
- Support documentation for the project budget;
 - [Evidence of Match](#);
- Project Schedule of critical milestones;

In addition to the above documentation, all fields in lowagrants.gov application form must be completed. **Incomplete application will not be reviewed or scored.**

Project Team Identification

Applicants will be required to submit a detail of the proposed project team with their application. The plan will indicate clearly who will be providing what supportive roles to the applicant. The details will include designation of the project team including, including their roles and responsibilities. All must be contractually established (except municipal staff). These include, but not limited to:

Chief Elected Official (CEO) – oversee City's contractual obligations to the project and all project contractors / vendors;

- Municipal Admin Lead – oversee the financial matters;
- Local Counsel – represent the applicant interests for all contractual / acquisition matters;
- Architect/Engineer – develop plans and assure that contractor builds to plans;
- Grant Administrator – oversee all state / federal funding compliance elements that apply to the project, IowaGrants data entry, City team liaison;
- Labor Compliance Officer – GA-designated member that reviews payrolls and completes interviews.

Project Costs

For this program, contingencies proposed in the application budget must be at least 10%.

- If the project has not yet received Final Design approval from Iowa Department of Natural Resources (IDNR), then the applicant should ensure there is sufficient contingency, but not exceed 25%.
- If IDNR approval for Final Design has occurred, the contingency should not exceed 15%.

As contingencies turn into project costs they will need to be supported with documentation to be claimed.. Grant Administrative cost will not exceed 10% grant award.

CDBG funds are made on a reimbursement basis and therefore, applicants and/or their contracted developers must have project financing for the project to pay vendors and other expenses prior to being reimbursed by IEDA. Therefore, IEDA will require the applicants to demonstrate full financing and submit supporting documentation for estimated project costs prior to release of funds.

For construction projects, all trades will utilize the AIA, EJCDC or equivalent standard Payment Applications forms for submitting costs with direct/indirect costs clearly indicated under the “general conditions” or “mobilization” pay item. IEDA will also provide a payment application template upon request.

Grant Administration

IEDA will only award applications with a Grant Administrator (GA) identified to perform administration services on the behalf of the Applicant / Subrecipient team. All GA's performing any activity on a CDBG project must comply [with IEDA's Certified Grant Administrator \(“CGA”\) Policy](#). All Applicants will be required to contract with a GA that appears on IEDA's CGA list; if the proposed GA is not in the CGA Program, then they must first contact IEDA to be read into the program rules and enter the training cycle for certification.

Iowa law permits local governments to obtain services from a Council of Governments through a Chapter 28E intergovernmental agreement, which is not subject to competitive procurement requirements applicable to private vendors. (<https://www.legis.iowa.gov/docs/ico/chapter/28E.pdf>)

The GA working with the project will be required to maintain an active IEDA Certified Grant Administrator certification. The GA will provide a lump sum estimate for administration in the application for CDBG funding. Administration must be substantiated by documentation of costs incurred.

The GA should provide to the Applicant a list of all team members that will participate in the project, and include this in the application, as noted in the **Required Application Documents**. This list should specifically list individuals that will perform critical cross-cutting functions, such as Environmental Review, Procurement, Federal Labor Standards, Section 3 Reporting, etc.

Additional CGA Eligibility Notes for the CGA Policy:

“In order to be eligible for the CGA program, the proposed grant administrator (GA):

- If a member of a **for-profit consulting firm**, the proposed CGA must demonstrate that they are NOT performing roles of a design professional (e.g., the project Architect / Engineer of record) and must have a distinct contract for grant administration / project delivery duties apart from any other services – this ensures that an entity is not self-performing compliance checks against itself;
 - If extenuating circumstances are experienced by a Subrecipient in acquiring a CGA, the Subrecipient may formally request a waiver;”

Grant Administration generally includes but is not limited to:

- Performing general oversight, and coordination duties required by the award under 24 CFR 570.206(a).
- Maintaining the environmental review process in accordance with 24 CFR Part 58.
- Establishing and maintaining required project files, policies, records, and reporting systems pursuant to 24 CFR 570.503(b).
- Preparing and submitting reimbursement claims and supporting documentation consistent with Uniform Administrative Requirements at 2 CFR Part 200.
- Ensuring compliance with procurement rules, civil rights requirements, fair housing, labor standards, Section 3, and LMI documentation consistent with 24 CFR Part 570 Subpart K.
- Performing Federal Labor Standards (Davis Bacon) and Section 3 compliance activities required under 24 CFR 570.603 and 24 CFR Part 75.-Bacon) and Section 3 compliance activities required under 24 CFR 570.603 and 24 CFR Part 75.
- Completing required performance reports, monitoring responses, closeout documentation, and maintaining retention of records in accordance with 2 CFR 200.334–200.337.

