

State of Louisiana Disaster Recovery CDBG Programs

GRANTEE ADMINISTRATIVE MANUAL TRAINING

Presented by LRA and OCD/DRU
February 10, 2010

Issues To Watch Out For

- Committing CDBG funds before conducting an Environmental Review and receiving the RROF
- Using improper procurement procedures
- Noncompliance with Section 3 in an RFP for construction services
- Failure to segregate financial duties; lack of financial control
- Inadequate monitoring of contractors and subrecipients

Issues To Watch Out For

- Inadequate documentation of invoices and receipts
- Noncompliance with Davis-Bacon labor requirements
- Inadequate project files
- Not providing enough description of a project to conduct the appropriate Environmental Review
- Not collecting the required information to adequately report on a project

Introduction

- DR CDBG Administrative Manual is arranged by functional area
- Grantees reference applicable sections for guidance when implementing a project
- Sample documents and forms
 - Provided as Exhibits
 - To be modified by the grantee prior to use
- Contact OCD/DRU for additional guidance

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Section 2:

Administration

Topics Included:

- National Objective
- Complaints
- Project Amendment Procedures
- Reporting
- Citizen Participation
- Additional Construction Contract Administration Requirements

Section 2:

Administration

A grantee is responsible for:

- Day-to-day program management
- Subrecipient/UGL monitoring
- Contractor management
- Beneficiary data
- Grantee's internal audit function
- Record Keeping
 - Document day-to-day management
 - Retain five years after overall grantee-HUD close-out
- Privacy
- Freedom of Information Act (FOIA) requests

Section 3:

Grant Implementation Checklist



Section 4:

Records Management

Types of files to maintain for each project, as applicable:

- Grant and Project Approval
- Citizen Participation
- Project Activity
- Construction Project
- Financial Management
- Audit
- Procurement
- Labor Standard
- Civil Rights
- Environmental Review
- Acquisition
- Demolition
- Relocation Case
- Property Management
- State Monitoring/Inspection
- Project Close-Out
- General Compliance Files

Section 5:

Financial Management

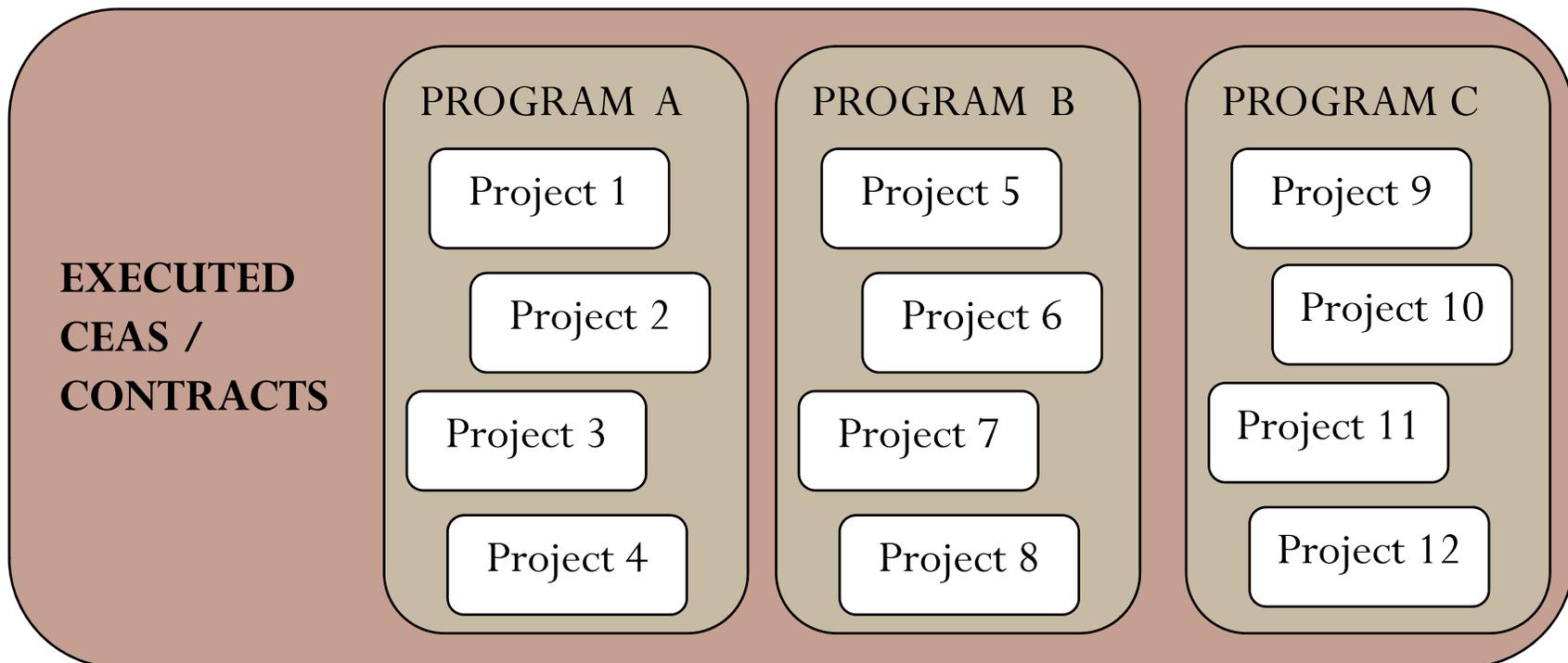
Basic functions of Financial Management System:

- Must have an identified procedure for recording all financial transactions
- All expenditures should be related to allowable activities in the CEA approved by the OCD/DRU
- All expenditures of Disaster Recovery CDBG funds must be in compliance with applicable laws, rules, and regulations
- Must meet applicable regulations

Section 5:

Financial Management

Grantee must track and report on each project within each program of the grant separately



Section 6:

Procurement Methods & Contractual Requirements

Procurement Type	Cost Reasonableness	Contract Type	Solicitation Method	Applications
Small Purchase	Price Competition	Purchase Order or Fixed Price	Quotations or Submitted Bids	Produced Items Single Task Service Supplies
Sealed Bid (formal advertising)	Price Competition	Fixed Price	Submitted Bids	Construction Items Produced or Designed Items
Competitive Proposals	Price Competition or Cost Analysis	Cost Reimbursement or Fixed Price	Submitted Proposals	Professional Services Multi Task Services Designed Items
Noncompetitive Proposals	Cost Analysis	Cost Reimbursement or Fixed Price	Submitted Proposals	Produced Items Single Task Service Professional Services Multi Task Services Designed Item

Section 8:

Civil Rights

Laws and Statutes

- Title VI of the Civil Rights Act of 1964
- Section 3 of the Housing and Urban Development Act of 1968, as amended
- Title VIII of the Civil Rights Acts of 1968, as amended (Fair Housing Act)
- Section 504 of the Rehabilitation Act of 1973, as amended
- Section 109 of the Housing and Urban Development Act of 1974, as amended
- The Age Discrimination Act of 1975, as amended
- Executive Order 11063
- Executive Order 11246, as amended

Section 7:

Labor Regulations

Applicable Statutes

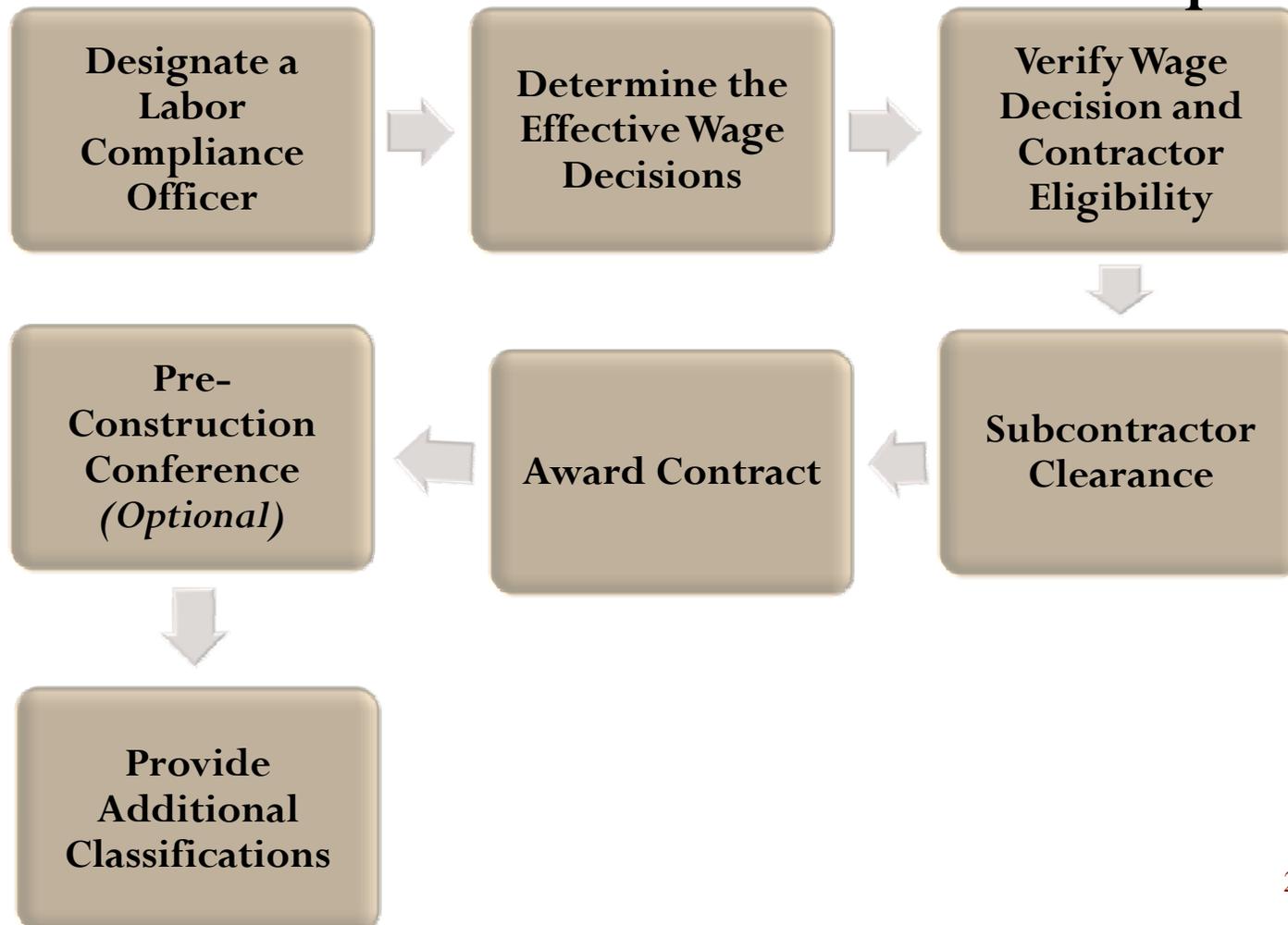
Construction contracts in excess of \$2,000 must comply with the following:

- Federal Fair Labor Standards Act
- Davis- Bacon Act and related Acts
- Copeland Anti-Kickback Act
- Contract Work Hours and Safety Standards Acts (CWHSSA)
- Louisiana Labor Standards (to be verified/identified) and local law and regulations

Section 7:

Labor Regulations

Grantee Administration of Labor Standards Requirements



Section 8:

Civil Rights

Section 504 Minimum Requirements

- Assurance to the OCD/DRU regarding compliance with Section 504 requirements (24 CFR 8.50(a))
- Self-evaluation of current policies and practices regarding requirements to be accessible to individuals with disabilities
- Self-evaluation of buildings and structures to determine if they can be approached, entered, and used by persons with disabilities

Section 8:

Civil Rights

Meeting Section 3 of the HUD Act of 1968

- Employment Requirements
- Contracting Requirements
- Other Employment and Business Related Economic Opportunities

Section 9:

Environmental Review

Types of Review Categories:

- Exempt activities
- Categorically Excluded activities
- Environmental Assessment (EA) activities

Section 10:

Acquisition and Relocation

Determine if Requirements Apply:

- Uniform Relocation Assistance (URA)
- Real Property Acquisition Act of 1970

Section 11:

Property Management

Grantee Rules

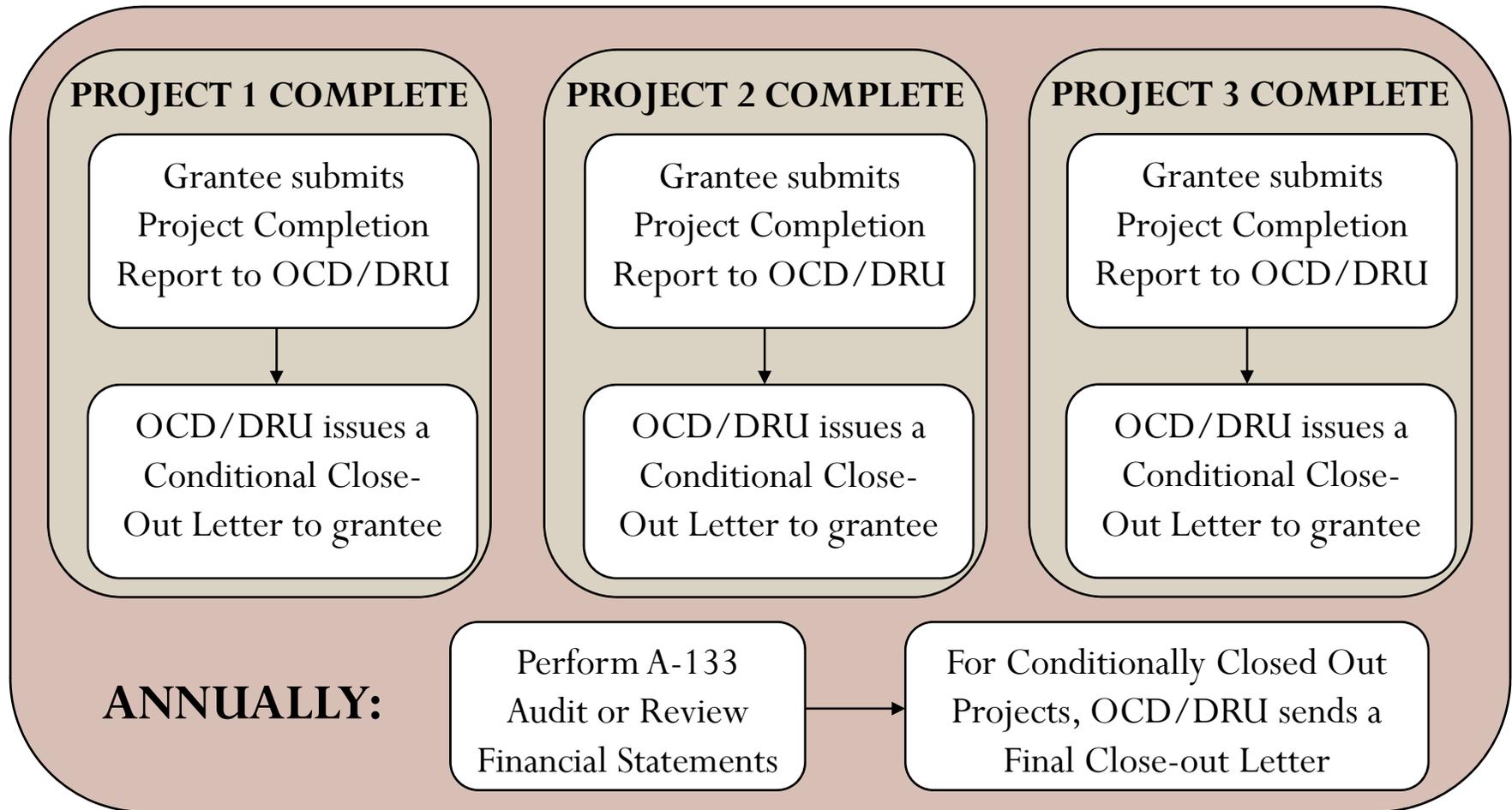
- Property Ownership
- Property Management
- Disposition of real and personal property

Section 12:

Monitoring

- Required by HUD
- Responsibility of Grantees and OCD/DRU
- Focus on appropriate use of DR CDBG funds

Section 13: Close-Out



Section 14:

Lead-Based Paint, Asbestos, and Mold

Regulations

- HUD
- Environmental Protection Agency (EPA)
- Occupational Safety and Health Administration (OSHA)
- Consumer Product Safety Commission (CPSC)