



Planning Grants

Program Guidelines

Version 1.0
January 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	4
Eligible Applicants	4
Required Match.....	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	12
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	14
Timeliness and Project Completion	14



Claims	15
General Program Requirements	16
Procurement and Contracting.....	16
Internal Controls.....	16
Audit Requirements.....	17
Prevention of Fraud, Waste, and Abuse.....	17
Financial Management.....	17
Conflict of Interest	18
Monitoring	18
Closeout	19
Records Management.....	19
Document Retention.....	20
APPENDIX:	21



Version History

Version	Date	Summary Description
1.0	January 2026	Original



Program Summary

Purpose

Communities across Iowa face growing challenges in maintaining safe, resilient, and sustainable infrastructure systems, as well as preserving the historic character that anchors local identity. Through the Community Development Block Grant (CDBG) Program, eligible applicants have the opportunity to seek funding for **Capital Improvement Plans**, **Asset Management Plans**, and **Historic District Surveys**—three foundational planning tools that help communities understand their needs, prioritize investments, and create long-term strategies for protecting public health, strengthening local economies, and sustaining critical infrastructure. By supporting these planning activities, the State recognizes the importance of equipping communities with the data, analysis, and forward-looking guidance necessary to make informed decisions, reduce risks, and enhance quality of life. These plans serve as essential building blocks for responsible stewardship of public resources, enabling communities to chart a proactive path toward resilience, fiscal stability, and preservation of cultural and historic assets for future generations.

The program is funded through the Community Development Block Grant (CDBG) and is designed to meet HUD's National Objective of benefiting low- and moderate-income (LMI) persons under 24 CFR § 570.208(a)(3).

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 [IEDA's 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 13-07](#)). 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 13-07](#)). 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).
- **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 & Urban Development (HUD). Administrative activities are led by the IEDA CDBG team.

Available Funds

Program	Budget
Planning	\$60,522.00

Maximum Award

The maximum assistance available is \$15,000 per project.

Eligible Activities

1. Historic District Surveys;
2. Asset Management Plans;
3. Capital Improvement Plans;



Eligible Activities

Section 24 CFR 570.489(a)(3)	Program planning activities. These activities, along with administration activities, are subject to the 20 percent limitation under 24 CFR 570.200(g) and 570.489(a)(3).
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Ineligible Activities

As per [24 CFR 570.207](#), IEDA will not fund the following activities through the Planning Grant program:

Ineligible Activities

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	<p>The purchase of equipment with CDBG funds is generally ineligible.</p> <ul style="list-style-type: none"> • 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.
Project Design Documents	The expenses associated with a Preliminary or Final design of any project will not be eligible under this grant program. Only those conceptual designs that are required to convey meaning for a municipality to approve of the eligible plans identified are eligible to be included in the program.
Construction	Construction costs of any kind will not be eligible under this program.



Ineligible Activities

Operating and maintenance	<p>Any expense associated with repairing, operating or maintaining public facilities, improvements and services is ineligible. Examples of ineligible operating and maintenance expenses are:</p> <ul style="list-style-type: none"> • 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.
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National Objectives

The planning activity will meet the Low-to-Moderate Income national objective, by supporting the development of projects intended to benefit LMI persons within the planning area. Per [24 CFR 570.205\(a\)](#) plans developed with CDBG funds *must include development of future CDBG projects*.

Eligible Applicants

Non-Entitlement units of general local government (UGLGs) are the eligible applicants for these funds. All UGLGs must work with a council of government or IEDA-approved consultant to submit the application and conduct project administration.

Required Match

Applicants must demonstrate that they have a minimum **Dollar-for-dollar Match** of cash as relates to the requested grant award value.

Match funds must be:

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

Allowable evidence of all forms of Match are:

- Applicant UGLG Board Resolution of Local Match;
- Bond Resolution;
- Executed Grant / Loan agreements by other State / Federal funding agencies;
- Loan approval letters documenting committed (not promissory) funds;



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 applicants 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.

- **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 the IEDA's 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 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 Affidavit of Publication and a copy of the actual public hearing notice;
- Meeting minutes, including comments and responses;

During the project implementation, 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

- An application workshop will be held: 2/12/2026
- Application Submission Window is 3/02/2026 – 5/01/2026

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 planning grant.
- 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.

Any budget contingencies proposed in the application may not exceed 10%. Each project will be evaluated related to the costs and benefits of the project.

Required Application Documentation

To be scored, applications must include:

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

- Resolution in Support of the Application / Project;
- 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;](#)
- [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;

Program-Specific Application Documents

- Proof of procurement for project delivery (as required) & A/E services;
- 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

All projects 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 city official), and all are eligible for reimbursement. 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 & reports to support project;
- Grant Administrator – oversee all state / federal funding compliance elements that apply to the project, IowaGrants data entry, City team liaison;

Project Costs

Any contingencies proposed in the application budget may not exceed 10%. As contingencies turn into project costs they will need to be supported with documentation to be claimed.

