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## CDBG GLOSSARY OF TERMS

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CDBG GLOSSARY OF TERMS

Annual Action Plan:
This document explains to the U.S. Department of Housing and Urban Development (HUD) what projects will receive funding during the upcoming program year. The plan includes the priority need and goal the proposal addresses. The Annual Action Plan must be submitted to HUD by June 15.

Annual Report:
Subgrantees are required to submit an Annual Report to Douglas County each year by August 15. This report provides much needed data that Douglas County reports back to HUD.

CDBG Advisory Board:
The CDBG Advisory Board consists of two members from each commissioner district, one appointed by each city or town (Castle Rock, Castle Pines, Lone Tree, Parker) and one at-large member totaling 11 Board members. The Advisory Board reviews the applications submitted and makes funding recommendations to the Board of County Commissioners for their approval.

Consolidated Annual Performance Evaluation Report (CAPER):
This document explains the project accomplishments that occurred during the program year. CDBG staff writes this document based on the information subgrantees provide in their draw down requests, Annual Report and Project Completion Report. The CAPER is submitted to HUD at the end of the program year on October 30.

Data Universal Numbering System (DUNS):
A DUNS number is used to identify a business entity and is required if your organization receives federal funds. Visit https://iupdate.dnb.com/iUpdate/viewUpdateHome.htm to search for, or request, a DUNS number. You will be assigned a number at no charge within a few days. The number must be provided to CDBG staff before funds can be awarded.

Draw Down Request:
In order to be reimbursed for CDBG funds, the subgrantee must submit a Draw Down Request form and include receipts, proof of payment, and a project update. Email an electronic copy and mail the original documents for each draw down request.

Letter of Interest (LOI):
A LOI is required in order for CDBG staff to determine if the proposal is eligible and meets federal requirements. Staff reviews the proposal and provides written comments to the applicant.

Project Completion Report:
Subgrantees are required to submit their Project Completion Report within 45 days from submitting their final draw down request. This information is reported to HUD and allows CDBG staff to close the project file in the federal reporting system.

System for Award Management (SAM):
The SAM is combining federal procurement systems and the Catalog of Federal Domestic Assistance into one system. All subgrantees and contractors must be registered in the SAM before entering into a Subgrantee Agreement that is paid for, in whole or in part, with federal funds.

Subgrantee Agreement:
The Subgrantee Agreement is a contract between Douglas County and the subgrantee receiving CDBG funds to complete a specific project or program. Agreements are signed and effective for one year. The Agreement must be fully executed before reimbursable expenses can be incurred.
U.S. Department of Housing and Urban Development (HUD):
The Community Development Block Grant program is available through HUD. All program criteria and funds are developed and funneled through this federal agency. Douglas County reports back to HUD on subgrantees' programs regarding the use of these funds.
INTRODUCTION

The purpose of this training manual is to provide CDBG subgrantees with an overview of the CDBG program, as well as providing pertinent information that the County requires for the successful completion of projects. Supplemental materials that provide additional useful information are located in the back of this manual.

CDBG staff hopes this training manual will aid in your understanding of the CDBG program, and assist you in organizing and preparing information and reports. We look forward to developing a relationship with your organization on projects that benefit low- and moderate-income residents.
PROGRAM OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) oversees the Community Development Block Grant (CDBG) program. This federal program is evaluated for funding during the U.S. Congressional budgetary process each year under Title 1 of the Housing and Community Development Act of 1974, as amended. The goal of this Act is to develop viable urban communities by providing decent housing, suitable living environments, and expanding economic opportunities. The primary use of these funds is intended to benefit persons of low- and moderate-income. CDBG funds must be used for activities that meet a broad national objective.

