

CDBG Certified Grant Administrator Training

CDBG overview/ Administrator responsibilities

February 20, 2024

Session 1:

Date: Tuesday, February 20, 2024

Time: 9:30 am-11:30 am

Topic: CDBG Overview (Dan Narber)
lowagrants.gov Overview (Don Dursky)

[Click here to join the meeting](#)

Session 2:

Date: Tuesday, February 20, 2024

Time: 1:30pm-4pm

Topic: Section 3 (Jacob Levang)
Uniform Relocation Act (Steven Stransky)

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Session 3:

Date: Wednesday, February 21, 2024

Time: 9am-11:30 am

Topic: Environmental (Robert Jonet)
Section 106 (Robert Jonet)

[Click here to join the meeting](#)

Session 4:

Date: Wednesday, February 21, 2024

Time: 1:30pm-4pm

Topic: Labor Standards (Dan Narber)

[Click here to join the meeting](#)

Session 5

Date: Thursday, February 22, 2024

Time: 9am-11:30 am

Topic: Submitting Claims (Jacob Levang)

Financial Management (Joyce Brown & Sarah Plowman)

Procurement (Sarah Plowman)

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Session 6

Date: Thursday, February 22, 2024

Time: 1:30pm-4pm

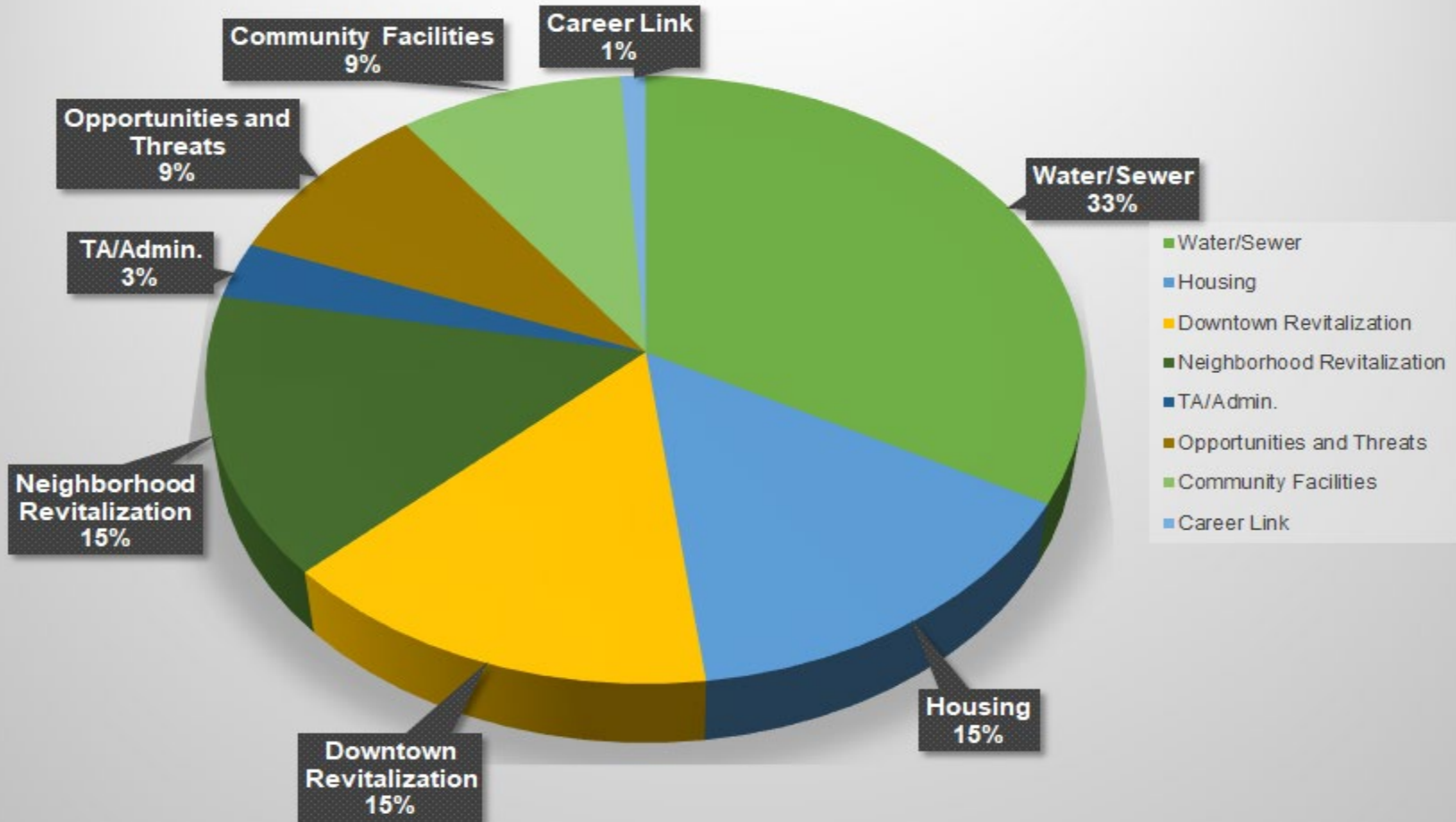
Topic: Monitoring (Dan Narber)

