



Third Thursdays with CDBG: Monitoring & Risk Assessments

Sarah Plowman & Chad Sands | CDBG Project Managers
Iowa Economic Development Authority

Agenda

- Understanding “Monitoring”?
- High-level Overview
- Risk Assessments
- Q&A Part I
 - 15-minute break*
- Language: Findings, etc.
- Site Visit – Deep Dive
- Next Steps
- Q&A Part II

Understanding “Monitoring”?

- *Through systematic monitoring through the course of the project vs one single instance, IEDA a) ensures the performance of the recipient, subrecipient, contractor(s), and/or developer(s) is in compliance with state and federal rules and regulations through the course of the progression and b) seeks to improve that performance, when necessary, by making recommendations, providing technical assistance, and/or issuing compliance findings.*

Understanding “Monitoring”?

- “Who” is *doing* the monitoring?
 - IEDA Project Managers
- “Who” is being monitored?
 - Recipient (city/county)
 - Subrecipient (nonprofit) – as applicable
 - Contractors (both general/prime and subcontractors) – as applicable
 - Developer(s) (typically in housing projects) – as applicable
- “What” is being monitored?
 - The performance (or actions) of all of these stakeholders

Understanding “Monitoring”?

- “Where” does monitoring take place?
 - More on this later – but sometimes virtual, sometimes in person
- “When” does monitoring take place?
 - Again, more on this shortly – but throughout the life of the project
- “Why” do we monitor?
 - Per 2 CFR 200.328-339, to determine whether all stakeholder actions are *in compliance with state and federal rules and regulations*
 - In order to improve those actions to meet the compliance requirements

Understanding “Monitoring”?

- “How” do we monitor?
 - In short: review for compliance, and then
 - If necessary, improve stakeholder performance via:
 - Making recommendations
 - Providing technical assistance
 - And/or issuing compliance findings

Understanding “Monitoring”?

- Language matters: “Monitoring” versus “Site Visit”
 - “Monitoring” is an umbrella term
 - “Monitoring” covers the life of the project – various monitoring activities
 - “Site Visit” is a particular point-in-time monitoring activity
 - “Site Visit” is a formal, deeper dive into a project

Understanding “Monitoring”?

- When and how we monitor:
 - Contractor Clearance Reviews
 - Claim Reviews
 - Site Visit
 - Documentation/Desk Reviews
 - Closeout Reviews
 - Annual Risk Assessments
 - Audit Review Process

High-level Overview

- Contractor Clearance
 - Debarment checks & licensing
 - Procurement
 - CDBG federal contract language provisions

High-level Overview

- Claim Reviews
 - Eligible/allowable expenses
 - Approval/proof of payment
 - BABA (as applicable)

High-level Overview

- Documentation/Desk Reviews
 - Environmental/Historic Reviews
 - Wage Rate
 - Section 3 (annually)
 - Housing unit verification

High-level Overview

○ Closeout Reviews

- National Objectives (blight, housing, limited clientele)
- Project completion/impact
- Beneficiary and other reporting data
- Audit documents

High-level Overview

- Supplemental monitoring may be triggered...
 - Via external audit
 - Suspected fraud, waste, or mismanagement
 - At the discretion of the CDBG Team Lead

Risk Assessments

- Risk assessments are an annual IEDA internal review to assist project managers in determining the timing and frequency of monitoring or technical assistance.
 - Have been done for several years
 - IEDA has made changes to the process for more transparency and usefulness
 - This is for both the DR and Regular programs (does not include Covid or Technical Assistance grants)

Risk Assessments

- Risk assessments will be done annually at the end of each year for every open project.
- This new process will start in December of 2026.
- The assessment will be done through IowaGrants by the Project Manager by answering a few simple questions. Based on the outcomes, the PM will determine if technical assistance is required or when a site visit must be held (if different from normal procedure).