A full description of anticipated duties and responsibilities of the GA can be found in the CDBG Management Guide. **The maximum reimbursable cost for administrative cost is not to exceed 10% total grant award.**

Project Delivery

In addition to identifying a Grant Administrator (GA) to perform general program administration, each CDBG project must also budget for and document Project Delivery (Activity Delivery) costs. Project Delivery refers to the eligible costs incurred to implement and carry out a specific CDBG-funded activity, including all tasks necessary to determine eligibility, complete regulatory requirements, and bring the project to completion in accordance with HUD rules.

Under HUD guidance, Activity Delivery Costs (ADCs) are distinct from general administration. ADCs include staff time, consultant costs, and related expenditures that are directly allocable to a specific project and necessary for completing activities eligible under 24 CFR 570.201–570.204. These costs are considered part of carrying out the project itself, not part of the overall management of the grant program. HUD also clarifies that general program administration may not include costs “directly related to carrying out activities” under these sections.

Eligible Project Delivery Activities

Project Delivery activities include, but are not limited to, the following tasks when they are performed for a specific CDBG-assisted project:

- Initial environmental review activities required under 24 CFR Part 58 for the specific project (e.g., site assessments, statutory checklists, consultations, SHPO/THPO correspondence).
- Initial income surveys or beneficiary documentation required to establish LMI national objective compliance for the project.

- Project specific procurement, bidding, and contracting support directly tied to the activity.-specific procurement, bidding, and contracting support directly tied to the activity.
- Project level monitoring, inspections, site visits, and compliance reviews necessary to carry out the activity.-level monitoring, inspections, site visits, and compliance reviews necessary to carry out the activity.
- Project specific financial management, such as tracking invoices, verifying requests for payment, and documenting activity level expenditures.-specific financial management, such as tracking invoices, verifying requests for payment, and documenting activity-level expenditures.
- Consultant or professional services retained solely to carry out tasks specific to the project.
- Conducting procurement support, contractor coordination, bid package preparation, and compliance checks in accordance with 2 CFR 200.317–200.327. *(Typically performed by an Architect or engineer of record)*
- **Technical Services for Housing Programs:** Carrying out inspections, code compliance checks, construction oversight, and activity specific project management consistent with eligible activity delivery costs under 24 CFR 570.201–570.205.
- Conducting activities such as demolition oversight, appraisal coordination, Codes reviews/inspections, lien development, and participation in mortgage closings for housing programs.
- Ensuring activity-specific documentation is prepared and maintained to demonstrate compliance and eligibility for reimbursement.

All Project Delivery costs must be reasonable, necessary, and directly attributable to the CDBG activity that is being carried out.

Contract Requirements

To maintain program integrity and promote financial management best practices, any COG or consultant performing Grant Administration and Project Delivery tasks must ensure that the two scopes of work are clearly defined in either:

- 2 distinct contracts for Grant Administration and Project Delivery, or
- 1 Contract that CLEARLY cites both scopes of work as distinct Tasks that can be tracked according to invoicing that aligns with said Tasks.

Documentation and Reimbursement

Project Delivery costs must be:

1. Identified separately from general program administration in the CDBG application;
2. Supported with detailed documentation demonstrating that the cost is directly tied to a specific eligible project activity; and
3. Allocated only to the project benefiting from the work.

There is no HUD or IEDA defined cap on Project Delivery costs; however, all costs must comply with federal cost principles (2 CFR 200) and IEDA may review for cost reasonableness.-defined cap on Project Delivery costs; however, all costs must comply with federal cost principles (2 CFR 200) and IEDA may review for

A full list of examples, documentation requirements, and cost allocation guidance is provided in the CDBG Management Guide.

