CDBG-CV Technical Assistance

Please be sure to sign-in to receive credit for this training.
Agenda

- Introduction  Kellon
- CDBG-CV Basics  Donielle
- Release of Funds  Jade
- Civil Rights  Kellon
- Procurement  Jade
- LMI Tracking  Donielle
- OkGrants  Kellon
- Financial Management  Kellon
- Duplication of Benefits  Jade
- Monitoring  Donielle
- Closeout  Kellon
- Keys to Success  Jade
CDBG-CV Basics
CDBG-CV Basics

Project Eligibility:

• Eligible projects must benefit **at least 51% LMI**;
• Eligible projects must either **prepare, prevent or respond** to the Coronavirus outbreak (must show tie-back to COVID);
• Eligible projects must fit under the following categories:

  • **Rental/Mortgage Assistance** – Beneficiaries must be past due on any bills they are seeking assistance for, and payment must go directly to the Landlord/Mortgage Company (Triggers the Lead-Based Paint Rule **for over 100 days of assistance**) *Note: This rule applies after the first payment is made and going forward, not when the assistance started. For example, if paying arrears for three months, the 100-day period begins from the date of first payment, not the beginning of the three months*;
  
  • **Utility Assistance** – Beneficiaries must be past due on any bills they are seeking assistance for, and payment must go directly to the Utility Company. *Note that if the utility is owned by the City, then they must waive late fees or any other fees that would **be considered as a profit to the City**;
  
  • **Medical Assistance**;
  
  • **Mental Health Assistance**;
  
  • **Nutrition Assistance**;
  
  • **Job Training Assistance** – Literacy, independent living skills, resume writing, job coaching, job retention training;
  
  • **Childcare Assistance** – Directly to the daycare or after-school service program, due to change in work hours, job changes, or other issues directly related to COVID-19 and generally offered only for **children under the age of 13**; and
  
  • **Rehabilitation Assistance** – Rehabilitation of a public facility to improve indoor air quality and ventilation to prevent the spread of Coronavirus.
Utility Payments

• Assistance for utilities should cover standard expenses. For example, late payment fees or loan fees should not be included in the assistance payment.

• If fees for utility bills are being waived, indicate whether these fees are simply being WAIVED by the city or PAID by the city on the bill.
CDBG-CV Basics

Process for Eligible Activities:

• All grantees will be required to upload documentation for eligible activities that receive CDBG-CV funds to ensure compliance with Federal and State regulations. In order for a subrecipient application intake process to be considered effective for utility and rental/mortgage assistance, subsistence payment records must be verified by using the following criteria to ensure expenses are necessary and reasonable:

  • Low-to-Moderate-Income Benefit
  • Duplication of Benefits
  • Tieback to COVID-19 Pandemic
    o Loss of Income
  • Household Income
  • Late Payment Notices
  • Beneficiary Agreement to return back duplicative funds
CDBG-CV Basics

Process for Eligible Activities:

• ODOC Forms
  • Householder Duplication of Benefits for Assistance Affidavit
  • Non-Profit Duplication of Benefits for Assistance Affidavit
  • Self-Declaration Form
  • Rent Reasonableness Check and Fair Market Rent Certification
  • Rental Agreement Plan Landlord Statement
  • CDBG-CV Equipment Inventory Form
  • Certification of Inventoried Items
  • Nutrition Assistance Application
CDBG-CV Basics

Tieback to COVID-19:

• All activities must have a tieback to COVID-19:
  • COVID-19 Prevention:
    • Equipment, Chemicals, or Materials that stop the spread of COVID
  • COVID-19 Preparation:
    • Equipment, materials, chemicals or electronics in place to better maintain services through social distancing
  • COVID-19 Response:
    • Beneficiaries must document how they experienced income loss or related issue due to COVID-19 that caused the need for utility, rental, or mortgage assistance.
CDBG-CV Basics

Tieback to COVID-19:

• Documentation of a tieback to COVID-19 can be any of the following, but is not limited to:
  • Statement of layoff or job loss;
  • Reduction in work hours due to COVID-19;
  • Reasoning for equipment or chemical purchase;
  • Statement from employer of business closure;
  • Bank statements showing reduction in weekly/monthly pay; or
  • Self-certification by beneficiary that the need was due to COVID-19.

Note: Self-certification is considered to be the lowest form of verification. While it is allowed, we strongly encourage subrecipients to do their due diligence in acquiring necessary documentation. If the self-certification method is used, a short narrative must be included stating a tieback to COVID and other related information to assist in determining eligibility.
CDBG-CV Basics

**Keeping an inventory of supplies/equipment** bought with CDBG-CV funds such as:

- Food;
- PPE;
- Chemicals;
- Other supplies for maintaining social distancing; and
- Equipment such as:
  - iPads and data plans;
  - Kitchen Machinery, Utensils, and Packing Supplies; and
  - Cleaning Products.
Emergency Payments - Covering Arrears

• Per Federal guidance, each assisted individual or family that is provided utility or rental/mortgage assistance for a period of multiple months, the period begins **on the date the first payment is made to a provider on behalf of an individual or family**. Thus, for rental/mortgage, or utility assistance, the following is required:
  • Assistance must be consecutive months;
  • Assistance must only be arrears (show of past due notice); and
  • Assistance can only be paid to the provider after the beneficiary is late on such payment.

*Note:* The period for emergency payments begins when the payment is made, not when the arrearage began. For example, an eligible applicant is 4 months in arrears. The first payment made will cover the 4 months of arrears. The applicant will still be eligible to receive 5 more months of assistance to fulfill the six consecutive month allowance.
Release of Funds
Release of Funds

• As with normal CDBG projects, subrecipients will be required to obtain Release of Funds (ROF) prior to drawing down any funds.

• Subrecipients will have **120 days** from the start date of their contract with ODOC/CD to obtain ROF and **270 days** from the start of their contract to begin construction.

• Subrecipients will be required to complete and upload the CDBG-CV ROF Checklist.

• To initiate release of funds (ROF), use the OKGrants Walkthrough located on the OKCommerce website. [https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/](https://www.okcommerce.gov/community-development/local-governments-edos/okgrants-guides-logon/)
Release of Funds

Release of Funds Checklist Requirements:

1. CDBG-CV projects will mainly involve three (3) levels of Environmental Review:
   - Exempt Activities 24 CFR 58.34(a)- Ex. Grant Administration and Consultation
   - Categorically Excluded not subject To 58.5 Activities: Ex. Public Services and Equipment
   - Categorically Excluded Subject to 58.5 Activities: Ex. Rehabilitation of public facilities

2. Sam.Gov Verification
   ✓ Verification of Sam.Gov check
   ✓ Grantee Debarment Review Certification
   ✓ Contractor Debarment Review Certification

3. Leverage/Matching Funds
4. Insurance and Bonding
5. Anti-displacement Plan
6. Fair Housing Activity (CEST and EA Reviews)
7. Section 3 Resolution or Plan (CEST and EA Reviews)
8. Engineer/Architect Acknowledgement (CEST and EA Reviews)
9. Request Release of Funds (Form 7015.15) (CEST and EA Reviews)
# Release of Funds Checklist

**Table: Determine Level of Environmental Review**

<table>
<thead>
<tr>
<th>Grants</th>
<th>Submitted Items</th>
<th>Reviewed Items</th>
<th>ODOC ONLY</th>
</tr>
</thead>
<tbody>
<tr>
<td>GRANTEE</td>
<td>1a.</td>
<td>1a.</td>
<td></td>
</tr>
</tbody>
</table>

1. **Exempt Activity** - Complete and Upload Forms in the ODOC Portal
   - a. Part 59 Environmental Review - Exempt Activity (Attachment 12)
   - b. Contractor Submittal/Inclusion Review Form (Attachment 12)

2. **Categorically Excluded (Not Subject to NEPA)**
   - a. Part 59 Environmental Review - Categorically Excluded Not Subject to NEPA

**Legend:**
- **STOP:** Your project must continue review documentation & NEPA.
- **NEXT:** Go to the next item.
- **COMPLETE:** You may complete the Project.