BABA Requirements (Chad Sands)

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CDBG Method of Distribution

CDBG Funding Allocation



CDBG Program overview

- » Iowa's CDBG allocation varies from year to year, based on allocation from Congress.
 - 2020 - \$24.8 million
 - 2021- \$22.8 million
 - 2022- \$24.7 million
 - 2023- \$24.7 million

- » State has the ability to create its own programs and funding priorities, based on community needs.

CDBG Program overview

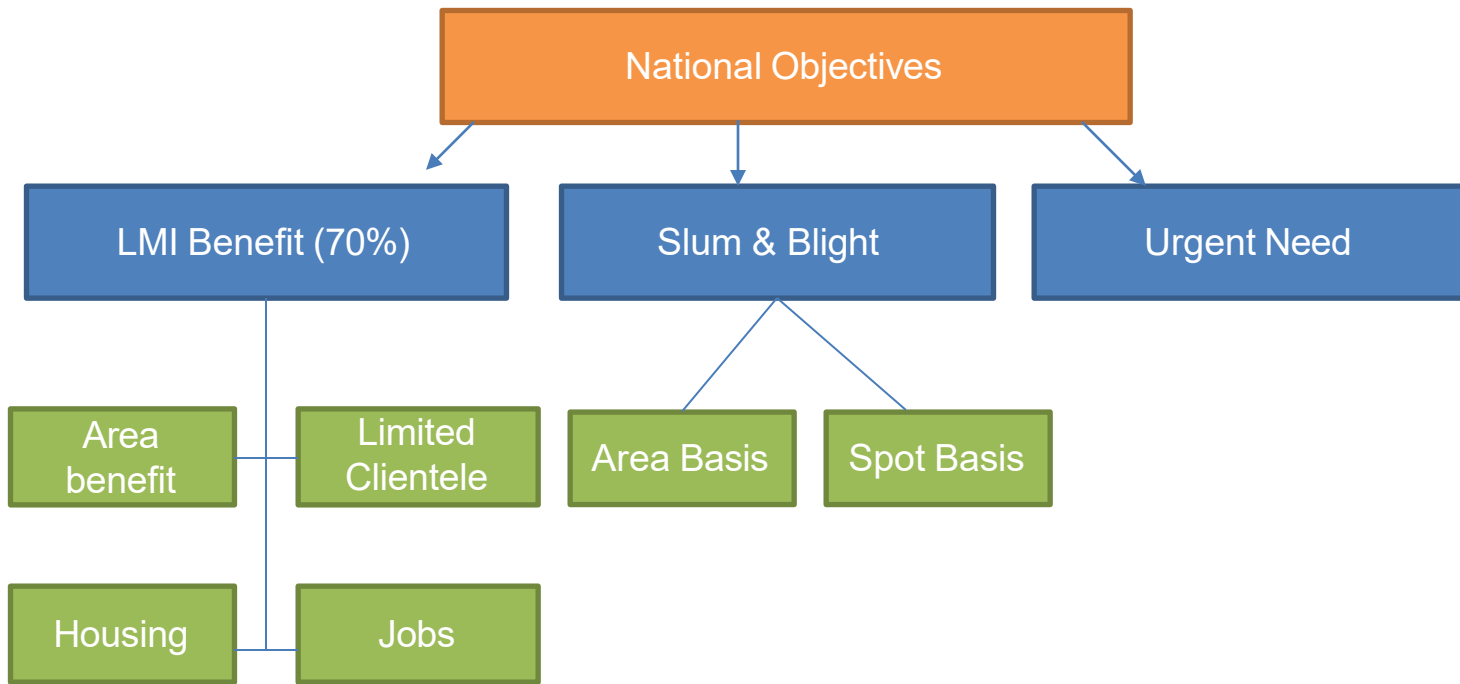
» Every activity funded with CDBG dollars must meet a national objective:

- Low to moderate income benefit

*80% or below of area median income= LMI

*70% of all funds

- Prevention or elimination of slum and blight
- Meet an urgent need



CDBG Program overview

National Objectives & IEDA programs:

- Water/ Sewer: LMI- area benefit (51%)
- Community Facilities: LMI- limited clientele (51%)
- Upper Story Housing: LMI-housing (51%)
- Downtown Revitalization: Slum and blight- area

CDBG Program overview

- » Not only must an activity funded with CDBG funds meet a National Objective....
- » The activity must be an Eligible Activity as well
- » Will the activity meet a national objective?
- » Is the activity an eligible activity?
- » If yes to both questions, activity can be funded with CDBG \$

CDBG Program overview

- » 24 CFR 570.201 describes eligible activities.
- » If an activity is not specifically authorized, it is ineligible for funding.
- » States may prioritize which activities to fund. IEDA does this through program creation/ design.

CDBG Program overview

» Eligible activities:

- Acquisition
- Disposition
- Public facilities and improvements (rehabilitation/construction)
- Clearance/ remediation (generally must result in an eligible activity)
- Public services (no more than 15% of allocation)
- Interim assistance (short term repairs)
- Relocation
- Loss of rental income (when displaced as a result of CDBG)
- Privately owned utilities (install/construct/rehab)
- Rehabilitation (residential or commercial)
- Housing construction (only under certain circumstances!)
- Code enforcement (only in deteriorating areas)

CDBG Program overview

»Eligible activities:

- “Special economic development” (assistance to for profits generally)
- Microenterprise assistance
- Homeownership assistance (downpayment)
- Planning
- Administration/ technical assistance (State admin)
- Reconstruction (law change in 1996- generally rebuilding)
- Removal of architectural barriers

CDBG Program overview

- » There are ways to mix and match an eligible activity with a national objective. Some activities can meet more than 1 national objective.
- » **EXAMPLE:** If a public facility will serve all residents in an LMI community (at least 51%), the LMA national objective can be used OR
- » If the public facility is in a slum/ blighted area and improvements will eliminate slum and blight, the SB national objective could be used.

Question- Which would you use for this project?

CDBG Program overview

- » There are certain CDBG eligible activities that require the use of a specific national objective.
- » EXAMPLE: Housing assistance requires use of LMI Housing national objective. Homeowner must be LMI
- » Special economic development almost always requires use of LMI jobs national objective (few exceptions)

CDBG Program overview

- » Activities that are not listed as eligible are generally ineligible.
- » Some activities are “extra” ineligible and are explicitly prohibited:
 - Assistance to buildings for “general conduct of government”
 - General government assistance
 - Political activities
 - Equipment purchases (unless an integral part of a structure/ ED project)
 - Operations maintenance
 - New housing construction (with narrow exceptions)
 - Income payments (excludes emergency payments)

CDBG Program overview

» IEDA will generally not require communities or grant administrators to determine eligible activities or national objectives as that is determined with program design.

Resource for information on national objectives and eligible activities:

[Guide to National Objectives and Eligible Activities for State CDBG Programs - HUD Exchange](#)

[24 CFR § 570.201 - Basic eligible activities. | CFR | US Law | LII / Legal Information Institute \(cornell.edu\)](#)

[eCFR :: 24 CFR Part 570 -- Community Development Block Grants](#)

Questions on National objectives/ eligible activities?