Selection

Scoring

IEDA will rank applications based on the composite score generated by IEDA review staff. The State will use the scores, in part, to rank projects, but reserves the right to allocate funds to projects that meet the State's ultimate program objectives. Program requirements, such as the Low/Mod area benefit, are prioritized through scoring criteria and will factor into final funding determinations. In the event that demand exceeds the amount of funds available, those projects with the greatest need and effectiveness will be recommended for funding.

Threshold Criteria

- Applicant has an Active SAM.gov account and Unique Entity Identifier (UEI) #;
- NOFA Public Hearing Minutes are complete with the 9 elements;
- Project Budget is correct & grant amount requested does not exceed the program cap;
- Project Grant Admin fee does not exceed program cap;
- Required Uploads are provided, complete and fully executed;
- Evidence that applicant meets LMI National Objective (Income Survey or ACS data);
- Evidence of Match is provided where required to complete the project;

Scored Criteria

- Magnitude of need for the project;
- Degree to which the project is ready to proceed;
- Degree to which the project can be completed in a timely fashion ;
- Degree of other sources of funding are well documented and / or local match inclusion;
- Degree to which the project can be leveraged by other funds;
- Degree to which the cost per beneficiary is within a reasonable range (CDBG dollars per beneficiary);
- Degree to which proposed plans align with the Applicants' Community Development & Housing Needs Assessment;
- Degree to which the Applicants' proposed plans Affirmatively Further Fair Housing;
- Potential degree of impact the activity will have on the identified need and the standard of living or quality of life of the proposed beneficiaries;
 - *(including financial impact and whether or not this project identified in an Iowa great places agreement)*
- **Percentage of LMI project beneficiaries;**

Award

Notice of Award

Once award amounts are determined for local governments, 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 guidelines document. Awards will be considered final upon receipt of a signed grant agreement between IEDA and the applicant. Prior to an award, a duplication of benefits review may take place as well as a determination of cost reasonableness and verification that the CDBG award will not supplant funding for the project from other sources.

Supplanting Funds

Under the CDBG program, applicants must use federal funds to **supplement**—not **supplant**—existing financial resources. Specifically, [24 CFR § 570.200](#) et seq. clearly prohibits substituting CDBG dollars for local, state, or federal funds that are already obligated or budgeted. HUD’s Office of Inspector General has emphasized that CDBG was never intended to fund activities that jurisdictions are already required to underwrite through their own budget authority. Instead, supplanting violates the program’s intent to **add** capacity to meet unmet community needs—an expectation reinforced in HUD CPD Notices and FAQs for the regular CDBG program. Applicants must document the **need** for CDBG funds, showing that proposed activities wouldn’t proceed absent federal assistance, and demonstrate adherence to a “maintenance of effort” standard rooted in the Housing and Community Development Act and HUD policy.

Cost Reasonableness

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.

Grant Agreement

Terms and Conditions

A written grant agreement will be provided to the applicant before any disbursement of CDBG funds. 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;

Post Award First Steps

All funded projects will be required to comply with all federal and state requirements. By signing the federal assurances, **the applicant – now a ‘Subrecipient’ from IEDA** - (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:

- IEDA will enter into contract with the city/county/tribe for the award amount;
- The Subrecipient will enter into a contract for grant administration / project delivery;
- The Subrecipient completes all necessary Environmental Review compliance steps;
- Release of Funds will be issued by IEDA;
- IEDA evaluates Subrecipient vendor contracts prior to execution for eligible costs;
- The Subrecipient will provide any stipulated pre-construction deliverable prior to incurring construction costs;

Section 106 of the National Historic Preservation Act

Section 106 of the National Historic Preservation Act of 1966 (NHPA) outlines the process of identifying and assessing the potential effects of a federal undertaking on historic and archaeological resources. The process consists of four steps:

1. Initiating the Section 106 process;
2. Identifying and evaluating historic properties;
3. Assessing the undertaking’s effects on historic properties;
4. Resolving adverse effects to historic properties;

The first step is to review the Programmatic Agreement IEDA has with the SHPO. It is available in the CDBG Management Guide on the IEDA website. It will list if the project is programmatically excluded from review or must complete a full Section 106 Review. If a full Section 106 Review is necessary, follow the steps as outlined in the CDBG Management Guide.