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**Diagram: Complete and Upload Environmental Assesment Form**

- a. **Historical Clearance Letter** (HA & TFHC)
- b. **Archaeological Survey**
- c. **Environmental Assessment**
- d. **Final Notice**

**Recommendations:**
- c. Complete all worksheets for CDT and NEPA activities. Complete project workbooks with supporting documents to ODOC.
- d. Submit all environmental assessment documentation.
- e. Submit NEPA Form 10 and NEPA Report.

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**ODOC/HRM Reference Name & Title**
Release of Funds Checklist

1. EXEMPT ACTIVITIES – Professional Services
   a) HUD or ODOC Form-Executed by Grantee’s Chief Elected Official
   b) Debarment Check:
      1. SAM.gov verification
      2. Grantee Debarment Review Cert.
      3. Contractor Debarment Review Cert.
   c) Procurement Documents (May also be uploaded drawdown request)

2. CATEGORICAL EXCLUDED (Not Subject to 58.5) CENST - (Purchase of a Fire Truck/Equipment)
   a) HUD or ODOC Form Executed by Grantee’s Chief Elected Official
   b) Procurement Documents (May also be uploaded drawdown request)
Release of Funds Checklist

3. CATEGORICAL EXCLUDED (Subject to 58.5) CEST – Improvements to Existing Infrastructure such as Public Facilities

Complete CEST (HUD/ODOC Form) with information from prepared “Resource Worksheets” for each Federal Law & Authorities listed at 24 CFR 50.4, 58.5 & 58.6.

a) Historical letters of concurrence (State & Tribal)
b) Archaeological letter of concurrence
c) Part of the review is Floodplain Management, the “Resource Topic Page & Worksheet” provides guidance to determine if the activity is located in the 100- or 500-year floodplain. If any portion of the project is located in the floodplain or wetland, a 5-step or 8-step review process shall be performed requiring two publications for public comment 1) Early Public Review & 2) Justification for locating project in a floodplain.

If no regulatory agency requires consultation or mitigation, the activity can convert to an exempt activity at 58.34(a)(12). No Notice to the Public is required and the Chief Elected Official executes the CEST Form. You may skip to f) Request for Release of Funds 7015.15

d) Prepare & post a Notice of Intent to Request Release of Funds for Public Comment Period

e) Distribute the Notice of Intent to interested parties

f) Chief Elected Official Certifies the Review of all Environmental Documents Prepared and Executes the CEST and the 7015.15 Request for Release of Funds (HUD/ODOC Forms).
4. Environmental Assessment (EA) Review (Primarily used for NEW construction)
Complete EA (HUD/ODOC Form) using information from prepared “Resource Worksheets”.

a) Historical letters of concurrence (State & Tribal)
b) Archaeological letter of concurrence
c) Part of the review is Floodplain Management, the “Resource Topic Page & Worksheet” provides guidance to determine if the activity is located in the 100- or 500-year floodplain. If any portion of the project is located in the floodplain or wetland, 5-step or 8-step review process shall be performed requiring two publications for public comment 1) Early Public Review & 2) Justification for locating project in a floodplain


e) Distribute the Combined Notice to interested parties

f) Chief Elected Official Certifies the Review of all Environmental Documents, Prepares and Executes the EA Form and 7015.15 Request for Release of Funds (HUD/ODOC Forms).

Items 5 thru 11 are other documents required before ODOC can provide a “Release of Funds”.
Release of Funds

Exempt and Categorically Excluded Not Subject To (CENST) Form:

Forms can be located in the CDBG-CV Policy and Procedure Manual or here: https://www.hudexchange.info/resource/3141/part-58-environmental-review-exempt-or-censt-format/

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Environmental Review
for Activity/Project that is Exempt or Categorically Excluded Not Subject to Section 58.5
Pursuant to 24 CFR Part 58.34(a) and 58.35(b)

This is a suggested format that may be used by Responsible Entities to document completion of an Exempt or Categorically Excluded Not Subject to Section 58.5 environmental review:

Project Information

Project Name: Corona Covid Relief Program

Responsible Entity: City of Corona

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 19864 CDBG-CV1

Preparer: Mr GoAway Corona, Grant Administrator

Certifying Officer Name and Title: Robert Corona, Mayor

Consultant (if applicable):

Project Location: Metro

Description of the Proposed Project [24 CFR 58.32; 40 CFR 1508.25]:

Due to the COVID-19 public health emergency, residents continue to sustain devastating economic losses causing the need for immediate assistance. To make a positive impact in the lives of Corona residents $500,000 will be used for Utility Assistance, Nutrition and Mental Health has been appropriated to provide assistance to residents.
Release of Funds

Exempt and CENST Form:

To determine Level of Environmental Review Determination, use the U.S. Department of HUD Office of Environmental and Energy Handbook of Laws, Regulations, and Executive Orders for HUD Environmental Compliance provided in the CDBG-CV Policy and Procedure Manual.

Level of Environmental Review Determination:

- **Activity/Project is Exempt per 24 CFR 58.34(a)**: (3) Administrative and management services. *Project funds will be used to pay for grant administration and consulting services.
- **Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b)**: (2) Supportive services including, but not limited to, health care, housing services, nutritional services, short-term payments for rent/mortgage/utility costs. *Project funds will be used for utility assistance, nutrition and mental health services.

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>19864</td>
<td>CDBG-CV1</td>
<td>$400,000</td>
</tr>
</tbody>
</table>

**Estimated Total HUD Funded Amount:**
- Utility Assistance: $170,000
- Nutrition Assistance: $106,000
- Mental Health: $100,000
- Activity Delivery Costs: $24,000
- Total HUD funds: $400,000

This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:**
- City of Corona Leverage: $100,000
- CDBG-CV1: $400,000
- Total HUD and non-HUD funds: $500,000
## Compliance with 24 CFR §50.4 and §58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates, names/itles of contacts, and page references. Attach additional documentation as appropriate.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4 and 58.6</th>
<th>Are formal compliance steps or mitigation required?</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.6</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Airport Runway Clear Zones and Accident Potential Zones</td>
<td>Yes No</td>
<td>N/A. This Activity is not a purchase or sale of an existing property.</td>
</tr>
<tr>
<td>24 CFR Part 51 Subpart D</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Coastal Barrier Resources</td>
<td>Yes No</td>
<td>N/A. Oklahoma is not a Coastal Barrier Resource Area.</td>
</tr>
<tr>
<td>Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1999 [16 USC 3501]</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flood Insurance</td>
<td>Yes No</td>
<td>N/A. Oklahoma does not require Flood Insurance as the State of Oklahoma is a Federal Formulated Grant Funded State from the US Dept. of Housing and Urban Development per 24 CFR Part 58.6(a)(3)</td>
</tr>
</tbody>
</table>
Mitigation Measures and Conditions [40 CFR 1505.2(c)]
Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