Risk Assessments

- The assessment will focus on the following categories:
 - Grant Administrator Management
 - Financial Risk
 - Project Compliance

Risk Assessments

- Grant Administrator Management

- Is the CGA in:

- Good standing?

- Conditional standing?

- Not in good standing?

Risk Assessments

- Financial Risk
 - Size of the award (bigger the award, the greater risk)
 - Program income (did project generate program income)
 - Match funding (local match drawn down at an appropriate percentage)
 - Claims (timing: drawn every 3-months without prompting)
 - Claims (documentation: proof of payment included, correct invoices, appropriate signatures, math is correct)
 - Local Audit: CDBG financial findings

Risk Assessments

○ Project Compliance

- Timeline / expenditure progress (meeting scheduled timeline)
- Planning / construction compliance of the CGA and Subrecipient (compliance issues regarding Davis Bacon, BABA, Section 3, Procurement, Environmental, etc.)
- Construction compliance of the contractor, subcontractors or developers
- Complaints (fraud, conflicts of interest, etc. complaints from public)
- Local Audit: CDBG compliance findings

Risk Assessments

○ Risk Scores

- 0 - 25 points (Low Risk): Site visit as required by Policies and Procedures (once per contract)
- 26 - 50 points (Medium Risk): Site visit as required by Policies and Procedures (once per contract). Provide Technical Assistance (TA) within 3 months.
- 51 - 75 points (High Risk): Site visit within 6 months or provide TA within 2 months. Hold any claim until remedy is in place.
- 76 - 110 points (Very High Risk) – Site visit within 3 months or prior to the next claim (whichever comes first). Hold next claim until TA is provided within the next month and a remedy is in place. Place a contract hold until on-site monitoring or TA is complete.

Risk Assessments

- Upon Completion of Risk Assessment
 - A formal memo will be provided to the CGA and City citing the risks that are of noted concern and any TA will be scheduled to work through the risks and create an action plan to establish a remedy. This memo will be sent in January of each year.
 - Also of note, the CGA and City will be provided a memo if you are low-risk as well.

Q&A Part I



Let's take a break... see you in 15



Language: Findings, etc.

- New monitoring compliance language
 - Concern
 - Finding
 - Corrective Action
 - Progressive Sanctions
- Why this switch?
 - HUD's resources use it
 - It's not altogether different from our current process; just a re-labeling

Language: Findings, etc.

○ Concern

- “A weakness in operations or performance which may become a finding in the future if not addressed”
- Examples of “concerns”:
 - Poor detail in the SOFA meeting minutes
 - Equal Opportunity Policy not immediately visible or accessible to the public
 - City is unaware they are responsible for assisting with any housing discrimination complaints if they arise
- Discussed/noted with recommendations/resources

Language: Findings, etc.

○ Finding

- “A material deficiency in operations or program performance, identified in the course of a formal Site Visit, which is a violation of a statutory, regulatory, or program requirement.”
- Examples of “Findings”:
 - Required Davis Bacon-related documentation that does not exist
 - Required BABA manufacturing product certifications that does not exist
 - Not having completed an elective Fair Housing action
 - Improper acquisition procedure that did not adequately follow the URA
- Sent in writing to Chief Elected Official, copying GA, clearly stated
- Grounds for withholding payments.

Language: Findings, etc.

○ Corrective Action

- “A plan or measure that must be taken to resolve an identified finding of noncompliance”
- How to resolve Findings via “Corrective Actions”:
 - Write a plan outlining measures a City will follow to avoid the Finding in the future, AND
 - Create/collect the missing documentation, OR
 - Receive a sanction of some kind
- Must be resolved within 45 days.

Language: Findings, etc.

○ Progressive Sanctions

- Sanction: “A penalty or restrictive measure that IEDA may impose in response to a) failure to comply with federal regulations or b) failure to resolve identified findings. These sanctions may be issued in a graduated or ‘progressive’ way.”
- Issued in consultation with CDBG Team Lead, communicated in writing
- Three tiers, dependent upon severity of issue

Language: Findings, etc.