It is important to initiate the Section 106 process early as it can take a great deal of time if a full Section 106 Review is necessary and the project will have an impact on historic properties.

An applicant may have site control only through a nonbinding, contingent form of control—such as an option to purchase agreement with nominal consideration, explicitly conditioned on completion of the environmental review—without violating the “choice limiting actions” prohibition under 24 CFR 58.22. Applicants may NOT hold binding purchase contracts, undertake acquisition, construction, rehabilitation, or any action that commits the project to a site before environmental clearance.-

Release of Funds

Before Release of Funds can be issued by IEDA, an environmental review process in accordance with the National Environmental Policy Act (NEPA) must take place to ensure compliance with all federal and state laws and regulations. The timeline for this will generally take 4-6 months, but the specific timeline will be dependent on-site conditions. Once the environmental review checklist is complete, it will be submitted to IowaGrants.

Throughout the environmental review, no choice-limiting actions can be committed by the subrecipient or its partners. These include actions to commit or spend CDBG or non-HUD funds for activities including but not limited to:

- Purchase of property or structures (including executing an option agreement);
- Bidding (or advertisement of bids);
- Signing construction contracts of any kind;
- Construction, demolition, rehabilitation, repair, conversion, site improvements, and any phase of construction activities;
- Platting and rezoning land (can work on preliminary plats and rezoning needs);
- Apply for building permits;

A description of the environmental review process can be found in the CDBG Management Guide.

Amendments and Extensions

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 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.**

Implementation

Timeliness and Project Completion

All IEDA contract awards have a standard three-year period of performance.

If the project manager has concerns about the spending or the status of project deliverables/tasks, the project manager will confer with the CDBG Team Lead for the next steps according to the Risk Assessment and Monitoring Polices. One of the following actions will be taken:

- Annual spending projections will be amended;
- Project manager will continue to monitor the project status and implement technical assistance as required;
- A meeting with subrecipient and grant administrator will be held, whereby the subrecipient will submit a revised quarterly budget projection and/or a plan to overcome progress delay or other remedies as required;
- Terminate the agreement;

Claims

IEDA will reimburse funds in the form of a grant for actual costs incurred. The grant agreements and documents incorporated by reference will explain the roles and responsibilities, identify the project(s) to be funded with CDBG funds, the total budget, the grant milestones, and the requirements for the use of CDBG 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;

Generally, claims are due within 6 months of the grant agreement execution, and every 90 days thereafter. Projects that experience protracted Release of Funds will be addressed on a case-by-case basis. As a standard, the IEDA Project Manager will notify the Subrecipient if payment is withheld due to delinquent reporting of any kind. Once funds requests are approved by project staff, IEDA Fiscal sends payment to each Subrecipient ACH.

All construction trades will utilize the AIA, EJCDC or equivalent standard form of Payment Applications for submitting costs with direct/indirect costs clearly indicated under the "general conditions" or "mobilization" pay item. IEDA will also provide a payment application template upon request

Retainage

IEDA will withhold all final claims until vendors are shown to be paid in full and compliance documents and reports are provided. As such, for public improvement projects, the Subrecipient shall comply with Iowa Code ss 573.12 and ss 573.13, as amended by [Iowa Senate Bill 574](#), to retain **at least 3%** of all contract values as retainage until 100% of all Work defined in contractors' scope is completed and the GA has acquired all compliance documents, reports, releases of liens from the participating contractors. Once the GA and IEDA have affirmed the vendor contracts are satisfied, proof of payment is provided, compliance elements are resolved and the National Objective is met, IEDA will process the final claims.