<table>
<thead>
<tr>
<th>Law, Authority, or Factor</th>
<th>Mitigation Measure</th>
</tr>
</thead>
<tbody>
<tr>
<td>None</td>
<td></td>
</tr>
</tbody>
</table>

Preparer Signature:  
Date: 4/19/21

Name/Title/Organization: City of Corona Grant Administrator

Responsible Entity Agency Official Signature:  
Date: 4/19/21

Name/Title: Mayor of Corona

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).
Release of Funds
Categorically Excluded Subject To (CEST)


Environmental Review for Activity/Project that is Categorically Excluded Subject To Section 58.5
Pursuant to 24 CFR 58.35(a)

Project Information
Project Name: City of Covid Public Facility Rehab

Responsible Entity: City of Covid

Grant Recipient (if different than Responsible Entity):

State/Local Identifier: 19865 CDBG-CV

Preparer: Mr. Covid Vaccine, Grant Administrator/Consultant

Certifying Officer Name and Title: Peggy Covid, Mayor

Grant Recipient (if different than Responsible Entity):

Consultant (if applicable): Mr. Covid Vaccine

Direct Comments to: Mr. Covid Vaccine

Project Location: Public facilities located at:
109 E. Springer
201 N. Division
407 Commerce Blvd.

Description of the Proposed Project [24 CFR 50.12 & 58.32, 49 CFR 1508.25]:
The City of Covid Replacement of HVAC Systems and Window Replacements Project will be paid with CDBG-CV funds in the amount of $500,000. The City is contributing $100,000. Compliance with the National Environmental Protection Act of 1969 (NEPA) is required. The City of Covid will use COVID rehabilitation assistance funds to install HVAC systems with filtration systems and replace inoperable windows in 3 buildings throughout the city that are heavily utilized by City personnel and the public on a regular basis. The ages of the buildings range from 1940 to 2011. The HVAC units and window replacements are needed to address the lack of ventilation and filtration needed to mitigate risks of airborne Coronavirus particles, improve indoor air quality, rapidly turn over fresh air within the buildings, and help to prevent the spread of COVID-19. This will increase social interaction in our city.

Level of Environmental Review Determination:
Categorically Excluded per 24 CFR 58.35(a), and subject to laws and authorities at §58.5:

§58.35a(iii) In the case of non-residential structures, including commercial, industrial, and public buildings:
(A) The facilities and improvements are in place and will not be changed in size or capacity by more than 20 percent; and
(B) The activity does not involve a change in land use, such as from non-residential to residential, commercial to industrial, or from one industrial use to another.

Funding Information

<table>
<thead>
<tr>
<th>Grant Number</th>
<th>HUD Program</th>
<th>Funding Amount</th>
</tr>
</thead>
<tbody>
<tr>
<td>18472</td>
<td>CDBG-CV</td>
<td>$500,000</td>
</tr>
</tbody>
</table>

Estimated Total HUD Funded Amount:
$500,000 - Rehab assistance

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:
$580,000
$120,000 - Match/leverage
$600,000 Total project cost
Release of Funds

All worksheets must be completed to confirm compliance determinations.

<table>
<thead>
<tr>
<th>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</th>
<th>Compliance determinations</th>
</tr>
</thead>
<tbody>
<tr>
<td>Are formal compliance steps or mitigation required?</td>
<td>Compliance determinations</td>
</tr>
<tr>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

**STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5**

<table>
<thead>
<tr>
<th>Clean Air</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Clean Air Act, as amended, particularly section 176(C) &amp; (D); 40 CFR Parts 5, 31, 93</td>
<td>See attachment 4. Nonattainment shows none of Oklahoma is in a nonattainment area.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Coastal Zone Management</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coastal Zone Management Act, sections 3705(c) &amp; (d)</td>
<td>See attachment 5. Project is located inland.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Contamination and Toxic Substances</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 50.3(c) &amp; 58.5(c)(2)</td>
<td>See attachment 6. Project is not located in an area of known history of toxic or hazardous materials. Site visit on 5/18/22 validates no toxic or hazardous materials are present.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Endangered Species</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</td>
<td>See attachment 7. Generic clearance letter used includes the following language: “Rehab or renovation activities associated with existing structures (e.g. houses, buildings) are permitted.”</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Explosive and Flammable Hazards</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>24 CFR Part 51. Subpart C</td>
<td>See attachment 8. On-site visit performed on 5/18/22 shows no above ground tanks were near project area.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Farmlands Protection</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Farmlands Protection Policy Act of 1981, particularly sections 405(b) and 1141, 7 CFR Part 658</td>
<td>See attachment 9. The project does not convert land use.</td>
<td></td>
</tr>
</tbody>
</table>

**Coastal Barrier Resources**

Coastal Barrier Resources Act, as amended by the Coastal Barrier Resources Act of 1990 [46 USC 3931] (40 CFR §1562.1) within 10,000 feet or civil airports within 2,500 feet of the project site. See attached airport maps.

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>See attachment 2. Project is located inland.</td>
</tr>
</tbody>
</table>

**Flood Insurance**

Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 (42 USC 4001-4128 and 42 USC 4001-4128.1) Yes | No |
| | See attachment 3. The project has an exception to the flood insurance purchase requirement, 24 CFR 58.64(a) because the project is funded by HUD and is a formula grant made to the State. |

**Floodplain Management**

Executive Order 11988, particularly sections 20(a), 24 CFR Part 55 Yes | No |
| | See attachment 10. None of the 3 buildings included in project are located in a floodplain. See attached floodplain map. |
Release of Funds (CEST)

**Important:**

If there are no mitigation measures the project can convert to exempt. (e.g., project located in a floodplain)

If there are mitigation measures, the project cannot convert to exempt and the subrecipient must publish a Notice of Intent (NOI) and Request Release of Funds (RROF) also known as form 7015.15.
Community Development Block Grant Construction Flow Chart

*Release of Funds must be achieved within 120 days after contract start date

401-27
Record Keapring Begins

402
Professional Services Contracts Negotiate

403
Exempt Activities

404-16
Receive Notice of Removal of Contract Conditions

404-16
Funds may be Requested

401-11 or 42 (ED)
Request for Authority to Use Grant Funds (Release of Funds)

401-13 or 22 (ED)
Receive Notice of Removal of Contract Conditions

406
Civil Rights, Equal Opportunity, Fair Housing Section 3 & 584 Activities

406
Fair Housing Steps:
1. Plan Ordinance or Resolution
2. New activity per year

408
Action to be Taken

BLUE - ACTION
RED - SEND TO ODOC

ODOC CD | CDBG-CV Technical Assistance (Updated May 2022)
Construction Flow Chart

