

CDBG-CV Project Progress Policy

Due to the condensed nature of the CDBG-CV timeline, it is of utmost importance that grant recipients are continually progressing with interim milestones as they work toward the completion of their projects. To that end, IEDA has crafted the following "CDBG-CV Project Progress Policy" in order to actively monitor and proactively correct any potential roadblocks or delays in project implementation.

This policy will go into effect July 1, 2022, with the start of the new fiscal year and in awareness of the fact that July 20, 2022, will mark one year remaining before CDBG-CV funds must be expended, as per HUD.

As of July 1, then, grant recipients must:

- Sign and return the contract by the date listed in the award letter
- Submit the environmental/historic review within 90 days of the contract start date
- Go out to bid for construction (or other procurement) within 30 days of receiving the ROF
- Submit a claim/draw request at least every six (6) months, from the contract start date
- Expend 50% of the CV award by the 75% mark of the life of the contract
- Expend 100% of the CV award by the contract end date or July 20, 2023, whichever comes first

If a recipient fails to meet any one of these expectations, they will receive a "strike." A strike will prompt a virtual meeting with IEDA, city/county, and the grant administrator. It will be the city/county's responsibility, in conjunction with their grant administrator, to develop a remediation plan subject to IEDA approval. If the plan is successfully followed, the strike is removed from the strike count. If the plan is not followed and/or the issue is not resolved, an additional strike occurs.

After three unresolved "strikes," IEDA may:

- Suspend reimbursement for any current and future claims submitted for the project, and/or
- Explore and initiate deobligation proceedings

Notes and further detail:

- The environmental/historic review does not have to be approved within 90 days of contract start date, but merely submitted in Iowa Grants by that time.
- "ROF" (as in, "Go out to bid... within 30 days of receiving the ROF") refers to the official Release of Funds letter from IEDA for any non-Tier II projects, and it also refers to the Tier II approval for projects that submitted the general environmental first and then completed the Section 106 second. Like any CDBG project, both environmental and historic reviews must be cleared before procurement can begin.
- For most of the milestones, compliance will be verified via dates on submitted forms or claims in Iowa Grants. However, for the bidding/procurement milestone, grant administrators should plan to upload documentation into Electronic Documents before the 30-day deadline. For example: a copy of an RFP publication notice, copies of quotes requested and/or received from simple procurement, etc. -- something that will demonstrate procurement progress.
- "Expend" (as in, "Expend 50% of the CV award by the 75% mark of the life of the contract") refers to approved claims in Iowa Grants, not merely submitted claims.
- Remediation plans will be due via email to Sarah Plowman within one week of the virtual meeting.
- If, as of July 1, 2022, when this policy goes into effect, a project is found to be out of compliance with the Project Progress expectations above, it will receive one (1) strike. Even if it is found to be out of compliance with more than one milestone, they will be grouped together into one strike and the remediation plan should address all of them.
- Even if IEDA elects to temporarily suspend reimbursement for claims while strikes are being resolved, a recipient is still expected to continue to submit them every six (6) months, as stated above.