Recapture of Funds

Potential Subrecipients must be aware that CDBG funds may need to be recaptured—or redirected—when issues arise such as duplication of benefits, ineligible costs, or noncompliance with HUD regulations. Under HUD policy and regulations at [24 CFR § 570.200\(k\)](#) and [§ 570.480\(h\)](#), unused or misspent funds must be returned to the state or federal line of credit rather than used for other activities. HUD's CPD memorandum "Methods for Returning Community Development Block Grant Funds" clarifies that these recapture actions ensure federal dollars remain properly allocated and safeguarded. For example, if a project receives overlapping federal assistance—resulting in a duplication of benefits—or if a Subrecipient spends CDBG funds on unapproved costs, IEDA is required to reduce or recapture funding. In such cases, IEDA staff will work with the Subrecipient to reconcile any overpayment or eligibility issues before formally requesting repayment. No project may be closed out until all recaptured funds have been fully returned and formally affirmed in writing by IEDA.

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 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. Unless otherwise agreed to in a signed amendment to this Contract, proceeds generated from the use of CDBG funds are considered program income when the total amount of any CDBG program income received by the Subrecipient in a fiscal year exceeds \$35,000, at which time the entire \$35,000 and excess are considered program income. Program income received by the Subrecipient shall be returned to IEDA.

General Program Requirements

Floodplain Requirement

Generally, all Activities must be sited and constructed outside of the HUD-defined Federal Flood Risk Management Standard (FFRMS) Floodplain. This may be waived specifically for below-ground utilities that are not subject to flood damage, such as water distribution mains, sanitary sewer collection systems, or stormwater conveyances.

Under HUD's 2024 Final Rule, the FFRMS floodplain may extend beyond the FEMA mapped 100-year and 500-year floodplains through the Climate Informed Science Approach (CISA), the 500-year floodplain approach, or the Freeboard Value Approach. No exceptions are permitted for new construction within the FFRMS floodplain. In limited circumstances where rehabilitation or other nonconstruction activities occur within the FFRMS floodplain, the applicant must provide documentation demonstrating compliance with all applicable elevation, floodproofing, mitigation, and environmental review requirements under 24 CFR Part 55, including justification of how the activity will preserve or enhance safe access for LMI households and how any flood risk reduction measures—existing or planned—adequately address future flood hazards.

Procurement and Contracting

Subrecipients shall follow the state of Iowa procurement requirements in [Iowa Code 26.3](#) and [362.3](#), federal procurement requirements in [2 CFR Part 200.318-326](#) and bonding requirements as found in the CDBG Management Guide. 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 and Federal and State language must be included, per the [Contract Requirements for CDBG Projects](#). All contractors must be registered to work in the State of Iowa with the [Iowa Workforce Development](#).

Any construction contracts procured through awarded projects must comply with the Bonding Requirements.

Violence Against Women Act (VAWA)

UGLG and Subrecipients of HUD funded programs must fully comply with the Violence Against Women Act (VAWA) and its housing protections, which safeguard applicants and program participants who are survivors of domestic violence, dating violence, sexual assault, or stalking. Under VAWA and HUD's implementing regulations, subrecipients are prohibited from denying admission, terminating assistance, or evicting any individual solely because they are a survivor of violence, and must provide required notices of VAWA rights, certification forms, and access to emergency transfer protections. Subrecipients must maintain strict confidentiality of survivor information, refrain from discrimination or retaliation, and support an individual's right to seek law enforcement or emergency assistance without penalty as required under the 2022 VAWA Reauthorization. These obligations ensure that survivors can safely access HUD assisted housing and services without further jeopardizing their safety or housing stability.

[Fact Sheet - VAWA Right to Report from Home for CDBG Recipients](#)

Buy America Build America (BABA)

Under the Infrastructure Investment and Jobs Act, HUD-administered CDBG infrastructure projects must comply with the Build America, Buy America (BABA) preference, which mandates the use of iron, steel,

manufactured products and construction materials that are produced in the United States. These domestic sourcing requirements take effect for HUD awards obligated on or after May 14, 2022, with full implementation guided by [2 CFR Part 184](#) and HUD's [CPD Notice CPD2501](#). Subrecipients must evaluate each infrastructure project for covered materials, document BABA compliance or waiver eligibility, and maintain records such as market research, certifications, and engineering data demonstrating that materials meet domestic content standards. Grant Administrators will work with the IEDA PM to assess the availability of waivers and methods to track BABA product certification, according to the CDBG Management Guide.

