



2025 CDBG Implementation Training

September 18, 2025 (Webinar)

Presenters: Sally Smarzinski & Joanna Storm

Division of Energy, Housing and Community Resources (DEHCR)
Bureau of Community Development (BCD)

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Welcome to Training!


- Purpose
- Agenda / Logistics
- Staff Introductions
- Reminders / Updates



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Purpose of Today’s Training


- Overview of requirements for administering Community Development Block Grants (CDBGs) for:
 - Public Facilities (PF),
 - Planning (PLNG),
 - Coronavirus (CV),
 - Economic Development (ED),
 - Disaster Recovery (DR),
 - Public Facilities for Economic Development (PFED), and
 - Public Services (PS)
- Introduce Bureau of Community Development (BCD) staff

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Training Agenda

1:30 – 2:30 p.m.	<ul style="list-style-type: none">• Welcome & Introductions• Getting Started:<ul style="list-style-type: none">• Pre-Agreement Documents & Activities• Grant Agreement Execution• Maintaining Compliance: Project Scope & Timeline
2:30 – 2:40 p.m.	Break (10 minutes)
2:40 – 3:45 p.m.	<ul style="list-style-type: none">• Maintaining Compliance: Project Scope & Timeline (continued)• Best Practices• Additional Resources
3:45 – 4:00 p.m.	<ul style="list-style-type: none">• Closing Remarks• Participant Questions (Q&A)

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Training Logistics (continued)

- Handouts:
 - Agenda
 - Training Slides
 - Example Grant Agreement – Attachments A-F
- [CDBG Implementation Handbook](#)
- [Additional Topic-Specific Webinar Sessions](#)



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Staff Updates

- Tamra Fabian, **Bureau Director**
- Angela Davis, **Section Chief**
- Casey Dobson, Grants Specialist – Advanced
- Amanda Knack, Grants Specialist – Advanced
- Samantha Larson, Grants Specialist – Advanced
- Ben Lehner, Grants Specialist – Advanced
- Stacey Miller, Grants Specialist – Advanced
- Sally Smarzinski, Grants Specialist – Advanced ← **Presenter / Trainer**
- Juli Speck, Grants Specialist – Advanced
- Joanna Storm, Grants Specialist – Advanced ← **Presenter / Trainer**



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Important Reminders

- Timely Expenditure of Funds
- Project Timelines – *For 2025 CDBG-PF:*
 - July 1, 2026, required **construction start date**
 - October 31, 2027, required **construction end date**
 - December 31, 2027, required **performance end date**
- Timely communications (delays, Amendment requests)
 - Continued delays and/or lack of communication may result in CDBG award being rescinded



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Getting Started

- Award Acceptance
- Pre-Agreement
- Contract Review/Execution
- Bidding / Procurement
- Communications



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Next Steps: Program Requirements

Upon Award:


- Award Acceptance
- Pre-Agreement Documents
- Execution of Grant Agreement

CDBG Implementation Training(s)

Compliance with Grant Agreement & [CDBG Implementation Handbook](#) – Including:

- Policies and Regulations
- Reporting, Recordkeeping, and Documentation Requirements
- Project Milestones, Deadlines, and Processes


Grantee’s **compliance is required** regardless of local Subrecipient or Grant Administration arrangements (i.e., contracted services).

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CDBG Program Requirements (cont.)

Non-compliance may result in cancellation of grant
and/or payback of CDBG funds

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Communications & Preferences




Email:

- Primary Contact = Designated Grant Administrator
- Carbon Copy = Local Clerk
- Reach out to your Assigned Program Representative (*first*)
- General Inbox: DOACDBG@Wisconsin.gov




Phone:

- Mention: UGLG/Grantee & Project/Contract Number
- Provide: Call-Back Number & Preferred Time(s), if applicable



Must use Email – Scan signed documents for submission




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Pre-Agreement Documentation

- Forms *may* need to be updated (during the project)
- Review Your Application (information **must** align)
 - Budget
 - Scope of Work
 - Project Beneficiaries (Demographics)
- HUD National Objective & Beneficiaries
 - Significant changes **may invalidate** your Grant Award



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Pre-Agreement (continued)

Low- and Moderate-Income

Area Benefit

Limited Clientele

Housing

Jobs


Slum and Blight

Area Basis

Spot Basis

Urgent Local Need

HUD National Objectives & Beneficiaries


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Pre-Agreement (continued)

Activities not allowed:

- Buildings for the general conduct of government, except to remove architectural barriers that will result in creating or improving accessibility for the disabled population
- General government expenses
- Political activities
- Operating and maintenance expenses for public facilities
- Lobbying activities

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Additional Helpful Websites

- DOA – Division of Energy, Housing & Community Resources (DEHCR) Bureau of Community Development:

Bureau: <https://energyandhousing.wi.gov/Pages/CommunityResources.aspx>

DEHCR: <https://energyandhousing.wi.gov/Pages/Home.aspx>



- HUD guidance on CDBG National Objectives – Code of Federal Regulations (24 CFR 570.208):

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-570/subpart-C/section-570.208>

- HUD guidance on CDBG Eligible Activities (HCDA Sec. 105):

<https://www.hudexchange.info/sites/onecpd/assets/File/CDBG-State-National-Objectives-Eligible-Activities-Appendix-A.pdf>



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Reminder: Change in Use Restrictions

Project Site Use & Income Restrictions **for 5 years after Project Completion:**

- No “change in use” of project site property that has been acquired or improved with CDBG funding assistance, unless UGLG meets certain requirements **and** the change is pre-approved by DEHCR; otherwise CDBG funds must be returned to the State/HUD.
- Restrictions regarding “income” generated from CDBG-funded project site acquisition or improvements – may be required to return funds to the State/HUD.
- Refer to [24 CFR 570.489](#)(e) and (j) and [24 CFR 570.505](#).