CDBG Program Overview

»As a state CDBG recipient, HUD requires IEDA to prepare and submit the following plans/ reports:

- Consolidated Plan (every 5 years)
- Annual Action Plan
- Consolidated Annual Performance and Evaluation Report (CAPER)
- Plans are prepared in conjunction with IFA as these plans include information on all HUD funded programs (HOME, ESG, etc.)

CDBG Program Overview

» Consolidated Plan:

- Submitted every 5 years. Current plan is for 2020-2024.
- Designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions
- The plan establishes goals for meeting these needs over a five-year period that reflect anticipated resources and past performance
- The Consolidated Plan determines housing and funding priorities and establishes goals. These goals are then carried out through the state's Annual Action Plan.

CDBG Program Overview

» Annual Action Plan:

- Submitted annually in the spring.
- Summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the needs and goals identified by the Consolidated Plan.
- Any program and/ or policy changes are required to be included in the Annual Action Plan. (changes in method of distribution)

CDBG Program Overview

» Consolidated Annual Performance and Evaluation Report (CAPER):

- Progress report submitted in March of each year for all HUD programs
- Number heavy- expenditures, persons served under each program, etc.
- Tie back to each of the goals established in the Consolidated Plan

CDBG Program Overview

- » State of Iowa is required to develop and follow a Citizen Participation Plan for all HUD related planning activities. This plan is designed to encourage citizen participation and input in the Consolidated & Annual Action Planning processes.
- » The most recent Consolidated Plan and Annual Action Plan are always available on the IEDA website:
- » All plans/ report, once prepared, are open for public comment before submitted. Includes any amendments to plans.
- » [Plans can be found here: CDBG Plans & Reports | Iowa Economic Development Authority \(iowaeda.com\)](#)

CDBG Resources

» Basically CDBG - HUD Exchange - online training

» Community Development Block Grant Program | HUD.gov / U.S. Department of Housing and Urban Development (HUD) (laws, best practices)

» CDBG Management Guide | Iowa Economic Development Authority (iowaeda.com)

Questions on CDBG program overview?

Role of a grant administrator

- » Local governments (cities/ counties) are legally and financially responsible for all CDBG projects.

However.....

- » IEDA requires all local governments to identify a grant administrator for each funded project.
- » Grant administrators should coordinate day to day activities associated with the CDBG award on behalf of the recipient and be a primary point of contact with IEDA.

Role of a grant administrator

Grant administrators should assist the local government with compliance with all state and federal requirements associated with an award.

Role of a grant administrator

» Immediate post-award activities

- Environmental review
- Release of funds
- Policies & required documents
- Record keeping

» Reimbursements

- Ensuring funds are drawn every 6 months
- Collecting and submitting required source documentation

Role of a grant administrator

» Compliance/ reporting

- Procurement
- Labor standards
- Section 3
- Civil Rights/ Fair Housing
- LMI documentation
- Monitoring Questions/Documents
- Other program specific compliance unique to a program (DTR, etc.)

Role of a grant administrator

» Project updates

- Should know status of projects & be able to give update to IEDA staff
- Respond to general information requests
- Act as a liaison between the local government and IEDA
- Contact IEDA with any issues or questions to ensure project moves forward successfully.

Primary Roles of a grant administrator

» Project Monitoring

- Creating filing systems
- Uploading documents for monitoring in lowagrants.gov
- Follow up documentation

» Close out

- Ensure all costs are incurred prior to end date
- Ensure final claims are submitted by end date
- Assist with submitting contract extension/ amendment requests

Iowa Certified Grant Administrator Program

- » IEDA implemented the certified grant administrator program in 2022.
- » This has been strongly encouraged by HUD as a best practice.
- » Based on programs/ policies from several other states.
- » Continued Goals: increase training opportunities for administrators, increase administrator capacity/ improve performance and further professionalize the industry.
- » There are currently about 135 certified administrators across the State

Iowa Certified Grant Administrator Program

- » To administer a CDBG award, individuals must complete IEDA training and pass required test to become a certified CDBG grant administrator.
- » Communities must have a certified grant administrator (CGA) on staff or hire/procure a certified administrator to manage a CDBG award.
- » Grant administrator is any person that works on any portion of CDBG project compliance. Staff involved in any aspect of administration of a CDBG project must be a CGA.