NATIONAL OBJECTIVES

- Benefiting low- and moderate-income persons
- Addressing slums or blight
- Meeting an urgent community development need

2014-2018 HOUSING AND COMMUNITY DEVELOPMENT PLAN (CONSOLIDATED PLAN)

CDBG activities must also address a local objective as described in the County’s Consolidated Plan available online at www.douglas.co.us by searching for “CDBG Consolidated Plan”. This plan lists the most urgent needs and outlines strategic goals and objectives to address these needs. Douglas County residents helped to determine and prioritize these needs into five broad categories (described below). The plan serves as a guide to citizens, project managers, planners, and elected officials when identifying projects and activities to be funded.

High Priorities:

**Housing Goal:** Expand available housing options to eligible residents.

- Affordable Housing: Develop and maintain quality affordable housing for owners and renters.
- Accessible Housing: Increase and maintain accessible housing options for the disabled and aging populations.
- Community-Supportive Housing: Develop and maintain community-supportive housing.

**Public Services Goal 1:** Expand services that create conditions for eligible residents to obtain and maintain self-sufficiency.

- Transportation Services: Increase affordable transportation options.
- Employment Services: Provide services to prepare eligible residents for employment.
- Supportive Services: Provide supportive services.

**Public Services Goal 2:** Increase services available to eligible residents.

- Emergency Services: Provide assistance to meet or supplement basic needs.

**Public Facilities and Improvements Goal:** Improve, expand or build facilities for eligible residents.

- Increase the organization’s capacity to deliver quality services.
Economic Development Goal: Create conditions that strengthen businesses and provide for a robust economy.

- Help local businesses grow and prosper by increasing or retaining the number of jobs available.

Low Priorities:

Infrastructure Goal: Improve existing and provide for new infrastructure where appropriate to enhance the quality of life for eligible residents.

- Provide public infrastructure improvements such as water and sewer, drainage, accessibility modifications, sidewalks, and road paving in CDBG target areas by leveraging funds.

**ANNUAL ACTION PLAN**

The Annual Action Plan serves as the County’s application to HUD for CDBG funding. This document describes the projects the County proposes to fund during the program year that address a goal identified above. The CDBG Advisory Board reviews the applications and makes recommendations for funding, which are incorporated into the draft Annual Action Plan. The draft document is then available for public comment. Following the public comment period, a final version is taken to the Douglas County Board of County Commissioners for approval. The plan is finalized and submitted to HUD by June 15. HUD reviews the document and approves it, or recommends changes, before the program year begins on August 1 and continues through July 31.
QUALIFYING A PROJECT OR ACTIVITY

TARGET AREA MAP

HUD regulations state that an activity may be funded using CDBG dollars if at least 51 percent (51%) of the residents within a designated Block Group are in the low- to moderate-income bracket. The activity must benefit the entire area and be made available to all residents. However, due to the low number of block groups (eight) that meet the 51 percent threshold, HUD allows DC to use an upper quartile exemption.

Based on demographic research through the Douglas County Department of Community Development, certain areas of the county have been designated as target areas. These areas qualify for funding under the national objective of benefiting persons of low- to moderate-income. HUD updates these areas periodically based on census information. Using the upper quartile figure of 29 percent means the County can use an additional 28 block groups as target areas. The Target Area Map is included in the Appendix.

LIMITED CLIENTELE

A low- to moderate-income, limited-clientele activity provides a direct benefit to an individual or a specific group of persons rather than everyone in an area. In certain categories clientele are presumed by HUD to be principally low- to moderate-income persons such as: abused children, elderly persons, battered spouses, homeless persons, severely disabled adults as defined by the Census Bureau, illiterate adults, persons living with AIDS, and migrant farm workers.

Low- to Moderate-Income Limits:
HUD is required by law to set income limits that determine the eligibility of applicants.

- **Moderate-income families** are defined as families whose incomes do not exceed 80 percent (80%) of the median family income for the area.
- **Low-income families** are defined as families whose incomes do not exceed 60 percent (60%) of the median family income for the area.
- **Extremely low-income** families are defined as families whose incomes do not exceed 30 percent (30%) of the median family income for the area.