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 tracking of all labor hours on the project sites, including projects not subject to Davis Bacon, and qualitative efforts undertaken to demonstrate compliance.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

Davis Bacon

Contractors must comply with the Davis-Bacon Act, the Contract Work Hours and Safety Standards Act (CWHSSA), and the Copeland Anti-Kickback Act (the Copeland Act) commonly referred to as the Davis-Bacon and Related Acts (DBRA).

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

Long-Term Sustainability

All newly constructed infrastructure that is assisted with CDBG funds must be designed and constructed to support the communities' needs for the lifecycle of the constructed infrastructure and withstand extreme weather events. Applicants should provide narratives that cite strong financial plans to support the infrastructure for the life of the infrastructure and cite designs that directly address resiliency.

Long-Term Maintenance

For utility projects (e.g., drinking water district projects, wastewater treatment district projects, stormwater district projects, etc.) IEDA **highly recommends** that applicants include in their engineer of record's scope of work to produce a Capital Improvement Plan and an Operations and Maintenance Plan that has been adopted by the municipal board by resolution to demonstrate a commitment to long term sustainment and investment for special district projects. Additional scoring will be provided to applicants that include Capital Improvement Planning and Asset Management Planning.

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 24](#), 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 tenants¹. If an identified project results in tenants leaving their homes involuntarily (being displaced), the tenants may be eligible for Tenant Relocation Assistance

¹ HUD's [Tenant Assistance, Relocation and Real Property Acquisition Handbook](#) (1378.0)

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.

Subrecipients must budget and plan if relocation occurs. The budget should include discovering the needs of displaced persons such as site visits, interviews, and orientations as well as housing market conditions, acquisition costs, relocation payments and other costs.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

Minimize Displacement

Subrecipients shall minimize displacement associated with funded activities. Subrecipients will be required to submit a Residential Anti-displacement and Relocation Assistance Plan (RARAP) with their applications. The type of infrastructure activities planned should not result in displacement. However, if displacement does occur subrecipients will follow their RARAP by assisting displaced entities and persons and ensure the accessibility needs of displaced persons with disabilities.

Fair Housing and Civil Rights

IEDA, Subrecipients, and developers (as applicable) must ensure that all program activities comply with applicable federal fair housing and civil rights laws. No person may be denied access to the Single-Family New Construction Program based on race, color, national origin, religion, sex, gender identity, sexual orientation, age, familial status, disability, or any other protected characteristic. Program partners must incorporate equal opportunity standards into marketing, outreach, eligibility review, sales practices, and all interactions with applicants.

Subrecipients must include required fair housing language in program materials, provide reasonable accommodations to applicants with disabilities, and ensure effective communication for individuals with limited English proficiency. Any fair housing concerns, complaints, or allegations of discrimination must be documented and referred to IEDA for review and resolution in accordance with state and federal requirements.

Internal Controls

Internal controls refer to the combination of policies, procedures, defined job responsibilities, personnel, and records that allow an organization (or an agency) to maintain adequate oversight and control of its cash, property, and other assets.

The soundness of any Subrecipient’s financial management structure is determined by its system of internal controls. Specifically, internal controls refer to the following:

- Effectiveness and efficiency of operations
- Reliability of financial reporting
- Compliance with applicable laws and regulations

With a sound internal control system, a Subrecipient can ensure that:

- Resources are used for authorized purposes and in a manner consistent with applicable laws, regulations, and policies.
- Resources are protected against waste, mismanagement, or loss.
- Information on the source, amount, and use of funds is reliable, secured, and up-to-date, and this information is disclosed in the appropriate reports and records.