Iowa Certified Grant Administrator Program

- » Individuals who do not successfully complete the training and the exam will not be certified. They can however, retake the test once without re-training
- » Certification is good for three (3) years from the date the administrator is first certified by IEDA.
- » IEDA will maintain a list of CGAs and will share this list on our website at [CDBG Training Resources | Iowa Economic Development Authority \(iowaeda.com\)](#).

» Certification tied to the individual, not the agency/city.

»

Iowa Certified Grant Administrator Program

- » Testing will take place after all trainings are completed.
- » Certification test will be available online....we will send link or you can request one
- » Test is open book. Score of 85% required to pass.
- » One retest will be allowed. If the individual does not pass the retest, certification training must be completed again prior to testing again.
- » IEDA may require CGAs to attend additional training throughout the year (new rules/ policies)

Iowa Certified Grant Administrator Program

- » CGAs must recertify every 3 years. Must be in good standing to recertify.
- » Conditional certification will be available to new employees. Training materials and test will be available.
- » Conditional certification is only good through the next certification training; to become fully certified, staff must attend training AND be in good standing.

Iowa Certified Grant Administrator Program

What does good standing mean?

- » CGA has completed and submitted the environmental review documents to IEDA within 6 months of the contract start date AND environmental review documents are complete upon submittal and are completed correctly.
- » Forms submitted to IEDA including claims, compliance forms, etc. are correct. Forms should not need to be sent back for corrections multiple times for the same errors and omissions.

Iowa Certified Grant Administrator Program

What does good standing mean?

- » CGA has promptly responded to monitoring requests and has resolved all missing items or deficiencies identified in monitoring visits within 30 days of IEDA's final monitoring report.
- » CGA is timely in responding to IEDA staff with information requests, project updates, and information requested by IEDA for the CDBG program
- » CGA has submitted draw requests at least every six months for each activity for each CDBG project.

Iowa Certified Grant Administrator Program

What does good standing mean?

- CGA has incurred all costs prior to the project ending date.
- CGA has submitted all project closeout materials within 60 days of a contract end date OR has requested contract extension prior to the contract end date.
- CGA completes monitoring visits with no findings/ issues OR any such issue is minor and can be quickly remediated.

Iowa Certified Grant Administrator Program

What does good standing mean?

- CGA has not committed any action that would lead IEDA to initiate decertification
- *CGA regularly attends CDBG trainings and does not miss mandatory ones*

Iowa Certified Grant Administrator Program

- » If not in good standing = Probation
- » IEDA will document reasons for probationary status.
- » CGA may be placed on probation for up to one year if the CGA has accumulated three (3) Good Standing violations within a two (2) year period.
- » CGA may continue to administer current CDBG contracts but may not administer any new CDBG contracts during the probation period.

Iowa Certified Grant Administrator Program

- » After probation period, CGA may be fully reinstated if there are no further documented good standing violations within that period
- » If additional violations are documented, the probationary period ends, and decertification process will proceed.

Iowa Certified Grant Administrator Program

(1) IEDA may immediately decertify an administrator after determining any of the following has occurred:

- CGA consistently circumvents federal or state policies and regulations
- CGA commits an illegal action (i.e.) fraud or theft
- CGA fails to disclose a conflict of interest the administrator has with the CDBG project

Iowa Certified Grant Administrator Program

(2) IEDA may immediately decertify an administrator after determining any of the following has occurred:

- » CGA takes inappropriate actions that result in a deobligation or refund of CDBG grant funds.
- » IEDA has received multiple, written, substantiated complaints from a grantee regarding the CGA (employee or elected official).

Iowa Certified Grant Administrator Program

(3) IEDA may immediately decertify an administrator after determining any of the following has occurred:

- » CGA has engaged in any conduct that is significantly detrimental to the administration of the CDBG program.
- » CGA allows other staff that are not CGAs to carry out administrative or compliance duties associated with a CDBG project.

Iowa Certified Grant Administrator Program

- » Decertification begins with written notice from IEDA.
- » CGA may request further opinion from IEDA Director or Director's designee
- » If a CGA is decertified by IEDA, the decertification is effective for 2 years. All projects must be transferred to another CGA.
- » Decertified CGAs will be required to attend certification training and pass all certification exams to again become certified.

Questions on Certified Administrator policy?