HUD provides an updated income limits table annually based on family size. Use the guidelines provided by HUD to determine income eligibility for projects that qualify as low- to moderate-income, limited-clientele projects.

Qualifying Clients:
Client eligibility is determined based on the income of all persons (18 years of age and older) who live in the household. The household income can be certified two different ways depending on the benefit provided. If the benefit to the client is less than $1,000, they can self-certify the household’s income. If the benefit to the client is $1,000 or more, the clients must document the income of all adults living in the household. You can choose to use the definitions based on IRS adjusted gross income (Form 1040), Section 8 (Part 5), or the American Community Survey. HUD provides an “Income Eligibility Calculator” on their HUD Exchange website at [www.hudexchange.info/incomecalculator/](http://www.hudexchange.info/incomecalculator/).
ADDRESSING SLUMS OR BLIGHT

- **Neighborhood Assessment**
  To qualify an activity under the national objective of slums or blight, neighborhood assessments should be made and the condition of buildings, yards, and public improvements examined. Activities to be assisted with CDBG funds must be limited to those that address one or more of the conditions that are contributing to the deterioration of the area as identified in the assessment.

- **Spot Blight**
  “Spot blight” exists when the deterioration is outside the boundaries of a designated blighted area. The spot blight area is determined to pose a threat to the public in general, or it poses a threat to the occupant's health and safety in a residential or commercial structure.

Photos demonstrating blight before cleanup and after cleanup:
HUD REGULATIONS

ENVIRONMENTAL REVIEW

The environmental review process ensures that federal funds are used in accordance with the National Environmental Protection Act (NEPA) passed in 1969. CDBG regulations require the preparation of an Environmental Review Record (ERR) and environmental clearance, which may include a public notification process and HUD certification of compliance depending on the level of review. The ERR must be completed before funds can be committed or costs incurred.

The following provides an overview of the environmental review process required of any activity receiving federal funds:

- Initiate the environmental review process as soon as proposed activities are identified.
- Determine the level of environmental review based on the type of activity funded. Some activities are more likely to impact the environment than others, and therefore, may require a greater, more substantial level of review.
- Evaluate the effects of the project or the activities on the human environment.
- Document compliance with applicable statutes and authorities.
- Record written determinations and other review findings required by federal and state environmental regulations.

The four environmental classifications are as follows:

- **Exempt Activities**
  Certain activities are declared exempt by HUD, and thus are not subject to the majority of procedural requirements related to the environmental review process. CDBG staff prepares and conducts the environmental review, which must be approved prior to contract execution.

- **Categorically Excluded Activities not Subject to 24 CFR Section 58.5**
  After adequate review, the activity may be considered excluded from NEPA requirements and are not subject to other statutory requirements. If CDBG staff has determined that a site-specific review is required, the subgrantee is responsible for submitting a Request for Environmental Review form to CDBG staff members once the site has been identified. Release of funds will occur once the review has been completed.

- **Categorically Excluded Activities Subject to 24 CFR Section 58.5**
  Activities that are categorically excluded from NEPA, but not from the statutory or regulatory requirements, must demonstrate compliance with laws, authorities and Executive Orders listed in 58.5. This process requires the use of HUD’s recommended Statutory Checklist (see table below) to document environmental findings. The review includes a 30-day response time with applicable agencies having jurisdiction over the various areas on the checklist.

- **Environmental Assessment (EA)**
  Activities which are neither exempt nor categorically excluded will require an EA of the project’s impact on the human environment, and documenting compliance with NEPA, HUD and other applicable federal laws. This project also requires the use of the Statutory Checklist and in some cases may result in a consultation with applicable agencies. A notice of Finding of No Significant Impact (FONSI), and Request for Release of Funds (RROF) must be published and distributed upon completion of the review. HUD must provide a final release before funds can be expended. This process can take 45-60 days.
Statutory Requirements

