



COMPLIANCE

Responsible personnel or unit: Disaster Recovery & Federal Programs teams

In addition to financial and performance information, several areas of compliance are tracked in IowaGrants including environmental, historic, monitoring visits and results, etc. Within the Compliance Forms and Quarterly Status Reports Component of IowaGrants, the subrecipient completes and submits Compliance forms associated with: Section 3, NHPA Section 106, Environmental Review, Wage Rates, Wage Restitution, Contractor Clearance, and Duplication of Benefits. Each form includes instructions along with relevant links.

The Site Visits component of IowaGrants allows project managers to document as many monitoring reviews as necessary. More information about this can be found in the Monitoring Policy section of this document.

Duplication of Benefits (DOB)

A detailed DOB review of each proposed disaster award to an entity is required by federal law and is intended to ensure that two different sources of funding are not being provided to the same entity for the same purpose. To avoid this potential duplication, the State will check each proposed award against awards already made (or in process) by FEMA, SBA, private insurance companies, etc. The State has developed a detailed DOB Process Manual (Appendix C) to assist in compliance with the federal law and regulations in this area.

Contractor Clearance

All contracts entered into through a CDBG-DR award are documented through the Contractor Clearance form. This form documents that the grant administrator has checked all potential contractors against the SAM.gov website for debarred contractors. IEDA reviews the information provided and approves the form. This form is also cross-checked to ensure all DOB forms are approved prior to construction.

Wage Rates

For construction projects triggering the Federal Labor Standards requirements, the Grant Administrator will complete and submit a wage rates compliance form and submit the form for IEDA review and approval. For CDBG-DR Infrastructure and watershed construction projects, the Intent to Obligate Funds form will be included in this submittal as documentation of compliance with FR Notice Vol, 81, No 109, page 36563 (8) *Design*.

Environmental Review

All CDBG-DR projects will undergo an environmental review process. The environmental review is to ensure that no adverse environmental impacts would result from the proposed project. The environmental review also includes a "Section 106" review, which includes assessment of effect on historic and cultural resources.

Record Retention and Access

Per 24 CFR 570.490, IEDA requires Subrecipients to maintain all original receipts, administrative records, financial records and project activity records pertaining to the DR award for a period of three years after the date the State's Grant is closed with HUD.





Subrecipient:

IowaGrants complies with all Federal and State security and accessibility regulations. IEDA electronic records are maintained through IowaGrants via the following process.

- Required subrecipient documents/information are uploaded to IowaGrants
- Documents/information are stored on a highly secure, encrypted and hosted on dedicated servers.
- Documents are retrieved using a standard web-based system fully compatible with Pcs and mobile devices.
- Reports are provided through Jasper Reports and IowaGrants.

The State of Iowa has an agreement with Dulles Technology to provide IowaGrants to multiple state agencies. The agreement includes data ownership and data transfer. The State of Iowa owns the data. IEDA's Data Operations Manager is the person responsible for electronic recordkeeping.

State:

The State will retain all records pertaining to the administration of the CDBG-DR grant for a period of at least three years after the grant close-out with HUD.

All financial and programmatic administrative reports, records, and data will be electronically stored securely on IEDA's file server. The file server is backed up nightly, uses encrypted technology and maintains redundancies to protect the data. All paper records will be scanned and saved on the file server. The Disaster Recovery Team Lead will oversee assuring that IEDA's records are maintained and organized.

Personally Identifiable Information (PII)

IEDA follows Iowa Administrative Rules 261, Chapter 195.14 which describes the nature and extent of personally identifiable information which is collected, maintained and retrieved by the agency by personal identifier in record systems as defined in rule 195.2(17A,22). This rule describes the means of storage of that information and indicates whether a data processing system matches, collates, or permits the comparison of personally identifiable information in one record system with personally identifiable information in another record system. Unless otherwise stated, the authority for IEDA to maintain the record are provided in Iowa Code chapter 15.

Iowa Administrative Rules 261, Chapter 195.14(6) Grant and loan application records. The agency administers a variety of state and federal grant and loan programs. Records of persons or organizations applying for grants, awards or funds are available through the agency. These records may contain information about individuals collected pursuant to specific federal or state statutes or regulations. Personally identifiable information such as name, address, social security number and telephone number may be included in these records when the applicant is an individual. Many program applicants are political subdivisions or corporations, not individuals.

CDBG-DR documents/information are stored on a highly secure, encrypted system and hosted on dedicated servers. IEDA staff are required to participate in annual cyber safety certification training which also includes an emphasis on not sharing passwords.

IEDA also complies with Chapter 22.7 which outlines the public records that shall be kept confidential.