- First-tier sanction

- Increased technical assistance (TA) or training
- Requiring more frequent reporting or project update communication from the City for a period of time
- Targeted, follow-up, remote monitoring

Language: Findings, etc.

- Second-tier sanction
 - Restricting reimbursements
 - Disallowing certain expenses or requiring partial repayment
 - Imposing a contract hold or “probationary” status

Language: Findings, etc.

- Third-tier sanction examples:
 - Terminating award prior to project completion
 - Temporarily suspending the city from applying for future awards for a determined period of time
 - Working with an IEDA attorney to initiate legal action

Language: Findings, etc.

- Potential impacts to projects and stakeholders:
 - Project:
 - Progress/timeline, budget, and/or beneficiaries impacted
 - Additional resourcing/training
 - Recipient:
 - Findings in the project file
 - Greater involvement in the project/understanding of CDBG and federal grant administration
 - Grant Administrator:
 - Tie-ins to Certified Grant Administrator (CGA) Policy
 - Increased resourcing/training *and* City involvement

Language: Findings, etc.

- “Findings” and “Corrective Actions” are specific to Site Visits
- Concerning things may be identified throughout a project
- The equivalent of progressive sanctions may be issued via other monitoring activities

Site Visit – Deep Dive

- Purpose
 - Point-in-time review
 - Deep-dive
 - Formal
 - Involve Recipient

Site Visit – Deep Dive

○ Initiating a Site Visit

- Possible triggers:
 - 50% funds expended and/or scope completed
 - Next claim will exceed 50%
 - Via a Risk Assessment
- Virtual or In-Person?
 - “Something (constructed) to see?” – in-person
 - Invisible deliverable – virtual
 - Purchased supplies – see program guidance
- Notifications will use Correspondence feature of IowaGrants

Site Visit – Deep Dive

- Preparing for a Site Visit
 - Status of Funded Activities (SOFA) public meeting required
 - Logistics set
 - Grant Administrator uploads documentation
 - IEDA Project Manager works through IowaGrants
 - Review uploaded documentation
 - Answers questions in the form
 - Catalogues concerns and findings

Site Visit – Deep Dive

- “Day Of” – monitoring review
 - Site Visit form filled out
 - Involves both Grant Administrator and the Recipient
 - Concerns/Findings logged
 - Everything communicated (notes & verbally) – no surprises

Site Visit – Deep Dive

- “Day Of” – project site tour
 - City officials/staff welcome
 - Grant Administrator required
 - See progress / check against plans
 - Identify any roadblocks
 - Opportunity: talk with beneficiaries/stakeholders

Site Visit – Deep Dive

- Afterwards: Site Visit Report
 - IowaGrants Site Visit form completed
 - Site Visit Final Report created
 - Notes
 - Concerns/Findings - with due dates
 - Report sent via Correspondence

Site Visit – Deep Dive

- Afterwards: Corrective Actions (if applicable)
 - City provides a Corrective Action
 - Sent, reviewed, approved in IowaGrants
 - While pending, no claims will be paid out
 - If not resolved, some kind of progressive sanction to be issued

Site Visit – Deep Dive

- Afterwards: Clearance Letter
 - All Corrective Actions accepted (if applicable)
 - Site Visit submitted in IowaGrants
 - Clearance letter sent via Correspondence

Site Visit – Deep Dive

- A summary of timelines:

- Initial notification *(30 days before)*

- Uploads due *(7 days before)*

- PM review *(0-7 days before)*

- **Site Visit**

- Report/notification sent *(7 days after)*

- Corrective actions due *(45 days after)*

- Final closure *(60 days after)*

Site Visit – Deep Dive

- A summary of roles
 - Project Manager
 - Grant Administrator
 - Recipient (City/County)