Contact DEHCR with any questions pertaining to these restrictions.



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Bidding / Procurement

Bidding:

- Refer to the “Prior to Construction” section of your CDBG contract’s **timetable** for construction bidding related documents due to DEHCR and activities needing to be completed



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Bidding / Procurement (continued)

Procurement:

- Refer to: [CDBG Implementation Handbook, Chapter 3](#) and [Chapter 7](#) (for Construction); Handbook **Attachment 3-F**
- Contracting for professional services is permitted, contingent upon compliance with ‘applicable’ procurement requirements (e.g., Grant Administration, Architectural/Engineering (A/E) services, Planning services, Acquisition/Relocation services, etc.)
- CDBG-funded Costs: Must comply with CDBG and UGLG’s local policies
- Match-funded Costs:
 - For Construction Activities – Must comply with CDBG and UGLG’s local policies
 - For Non-Construction Activities – Must comply with UGLG’s local policies




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Bidding / Procurement (continued)

- **Exception to competitive procurement when using CDBG funds – not required** for contracts with:
 - Other UGLGs;
 - Regional Planning Commissions (RPCs); and most
 - Publicly-funded non-profit Economic Development Organizations (EDOs) (contingent upon compliance with UGLG local policies)
- Contract language/insertions pertaining to the CDBG Equal Opportunity and various other CDBG Compliance Requirements (Refer to Handbook **Attachment 3-I**)

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Procurement for CDBG Projects

Requirements Apply to ALL aspects of Project:

ALL
Contracting

ALL
Purchasing


Grant Administration
Contracting
Planning
Training/Instruction
Environmental Review
Acquisition/Relocation

Construction

Financial Auditors
Appraisals

Construction Supplies
Office Supplies
Supplies
Food
Rentals/Leases

Equipment
Programming


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WI Statutes: Public Works Procurement


Statute	Requirement Topic
§66.0901	General for Municipality: Public works, contracts, bids
§59.52(29) - (31)	Counties: Public contracts and competitive bidding
§60.47	Towns: Public contracts and competitive bidding
§61.50 - §61.57	Villages: Ordinances, contracts, public works, acquisition of recycling or resource recovery facilities without bids
§62.15	Cities: Public works

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Procurement Decisions: Ask Yourself...


- Who will be performing the work?
- What type of work is needed?
- What funds will be used to pay for it?

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Who's doing the work?


Labor by Grantee/UGLG or Subrecipient (e.g., "In-house" staff):	Labor by Non-Governmental 3 rd Party (e.g., external firm/contractor):
<ul style="list-style-type: none">• No procurement ("force account" work)• Intergovernmental agreements must be in writing	<ul style="list-style-type: none">• Requires procurement• Agreements/contracts must be in writing

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Type of work being done?


Construction-Related Contracts	Professional Services / Non-Construction Contracts
<ul style="list-style-type: none">• Comply with Local, State, and Federal requirements (<i>regardless of funding source</i>)• Requires competitive process unless exception approved by DEHCR	<ul style="list-style-type: none">• Competitive procurement required if CDBG-funded (except Inter-Governmental, RPCs, certain EDOs)• Comply with local policy(ies) if only match-funded; must include certain contract language

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What funds will pay for the work?

All Contracts Funded ("In Whole" or "In Part") Using <u>CDBG</u> Dollars:	Local/ <u>Match-Only</u> Funds Used (<i>Non-Construction</i>):
<ul style="list-style-type: none">Must comply with the most restrictive requirements of the applicable Local, State, and Federal requirements.	<ul style="list-style-type: none">Know & comply with <u>local policy(ies)</u>Consider updating to incorporate "Best Practices" in Ch. 3 and 2 CFR 200.Still must comply with some <u>State/Federal requirements</u> for certain activities, e.g., contract content, construction.

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Contract Language & Attachments

Contract Language/Insertions Summary
For Contracts Executed for a CDBG Project

Must be included <u>within</u> construction bidding packets & contracts (cannot be by reference only – for prime contractors and sub-contractors):	
Construction Contracts of \$10,000 or LESS	Construction Contracts of GREATER Than \$10,000
<ul style="list-style-type: none">Attachment 3-C [24 CFR 570.489(h) Conflict of Interest Clause]Attachment 3-J [CDBG Build America, Buy America Act (BABA) Requirements]Attachment 6-B(1) or 6-B(2) (depending on when Grant was awarded to UGLG)*** [Section 3 Contract Requirements]Attachment 7-B** [Davis-Bacon and Related Acts (DBRA)]Attachment 7-G** [Federal Labor Standards Provisions (4010)]Applicable Davis-Bacon/Federal Wage Decision(s)** – Must be in bid packets, in all prime contracts and sub-contracts, and posted at the project site, visible to all workers.	<ul style="list-style-type: none">Attachment 3-C [24 CFR 570.489(h) Conflict of Interest Clause]Attachment 3-J [CDBG Build America, Buy America Act (BABA) Requirements]Attachment 6-A** [Equal Opportunity Clause (EO 11246)]Attachment 6-B(1) or 6-B(2) (depending on when Grant was awarded to UGLG)*** [Section 3 Contract Requirements]Attachment 6-C** [Affirmative Action Requirements (EO 11246)]Attachment 6-D** [Federal Equal Employment Opportunity Clauses Construction Contract Specifications (EO 11246)]Attachment 7-B** [Davis-Bacon and Related Acts (DBRA)]Attachment 7-G** [Federal Labor Standards Provisions (4010)]Attachment 7-R [MBE/WBE/DBE Web Resources]Applicable Davis-Bacon/Federal Wage Decision(s)** – Must be in bid packets, in all prime contracts and sub-contracts, and posted at the project site, visible to all workers.