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

Eligible costs for the Planning Grants program are limited to those demonstrated to be necessary for the data collection, study and report deliverable associated with the Capital Improvement Plans, Asset Management Plans or Historic District Surveys.

Grant Administration

IEDA will only award applications with a Grant Administrator (GA) identified to perform grant 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 5% 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.
- Project-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.
- 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.



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) #;
- Grant amount requested does not exceed the program cap;
- Project Delivery / Admin fee does not exceed program cap;
- Required Uploads are provided, complete and fully executed;
- NOFA Public Hearing Minutes are complete with the 9 elements;
- Project Budget is correct;
- Evidence of Match is provided;

Scored Criteria: General

- 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 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);
- Consistency with local or regional plans;
- *Percentage of LMI project beneficiaries*;
- *Connection to future CDBG Projects*:

Scored Criteria: Capital Improvement Plans

- Identify infrastructure categories addressed (waters, sewer, stormwater, streets, etc.);
- Describe how CIP priorities serve LMI areas / populations;
- Demonstrated Infrastructure need (e.g., regulatory driven compliance vs deferred maintenance);
- Plan integration with fiscal plans / comprehensive plans;

Scored Criteria: Asset Management Plans

- Identify infrastructure categories addressed (waters, sewer, stormwater, streets, etc.);
- Are assets already inventoried;
- How the AMP will be used for applicant decision making (maintenance prioritization, capital planning, etc.);



- Methodology inclusive of condition assessments, failure risk scoring, lifecycle cost analysis?
- Include planning for capacity building?
- Commitment to implementation & maintenance from applicant;

Scored Criteria: Historic District Surveys

- Identify infrastructure categories addressed (streets, store fronts, mixed-use spaces, etc.);
- Clear purpose and future use (e.g., local district historic designation, design guidelines, revitalization planning, etc.);
- Nexus to community development outcomes (e.g., downtown revitalization, LMI neighborhood stabilization, rehab programs, façade programs, etc.);
- Demonstrated SHPO coordination;
- Demonstrated community support;
- Readiness to act on findings;

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 will 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, grantees 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 both regular CDBG and CDBG-DR programs. Grantees 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 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 subrecipient 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:

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;
3. The Subrecipient and/or GA completes all 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;
6. 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.

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 for construction projects, but the specific timeline will be dependent project type and 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/CDBG-DR 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. The IEDA Project Manager will also determine if the delays in spending or the completion of deliverables/tasks can potentially result in a negative impact on the project by conducting Risk Assessments on not less than an annual basis. If the discrepancy in spending or progress is deemed reasonable, the IEDA Project Manager will continue to monitor the expenditure rate.

If the IEDA Project Manager has concerns about the spending discrepancy or the status of project deliverables/tasks, or the recipient has reported a spending discrepancy for 2 consecutive years, the



IEDA Project Manager will confer with the CDBG Team Lead for the next steps according to the Risk Assessment and Monitoring Policies. One of the following actions will be taken:

- Annual spending projections will be amended;
- IEDA Project Manager will continue to monitor the project status and implement technical assistance as required;
- A meeting with Subrecipient and GA 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. Per the Subrecipient Agreement, the final Claim will be submitted within 30 days prior to the grant agreement period of performance end date.

Retainage

IEDA will withhold all final claims until vendors are shown to be paid in full and compliance documents and reports are provided. 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

Grantees 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.

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. IEDA does not anticipate generating program income. If program income is generated, it will be transferred from the subrecipient to IEDA. Program income will be expended before drawing funds from HUD.

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

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.

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 GA 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:

1. The Subrecipient will charge the 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.

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 Subrecipients 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
- Program Management/Capacity – is the administrator familiar with CDBG and attended mandatory IEDA trainings
- Project Compliance – are there outstanding compliance/reporting concerns
- Program Income- has the contract generated program income
- Is the program reasonably on track

The IEDA Project Manager will schedule a Site Visit with the Subrecipient upon the expenditure of at least 50% of the award by a Subrecipient, or upon 50% implementation. The IEDA Project Manager will email the Subrecipient and GA to schedule the visit. Site Visit information and forms will be made available and completed in IowaGrants. The IEDA Project Manager will instruct GAs 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.
 - **Subrecipient provides copy of the Plan developed with the CDBG funds.**
 - **Evidence that Subrecipient has adopted the Plan (Resolution of Adoption).**
- 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).
 - Close out applicant files and make sure files are consistently organized.
 - Closeout 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 cross-cutting 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. Best Practices for Capital Improvement Plans
3. Best Practices for Asset Management Plans
4. Best Practices for Historical Plans



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. BEST PRACTICES FOR CAPITAL IMPROVEMENT PLANS

The Government Finance Officers Association (GFOA) is the primary national authority that published best practices and structured guidance for Capital Planning used, by cities, counties and states nationwide. IEDA recommend following the general practices set forth by the GFOA.