Site Visit – Deep Dive

- IEDA Project Manager
 - Sets up site visit in IowaGrants
 - Sends initial alert
 - Reviews documentation
 - Asks questions & enters answers
 - Sends final report and associated notification letters
 - Manages any findings and follow ups (deadlines)

Site Visit – Deep Dive

- Grant Administrator
 - Assists in scheduling
 - Uploads requested documentation
 - Attends Site Visit
 - Provides verbal answers
 - Uploads corrective actions (tracks timelines/deadlines of that)

Site Visit – Deep Dive

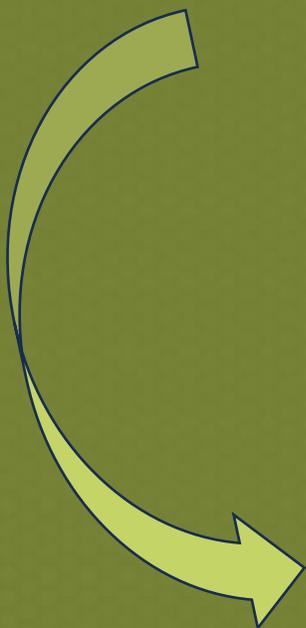
- Recipient (City/County)
 - Attends the meeting
 - Provides verbal answers
 - Provides corrective actions, if applicable

Next Steps

- Proposed changes to IowaGrants
 - Where documents are uploaded
 - Introducing an “Executive Summary” page
 - Tracking “concerns” and “findings” instead of “missing items”
 - Merging CDBG-DR (Disaster Recovery) and Regular CDBG
 - Removal of redundant information

Next Steps

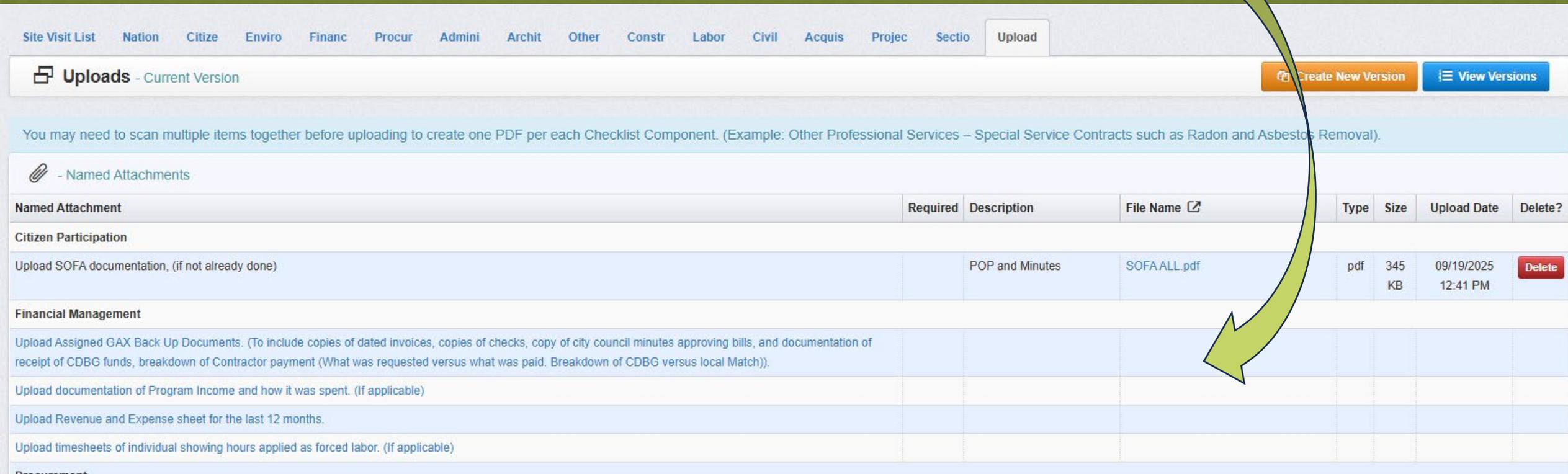
- Where documents are uploaded
 - Currently, in the Regular program...