Refer to Attachment 3-I

- Construction vs. Non-Construction
- Required to be in (i.e., “as part of”) the contract vs. provided separately

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Additional Considerations

- Potential Conflicts of Interest – Mechanisms for Disclosure and Review (**Attachments 3-B & 3-C**, local policies/ordinances)
- MBE/WBE, Section 3/LMI, local and small business participation (**Attachments 6-A, 6-B(2), 6-C, 6-D, 7-R**)
- Lobbying activity restrictions and disclosure (**Attachments 3-D, 3-E**)
- No **debarred** contractors – check System for Award Management (SAM): <https://sam.gov/content/entity-information>
- **Update:** BABA requirements and forms (**Attachments 3-J, 3-K, 3-L, 3-M, 3-N**)



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CDBG Competitive Procurement

Methods:

- Refer to Chapter 3 and **Attachment 3-F**.

Professional Services:

- No Multiple-Services Procurement and Contracting
 - **Exception 1:** Same firm for prelim. engineering & project engineering
 - **Exception 2:** Same firm for CDBG Application preparation & administration
 - **Exception 3:** Same firm for CDBG Planning (PLNG) Application preparation & Planning process



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Professional Services Procurement

No Loss-Leader Arrangements:

No discounted or free grant application preparation or preliminary engineering estimates *in exchange for* contract award if application is funded

Ineligibility for Contract Awards:

If a firm helps write an RFP, that firm cannot submit a proposal or quote.



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Build America, Buy America (BABA) Act

“Buy America Preference (BAP)” or “domestic procurement” requirement:

- Products purchased in connection with infrastructure projects funded by Federal Financial Assistance (FFA) programs must be U.S. produced

Purpose:

- Bolster critical American supply chain;
- Stimulate private sector investments in American manufacturing;
- Support the creation of jobs so that America’s workers and firms can compete and lead globally.



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BABA Act (cont.)

Project Applicability:

- 2025 awardees: Iron and steel, construction materials, and manufactured products purchased for infrastructure projects. Refer to **Chapter 3** and **Attachment 3-J** for more information.

Project-Specific Waivers:

- Waiver request required (**Attachment 3-K**)


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BABA Act (cont.)

General Waivers:

- De minimus
- CDBG awards from the State prior to 2023
- Non-Infrastructure projects (for the PLNG and CV Public Services grantees tuning),
- Housing infrastructure projects for less than 5 units
- Projects with <\$250,000 total project budget (for PLNG awardees tuning in)
- Emergency assistance projects (DR, CV, ESG-CV, MIT)
- Projects with no use of BABA "covered materials"

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BABA Act (cont.)

Grantee Requirements:

- BABA contract insertion (**Attachment 3-J**)
- Purchaser/Contractor Self-Certification (**Attachment 3-L**)
- **Updated** Materials List (**Attachment 3-M**) w/Pay Request to DEHCR
- Compliance documentation kept on file

For more information and to access the BABA Webinar from DEHCR, see the [CDBG Training and Technical Assistance Website](#).



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Procurement: Common Pitfalls

- Not following local procurement policy(ies)
- Not competitively procuring when intending to fund with CDBG (in whole or in part)
- Not obtaining 3 written quotes or not making the RFP “publicly available” for professional services when intending to fund with CDBG
- Not having all RFP/RFQ documentation on file



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Procurement: Common Pitfalls (cont.)

- Not all CDBG language/insertions “in”/as part of both prime contracts **and** all subcontracts
- Not following potential conflicts of interest review requirements
- Not conducting SAM debarment check at time of contracting or not having SAM records on file



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Procurement: Monitoring (file contents)

Refer to Chapter 2 and Chapter 3
of the *CDBG Implementation Handbook*
for file contents requirements.




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Helpful Websites

- **2 CFR 200.320 (Federal Procurement Regulations):**
<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/subpart-D/subject-group-ECFR45ddd4419ad436d/section-200.320>
- **Wisconsin Supplier Diversity Program (MBE/WBE Resource):**
<https://doa.wi.gov/Pages/DoingBusiness/SupplierDiversity.aspx>
- **HUD Information on Cost and Price Analysis:**
<https://www.sa.gov/files/assets/main/v/1/nhsd/documents/quickguidetocostandpriceanalyst.pdf>
- **Wisconsin State Statutes:**
<https://docs.legis.wisconsin.gov/statutes/prefaces/toc>
(see 66.0901, 59.52(29)-(31), 60.47, 61.50, 61.54-61.57, 62.15)


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Maintaining CDBG Program Compliance

- Grant Agreement
- Scope of Work
- Timeline



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Maintaining CDBG Program Compliance

ATTACHMENT A

SCOPE OF WORK

In the event of conflict between the application and/or other supporting documents previously submitted to the Department by the Grantee with respect to the contents of this attachment, provisions within this attachment shall take precedence.

1. Scope of Work:

Columbia Street (from South Chestnut Avenue to North Farm Road) utilities & roadway reconstruction with improvements, including:

- Replacement of aging sanitary sewer & water system infrastructure (including sanitary sewer, manholes, watermain, fire hydrants, water valves, appurtenances, and associated sewer laterals & water services where applicable);
- Replacement of aging storm water system components (storm sewers & storm inlets), along with
- Reconstruction of the disturbed roadway, including concrete curbs & gutters;
- Construction of sidewalk along south side of the roadway, along with
- Construction of a new lift station near the 300 block of Columbia Street.

Completion of engineering & grant administration work necessary for the project.