Check www.sam.gov for debarment information

```
405-41
Notice of Award
Covered Not on Debarment

406-11
Pre-Construction Conference

406
Progress Payments & Change Orders

404-18
Request for Payment of Contract Funds

405
Construction Begins

406-16
Construction Inspections

406-22 & 23
Wage Rate Employee Interviews

406-19-21
Weekly Payroll

406
Job Tracking (ED)

406
Construction Supervision & Inspection

406
Contract Closeout

END

Final Expenditure Report 419-6 or 419-7 (ED)

Beneficiary Report 419-8

Contract Closeout Certification 419-9

Final Public Hearing

Final Wage Compliance Report 419-11

Proof of Insurance

Board Minutes

Final Inspection Report

Section 3 Summary Report 410 14-17```

BLUE - ACTION
RED - SEND TO ODOC

*** CLOSEOUT TO BE SUBMITTED WITHIN (60) DAYS AFTER CONTRACT END DATE

** Construction must start 270 days after CDBG contract start date

ODOC CD | CDBG-CV Technical Assistance (Updated May 2022)
Release of Funds

Extra step when debarment requirements have not been met or if there is other missing information:
Release of Funds Overview

- Submit Release of Funds for Exempt/CENST activities. Examples include grant administration, engineering/architect fees, inspections and other soft costs found in 58.34 or 58.35(b);
- After clearance has been received for Exempt/CENST activities prepare environmental review for CEST activities found in 58.35(a);
- Submit Wage Determinations found at [www.sam.gov](http://www.sam.gov) 45 days prior to bid;
- Request 10-day call ten days prior to bid opening to verify wage rates;
- After bid opening obtain approval for Notice of Award;
- Complete Release of Funds;
- Begin construction.
Civil Rights, Fair Housing and Section 3
Fair Housing

The Fair Housing Act prohibits discrimination in housing opportunities for nine (9) protected classes:

- Race
- Color
- Age
- Religion
- National Origin
- Gender
- Disability
- Family Status
- Sexual Orientation
Fair Housing Requirement

ODOC requires all CDBG grant recipients to:

* adopt a Fair Housing Ordinance or pass a Fair Housing Resolution as the first step in affirmatively furthering fair housing.

* undertake at least one (1) new activity per year to further fair housing.
Fair Housing requirements examples

- Have a written local complaint and monitoring process and notify the public of its existence through newspaper advertisement, or through notices in utility statements.
- Designate April or any month as “Fair Housing Month” by Proclamation or Resolution along with another sponsoring activity
- Newspaper advertisements, marquis displays or public service announcements
- Poster contest, essay writing contest at local schools
- Display items at local businesses
When it comes to housing, little things shouldn’t make a difference.

If you have children or are pregnant and a landlord refuses to rent to you, requires a higher security deposit, limits the use of facilities, or says you can only live in certain areas of a housing complex... that could be discrimination. And housing discrimination because of familial status is against the law.

If you believe you may be a victim of housing discrimination, contact HUD or your local Fair Housing Center.

Visit www.hud.gov/fairhousing or call the HUD Hotline 1-800-669-9777 (voice) 1-800-927-9275 (TTY)

Summary:
Section 504 of the Rehabilitation Act of 1973 prohibits discrimination on the basis of disability in programs and activities conducted by HUD or that receive financial assistance from HUD.

Purpose:
• In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing HUD has a statutory responsibility under Section 504 to ensure that individuals are not subjected to discrimination on the basis of disability by any program or activity receiving HUD assistance.
• Section 504 charges HUD with enforcing the right of individuals to live in federally subsidized housing free from discrimination on the basis of disability.
• Further, Section 504 covers employment discrimination based on disability and requires HUD and HUD-assisted agencies to make reasonable accommodations for the known physical or mental limitations of an employee or qualified applicant.
• It covers all HUD programs except for mortgage insurance and loan guarantee programs.
SECTION 109 OF THE HOUSING AND COMMUNITY DEVELOPMENT (HCD) ACT OF 1974

Summary:
Section 109 of the HCD Act of 1974, Title I, prohibits discrimination on the basis of race, color, national origin, disability, age, religion, and sex within Community Development Block Grants (CDBG) programs or activities.

Purpose:
- In addition to its responsibility for enforcing other Federal statutes prohibiting discrimination in housing, HUD has a statutory obligation under Section 109 to ensure that individuals are not subjected to discrimination on the basis of race, color, national origin, disability, age, religion, or sex by recipients of CDBG funds.
- Section 109 charges HUD with enforcing the right of individuals to live in CDBG-funded housing free from such discrimination.
- However, this additional statutory authority only applies to CDBG and allied programs, such as Section 108 loan guarantees and the Historically Black Colleges and University program.
Title II of the Americans with Disabilities Act of 1990

Title II prohibits discrimination based on disability in programs, services, and activities provided or made available by public entities. HUD enforces Title II when it relates to state and local public housing, housing assistance and housing referrals.

Architectural Barriers Act of 1968

The Architectural Barriers Act requires that buildings and facilities designed, constructed, altered, or leased with certain federal funds after September 1969 must be accessible to and useable by handicapped persons.

Age Discrimination Act of 1975

The Age Discrimination Act prohibits discrimination on the basis of age in programs or activities receiving federal financial assistance.
Section 3 Requirements

Section 3 of the Housing and Urban Development Act of 1968 requires that grantees, sub grantees, sub recipients, contractors, subcontractors, and/or developers funded in whole or in part by CDBG-CV funding, to the greatest extent feasible, extend hiring opportunities and contracts to Section 3 eligible residents and businesses. Section 3 eligible residents are low- and very low-income persons, particularly those who live or reside in public or government assisted housing.

For those entities that receive more than $200,000 in HUD CDBG-CV assistance, and contractors that are awarded covered contracts that exceed $200,000, ODOC requires that an approved Section 3 plan be in place before the project is awarded and approved.

**Important**: If a construction contractor has identified as a Section 3 Business, labor hours will need to be tracked. These forms will soon be added to the CDBG-CV Policy and Procedure Manual. Stay tuned.
Procurement Requirements

Cities and Towns are required to follow their own procurement procedures as established by local ordinance for the purchase of all goods and services. In the absence of procurement procedures, Cities and Towns should use the procurement requirements outlined in the CDBG-CV Policy and Procedure Manual.

➢ Small Purchases - $5,000 or less in aggregate
➢ Between $5,000 and $50,000 – Must receive in writing at least 3 bids or quotes.
➢ $50,000+ - Must obtain Sealed Bids

Counties are required to follow the procedures as defined in O. S. 19, et.al. County purchasing practices in Oklahoma are regulated by Sections 1500 through 1505 in Title 19, Chapter 33, “County Purchasing Procedures”, of the Oklahoma Statutes, commonly referred to as the County Purchasing Act. These practices are also regulated by the “Public Competitive Bidding Act” (PCBA) in Title 61, Sections 101 through 138 in the Oklahoma Statutes. These Statutes are revised each year by the Oklahoma Legislature to keep them current and beneficial.