For HUD projects which are Categorically Excluded Subject to 24 CFR Sec. 58.5

- Historic preservation
- Floodplain management
- Wetland protection
- Sole source aquifers
- Coastal Zone Management Act
- Endangered Species Act
- Wild and Scenic Rivers Act
- Clean Air Act
- Farmland Protection Policy Act
- Environmental Justice
- Noise Abatement and Control
- Explosive and Flammable Operations
- Toxic Chemicals and Gases, Hazardous Materials, Contamination, and Radioactive Substances
- Airport Clear Zones and Accident Potential

Affirmatively Furthering Fair Housing

Fair Housing Act
The federal Fair Housing Act was adopted in 1968 and amended in 1988. HUD is the agency charged with enforcing the Fair Housing Act. According to HUD, impediments to fair housing choice are any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin that restrict housing choices, or the availability of housing choices. HUD also considers any actions, omissions or decisions that have the effect of restricting housing choices or the availability of housing choices on the basis of race, color, religion, sex, disability, familial status, or national origin to be impediments to fair housing choice. The State of Colorado also has enacted legislation prohibiting housing discrimination, and State law offers the same protections as the Fair Housing Act, with additional protections based on marital status, creed, and ancestry.

Types of Housing Discrimination
Whether people are trying to rent, buy, sell, or finance a home or apartment, as a tenant, homeowner, or landlord, rights and protections are provided by the Federal Fair Housing Act. Illegal housing discrimination can take many forms:
- Realtors showing apartments or homes only in certain neighborhoods
- Advertising housing only to preferred groups of people
- Denials of property insurance
- Discriminatory property appraisals
- Refusals to make reasonable accommodations for persons with disabilities

Reports across the country indicate that those who are low-income; seniors or disabled; or seeking to purchase, refinance, or secure a reverse mortgage, are often targets for predatory lenders or loan fraud. Predatory lenders take advantage of borrowers with a variety of abusive practices, such as charging excessive interest rates or loan fees.

The County's Role in Fair Housing
One of HUD's strategic goals is to ensure equal opportunity in housing choice. The County's role in addressing that strategic goal begins by certifying that we will affirmatively further fair housing. This means the County will:
- Conduct an Assessment of Fair Housing (AFH).
- Take appropriate actions to overcome the effects of impediments identified through the assessment.
- Maintain records reflecting the assessment and actions.
The County’s AFH, previously called the Analysis of Impediments to Fair Housing Choice (AI), was conducted in 2011. The Consolidated Annual Performance Evaluation Report (CAPER) informs HUD what actions the County has taken in addressing fair housing issues. The most recent AI and CAPER can be viewed online at www.douglas.co.us by searching for CDBG Analysis of Impediments and CAPER. The following is an excerpt from the current AI.

**IMPEDEMENTS AND ACTIONS IDENTIFIED IN THE 2011 AI**

**Impediments**
The research conducted as part of Douglas County’s 2011 AI identified the following impediments to fair housing:
- Shortage of transit opportunities for persons with disabilities, seniors and low-income residents
- Lack of diversity and balance
- Lack of understanding of fair housing issues among residents in Douglas County
- Potential barriers to fair housing choice exist in zoning regulations

**Actions**
The following recommendations for reducing fair housing impediments are listed in the AI:
- Improve transit options in Douglas County
- Support local transit organizations
- Invite diversity
- Become a metro area leader in "balanced" communities
- Assist developers in creating a wider variety of housing prices and increase the stock of affordable rental units
- Expand efforts in fair housing education and training
- Explore fair housing education and outreach grants
- Review Douglas County ordinances for compliance with fair housing regulations
- Share the assessment of local ordinances with other jurisdictions

**LIMITED ENGLISH PROFICIENCY**

Providing meaningful access to services for persons with limited English proficiency is a HUD requirement. According to federal guidelines reasonable efforts must be made to provide, or arrange for, persons to have equal access to CDBG-funded services. This may require hiring an interpreter to translate information into another language or use sign language to assist a client. Douglas County developed a Language Assistance Plan that identifies a protocol for serving persons with limited English proficiency. This plan is available upon request.