2. Timetable:

Due Date	Activity
Prior to Construction and Acquisition	<ul style="list-style-type: none">• Execute Grant Agreement.• Establish record keeping system.• Establish financial management system.• Procure engineering and administrative services, if contracting with third-party firm(s) for these services.• Enter into the grant administration contract, if contracting with a third-party for grant administration. Submit executed contract to DEHCR CDBG Project Representative.• Complete Environmental Report and obtain official approval from DEHCR Environmental Desk. Submit copy of approval from DEHCR Environmental Desk to DEHCR CDBG Project Representative.• Submit "Notice of Acquisition/Relocation to DEHCR" form if any acquisition (including easements) and/or relocation will be required for the CDBG Project.• Complete acquisition and relocation requirements for property purchase, easement(s), etc., if applicable to Project.• Obtain federal Davis-Bacon wage decision(s) for the construction contract(s) to insert in the bid packet(s) if federal labor standards are applicable to Project.• Complete Record of Wage Decision Selection Form prior to bidding if federal labor standards are applicable to project and submit to DEHCR CDBG Project Representative for review.

- **Example** Grant Agreement "Attachments A-F" (*handout provided*)
- **Project Scope of Work (SOW)**
 - For construction projects: General summary of improvements/construction activities;
For PLNG projects: Plan creation/update
- **Environmental Review** report documents *may* need to be updated (if issues arise during the project)

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Grant Agreement Timetable

Example:

Due Prior to Acquisition/Relocation and Prior to Starting Construction

2. Timetable:

Due Date	Activity
Prior to Acquisition/Relocation (if applicable to project)	<ul style="list-style-type: none">• Execute Grant Agreement (<i>execution is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds</i>).• Complete <i>Environmental Report</i> (ER) and obtain official approval from DEHCR Environmental Desk (<i>approval is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds</i>).• Submit copy of ER approval received from DEHCR Environmental Desk to assigned DEHCR CDBG Project Representative.• Submit <i>Notice of Acquisition/Relocation to DEHCR</i> form if any acquisition (including easements) and/or relocation activities will be required for the CDBG Project.• Complete all other applicable acquisition and relocation related activities specified in the Program Implementation Handbook as required before acquiring property and paying relocation benefits.
Prior to Starting Construction	<ul style="list-style-type: none">• Execute Grant Agreement.• Complete <i>Environmental Report</i> (ER) and obtain official approval from DEHCR Environmental Desk.• Submit copy of approval received from DEHCR Environmental Desk to assigned DEHCR CDBG Project Representative.• Complete all applicable acquisition and relocation related activities specified as required prior to the start of construction for any property purchase(s), easement(s), etc. (if applicable to the CDBG Project).• Establish record keeping system.• Establish financial management system.• Procure engineering and administrative services, if contracting with third-party firm(s) for these services.

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Environmental Review: Issues/Updates


- For projects without a certified ER:
 - Refer to Environmental Review Training slides & recording online (on [CDBG Training & Technical Assistance](#) website).
 - Updates are posted online as information becomes known.
 - Non-PF Projects’ review requirements *may* differ.
 - If your project changes, additional environmental review is likely required.

2. Timetable:

Due Date	Activity
Prior to Acquisition/Relocation (if applicable to project)	<ul style="list-style-type: none">Execute Grant Agreement (<i>execution is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds.</i>)Complete <i>Environmental Report (ER)</i> and obtain official approval from DEHCR Environmental Desk (<i>approval is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds.</i>)Submit copy of ER approval received from DEHCR Environmental Desk to assigned DEHCR CDBG Project Representative.Submit <i>Notice of Acquisition/Relocation to DEHCR</i> form if any acquisition (including easements) and/or relocation activities will be required for the CDBG Project.Complete all other applicable acquisition and relocation related activities specified in the Program Implementation Handbook as required before acquiring property and paying relocation benefits.
Prior to Starting Construction	<ul style="list-style-type: none">Execute Grant Agreement.Complete <i>Environmental Report (ER)</i> and obtain official approval from DEHCR Environmental Desk.Submit copy of approval received from DEHCR Environmental Desk to assigned DEHCR CDBG Project Representative.Complete all applicable acquisition and relocation related activities specified as required prior to the start of construction for any property purchase(s), easement(s), etc. (if applicable to the CDBG Project).Establish record keeping system.Establish financial management system.Procure engineering and administrative services, if contracting with third-party firm(s) for these services.

Environmental Review: Questions?

Email: DOAEnvironmentalDesk@wisconsin.gov




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Maintaining Compliance (continued):

Project Scope of Work (SOW)

Acquisition & Relocation



2. Timetable:


Due Date	Activity
Prior to Acquisition/Relocation (if applicable to project)	<ul style="list-style-type: none">• Execute Grant Agreement (<i>execution is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds</i>).• Complete <i>Environmental Report</i> (ER) and obtain official approval from DEHCR Environmental Desk (<i>approval is required prior to acquiring property and/or paying relocation benefits if funded, in whole or in part, with CDBG funds</i>).• Submit copy of ER approval received from DEHCR Environmental Desk to assigned DEHCR CDBG Project Representative.• Submit <i>Notice of Acquisition/Relocation to DEHCR</i> form if any acquisition (including easements) and/or relocation activities will be required for the CDBG Project.• Complete all other applicable acquisition and relocation related activities specified in the Program Implementation Handbook as required before acquiring property and paying relocation benefits.