➢ Small Purchases - $10,000 or less in aggregate
➢ $10,000 + – Must advertise, solicit and obtain Sealed Bids
Procurement Requirements


A State/Subrecipient shall have fiscal and administrative requirements for expending and accounting for CDBG funds that:

- Are specific enough to ensure compliance
- Ensure that CDBG funds are spend for reasonable and necessary costs;
- Ensure that CDBG funds are not used for general expenses

A State/Subrecipient may satisfy this requirement by:

- Using requirements applicable to the use of its own funds;
- Adopting new requirements; or
- Applying the provisions in 2 CFR part 200 (in which case, the provisions of part 200 apply to the State and its sub-recipients)
Procurement Requirements

Tip: As a good rule of thumb, where local and state rules address the same matter/requirements as 2 CFR part 200, follow the most restrictive standard unless it conflicts with the Federal Requirement (if there is a conflict, follow Part 200 rule or contact ODOC for guidance)

Procurement transactions must be handled in a manner that provides “full and open competition” (2 CFR 200.319)

Please refer to the CDBG-CV Policy and Procedure Manual for more detail.
Low to Moderate Income (LMI) Tracking
Low to Moderate Income

Two Ways to Verify LMI

➢ Beneficiary-by-Beneficiary: Primarily for individual and household level services as they are provided.

➢ Target Area: Only necessary for area wide services. If this method is used, only new 2022 surveys will be accepted.
  ➢ Example: A community would like to complete rehab on an existing public facility but does not automatically qualify at least 51% LMI. In this scenario, the community would need to obtain new income surveys to prove LMI eligibility in the target area.
Low to Moderate Income (LMI)

LMI Beneficiary-by-Beneficiary Tracker

- The Beneficiary-by-Beneficiary Tracker (BBT) should be used to track LMI information for individual services.
- BBT tracks information such as:
  - Name
  - Address
  - Type of Assistance
  - Amount of Assistance
  - Duplication of Benefits / Other Assistance
  - COVID Tieback
  - LMI Verification

Note: If working with a Community Action Agency or Non-profit organization make sure they are documenting LMI correctly.
Low to Moderate Income (LMI)

When tracking beneficiaries on the LMI Beneficiary-by-Beneficiary Tracker form, group all activities together. Ex: All utility bills paid should be grouped together and totaled at the bottom, then all rental bills paid should be grouped together and totaled.

When tracking tie back to COVID, Presumed Benefit is not a valid response. Please explain the reasoning for why they are a presumed beneficiary such as elderly, disabled, or abused children.
### Low to Moderate Income (LMI) Beneficiary Tracker

**LMI Beneficiary by Beneficiary Tracker**

**Project Detail Report**

**CDBG-CV Contract #18118**

---

#### On-going COVID Assistance Details

(Notes: No direct payments to clients)

<table>
<thead>
<tr>
<th>Client Name or Initials or Identification #</th>
<th># in Household</th>
<th># of Meals Served</th>
<th>Client Address</th>
<th>Client Zip Code</th>
<th>Type of Assistance</th>
<th>Total # of Assistance Given</th>
<th>Assistance Paid</th>
<th>Address to Mail Assistance Payment</th>
<th>Date of Assistance Application</th>
<th>Date Assistance Paid</th>
<th>Client Address Within Target Service Area? Y or N</th>
<th>Duplication of Benefits Y or N</th>
<th>Note: Other Sources of Assistance were Available? Y or N</th>
<th>Within Target Service Area? Y or N</th>
<th>Total Household Income ≤ 80% MHH</th>
<th>CDBG LMI Eligible Y or N</th>
<th>Narrative - Economic impact due to COVID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alice Smith</td>
<td>3</td>
<td>420</td>
<td>123 Main St.</td>
<td>32005</td>
<td>Food</td>
<td>5000.00</td>
<td>4000.00</td>
<td>111 Main St. Olympia</td>
<td>12/30/2020</td>
<td>1/30/2021</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>60000.00 &lt; 60000.00</td>
<td>Y</td>
<td>Disabled/High Risk</td>
</tr>
<tr>
<td>Florence L.</td>
<td>1</td>
<td>100</td>
<td>456 Oak St.</td>
<td>32005</td>
<td>Rent</td>
<td>1500.00</td>
<td>1200.00</td>
<td>555 Main St. Olympia</td>
<td>7/23/2021</td>
<td>7/23/2021</td>
<td>Y</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>50000.00 &lt; 60000.00</td>
<td>Y</td>
<td>Elderly</td>
</tr>
<tr>
<td>Burton B.</td>
<td>1</td>
<td>150</td>
<td>789 Pine Ave.</td>
<td>32005</td>
<td>Rent</td>
<td>800.00</td>
<td>600.00</td>
<td>666 Main St. Olympia</td>
<td>7/23/2021</td>
<td>7/23/2021</td>
<td>Y</td>
<td>N</td>
<td>N</td>
<td>Y</td>
<td>50000.00 &lt; 60000.00</td>
<td>Y</td>
<td>Elderly</td>
</tr>
<tr>
<td>Lisa P.</td>
<td>1</td>
<td>120</td>
<td>890 N St.</td>
<td>32005</td>
<td>Rent</td>
<td>1600.00</td>
<td>1200.00</td>
<td>777 Main St. Olympia</td>
<td>7/23/2021</td>
<td>7/23/2021</td>
<td>Y</td>
<td>N</td>
<td>Y</td>
<td>Y</td>
<td>50000.00 &lt; 60000.00</td>
<td>Y</td>
<td>Reduction of Income/Loss of hours</td>
</tr>
</tbody>
</table>

**Total Rent**

4,000.00

**Total Mortgage**

2,000.00

**Total Utility**

1,000.00

---

ODOC CD | CDBG-CV Technical Assistance (Updated May 2022)
OKGrants
All funding opportunities require applicants to complete and submit their respective applications and applicable attachments online using the OKGrants Grant Management System. Paper applications are not accepted.

Program Guidance

See program descriptions and guidance documents on the Community Development Block Grants page.

Program Implementation includes all phases after the contract has been awarded such as:

- Release of Funds / Environmental Review
- Advance Request / Reimbursement Claims
- Monthly Expenditure Reports
- Quarterly Performance Reports
- Monitoring
- Closeout
Program Guidance
See program descriptions and guidance documents on the Community Development Block Grants page.

Module Walkthroughs
- Contract Modification
- Request for Funds
- Reimbursement Claim
- Expenditures
- Grant Monitoring
- Closeout
- Initiate Release of Funds

Guides + Manuals
- CDBG Project Management Guide
  October 2021 CDBG Manual
- OKGrants for New Users
  A brief presentation providing an introduction to the grant management system.
- OKGrants FAQ/Troubleshooting
  A selection of answers and hints for the most common questions and issues.
- Status Glossary
  A breakdown of the various document statuses and their meanings.
- OKGrants Subgrantee User Manual
  An in-depth look at the processes and capabilities of the Grant Management System.

For questions regarding the OKGrants Grant Management System contact Cody Butler at 405-213-8667 or cody.butler@okcommerce.gov.
OKGrants Walkthroughs and Roles

Step-by-step walkthroughs can be obtained from within the OKGrants system or on our website okcommerce.gov OKGrants Guides.

Subrecipient Roles:

- **Agency Administrator** – Handles user accounts only;
- Viewer – Cannot edit or save. Used for auditors;
- **Writer** – Can edit and save, but cannot submit anything;
- Financial Officer – Can, edit, save and submit;
- **Authorized Official** – Full permissions for everything.
Financial Management
Financial Management

- OKGrants is required for the submission of applications, implementation of projects and subsequent closeout. It is important to note that some documents will be completed on forms that are programmed into OKGrants such as reimbursement claims and quarterly reporting. Certain other documents may be completed by the Grant Recipient and then uploaded into OKGrants. All paper documents should be maintained by the subrecipient at their primary office.