**LEAD-BASED PAINT**

Lead-based paint regulations apply to homes built before 1978. When homes are purchased, repaired or rehabilitated with federal funds, the regulations require that subgrantees notify occupants, homeowners, and homebuyers of any potential lead-based paint hazards. Under certain conditions, defective paint must be identified and treated. If a child with an elevated blood lead level (EBL) is identified, additional steps are required.
This is a summary of current requirements that must be taken to address lead-based paint.

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<th><strong>Category</strong></th>
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<td>Notification</td>
<td>All of the following apply:</td>
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<td>- Pamphlet</td>
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<td>- Disclosure</td>
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<td>- Notice of Lead-Hazard Evaluation or Presumption</td>
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<td>- Notice of Lead-Hazard Reduction Activity</td>
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<td>Lead-Hazard Evaluation</td>
<td>One or more of the following may apply:</td>
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<td>- Visual assessment (HUD certification required)</td>
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<td>- Paint testing</td>
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<td>- Risk assessment (or Lead-Hazard Screen)</td>
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<td>Lead-Hazard Reduction</td>
<td>The following always apply:</td>
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<td>- Safe work practices (certified practitioner)</td>
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<td>- Clearance</td>
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<td>One or more of the following may apply:</td>
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<td>- Paint stabilization</td>
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<td>- Interim controls (or standard treatments)</td>
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<td>- Abatement</td>
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<td>Ongoing Maintenance</td>
<td>This requirement may apply:</td>
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<td>- Inspect and maintain lead hazard reduction work</td>
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<td>Response to Children with Environmental Intervention Blood Lead Levels</td>
<td>All of the following requirements may apply:</td>
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<td>- Sharing and comparing information</td>
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<td>- Risk assessment</td>
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<td>- Interim controls or abatement</td>
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<td>- Notices and disclosure</td>
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**LABOR STANDARDS**

CDBG-funded projects that include construction are subject to federal prevailing wage requirements (Davis-Bacon) and related labor standards.

**Davis-Bacon Act**

Federally-funded projects in excess of $2,000 that involve the construction, alteration, or repair (including painting and decorating) of public buildings or public works must adhere to the Davis-Bacon Act. This Act ensures that contractors and subcontractors are paying their laborers and mechanics no less than the locally prevailing wages and fringe benefits as determined by the Department of Labor. Douglas County has the right to withhold funds from contractors to ensure compliance with wage provisions, including termination of the contract or debarment for failure to adhere to required provisions.

Exceptions to the Davis-Bacon Act are:
- The prime construction contract, funded in whole or in part with CDBG funds, is less than $2,000.
- The entire project consists solely of demolition.
- The entire project consists of rehabilitating property that was designed for fewer than eight units.
- Part, or all, of the project consists solely of the delivery of goods or services (no construction contract).
- Part, or all, of the project will be done through a force account. *(Note: A force account is compensation for unanticipated work completed on a time and materials basis.)*
• Federal funds are not being used for construction.
• All, or a portion, of the funds shall be used for the purchase of equipment when:
  o Installation of equipment is incidental (less than 13 percent) of the total cost; and
  o NO installation costs are included in the purchase of equipment.
• The funds shall be used for working capital ONLY.
• The funds are used for acquisition ONLY and there is no construction.

**UNIFORM RELOCATION ACT AND 104(D) REQUIREMENTS**

The purpose of the Uniform Relocation Act is to protect displaced persons and businesses by providing fair, equitable treatment and protection from disproportionate injury by projects designed to benefit the public as a whole.

**Guiding Statutes and Regulations**

There are three major types of requirements that cover relocation and acquisition in HUD programs:

- Section 104(d) of the Housing and Community Development Act of 1974.
- HUD regulations that apply to specific projects.