The following is an excerpt is derived from their website: [Capital Planning Policies](#)

Policies designed to guide capital planning help to assure that each jurisdiction's unique needs are fully considered in the capital planning process. Effective policies can also help a government to assure the sustainability of its infrastructure by establishing a process for addressing maintenance, replacement, and proper fixed asset accounting over the full life of capital assets¹. In addition, capital planning policies can strengthen a government's borrowing position by demonstrating sound fiscal management and showing the jurisdiction's commitment to maximizing benefit to the public within its resource constraints.

Good capital planning policies can lead to the development of a capital plan that is consistent with best practices; however, they do not constitute the capital plan itself. Rather, capital planning policies establish a framework in which stakeholders understand their roles, responsibilities, and expectations for the process and an end result. Ideally, such policies also include guidelines for coordinating capital projects and promoting sound, long-term operational and capital financing strategies.

To create a sustainable capital plan, the finance officer and other participants in the capital planning process need to consider all capital needs as a whole, assess fiscal capacity, plan for debt issuance, and understand impact on reserves and operating budgets, all within a given planning timeframe. Capital planning policies provide an essential framework for managing these tasks and for assuring that capital plans are consistent with overall organizational goals.

GFOA recommends that governments develop and adopt capital planning policies that take into account their unique organizational characteristics including the services they provide, how they are structured, and their external environment.

Capital planning policies should provide, at minimum:

1. A description of how an organization will approach capital planning, including how stakeholder departments will collaborate to prepare a plan that best meets the operational and financial needs of the organization.
2. A clear definition of what constitutes a capital improvement project.²
3. Establishment of a capital improvement program review committee and identification of members (for example, the finance officer or budget officer, representatives from planning, engineering, and project management, and, as deemed appropriate, operations departments most affected by capital plans, along with a description of the responsibilities of the committee and its members.



4. A description of the role of the public and other external stakeholders in the process. (The level and type of public participation should be consistent with community expectations and past experiences.)
5. Identification of how decisions will be made in the capital planning process including a structured process for prioritizing need and allocating limited resources
6. A requirement that the planning process includes an assessment of the governments fiscal capacity so that the final capital plan is based on what can realistically be funded by the government rather than being simply a wish list of unfunded needs.
7. A procedure for accumulating necessary capital reserves for both new and replacement purchases.
8. A policy for linking funding strategies with useful life of the asset including identifying when debt can be issued and any restrictions on the length of debt.³
9. A requirement that a multi-year capital improvement plan be developed and that it include long term financing considerations and strategies.
10. A process for funding to ensure that capital project funding is consistent with legal requirements regarding full funding, multi-year funding, or phased approaches to funding.
11. A requirement that the plan include significant capital maintenance projects.
12. Provisions for monitoring and oversight of the CIP program, including reporting requirements and how to handle changes and amendments to the plan.

Notes:

1 See GFOA Best Practices on capital planning. (Multi-Year Capital Planning (2006) and The Role of Master Plans in Capital Improvement Planning (2008)

2 See GFOAs Best Practice, Establishing Appropriate Capitalization Thresholds for Capital Assets

3 Capital planning policies should be consistent with or reference an organizations debt policies

References:

- GFOA Best Practice, Asset Maintenance and Replacement, 2010
- GFOA Best Practice, Understanding Your Continuing Disclosure Responsibilities, 2010
- GFOA Best Practice, Disaster Preparedness, 2008
- GFOA Best Practice, Multi-Year Capital Planning, 2006
- GFOA Best Practice, Establishing Appropriate Capitalization Thresholds for Capital Assets, 2006

3. BEST PRACTICES FOR ASSET MANAGEMENT PLANS



Effective asset management planning for water, wastewater, and stormwater systems is strengthened by nationally recognized guidance developed by both the U.S. Environmental Protection Agency (EPA) and the American Water Works Association (AWWA).

EPA provides comprehensive best-practice frameworks for utilities through its sustainable water infrastructure resources, including guidance on asset inventories, level of service development, lifecycle costing, and risk-based decision-making—captured in documents such as *Asset Management Programs for Stormwater and Wastewater Systems*, which offer practical case studies and tools to help communities build and implement robust asset management programs. Similarly, AWWA advances industry-leading standards and tools for utilities, including its formal *Policy Statement on Asset Management* and extensive asset management resources, which promote proactive, full-lifecycle asset stewardship and provide utilities with practical tools such as the Effective Useful Life Estimating Tool and guidance on levels of service, condition assessment, and long-term planning. Together, these organizations offer communities a complete suite of best-management practices, templates, technical guidance, and training materials that support the development of resilient, fiscally responsible, and sustainable asset management plans.