As part of an effective internal control system, one person should be designated as the primary person at the Subrecipient organization responsible for the financial management of a CDBG project. This person

should be familiar with their organization's accounting system and how the accounting of CDBG funds is integrated into the Subrecipient's existing system. Refer to [2 CFR 200.303](#) for more information.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

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 funding, and if there are findings that the subrecipient has taken corrective action. To that end, IEDA reserves the right to perform due diligence assessments on the status of an applicants Audits from open source mediums prior to making a recommendation for award.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

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 funds received and to maintain adequate source documentation to demonstrate that CDBG funds are used in compliance with all the terms and conditions of the 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:

- The Subrecipient will charge the award only allowable costs incurred during the period of performance and any authorized pre-award costs.
- 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.
- If applicable, Subrecipients will disburse funds available from program income or send it to the state, before requesting additional grant funding.
- 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.
- Subrecipients will submit to HUD mandatory quarterly progress reports for IEDA's review of program progress.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

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 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-assisted activity, or have a financial interest in any contract, subcontract, or agreement with respect to a CDBG-assisted activity, or with respect to the proceeds of the CDBG-assisted activity, either for themselves or those with whom they have business or immediate family ties, during their tenure or for one year thereafter.



Monitoring

Monitoring will be conducted via multiple methodologies throughout the project. One method is the Risk Assessment that IEDA will conduct annually per 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;
- Report 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 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; any identified findings or concerns will also be communicated along with deadlines for submission of corrective actions. 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.

Subrecipients are required to follow the requirements listed in the CDBG Management Guide.

Closeout

To close out the project, 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.
 - **Receive copy of Engineer of Record's Certification of Substantial Completion (EJCC C-704, or equivalent);**
- Financials:
 - Confirm that 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.
 - Confirm Single Audits, as applicable, have been submitted to the Federal Audits Clearinghouse;
- Administrative
 - Confirm documentation is retained for any critical decisions made or policies developed (for future audits).
 - Confirm final compliance reporting is complete:
 - Subrecipient Section 3 Reports, IEDA Semi-Annual Labor Standards Reports;
 - **Project Photos acquired for before & post project completion (collected at Site Visits).**
 - Close-out applicant files and make sure files are consistently organized.
 - Close-out individual activities.

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 special conditions of the program were met.
- All audit and monitoring issues were resolved.

Records Management

IowaGrants.gov is intended to serve as the primary medium for administering CDBG funds and tracking the various compliance requirements stated in the grant agreement, the CDBG Management Guide and this Program Guide. However, the Subrecipient must maintain complete and accurate records that fully document compliance with all CDBG program requirements. This includes maintaining financial, programmatic, procurement, environmental, civil rights, labor standards, and contract records in a manner that provides a clear audit trail and supports IEDA's oversight responsibilities.

Records must demonstrate:

- Activity eligibility and National Objective compliance
- Proper procurement and contractor selection
- Compliance with labor standards and other crosscutting requirements
- Accurate financial management and documentation of costs
- Performance outcomes and beneficiary data
- Resolution of monitoring or audit findings

Records must be retained for the required federal retention period and must be made available to IEDA, HUD, or other authorized oversight entities upon request.

Document Retention

The Subrecipient must retain all documentation of this project for three years after the entire CDBG grant between IEDA and HUD is closed. Subrecipients may also contact IEDA’s CDBG Team to inquire about document retention times for CDBG grant.



APPENDIX

1. Iowa Profile Resource for Demographics
2. Resources for Conducting Income Surveys

1. IOWA PROFILE RESOURCE FOR DEMOGRAPHICS

The Iowa Profile serves as a comprehensive data resource, offering policymakers and community leaders valuable insights across various domains such as housing, public health, safety, transportation, education, quality of life and economy.

The first of its kind tool provides customized reports and enables comparisons with other regions, empowering changemakers in community and economic development to make informed decisions based on regularly updated data from diverse sources. The tool provides essential information for designing effective programs and resources to foster opportunities for Iowans, communities and businesses to thrive.

You can find more information here: [Iowa Profile - Welcome Home Iowa](#)

2. RESOURCES FOR CONDUCTING INCOME SURVEYS

COSDA Presentation on Income Surveys:

https://coscda.org/wp-content/uploads/2023/03/CDBGIncomeSurveyToolkit_ErinnMartin-002.pdf

CDBG Income Survey Toolkit - HUD Exchange

<https://www.hudexchange.info/programs/cdbg/cdbg-income-survey-toolkit/>

Conducting a Low-and Moderate – Income Survey:

<https://opportunityiowa.gov/community/community-infrastructure/cdbg-resources/cdbg-program-guidance-resources>