**URA General Requirements**

The URA applies to the following actions:

- Displacement (when a person must move permanently) as a direct result of acquisition, demolition, or rehabilitation for federally-assisted projects. These projects may be carried out by public agencies, not-for-profit organizations, private developers, or others.
- Acquisition of real estate for HUD-assisted projects, whether publicly or privately undertaken.
- Temporary relocation of persons who are required to move for a relatively short time because of a federally assisted project, but who may return to the building once the work is complete.

Displaced persons under the URA receive three things:

- Advisory services
- Replacement housing payments
- Moving expenses

Temporarily relocated persons receive three things:

- Advisory services
- Out of pocket payment of increased rent and round-trip moving costs
- The offer of a suitable, affordable unit in the building once the project is complete

We are required to take all necessary steps to minimize displacement resulting from federally-funded projects. Displaced households or businesses are entitled to assistance in accordance with the URA and must be advised of their rights. Residential tenants may be entitled to relocation benefits whether they are displaced temporarily or permanently. The regulations apply when one of the following occurs:
Displacement results from acquisition, demolition, or rehabilitation for HUD-assisted projects carried out by public agencies, not-for-profit organizations, private developers, or others.

When real property is acquired for HUD-assisted projects.

**Women- and Minority-Owned Businesses**

The County does not discriminate on the basis of race, color, religion, sex, age, national origin, disability, sexual orientation, or political affiliation in the admission or access to, or treatment or employment in, its federally-assisted programs and activities. The County further seeks bids and proposals from Minority Business Enterprises (MBEs) and Women’s Business Enterprises (WBEs) in connection with CDBG-funded activities.

**Section 3 Reporting**

Projects that require hiring a contractor, business, or organization are subject to federal regulations that provide opportunities for employment to low- and moderate-income people. CDBG staff are required to complete a Section 3 Summary Report on subgrantees’ activities. If your project entails construction activities, especially if your contractor needs to hire new employees to work on the project, this regulation applies to you. If this is the case, CDBG staff will request information from you and provide a deadline. A copy of the Section 3 Summary Report is included in the “Sample Forms & Reports” tab of the Project Manager Training Manual.

**Executive Order (EO) 12372**

EO 12372 applies to projects that include the planning or construction of water or sewer facilities. Since October 1, 1983, most states have acted to establish a review and comment system in response to EO 12372. In such cases, subgrantees need to meet the requirements of the intergovernmental consultation process established by Douglas County.

EO 12372 impacts only water and sewer improvement projects. CDBG staff are required to complete a process to notify any districts, utilities, or organizations that could be impacted by the project. The purpose is to inform them of the scope and timing of the project, and allow them 30 days to provide comments to CDBG staff. The intention is to prevent conflicts between overlapping projects.
PROGRAM ADMINISTRATION

SUBGRANTEE AGREEMENT

After CDBG funds are allocated, a contract or Subgrantee Agreement is drawn up between Douglas County and the grant recipient (subgrantee). A Scope of Services, Project Budget, and Project Timeline are requested and must be approved by CDBG staff in order to attach as exhibits to your Subgrantee Agreement. At a minimum, documentation may be required prior to final execution of the Subgrantee Agreement, including the following:

- A Certificate of Insurance naming Douglas County as a certificate holder.
- A copy of the most recent audit, if different from the audit submitted with your application.
- Confirmation that you are registered in the System of Award Management (SAM).

If your grant allocation is for $100,000 or more, please note the Subgrantee Agreement must be reviewed and approved by the Board of County Commissioners (BCC). Allow additional time for the execution of this agreement. Once the Subgrantee Agreement is signed or executed by all parties, including approval from the BCC, you may begin to incur expenses and request a draw down from your grant.

PURCHASING

Douglas County staff recommends that subgrantees adopt a policy and establish procedures if their project involves purchasing equipment, property, or contracting for services using CDBG funds. This will allow you to document each purchase made in a consistent manner. The procurement policy and procedures must comply with the Code of Federal Regulations (CFR), 2 CFR Part 200, which was recently updated. Any hired contractors will also need to perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

TIMELINESS

Communities receiving CDBG funds are required to use funds in a timely manner. Proposed projects that get delayed develop a funds backlog, which can push the community’s entire program into noncompliance with HUD’s timeliness standards.