Asset Management Planning Resources

U.S. Environmental Protection Agency (EPA)

EPA provides comprehensive guidance, tools, and case studies that help communities develop and implement effective asset management programs for drinking water, wastewater, and stormwater systems.

- **EPA – Asset Management for Water and Wastewater Utilities**
<https://www.epa.gov/sustainable-water-infrastructure/asset-management-programs-stormwater-and-wastewater-systems>
[\[epa.gov\]](#)
- **EPA – Asset Management Programs for Stormwater & Wastewater Systems (Report PDF)**
<https://www.epa.gov/sites/production/files/2018-01/documents/overcoming-barriers-to-development-and-implementation-of-asset-management-plans.pdf>
[\[iowaeconom...bsites.net\]](#)
- **EPA Asset Management Resources for States & Local Governments**
<https://www.epa.gov/sustainable-water-infrastructure>
(General hub for tools, training, case studies, and guidance materials.)

American Water Works Association (AWWA)

AWWA is the nation's leading industry organization for drinking water system best practices, offering policy guidance, technical tools, and sample frameworks for comprehensive utility asset management.

- **AWWA Asset Management Resource Center**
<https://www.awwa.org/resource/asset-management>



[\[fema.gov\]](#)

- **AWWA Policy Statement on Asset Management**
<https://www.awwa.org/AWWA-Articles/revised-awwa-policy-statement-on-asset-management/>
[\[hud.gov\]](#)
- **AWWA Effective Useful Life (EUL) Estimating Tool**
(Located on the AWWA Asset Management Resource page above; supports lifecycle planning for water utility assets.)



4. BEST PRACTICES FOR HISTORIC DISTRICT SURVEYS

When preparing a Historic District Survey as part of a CDBG Planning Grant, applicants should rely on the technical standards, procedures, and documentation requirements issued by the Iowa State Historic Preservation Office (SHPO). As Iowa's authoritative preservation entity, SHPO provides the official guidance on how to plan and conduct historic district surveys, including survey methodology, required forms, historic context development, evaluation criteria, mapping requirements, and digital deliverable standards. SHPO's guidance is built to align with the National Park Service's (NPS) federal preservation standards, ensuring that local surveys meet professional requirements for National Register eligibility, Section 106 compliance, and long-term use in Iowa's statewide historic inventory. These SHPO resources help communities produce high-quality historic district surveys that are accurate, consistent, and suitable for both state and federal preservation processes.

Resources for Preparing Historic District Surveys

(All links point directly to Iowa SHPO resources or essential NPS standards used by SHPO.)

Iowa SHPO – Core Survey Guidance

1. Iowa Historic Preservation Planning & Programs (Survey Guidance Hub)

A central resource page with links to survey guidelines, planning tools, forms, and program requirements.

<https://opportunityiowa.gov/community/historic-preservation/historic-preservation-planning-programs>

2. Iowa Site Inventory Form (Required for Historic District Surveys)

The official form used to document buildings, structures, and sites within a historic district.

Form Instructions (PDF)

<https://opportunityiowa.gov/media/3923/download?inline>

This form is required for EACH resource within the district and is the foundational documentation tool for SHPO review.

3. Iowa Historic Property Inventory Database (Search Existing Surveys & District Data)

Useful for understanding SHPO expectations, comparing similar districts, and conducting background research.

<https://shporecords.opportunityiowa.gov>

Iowa SHPO – Additional Preservation Guidance

4. Historic Preservation Guidelines (Eligible Activities, Survey Expectations)

Provides guidance on survey projects, National Register eligibility, and documentation requirements.

<https://history.iowa.gov/resources/grants/historical-resource-development-program/historic-preservation-guidelines>



5. Local Preservation Planning Resources (Includes Survey Methodology Standards)
Includes guidelines for local historic surveys, preservation planning, and federal SOI Standards.

<https://opportunityiowa.gov/community/historic-preservation/historic-preservation-planning-programs>

National Park Service – Foundational Federal Standards Referenced by SHPO

Although Iowa SHPO is the primary authority, applicants should also reference the federal standards SHPO follows:

6. NPS – Secretary of the Interior's Standards for Preservation Planning
Federal planning framework that governs how historic districts are identified and documented.

<https://www.nps.gov/subjects/historicpreservationfund/statewide-historic-preservation-plans-basic-requirements-overview.htm>

7. NPS – Secretary of the Interior's Standards for Identification & Evaluation
Guidance for determining district boundaries, evaluating significance, and classifying contributing vs. noncontributing resources.

<https://www.nps.gov/tps/standards.htm>