- All Grant Recipients are required by State statute to track Federal dollars by fund. This simply means that a separate set of accounting records must be set up for each CDBG contract received.

- All entries recorded in the cash disbursements journal must be traceable to some form of source documentation, e.g., invoices, partial pay estimates, employee time sheets, etc. Additionally, all original documentation should be filed in an orderly manner and readily available for review in the event ODOC performs a financial monitoring.

- If leverage funds are used, they must be tracked and reported monthly.

- Non-Collusion Affidavits are required to be attached to all contracts for $25,000 or more

- The most important thing to remember is that you can only expend funds on the items that are listed in the detailed budget submitted with your application for funding.
Advance Request Requirements

Upload the following for every advance request through OKGrants:

1. Reimbursement Claim (attached to the CDBG-CV Policies and Procedures Manual);
2. Purchase Order – If POs are not used, the first advance request should include an explanation on why POs are not used and what process is outlined for approved purchases;
3. Invoice(s);
4. LMI Beneficiary by Beneficiary Tracker;
5. Employee Timesheets - required if advance request includes administrative costs (also called Activity Delivery Costs). This does not apply if you are a City employee being paid from the City budget.

Note: Due to limitations within OkGrants, the term Advance Request and Reimbursement Claim are used interchangeably in the CV program. Both terms are the same.
Advance Request File Organization

When an advance request is submitted, files should be organized properly for review. Files should be uploaded in the following manner:

1. Reimbursement Claim
2. Purchase Order
3. Invoice
4. LMI Tracker
5. Timesheets (if applicable)
6. Equipment Inventory (if applicable)
Advance Request File Organization

Files should also be labeled accordingly in OkGrants.

**UPLOADS**

Instructions:
Upload a file and complete the description, click **Save**
To remove a file, select the DELETE checkbox, clear the description, and click **Save**

Refer to your complete application packet for guidance on uploadable attachments.

<table>
<thead>
<tr>
<th>Description</th>
<th>File Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reimbursement Claim Form</td>
<td><img src="#" alt="Browse..." /> No file selected. <img src="#" alt="DELETE" /> 821025_607135-reimbursementclaimform2.pdf</td>
</tr>
<tr>
<td>Expense Documentation - PO and Invoice</td>
<td><img src="#" alt="Browse..." /> No file selected. <img src="#" alt="DELETE" /> 821025_607135_2-expensedocumentationclaim2.pdf</td>
</tr>
<tr>
<td>LMI Beneficiary Tracker</td>
<td><img src="#" alt="Browse..." /> No file selected. <img src="#" alt="DELETE" /> 821025_607135_3-LMitrackerclaim2.pdf</td>
</tr>
<tr>
<td>Expense Information from invoice totaling $25,436.37</td>
<td><img src="#" alt="Browse..." /> No file selected. <img src="#" alt="DELETE" /> 821025_607135_4-CopyofOct2021CDBGInvoiceClientServices.pdf</td>
</tr>
<tr>
<td>Timesheets</td>
<td><img src="#" alt="Browse..." /> No file selected. <img src="#" alt="DELETE" /> 821025_607135_5-NovOctTimesheets.pdf</td>
</tr>
</tbody>
</table>
Pay Advances

All funds requested on are present on pay advance.

Make sure you have enough funds to request.

Upload all supporting documents
For any entity that is offering beneficiary services for multiple months or more than one activity such as receiving assistance for utilities and rent, please do not double count persons receiving that service or assistance. For example, if a household receives utility assistance for 6 months that beneficiary is counted as 1 household on the Reimbursement Claim Form, as well as in all Quarterly Performance Reports. The same would apply if that same individual receives rental assistance, the beneficiary or household should only be counted once when tracking LMI information.
Financial Management

Reimbursement Claims

- Reimbursement Claims will need to be submitted with each advance request.
- Information from Reimbursement Claims will also be used on the Quarterly Performance Report (QPR).

![CDBG-CV Reimbursement Claim Form](image-url)
Financial Management

Personnel Timesheets

- For staff that perform work on CDBG-CV eligible activities, a timesheet will need to be submitted for reimbursement. (Note: It would be best, but not required, to submit these timesheets monthly to ensure compliance and documentation requirements.) Ex. Community Action Agency staff or non-profit organization staff time on project. This does not apply to City staff being paid from the City budget.

- Make sure timesheets are signed accordingly. Incomplete timesheets will not be processed for payment.

![Timesheet Table]

*Note: Please be sure to attach the approved timesheets and pay stub together when submitting program reimbursements.*
Financial Management

Note: Personnel timesheets should not be used for construction activities. Wage and Hour Division (WHD) Payroll timesheets should be used for construction projects to ensure Davis Bacon compliance.

**Davis Bacon applies to construction contracts over $2,000.** Subrecipients must ensure construction contractors are paying the correct wage rates to their employees.

Weekly payrolls must be submitted with each drawdown request.
Monthly Expenditure Report (MER)

• Monthly Expenditure Report must be entered on OKGrants by the **10th of every month** following a month in which there has been a draw, expenditure, or cash balance of CDBG funds.

• **Leverage expenditures must also be included on the report.** Leverage expenditures must be reported when incurred, if there has not been an expenditure of leverage funds please place a zero in the appropriate line item. If there are no CDBG expenses to report during the month, a report for leverage expenditures only must be submitted if leveraged expenditures occurred. Along with the submitted Leverage Expenditure Report, supporting documentation such as invoices, receipts and cancelled checks must be uploaded in OKGrants.

• Timely submission of the Monthly Expenditure Report is important. Requests for funds will not be processed if there are any delinquent reports outstanding.
**Expenditure Report**

**Monthly Vs. Final**

Month and year selected the expenditure accrued

**Budget Item**

Description of expenditures

---

### Interest Reconciliation

- **Total Interest Earned (Total to Date):** $0
- **Less Interest Expended (Total to Date):** $0
- **Interest Earned Cash Balance:** $0

### Cash Reconciliation

- **Cash Received (Total to Date):** $21,028.49
- **Cash Expended (Total to Date):** $21,028.49
- **Unexpended Cash Balance:** $0

### Category

<table>
<thead>
<tr>
<th>Category</th>
<th>Current Expenditures</th>
<th>Expenditures to Date</th>
<th>Budget</th>
<th>Remaining Balance</th>
</tr>
</thead>
<tbody>
<tr>
<td>Construction/Activities</td>
<td>$16,353.49</td>
<td>$16,353.49</td>
<td>$234,050.00</td>
<td>$217,696.51</td>
</tr>
<tr>
<td>Engineering/Architect</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Inspection</td>
<td>$0</td>
<td>$0</td>
<td>$9,500.00</td>
<td>$9,500.00</td>
</tr>
<tr>
<td>Planning</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Direct Grantee Admin</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Public Facilities Admin</td>
<td>$4,675.00</td>
<td>$4,675.00</td>
<td>$14,025.00</td>
<td>$9,350.00</td>
</tr>
<tr>
<td>Other</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
<td>$0</td>
</tr>
</tbody>
</table>

**Total CDBG Costs:**

- **Leverage/Match:** $21,028.49
