



REPORTING AND PERFORMANCE REVIEW

Responsible personnel or unit: Disaster Recovery Team, Internal Controls Project Manager, Data Manager

Internal Control System

IEDA has identified personnel within the Disaster Recovery and Federal Programs teams to oversee the data management, reimbursement and financial procedures, special programs, and contract closeout. While most of this Policies and Procedures document reflects IEDA's integration of internal controls into standard practices, this section will reflect IEDA's compliance with and reference to the *United States Government Accountability Office's Standards for Internal Control in the Federal Government, GAO-14-704G* ("the Green Book").

Internal Auditing - IEDA has established a separate Internal Controls Project Manager position and placed it within the Iowa Finance Authority (IFA) State Programs Team to provide an internal audit function. This position allows for separations of duties from the Disaster Recovery Team, whose primary work is to establish programs, make awards, and manage open grants, including conducting risk assessments and monitoring of awarded subrecipients. This position reports separately from the IEDA Disaster Recovery and Federal Programs teams to the IFA State Programs Director, who reports to the IEDA | IFA Chief Programs Officer. See the organizational chart for the reporting structure.

Control Environment – By empowering existing Disaster Recovery and Federal Programs staff to review and enforce compliance requirements, the IEDA has established an appropriate separation of duties. Ensuring that those writing, awarding and managing programs are not the same staff who are reviewing and processing financial claims, internal audits and grant close out.

Risk Assessment – Project Managers conduct an annual risk assessment of all subrecipients funded with CDBG-DR funds. These risk assessments take into consideration the subrecipient's risks in terms of financial risk, program management/capacity, quarterly progress, and completion of deliverables.

Control Activities – The Data Manager plays an active role in ensuring that the information collected through CDBG-DR funded grants accurately reflects the work being completed by the subrecipients. This data is also used to document compliance with federal and state laws and regulations. The Data Manager works with project managers to set up recurring custom reports that are sent directly to the project managers to assist in grant management.

Information and Communication – The information and data collected through the IowaGrants system and overseen by the Data Manager is used to clearly communicate progress, issues, and solutions to team members of agency management.

Monitoring – All CDBG-DR funded activities are managed by project managers in accordance with the monitoring policy of this document. Furthermore, IEDA's Internal Controls Project Manager conducts an annual assessment of the Disaster Recovery Team's practices in comparison to the policies and procedures outlined in this document. This annual assessment informs updates to policies.





Agreed Upon Procedures

In addition to the above internal control components, the Office of the Auditor of the State of Iowa will provide audit and oversight of IEDA. Additionally, internal control will be reviewed through the audit function provided by the Office of the Auditor of the State of Iowa, per Agreed Upon Procedures for the CDBG-DR funds. The results of these audits/reviews are reported to IEDA Community Development personnel, the public, the IEDA board, HUD, and the IEDA director.

The Appendix includes:

- Copy of Article IV, Constitution of the State of Iowa, Section 22 – states the auditor of state is an elected official.
- Letter dated _____ from the Office of the Auditor of State regarding Agreed Upon Procedures for CDBG-DR Supplemental funds.

Internal Reporting

Monthly Reports to Department of Management

The Accounting Team is responsible for providing accurate and timely financial reports to the Department Management. The monthly budget vs. actual reports is prepared by the accountant to enable IEDA and the Department of Management to quickly analyze the financial position of the CDBG program. The report shows the current budgeted amount in the action plan for each program and the amounts disbursed both by program and region. Total disbursed funds by region are split between program and administrative costs to monitor compliance with the administration allocation.

External Reporting

Responsible personnel or unit: Operations Program Manager

The DRGR Action Plan and Quarterly Performance Report (QPR) are submitted to HUD each quarter through the Disaster Recovery Grant Reporting (DRGR) system by IEDA's Operations Program Manager, a member of the Disaster Recovery Team. HUD gathers information from the Iowa QPR and reports to the U.S. Congress.

The DRGR Action Plan is submitted to HUD through DRGR 15 days after the end of the quarter. The DRGR Action Plan lists all of the activities in the CDBG-DR grant, the activity description, the total CDBG-DR Grant Funds Budgeted for each activity and the expected performance measures. The budgeted totals for each program must not exceed the amount authorized in the DRGR system. After the DRGR Action Plan is updated in DRGR, it is then submitted to HUD to review and approve. Only after the DRGR Action Plan is approved can the QPR be submitted.

The Quarterly Performance Report must be submitted to HUD through DRGR 30 days after the end of the quarter. The QPR contains financial information, performance measures achieved, and an activity progress narrative for each activity. Actual amounts expended, drawn down (revenue) and obligated during the quarter are included in the financial information reported. The drawdown and obligated amounts are automatically updated from the DRGR drawdown module each quarter. However, the amounts expended must be manually entered into the QPR. After the QPR has been updated, it is then submitted by the Operations Program Manager to HUD to review and approve. HUD will review the QPR and submit data from the report to the U.S. Congress by the 19th of the following month. The table below outlines the target dates for Disaster Recovery Grant Reporting.





Target Dates – Deadlines

	January 1- March 1 Report	Apr 1st to Jun 30th Report	Jul 1st to Sep 30th Report	Oct 1st to Dec 31st Report
Grantee to submit Action Plan changes with new or modified activities	March 30	June 30	September 30	December 31
HUD to review Action Plan changes - approve or reject for modification	April 15	July 15	October 15	January 15
Grantee to submit Quarterly Performance Report (QPR)	April 30	July 30	October 30	January 30
HUD to submit QPR data in Reports to Congress	May 19	August 19	November 19	February 19

Reports Available to Public

IEDA’s Disaster Recovery staff ensures that all DRGR quarterly reports that have been reviewed and approved by HUD are posted on the IEDA website for public review.

STATE CLOSEOUT PROCEDURE & DEOBLIGATION OF FUNDS WITH HUD

Responsible personnel or unit: Disaster Recovery Team Lead, Operations Program Manager

IEDA will follow closeout procedures for subrecipient agreements as contracts are completed, as stated in the previous section Financial Procedures, IowaGrants Management System Process, Subrecipient Closeout Procedures. Upon the closeout of all subrecipient agreements, IEDA will begin the closeout procedure for the CDBG-DR award. IEDA’s role in the closeout procedure includes the following steps, or as determined by HUD closeout guidance.

- Expend all grant funds in accordance with needs or return funds
- Update accomplishments data to reflect all activities completed (or canceled)
- Update the performance measures for actual versus proposed
- Review final QPR
- Resolve all audit and monitoring issues
- Complete closeout certification and checklist as provided by HUD
- Complete closeout agreement

If a CDBG-DR funded project results in return of funds during or after the HUD closeout procedure, the funds will be held by IEDA and treated as program income. The funds will be expended through IEDA’s annual CDGB program prior to the expenditure of additional regular program funds.

