

## **CDBG administrator training & performance policy**

The Community Development Block Grant (CDBG) program requires that communities, businesses, and other project beneficiaries meet a variety of complex federal requirements throughout the duration of the project. The Iowa Economic Development Authority (IEDA) believes it is important for the state to assist communities by providing funds for communities to hire a knowledgeable CDBG grant administrator to help communities follow necessary administrative and financial procedures. Grant administrator performance in Iowa is directly tied to the success of the state's CDBG program; Well-trained administrators are critical to continued economic growth in Iowa's communities.

This document describes the process IEDA will follow to ensure compliance with the state's CDBG program.

### **Grant administrator training**

IEDA will host grant administrator training on an annual basis. Agencies that wish to administer CDBG awards must send representatives to the training. To the extent possible, all staff administering CDBG awards should attend the training. New staff members must attend the training prior to administering a CDBG project on behalf of their agency.

IEDA will not require a test or certify individual staff members as grant administrators upon completion of the training.

In addition to annual training, IEDA will host a CDBG application workshop and CDBG recipient workshop each year. Administrators should plan to attend these workshops, as IEDA staff will cover program updates/ changes at these events.

While IEDA is committed to providing training and developing tools to assist administrators, IEDA expects that individual agencies will also provide ongoing internal training of staff. (i.e. Having new CDBG administrators work closely with more experienced administrators in the agency)

### **Grant administrator performance**

IEDA will continue to monitor administrator performance. Grant administrator performance will be monitored using the following criteria:

1. Overall knowledge of and compliance with CDBG requirements
2. Timeliness
3. Responsiveness
4. Project monitoring performance

IEDA will inform grant administrators of any issues or concerns with performance as those occur.

IEDA staff will document issues or performance concerns through reports, emails, letters and other similar documentation.

At least annually, IEDA will review documentation on administrator performance.

**Grant administrators in good standing**

In order to administer CDBG awards on behalf of recipients, grant administrators must remain in good standing. Good standing means:

1. The administrator has completed and submitted the environmental review documents to IEDA within 6 months of the contract start date. Environmental review documents are complete upon submittal and are completed correctly.
2. The administrator has resolved all missing items or deficiencies identified in monitoring visits within 30 days of IEDA's final monitoring report.
3. The administrator is timely in responding to IEDA staff with information requests, project updates, and other materials requested by IEDA for the CDBG program.
4. The administrator has submitted draw requests at least every six months for each activity for each CDBG project.
5. The administrator has provided all project close-out materials to IEDA within 60 days of a contract end date OR has requested a contract extension prior to the contract end date.

**Grant administrators not in good standing**

An administrator is not in good standing when:

1. The administrator has not meet two or more of the above referenced requirements over the past year.
2. The administrator has, as determined by IEDA, one or more significant documented compliance issues over the past year.
3. The administrator has a documented pattern of noncompliance/nonperformance on multiple CDBG projects over the past year.

IEDA may immediately determine an administrator is not in good standing upon determining any of the following has occurred:

1. The administrator consistently circumvents federal or state policies and regulations
2. The administrator fails to disclose a conflict of interest the administrator with the CDBG project
3. The administrator takes inappropriate actions that result in deobligation or refund of CDBG grant funds
4. IEDA has received multiple, written complaints from a grantee regarding the administrator (employee or elected official).
5. The administrator has engaged in any conduct that is significantly prejudicial to the administration of the CDBG program.

#### **Grant administrator status**

When IEDA determines that a grant administrator is not in good standing, the administrator will be notified in writing. This notification will include information on the specific issues and reasons for IEDA's determination.

Upon notice from IEDA, the administrator will not be allowed to administer any CDBG awards in the next annual round of CDBG awards **and** must complete the next CDBG administrator training. Upon completion of the next available training, the administrator will be allowed to administer future CDBG projects, if IEDA determines that the previously identified performance issues have been resolved.