Component	Complete?	Last Edited
National Objectives / Project Progress	✓	Oct 14, 2025 8:51 AM - S
Citizen Participation	✓	Oct 8, 2025 10:53 AM - S
Environmental	✓	Oct 8, 2025 10:56 AM - S
Financial Management	✓	Oct 8, 2025 11:02 AM - S
Procurement	✓	Oct 8, 2025 11:09 AM - S
Administration	✓	Sep 30, 2025 4:12 PM - S
Architectural/Engineering	✓	Oct 1, 2025 3:17 PM - S
Other Professional / Technical Services	✓	Oct 1, 2025 3:22 PM - S
Construction	✓	Oct 1, 2025 3:48 PM - S
Labor Standards	✓	Oct 8, 2025 11:19 AM - S
Civil Rights	✓	Oct 8, 2025 11:33 AM - S
Acquisition and Relocation	✓	Oct 8, 2025 11:30 AM - S
Project Pictures	✓	Sep 19, 2025 12:35 PM - S
Section 3	✓	Oct 8, 2025 11:30 AM - S
Uploads	✓	Sep 19, 2025 1:08 PM - S
Funding Opportunity	-	
Application	-	

Next Steps

- Where documents are uploaded
 - Currently, in the Regular program...



The screenshot displays a web application interface for document uploads. At the top, a navigation menu includes categories like 'Site Visit List', 'Nation', 'Citize', 'Enviro', 'Financ', 'Procur', 'Admini', 'Archit', 'Other', 'Constr', 'Labor', 'Civil', 'Acquis', 'Projec', 'Sectio', and 'Upload'. Below the navigation, the page title is 'Uploads - Current Version', accompanied by 'Create New Version' and 'View Versions' buttons. A light blue informational banner states: 'You may need to scan multiple items together before uploading to create one PDF per each Checklist Component. (Example: Other Professional Services – Special Service Contracts such as Radon and Asbestos Removal)'. Below this, a section titled '- Named Attachments' contains a table with columns for 'Named Attachment', 'Required', 'Description', 'File Name', 'Type', 'Size', 'Upload Date', and 'Delete?'. The table lists several attachment categories, with the first row showing 'Citizen Participation' with a sub-entry 'Upload SOFA documentation, (if not already done)' that has a 'Required' status, a description of 'POP and Minutes', a file named 'SOFA.ALL.pdf', a size of 345 KB, and an upload date of 09/19/2025 at 12:41 PM. A red 'Delete' button is visible next to this entry. A large green arrow points from the text 'Currently, in the Regular program...' to the 'Upload' button in the navigation menu.

Site Visit List Nation Citize Enviro Financ Procur Admini Archit Other Constr Labor Civil Acquis Projec Sectio Upload

Uploads - Current Version [Create New Version](#) [View Versions](#)

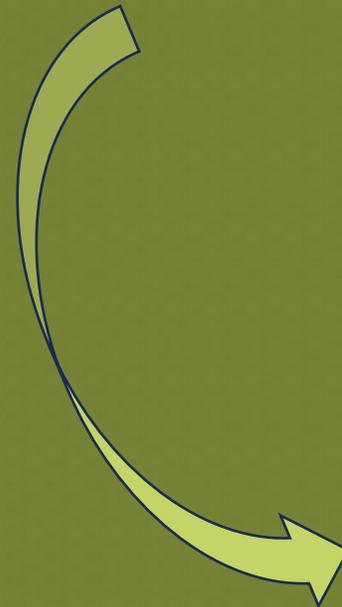
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- Named Attachments