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Chapter 5: Acquisition/Relocation (A/R)

Relevant Laws and Regulations:

- 42 U.S.C. Ch. 61 - Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA) of 1970, as amended
- 49 CFR Part 24 – Uniform Relocation Assistance and Real Property Acquisition for Federal and Federally-assisted Programs (FHWA)
- FHWA Published URA New Rule (effective 6/3/2024)
- Section 104(d) of the Housing and Community Development Act of 1974 (Barney Frank)
- 24 CFR Part 570 – Community Development Block Grants (HUD)
- Wis. Stat. Ch. 32: Eminent Domain
- Wis. Admin. Code Ch. 92: Relocation Assistance



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URA Applicability

- Publicly funded projects (Buyer may be UGLG or other entity)
- Real Property
 - Acquisition (includes Easements)
 - Rehabilitation
 - Demolition
- Relocation Assistance for Displaced Persons (persons, businesses, farms, non-profits – including personal property)



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Types of Acquisition

- **Voluntary**
 - No threat of use of eminent domain authority (condemnation)
 - Any acquisition for which the Buyer does not have eminent domain powers
 - Must meet specific criteria for Voluntary Acquisition
 - ***A willing owner does not constitute voluntary acquisition!***
- **Involuntary**
 - Any acquisition that does not qualify as Voluntary
 - Any time *Potential* for use of eminent domain authority (condemnation)
- **Easements** (may be Voluntary or Involuntary)
 - Temporary or Permanent



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Voluntary Acquisition

To qualify as “Voluntary” all the following must be true:

- Not a specific site needed for CDBG project; **and**
- Property not part of an intended, planned or designated project area where other properties will be acquired within specific time limits; **and**
- Must inform owner property will not be acquired by condemnation if negotiations fail; **and**
- Must inform owner in writing of the property’s current fair market value (refer to **Attachment 5-B**)



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Involuntary Acquisition

Involuntary Acquisition Determination:

- Any property acquisition that does not meet all of the requirements for voluntary acquisition
- UGLG may or may not opt to exercise power of eminent domain authority to acquire property
- Triggers full URA requirements




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Easements

- **Definition:** The right to use the real property of another for a specific purpose without profit
- **URA Applicability:** Applies to Voluntary & Involuntary Easements
- **Temporary:** Easements granted for a specific period of time
 - Exception to URA applicability:
Temporary limited easement for **sole benefit** of the owner/resident
Email Letter to DEHCR and maintain in file (**Attachment 5-E**)
- **Permanent:** Easements attached to a deed and continue to affect the land through subsequent changes in ownership

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Relocation Applicability

Voluntary Acquisition:

- Owner-Occupants: do not qualify for relocation assistance
- Tenant-Occupants: MUST be provided notices of relocation rights (rights cannot be waived); and provided relocation assistance (if displaced)

Involuntary Acquisition:

- Owner-Occupants and Tenant-Occupants: MUST be given notices of relocation rights (rights cannot be waived); and provided relocation assistance (if displaced)
- Refer to **Attachments 5-F thru 5-I**

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Relocation Plan

- State and Federal Requirement
- Must prepare Plan if relocation “may be necessary” for the project
- Plan Templates on State Relocation website (by *DOA Division of Legal Services*)
- Prior to Initiation of Negotiations (includes “verbal” commitments for relocation purposes) must submit Plan to and receive approval of Plan from *DOA Division of Legal Services*
- Submit copy of approved Plan to DEHCR



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Relocation: Provisions (LMI Residents)

- Special Provisions for Low-Income Housing and LMI Residential Owner and Tenants
[Per Section 104(d) of the Housing and Community Development Act of 1974 (Barney Frank)]

Refer to **Attachment 5-G** and **5-I**

Must meet Low- to Moderate-Income (LMI) Threshold based on
[HUD URA Income Limits](#)



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Acquisition / Relocation: Timing

- Must notify DEHCR prior to start – submit **Attachment 5-L (updated)**
Inform DEHCR if Acquisition for property occurred prior to Award.
- No construction on property until A&R processes are completed

If using CDBG funds to cover any Acquisition costs (in whole or in part):

- Environmental Review must be complete
- DEHCR (DOA) Grant Agreement must be executed



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Acquisition / Relocation Processes

- Voluntary Acquisition: **Attachment 5-C**
- Involuntary Acquisition: **Attachment 5-D**
- Relocation Process: **Attachments 5-F, 5-H, 5-I**

If persons will or potentially will be displaced:

Relocation Notices and Assistance Activities may occur throughout the acquisition process and after Acquisition is complete (and after CDBG Project is complete).



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A/R: Templates & Forms

- [CDBG Implementation Handbook](#) – Chapter 5 Attachments*
- [HUD Tenant Assistance, Relocation and Real Property Acquisition Handbook \(1378.0\)](#)*
- **Consult professional legal/real estate counsel!**

****Templates are for Guidance Only – Customize for Your Needs.***



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A/R: Monitoring & Documentation

Acquisition/Relocation Monitoring Checklist:
Attachment 5-K

*(Required to be submitted to DEHCR
at time of DEHCR's monitoring of project)*



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Common Pitfalls

- Incorrect classification of Acquisition Type
- Failure to submit notice of Acquisition/Relocation (5-L) **prior to** starting acquisition/relocation
- Insufficient records for FMV determination
- Failure to obtain signed waiver of appraisal for donated property
- Failure to provide required notices to Owners and Tenants and having approval for Relocation Plan **prior to** initiation of negotiations
- Incomplete records of relocation communications with owners/tenants



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A/R: Additional Helpful Websites

Wisconsin State Relocation Website (*by DOA Division of Legal Services*):

<https://doa.wi.gov/Pages/AboutDOA/RelocationAssistance.aspx>

HUD Exchange:

<https://www.hudexchange.info/programs/relocation/>

HUD Handbook:

Tenant Assistance, Relocation and Real Property Acquisition Handbook (1378.0):

<https://www.hudexchange.info/programs/relocation/guidance/#handbooks>

Federal Highway Administration (FHWA):

http://www.fhwa.dot.gov/real_estate/uniform_act/relocation/

FHWA URA Final Rule Effective 6/3/2024

<https://www.hudexchange.info/news/ura-final-rule-published/>



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Maintaining Grant Compliance