The HUD standard requires that a community not have more than 1.5 of its annual grant in its line of credit 60 days prior to the close of the program year. For Douglas County that date is June 1st. The penalty for noncompliance is loss of future CDBG funding allocated to Douglas County.

If an activity or project is no longer feasible, funds may be recaptured and reallocated to another project to ensure timely expenditure of the funds. Pre-planning activities such as design, outside agency approvals, neighborhood meetings, etc., can be funded separate from project implementation. Staff recommends that you apply for CDBG funding when the project is ready to begin. This means that all pre-planning steps have been accomplished, and your organization has explored and identified potential funding sources.
PROGRAM MONITORING

ANNUAL RISK ASSESSMENT

CDBG staff is required to evaluate subgrantees for compliance with Federal and County regulations. A risk assessment tool is used to perform this assessment. The tool helps determine whether or not CDBG subgrantees require additional technical assistance to successfully complete spending down grant funds. CDBG staff uses this tool to evaluate all active CDBG projects on an annual basis to help determine their level of risk for non-compliance. Programs are evaluated and scored and the results of each assessment are provided to subgrantees. Programs that score as a high risk are deemed to need additional oversight and technical assistance. An on-site monitoring will be scheduled to review the subgrantee’s program files and provide assistance when scores indicate a high risk for non-compliance or inability to complete projects in a timely fashion.

CONSOLIDATED ANNUAL PERFORMANCE EVALUATION REPORT (CAPER)

The Consolidated Annual Performance Evaluation Report (CAPER) provides an annual summary of the County’s CDBG program. It highlights the contributions the grant has made in the Douglas County community during the previous year. This document includes the following:

- An evaluation of the County’s overall progress in meeting identified priority needs
- Financial statements
- Year-end reporting to HUD
- Lists of revenues and expenditures
- Outlines risk assessments and monitoring activities
- Summarizes program accomplishments

RECORDS RETENTION

Uniform administrative regulations require grantees and subgrantees to retain CDBG records for a period of no less than five years. Record retention begins when the specific activity is reported in the CAPER for the final time. The CAPER is due each year on October 30. CDBG staff will issue a letter to subgrantees to inform them that their activity has closed and when the record retention period begins.

Financial records, supporting documents, statistical records, and all other records pertinent to the CDBG program should be kept on file in one location.

HUD, the Comptroller General of the U.S., or their authorized representatives, have the right to request access to grantee and subgrantee program records. This right is not limited to the retention period (discussed above).
TIMESHEETS

The U.S. Office of Management and Budget (OMB) regulates compensation documentation related to personnel services funded with CDBG dollars. Subgrantees are required to keep personnel activity reports or equivalent documentation (i.e., timesheets) for every position paid for with CDBG funds. You may design a form that works best for you or you may use the sample provided in the manual. Timesheets must be kept on file and made available during monitoring visits. Keep in mind the reports must meet all of the following standards:

- Reflect the actual activity of the employee
- Account for the total activity for which each employee is compensated
- Prepare monthly or quarterly timesheets to coincide with one or more pay periods
- Signed timesheets by the employee and the employee’s supervisor

REPORTING REQUIREMENTS

- Subgrantee Draw Down Request and Progress Report
- Subgrantee Quarterly Program Income Report
- Annual Report
- Project Completion Report

PHOTOS AND TESTIMONIALS

It is important to keep a photo history of all your projects and activities for your own records. Before and after pictures of construction projects and pictures of smiling faces tell a story better than words.

Include client stories and other project-related success stories with each draw down request submitted. Client testimonials describing the project impact, thank you notes from clients, or stories clients share with you are important in helping Douglas County staff and HUD to understand the efforts and accomplishments of the CDBG program.