Named Attachment	Required	Description	File Name ↗	Type	Size	Upload Date	Delete?
Citizen Participation							
Upload SOFA documentation, (if not already done)		POP and Minutes	SOFA.ALL.pdf	pdf	345 KB	09/19/2025 12:41 PM	Delete
Financial Management							
Upload Assigned GAX Back Up Documents. (To include copies of dated invoices, copies of checks, copy of city council minutes approving bills, and documentation of receipt of CDBG funds, breakdown of Contractor payment (What was requested versus what was paid. Breakdown of CDBG versus local Match)).							
Upload documentation of Program Income and how it was spent. (if applicable)							
Upload Revenue and Expense sheet for the last 12 months.							
Upload timesheets of individual showing hours applied as forced labor. (if applicable)							
Documentation							

Next Steps

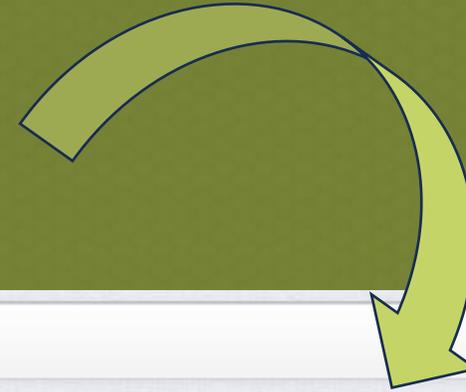
- Where documents are uploaded
 - Currently, in the Regular program...



Grant Components	Status Report
☰ Grant Components	
Component	
General Information	
Main Data	
Activity	
Budget	
Appropriations	
Compliance Forms	
Claims	
Contract Amendments	
Site Visits	
Close-Out	
Contract Holds	
Green Streets Criteria	
Cost Estimates	
Individual Building Details	
Contract Condition Clearance Documents	
Audit Documents	
Risk Assessment	
Monitoring Uploads	
Required Uploads	
Electronic Documents	
Correspondence	

Next Steps

- Where documents are uploaded
 - Currently, in the Regular program...



 **Monitoring Uploads** - Current Version

Documents on this form should only be provided when specifically requested as a result of an IEDA Project Manager Site Visit (Monitoring). Requested documents ca

 - Other Attachments

Description	File Name 
Asbestos Ad POP	Proof of Publication.pdf
Asbestos Bid - Impact 7G	Impact 7G Bid.pdf
B2 Environmental Asbestos Bid	B2 Environmental Bid.pdf
Bi State Masonry Davis Bacon Wage Sheets Week 21	Week 21 8-9-2025.pdf
Bi State Masonry Interview Forms	Interview Forms.pdf
Bi States Masonry Pay stubs week 21	Pay Stubs Week 8-9-2025.pdf
Bi States Sub Contract	Bi States Contract.pdf
Claim 4 - All City Council Meeting Minutes and Claims Lists	BP-70C36_20251001_084040.pdf
Composites DB Wage Sheet - Week 6 (Lopez Pointing)	Week 6.pdf

Next Steps

National Objectives / Project Progress	✓
Citizen Participation	✓
Environmental	✓
Financial Management	✓
Procurement	✓
Administration	✓
Architectural/Engineering	✓
Other Professional / Technical Services	✓
Construction	✓
Labor Standards	✓
Civil Rights	✓
Acquisition and Relocation	✓
Project Pictures	✓
Section 3	✓
Uploads	✓
Funding Opportunity	-
Application	-

Oct 14, 2025 8:51 AM - 9

Grant Components

Status Report

Grant Components

Component

General Information

Main Data

Activity

Budget

Appropriations

Compliance Forms

Claims

Contract Amendments

Site Visits

Close-Out

Contract Holds

Green Streets Criteria

Cost Estimates

Individual Building Details

Contract Condition Clearance Documents

Audit Documents

Risk Assessment

~~Monitor Uploads~~

Required Uploads

Electronic Documents

- Site Visit List
- Nation
- Citize
- Enviro
- Financ
- Procur
- Admini
- Archit
- Other
- Constr
- Labor
- Civil
- Acquis
- Projec
- Section
- Upload