- Timeline/Performance Period – Deadlines & Submissions:
 - Acquisition & Construction or PLNG **Start** Date
 - Reporting
 - Fair Housing Actions
 - 2nd Citizen Participation Public Hearing
 - Monitoring (*generally after construction or PLNG starts & before it ends*)
 - Construction or PLNG **End** Date
 - Performance Period **End** Date/Final Payment Request **Due** Date



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Construction Start / Labor Standards

Federal Labor Standards – Davis-Bacon & Related Acts (DBRA) Applicability:

- Chapters 3, 6, 7
- **Attachments 3-B thru 3-E, 3-I thru 3-N, 6-A thru 6-D, 7B thru 7-T**
- U.S. Department of Labor (USDOL) Final Rule (*effective 10/23/2023*)



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Davis-Bacon and Related Acts (DBRA)

For CDBG and other federally funded construction projects:

- Construction, alteration, or repair of a public building or public work
- Projects with other funding sources – follow applicable rules and regulations for that program
- **Does not apply to non-construction projects** such as Planning (PLNG)-Only, or Public Services (PS), CV projects not involving construction



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DBRA (continued)

Davis-Bacon Act:

- Workers must be **paid**:
 - At least weekly
 - At least the federal wages for similar work in the locality
- Applicable federal wage rates: [USDOL Wage Determinations](#)
- **Violation results in contractor being liable** for unpaid wages, and potentially penalties, fines, suspension of payments, contract termination, and/or suspension or debarment



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Exceptions

- Force Account Work (refer to Ch. 7 and **Attachment 7-Q**)
- Construction activities assisted solely by means of loans guaranteed with interest-bearing collateral accounts
- Residential rehabilitation in structures with fewer than 8 units
- Contract(s) that are part of a project <\$2,000 value
- **Economic Development** projects where federal funds are *used only for non-construction* activities.



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Failure to Comply

Noncompliance may result in:

- Loss of UGLG's awarded grant
- UGLG's ineligibility for future grant awards
- Contractors being subject to fines, imprisonment, and/or debarment from future federally funded projects



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Additional Relevant Laws

- Copeland “Anti-Kickback” Act – *Payroll Deductions*
 - Violation is a **felony** and may result in termination of contract or criminal prosecution by the U.S. Govt., punishable by a fine, imprisonment, or both
- Contract Work Hours & Safety Standards Act (CWHSSA) – *Overtime*
 - **Overtime**: Workers paid **1 ½ times** regular pay for hours worked **over 40** in a week
 - **Applicability**: Contracts **over \$100,000** (includes subcontractors)
 - **Fines/Penalties**: Liquidated damages + back-wages (or “other”)
 - **Liability cascades**: from the sub(s)/prime(s) to the Grantee (i.e., UGLG)
- Fair Labor Standards Act (FLSA) – *Wages + Overtime*



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Designated Labor Standards Officer

- Submit ***Labor Standards Officer Designee*** form (**Attachment 7-C**) prior to or at the time of submitting ***Record of Wage Decision Selection*** (**Attachment 7-D**)
- UGLG **must** act as Labor Standards Officer (LSO) unless a different person is officially designated.




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Labor Standards Officer (LSO)

Responsibilities:

- Federal Wage Determinations
- Wage Decision Modifications prior to bid opening
(Do not open bids on Fridays)
- Additional Labor Classifications
- Bid Notifications
- Contractor Eligibility Clearance
- Construction Contract Notifications
- Pre-Construction Conference
- Compliance Monitoring
- Compliance Enforcement


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Federal Wage Determinations


90-Day Rule:

If contract award is >90 days after bid opening, check wage determination again and use most current modified decision if it has been updated since bid opening.



Change in Scope/Substantial Amendment Rule:

A substantial amendment/change order to contract may require checking and using the most current wage decision for work covered under the amendment/change order.

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Wage Determinations (continued)

Wrong Federal Wage Decision(s) in Bid Packet and/or Contract:

UGLG must correct error:

- Obtain the correct wage decision(s)
- Inform contractors they must pay those wage rates retroactively to the beginning of the project
- Verify wage restitution/underpayments are made; and
- May be forced to reimburse the contractor



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Bid Packets & Construction Contracts

Bid Packet/Ad for Bids Content:

- **Attachment 3-I:** Contract Attachments Insertions Summary (from Ch. 3) – List of required and recommended insertions
- **Attachment 7-F:** Advertisement for Bids (from Ch. 7) – Template with required and recommended content

Prime Contract(s) and Subcontract(s):

- **Attachment 3-I:** Contract Attachment Insertions Summary (same as bid packet)



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Construction Contracts (continued)

Additional Subcontract Requirements:

- **Must be in writing** and include:
 - Name of contractor/subcontractor
 - Dollar amount of contract
 - Goods/services to be provided
 - Terms/conditions
- Copy of executed subcontracts (with any and all attachments and **signed** addendums) must be in the CDBG project file



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Bid Packet/Contract Requirements (cont.)

Inclusion of the required CDBG notices/attachments and wage determinations in the bid packet and contracts *by reference only* is **not** acceptable.