- **Total CDBG Cost:** $21,028.49

**Total Project Cost:**

- **Leverage/Match:** $21,028.49
- **Total Project Cost:** $21,028.49

By submitting this report, I hereby certify that the expenditures reported are taken from the original Books of Account and that such expenditures are valid and consistent with the terms of the contract.

Revision Explanation:
The general ledger is to remain on file and must include data from the following information:

- Invoice
- Purchase Order
- Check
FR 6218-N-01 mandates that 80% of CDBG-CV funds must be obligated and expended within three (3) years of the date funds are obligated, unless a waiver is granted by HUD. March 2023 is the deadline for this requirement.

What does this mean for subrecipients?

- At the end of one year, the sub-recipient will have eligible expenditures and will have drawn a minimum of ten percent (10%) of the total contract amount.

- At the end of eighteen months the sub-recipient will have eligible expenditures and drawn a minimum of eighty percent (80%) of the total contract amount.

- At time of closeout submission, the sub-recipient will have submitted the final request for all eligible expenditures.
Quarterly Performance Reporting

- Quarterly Performance Reports (QPR) will be due by the 10th of January, April, July and October until closeout documents are submitted. This is not to be confused with the Monthly Expenditure Report (MER). A Monthly Expenditure Report must be prepared and submitted in OKGrants by the 10th of every month following a month in which there has been a reimbursement claim/advance request.

- Data entered on the QPR should be cumulative of what has been submitted on past reimbursement claims.

- If the QPR has not submitted as directed, advance request will not be processed.

### CDBG CV - SUB RECIPIENT QUARTERLY REPORT

<table>
<thead>
<tr>
<th>Date of Report</th>
<th>11/10/2021</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reporting Period (Quarter)</td>
<td>Jul-Sep 2021</td>
</tr>
<tr>
<td>CDBG-CV Contract Number</td>
<td>CDBG-CR 20</td>
</tr>
<tr>
<td>Responsible Entity</td>
<td>City of</td>
</tr>
<tr>
<td>Subcontractor/Subgrantor</td>
<td></td>
</tr>
<tr>
<td>Contract Period</td>
<td>From April 1, 2021 until March 31, 2023</td>
</tr>
</tbody>
</table>

#### FINANCIAL INFORMATION

<table>
<thead>
<tr>
<th></th>
<th>This Quarter</th>
<th>To Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Projected Budget from All Sources</td>
<td>$1,656,575.00</td>
<td>$1,844,593.53</td>
</tr>
<tr>
<td>Total CDBG-CV Budget</td>
<td>$838,300.00</td>
<td>$336,459.53</td>
</tr>
<tr>
<td>Total Obligated</td>
<td>$915.99</td>
<td>$1,844.593.53</td>
</tr>
<tr>
<td>Total Funds Drawdown</td>
<td>$915.99</td>
<td>$1,844.593.53</td>
</tr>
<tr>
<td>Program Funds Drawdown</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Program Income Drawdown &quot;if applicable&quot;</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Program Income Received</td>
<td>$0</td>
<td>$0</td>
</tr>
<tr>
<td>Total Funds Expendited</td>
<td>$1,844.593.53</td>
<td>$1,844.593.53</td>
</tr>
</tbody>
</table>

#### Utility Assistance

- Accomplishments Performance Measures
  - This Report Period: Utility Assistance
  - Total Assisted This Quarter: Cumulative Total

<table>
<thead>
<tr>
<th></th>
<th>0</th>
<th>0</th>
</tr>
</thead>
<tbody>
<tr>
<td># Units Assisted - Gas</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td># Units Assisted - Electricity</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td># Units Assisted - Water</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td># Units Assisted - Sewer</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td># Units Assisted - Trash</td>
<td>12</td>
<td>20</td>
</tr>
<tr>
<td>Total # of Persons/Households</td>
<td>39</td>
<td>63</td>
</tr>
<tr>
<td>Total # of LMI Served</td>
<td>$915.99</td>
<td>$1,844.593.53</td>
</tr>
<tr>
<td>Total $ Reimbursed</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Recapture Policy

• ODOC CDBG-CV Staff will be reviewing CDBG-CV projects regularly to make sure funds are spent in a timely manner.

• If ODOC finds that funds are not being spent in a timely manner, the recapture policy will be enforced as shown in the CDBG-CV Policy and Procedure Manual.
In some instances, a subrecipient may need to modify their budget to align with program implementation. This is considered as a budget modification. The following is required for a budget modification in OKGrants:

1. Detailed letter on letterhead from the subrecipient requesting the modification. Must be signed by the Authorized Official.

2. Updated Leverage Certification Form showing the amended amounts. Must be signed by the Authorized Official.
If for some reason the subrecipient will need additional time to complete their project a **contract modification** may be requested through OKGrants. To complete a contract modification, a subrecipient must submit the following:

1. Detailed letter on letterhead from the subrecipient requesting the modification. The letter must include a brief description of the reason for the change along with the month, date, and year. The letter must be signed by the Authorized Official.
Duplication of Benefits
Duplication of Benefits Requirements

Maintain beneficiary files with the following:

• **Subrogation agreement** or other agreement that the beneficiary signed ensuring they will pay back any funds found to be duplicative;

• Chart showing all the funding the beneficiary received because of COVID-19 (like the DOB Chart); and

• Up-to-date beneficiary contact information.

• Ensure that you are following your DOB policies and procedures in place.

All DOB information should be kept in organized files for the DOB Consultant, Ernst & Young, to easily identify all information for an applicant in one place.
Duplication of Benefits

- Utilize forms already created by keeping all information on a client in one central location. Have client information on types of assistance received, COVID eligibility and intake information together.

- Trackers can include serial numbers rather than identifiable information when reporting on beneficiaries where HIPAA violations could occur. The subgrantee should have all necessary identifiable information matching the given serial number in the client’s files.
Duplication of Benefits – HIPAA Requirements

When using CDBG-CV funds for projects offering medical/mental health services for beneficiaries, every beneficiary should have a DOB checklist filled and signed within their files by a case manager or other individual that is allowed to review client files. This checklist should verify that the client is not receiving more service than they need or a duplication of assistance.

CDBG CV CLIENT FILE DOCUMENTATION
Duplication of Benefits (DOB) CHECKLIST

Agency Name: __________________________ Date: __________________________

Beneficiary/Client Individual Identification Number:

All CDBG-CV beneficiaries should have the following DOB checklist within their files. All beneficiaries should be checked to ensure they meet the Low-to-Moderate Income threshold, have a need due to the COVID pandemic, and are not receiving a duplication of benefits when receiving services. Attestation will be required by both Case Manager/Preparer AND Executive Director.

ODOC will not ask for a client’s personal information to ensure HIPAA guidelines are maintained but will require CDBG-CV sub-recipients to verify that the following checklist is signed and accurate. This document will serve as verification that you, the CDBG CV grant sub-recipient, are adhering to ODOC policies and procedures concerning DOB.

<table>
<thead>
<tr>
<th>Verified by: (Initials)</th>