Uploads - Current Version

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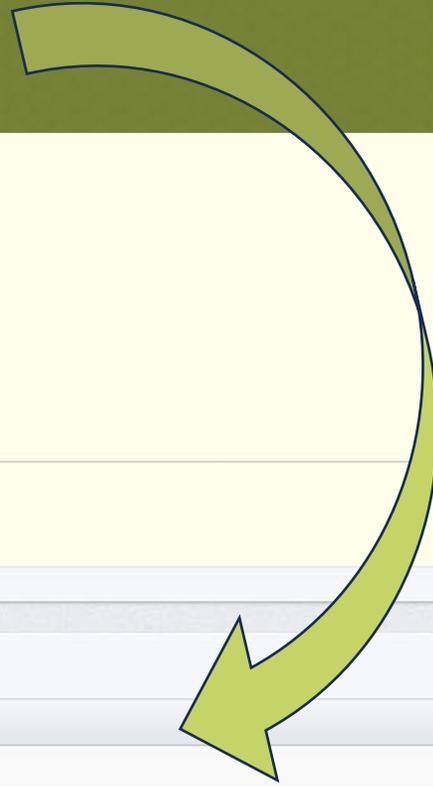
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Named Attachment	Required	Description	File Name
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Upload documentation of Program Income and how it was spent (if applicable)			
Upload Revenue and Expense sheet for the last 12 months.			
Upload timesheets of individual showing hours applied as forced labor. (If applicable)			
Procurement			



Next Steps

- Where documents are uploaded
 - Currently, in the DR program...



General description of the remaining project work to be done?: Yes

Location of proposed activities?: Yes

Description of any changes made to the project since the time of application in terms of a) budget; b) performance targets or units; c) timelines/schedules; d) project scope or objectives; e) location of activities or f) planned beneficiaries?: Yes

Last Edited By: Sarah Plowman - Sep 26, 2024 1:12 PM

[Edit Form](#)

Misc. Documents - Multi-List

[+ Add Row](#)

File	Description
sofa docs.pdf	Collated sofa documents

Last Edited By: Sarah Plowman - Sep 26, 2024 1:12 PM

[+ Add Row](#)

Next Steps

- Where documents are uploaded
 - How things will change...

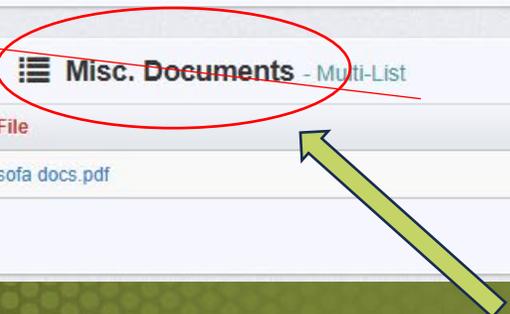
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Re-name to "Pre-Visit Uploads"

Next Steps

- Where documents are uploaded
 - How things will change...



A screenshot of a web application interface showing a table. The table title is "Misc. Documents - Multi-List", which is circled in red. A green arrow points from the text "Re-name to 'Pre-Visit Uploads'" below to the circled title. The table has two columns: "File" and "Description". The table is currently empty, displaying "No Data for Table". At the bottom right, there is a green button labeled "+ Add Row" and a text label "Last Edited By: Jacob Levang - Oct 25, 2023 9:24 AM".