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Contractors' Eligibility Clearance

- **All** contractors (company and owners) cannot be debarred
- Prime contractor (and Grantee) must ensure all subcontractors are not debarred
- Retain debarment check ("Exclusion" check) records for **all** contractors (primes and subs – owners/officers)
- Contact DEHCR **immediately** if any debarment discovered



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Additional Items

- Pre-Construction Conference ← ***strongly recommended***
- Compliance Monitoring
(Payrolls, Wages, OT, Fringes, Deductions, Classifications, Apprentices & Trainees' Indenture Papers)
- Work Site Monitoring
- Work Site Signage – Refer to Ch. 7 and **Attachment 7-T** template (Updated)
- Compliance Enforcement
- Documentation Submissions to DEHCR
- Maintaining Paperwork / File Contents / Monitoring Prep



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Labor Standards: Common Pitfalls

- Not submitting Record of Wage Decision Selection to DEHCR prior to advertisement for bids release
- Incorrect wage determination(s) selected or used
- Insufficient Fringe Benefits and Deductions payroll documentation on file
- Not requesting “Additional Classification” when it was warranted



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Labor Standards: Common Pitfalls (cont.)

- Not checking payroll records weekly
- Miscalculations for overtime underpayments
- Not following up on payroll or employee interview discrepancies
- Not reporting underpayments on semi-annual CDBG Data Report and Final Labor Standards Compliance Report




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Helpful Websites

- HUD Labor Standards and DBA Resources on HUD Exchange:
 - <https://www.hudexchange.info/resource/6717/davis-bacon-and-labor-standards-agency-contractor-guide-and-contractor-addendum>
 - <https://www.hudexchange.info/trainings/courses/davis-bacon-labor-standards-payroll-analysis>
- U.S. Department of Labor Wage and Hour Division:
 - <https://www.dol.gov/whd/>
- WI Department of Workforce Development Labor Standards Overview:
 - <https://dwd.wisconsin.gov/er/laborstandards/>
- Debarment Checks & Wage Determinations:
 - <https://sam.gov/content/home>



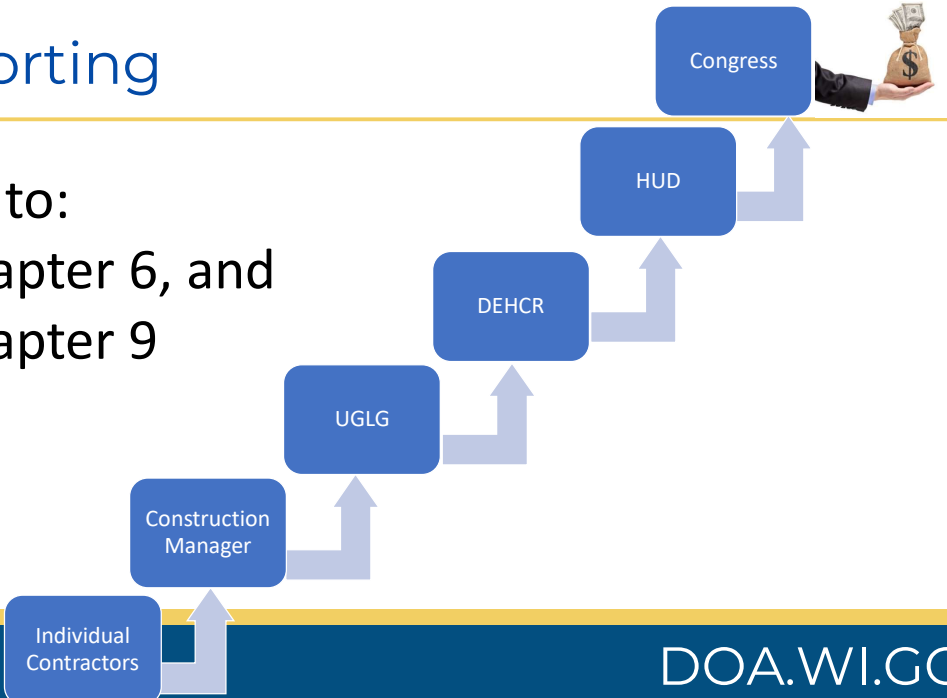
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Reporting


Refer to:

- Chapter 6, and
- Chapter 9



```
graph BT; IC[Individual Contractors] --> CM[Construction Manager]; CM --> UGLG[UGLG]; UGLG --> DEHCR[DEHCR]; DEHCR --> HUD[HUD]; HUD --> Congress[Congress]
```

The flowchart illustrates the reporting hierarchy for CDBG funds. It starts with 'Individual Contractors' at the bottom, moving up through 'Construction Manager', 'UGLG' (University Grants and Local Government), 'DEHCR' (Department of Economic Development, Commerce and Community Resources), 'HUD' (U.S. Department of Housing and Urban Development), and finally to 'Congress' at the top. An illustration of a hand holding a money bag is next to the Congress box.



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Reporting (continued)

- Semi-Annual Summary Narrative Report
 - (incl. Timetable compliance and project progress, Fair Housing Actions, Citizen Participation Hearing)
- Semi-Annual CDBG Data Report
 - (incl. contracting, MBE/WBE, Labor Standards, Section 3)
- Annual Single Audit Statement
- Annual Single Audit Report (if applicable)
- Client Income Certification Report (if applicable)
- CDBG Jobs Project Employee Self Certification Report (if applicable)



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Reports, Actions, & Compliance

- Refer to the:
 - Grant Application
 - Grant Agreement's Timetable, Attachments, and Articles
- 1st report submissions must cover the **full timeframe** from the award date to the end of the current required reporting period



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Reports, Actions, & Compliance (cont.)

- Payment (“Draw”) Requests **will not be processed** until all report submissions are up-to-date
- Unresolved Single Audit Exceptions (i.e. “findings”) and Monitoring Findings **may impact DOA determinations**, and could result in a payment being withheld or termination of the Grant Agreement



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Reports, Actions, & Compliance (cont.)