<th>Information Required</th>
</tr>
</thead>
<tbody>
<tr>
<td>Client file with unique Individual Identification Number</td>
<td></td>
</tr>
<tr>
<td>Service Entry / Exit Dates</td>
<td></td>
</tr>
<tr>
<td>Proof of meeting Low-to-Moderate Income Threshold</td>
<td></td>
</tr>
<tr>
<td>Proof of need due to COVID Pandemic</td>
<td></td>
</tr>
<tr>
<td>Client disclosure of other types of assistance received for mental health</td>
<td></td>
</tr>
<tr>
<td>Verification by mental health provider that client is not receiving a duplication of the same type of assistance</td>
<td></td>
</tr>
<tr>
<td>Verification by mental health provider that client is not receiving more assistance than client’s actual need</td>
<td></td>
</tr>
<tr>
<td>All required client supporting documentation</td>
<td></td>
</tr>
</tbody>
</table>

Attestation:

NOTE: Both signatures are required

We, __________________________ and __________________________

(Executive Director PRINTED Name) (Case Manager/Preparer PRINTED Name)
Duplication of Benefits

Identifying and Collecting Duplication of Benefits Data

• If a duplication of benefits is found, subrecipients should do the following:
  1. Contact ODOC;
  2. Verify that beneficiary signed a subrogation agreement;
  3. Keep records of duplicative assistance identified;
  4. Follow ODOC’s instructions on moving forward – it will be a case-by-case scenario.
Monitoring
Monitoring

- All monitorings will be completed by using the desk monitoring method until further notice.

- Projects will be monitored on two occasions:
  1. **Pre-monitoring** - Conducted after the first reimbursement claim has been processed.
  2. **Monitoring** - Will begin after at least 50% or more of funds have been drawn.
Monitoring

- Pre-monitoring will not be counted against the subrecipient but will be used as a learning tool to ensure compliance.
- Like monitoring for regular CDBG, subrecipients will be notified prior to date of monitoring by email.
- A monitoring tool will be attached to the notification letter and the subrecipient will be required to respond with all required documentation by a certain date.
- All required documents should be emailed to Project Manager for review.
December 15, 2021

Will Banks, Chairman
Carter County
25 A Street NW
Ardmore, OK 73402-1544

RE: Desk Monitoring
17345 CDBG 19

Dear Chairman Banks:

This letter serves as a notification that Taylor Huizenga from the Oklahoma Department of Commerce has scheduled a Desk Monitoring of your CDBG-CV contract on or after January 2, 2022. Your grant administrator, Tom Coins, has been notified and is aware of the necessary documents that should be available for this monitoring. Attached you will find desk monitoring tool that needs to be completed, signed and documents will need to be emailed to Taylor.Huizenga@okcommerce.gov no later than January 2, 2022.

Please contact Christy Davis at 405-215-5395 if you have any questions or concerns.

Sincerely,
Desk Monitoring

Community Development Block
Grant (CDBG-CV)
Desk Monitoring
Checklist

Grantee: ________________________________
Contract #: ________________________________
Due Date: ________________________________

In the following sections, the Grantee will need to check each box as applicable to their project and answer each question. Items that are checked will need to be emailed to your project manager at ________________________________ to complete your CDBG Desk Monitoring.

Financial Information (Upload)
Documents: CDBG-CV Grant Funds: ________________________________
Leveraged/Match Funds: ________________________________
Leveraged Funds Source (Town/City/County): ________________________________
- General CDBG Ledger to include match
- Purchase Orders/Board authorized payments in accordance to 24 CFR 210.122
- Non-collusion affidavit for payments of $25,000.00 provided by the Vendor
- Invoices or supporting documentation for expenses
- Credit Checks – including leverage funds
- Board Minutes of Meetings approving Purchase Orders, Invoices pertaining to above referenced contract
- Inter-Local or Subcontractor Agreement (CRA, Non-Profit, Etc)
- Reimbursement Claim
- Quarterly Report
- Inventory Form
- LFMS Tracking Random Sample (3-6 beneficiaries) to be selected by Project Manager

June 2021

1. Who maintains the General Ledger? (Name & Title) __________
2. Are CDBG-CV funds kept in a separate account from other funding? ☐ Yes ☐ No
3. Are Bank Statements Reconciliations performed? ☐ Yes ☐ No

If Yes, who performs this duty? (Name & Title)
4. Are separate persons performing bank statement reconciliations and accounting duties? ☐ Yes ☐ No
5. Are any municipalities/city/county/non-profit or other employees paid with CDBG-CV funds? ☐ Yes ☐ No

*If yes please provide copies of employee timesheets to ODOC (CDBG-CV Timesheet).

Procurement (Upload Documents)
- Grant Administrator contract along with the Direct Solicitation Proposal or Advertisement Proposal
- Consultant
- Other (Food, Equipment, Etc.)

Citizen Participation (Upload Documents)
1. Public Hearing Notice – ☐ Application ☐ Closeout
2. Public Hearing Minutes – ☐ Application ☐ Closeout
3. Public Hearing Attendance Sheet – ☐ Application ☐ Closeout
4. Were all public hearings accessible to handicapped? ☐ Yes ☐ No
5. Were more than 15% of attendees non-English speaking? ☐ Yes ☐ No
6. Interpreter Provided? ☐ Yes ☐ No

If yes any written complaints been received and was there action taken? ☐ Yes ☐ No

Comment:

Equal Opportunity/Civil Rights (Provide answers & Upload Documents)
1. How many full-time employees? __________
2. If 10 full-time employees or more, is there a Personnel Policy in place? ☐ Yes ☐ No
   a. IF YES – Please upload document in ODKGRTS.
3. IF so, does Policy Job application include EEO statement to include all groups? (Mental/Physical
   Discrimination – Age – Sex – Race – Religion – National Origin) ☐ Yes ☐ No
4. Have any EEO complaints been filed against the City? ☐ Yes ☐ No

Fair Housing (Provide answers & Upload Documents)
1. Does City have an Ordinance or Resolution? ☐ Yes ☐ No Date passed __________
2. Have any complaints been received? ☐ Yes ☐ No
3. Identity steps to further Fair Housing: __________
4. Were CDBG funds expended for further fair housing? ☐ Yes ☐ No

June 2021
Closeout
Closeout

- Closeout is required to be submitted within (60) days of contract expiration
- Project must be fully monitored before it can be closed out.
- If project included an activity for data plans, the contract for the data plans must be completed before project can be closed.
Closeout

✓ CDBG-CV Closeout Checklist
✓ Proof of second public hearing
✓ Proof of Insurance (Equipment)
✓ Signed Board Minutes or Closeout Resolution
Keys to Success
Keys to Success with CDBG-CV Funds

• Follow All Checklists;
• Keep documentation and records of everything CDBG-CV related;
• Keep a detailed inventory of all CBDG-CV purchases;
• Include Federal regulations in all local CDBG-CV policies to ensure compliance;
• Look for current and future possible duplicative assistance for CDBG-CV activities;
• Make sure payments for rental assistance are made to the landlord and not directly to the beneficiary;
• Create processes that are easy to track and maintain.
  • Ex. It may be appropriate for the City/Community Action Agency/Non-Profit Organization to pay for services upfront and request for reimbursement from CDBG-CV.
• If you don’t know, just ask. We’re here to help!
Questions

**ODOC Resources**
https://www.okcommerce.gov/reporting-compliance/cdbg-covid-19/

Kellon Dixon  Kellon.Dixon@okcommerce.gov or 405-215-5626  
Donielle Suber  Donielle.Suber@okcommerce.gov or 405-431-0569  
Jade Shain  Jade.Shain@okcommerce.gov

**HUD Resources**
https://www.hudexchange.info/programs/cdbg-cv/