File	Description
No Data for Table	

Last Edited By: Jacob Levang - Oct 25, 2023 9:24 AM

Re-name to "Pre-Visit Uploads"



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File	Description
No Data for Table	

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Re-name to "Post-Visit Uploads"

Next Steps

- “Executive Summary” page
 - Currently... “National Objectives / Project Progress”

Site Visit Preview Attachments Alert History M

🔍 Site Visit Details

Site Visit cannot be Submitted Currently

- Site Visit in wrong status

Component

- National Objectives / Project Progress**
- Citizen Participation
- Environmental
- Financial Management
- Procurement
- Administration
- Architectural/Engineering
- Other Professional/Technical Services



- Person(s) Interviewed:
- Monitoring Notification Date:
- Monitoring Final Report Date:
- Notification Type:
- Original Signatures on Claims, Amendments, Alternate Signatory Forms, etc. :
- National Objective of the project:
- If project benefits LMI how was it determined:
 - If other, please specify:
- Do project files include adequate documentation to support LMI determination:
- Is the project complete:
 - If no, what is the project progress and estimated completion date:

Next Steps

- “Executive Summary” page
 - Currently... “National Objectives / Project Progress”

☰ Missing Components - Multi-List + Add Row					
Subject	Missing Component	Due Date	Status	Cleared Date	Comments
Other Professional / Technical Services	Signed Executed Contract	09/30/2024	Not Available	09/26/2024	For Impact7G
Labor Standards	Employee Interview Forms	09/30/2024	Cleared	09/26/2024	Signed version for MTS
Construction	Signed Executed Contract	09/30/2024	Cleared	09/26/2024	For two subs
Civil Rights	Affirmative Fair Housing Policy	09/30/2024	Cleared	09/26/2024	Need the signed/dated/adopted version or resolution
Environmental	LBP Testing/Clearance	12/31/2024	Cleared	05/27/2025	Clearance testing
Last Edited By: Sarah Plowman - Aug 19, 2025 9:47 AM + Add Row					

Next Steps

- “Executive Summary” page
 - Who was involved
 - Dates / notifications
 - “Missing Components” tracking (*with changes)

Site Visit Preview Attachments Alert History

Site Visit Details

Site Visit cannot be Submitted Currently

- Grant is in Wrong Status
- Site Visit in wrong status

Component

Insert here

National Objectives / Project Progress

Citizen Participation

Environmental

Financial Management

Procurement

Duplication of Benefits

Administration

Architectural/Engineering

Other Professional Services

Construction

Labor Standards

Civil Rights

Acquisition and Relocation

Property Management

Project Pictures

Section 3

Funding Opportunity

Application

Next Steps

- Tracking “concerns” and “findings”
 - Currently... “Missing Components”

☰ Missing Components - Multi-List + Add Row					
Subject	Missing Component	Due Date	Status	Cleared Date	Comments
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Environmental	LBP Testing/Clearance	12/31/2024	Cleared	05/27/2025	Clearance testing

Last Edited By: Sarah Plowman - Aug 19, 2025 9:47 AM + Add Row

Next Steps

*Replace "Missing" with "Pending,"
"Cleared" with "Resolved"*

- Tracking "concerns" and "findings"
 - How things will change...

Re-name to "Compliance Issues"

Subject	Missing Component	Due Date	Status	Cleared Date	Comments
Other Professional / Technical Services	Signed Executed Contract	09/30/2024	Not Available	09/26/2024	For Impact7G
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Environmental	LBP Testing/Clearance	12/31/2024	Cleared	05/27/2025	Clearance testing

Last Edited By: s

Insert here

Add column "Type" with drop-down menu choices "Concern" and "Finding"

Next Steps

- Merging DR and Regular
 - Goal in many things on our team this year
 - You've seen the changes!
 - Smaller edits for consistency
 - Allow topic-specific Site Visits

Next Steps

- Removing redundant information
 - If it exists elsewhere in IowaGrants
 - If we've already monitored it

Next Steps

- Nuanced interim period
 - Immediate changes: Uploads, tracking, and “executive summary”
 - Ongoing changes: Merging DR & Regular
 - Future changes: Removing redundant information
 - What you see is what you use

Q&A Part II





THANK YOU

Name | Title

Iowa Economic Development Authority