- Late final payment submissions are not eligible for review/approval
- Performance Period reporting requirements will be automatically **extended** to future reporting period(s), until all Completion Report document submissions are complete
- Do not submit unsigned nor incomplete documents




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Important Dates

DEADLINE	REPORTING DUE
JANUARY 15 TH	Annual Single Audit Statement
MARCH 25 TH	CDBG Data Report (MBE/WBE, Labor Standards, Section 3)
APRIL 15 TH	Semi-Annual Summary Narrative Report
SEPTEMBER 25 TH	CDBG Data Report (MBE/WBE, Labor Standards, Section 3)
SEPTEMBER 30 TH	Annual Single Audit Report <i>(if Single Audit required for CY)</i> **Or Earlier - See Ch. 9
OCTOBER 15 TH	Semi-Annual Summary Narrative Report
DECEMBER 31 ST <i>*(OR AS LISTED IN TIMETABLE)</i>	Project Completion Report & Certification* and CDBG Final Payment Request* (for 2025 CDBG-PF projects)
WITHIN 60-DAYS OF RECEIVING FINAL CDBG PAYMENT	Financial Certification of Completion

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Reporting (continued)

DEHCR > CDBG Implementation Handbook

CDBG Implementation Handbook

The Implementation Handbook has been created by the Bureau of Community Development for use by Department of Administration (DOA) CDBG-PF, CDBG-PLUG, CDBG-ED and CDBG-PFED Grantees. The Bureau of Community Development resides within the Wisconsin Department of Administration's Division of Energy, Housing and Community Resources (DEHCR).

Chapters

- ☐ Cover
- ☐ Table of Contents
- ☐ Chapter 1: Introduction
- ☐ Chapter 2: Administrative Requirements
- ☐ Chapter 3: Procurement and Contracting
- ☐ Chapter 4: Environmental Review
- ☐ Chapter 5: Acquisition/Relocation
- ☐ Chapter 6: Equal Opportunity Fair Housing and Section 3
- ☐ Chapter 7: Labor Standards
- ☐ Chapter 8: Financial Management
- ☐ Chapter 9: Reporting
- ☐ Chapter 10: Project Completion
- ☐ Appendix A: Acronyms
- ☐ Appendix B: Important Websites (Listing by Chapter)

Chapter Attachments/Fillable Forms

- ☐ 2-A: File Checklist
- ☐ 2-B: Self-Monitoring Checklist

Use current version of forms
(for *each reporting period*)
posted on [Implementation Handbook website](#)


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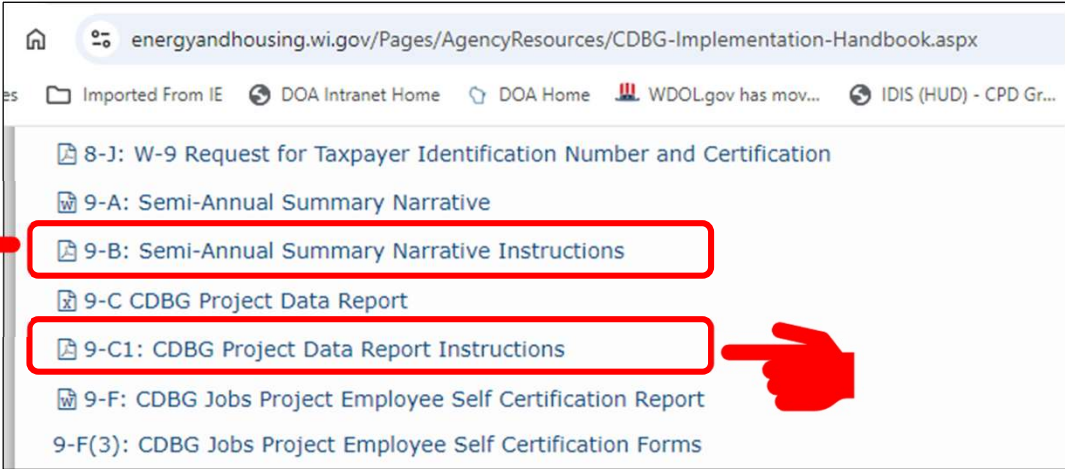
Finding Instructions & Guidance

- Separate documents posted on website
- Step-by-step (review) recordings posted
- “Instructions” (sections) listed at **end** of reporting forms (*documents in Microsoft Word*)
- “Instructions” (**tabs**) within individual forms (*Excel workbooks/worksheets*)
- “Guidance” (hover-over) **notes** within cells

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Instructions & Guidance (continued)



energyandhousing.wi.gov/Pages/AgencyResources/CDBG-Implementation-Handbook.aspx

Imported From IE DOA Intranet Home DOA Home WDOL.gov has mov... IDIS (HUD) - CPD Gr...

- 8-J: W-9 Request for Taxpayer Identification Number and Certification
- 9-A: Semi-Annual Summary Narrative
- 9-B: Semi-Annual Summary Narrative Instructions**
- 9-C CDBG Project Data Report
- 9-C1: CDBG Project Data Report Instructions**
- 9-F: CDBG Jobs Project Employee Self Certification Report
- 9-F(3): CDBG Jobs Project Employee Self Certification Forms

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Instructions & Guidance (continued)

Contract Amount:		\$45,333.00	
CDBG-Funded Activity	IDIS Activity Number	Previous Request Number	Current Request Number
Planning	23784	0	
TOTALS:			
Match-Funded Activity (Non Close)	REMINDER	Minimum Required Match	
Planning	The minimum required Match percentage for	33.33%	#NIV/0

Instructions for CDBG Request for Payment

Instructions

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Instructions & Guidance (continued)

Semi-Annual CDBG Data Report (MBE/WBE, Labor Standards Enforcement, and Section 3) (9-C)

SEMI-ANNUAL CDBG DATA REPORT (MBE/WBE, Labor Standards Enforcement)

Click on the red triangles in the upper right corner of cells throughout the electronic version of this form to view instructional/guidance notes.

Grantee/UGLG Name: (Grantee's Name) Grant AWARDED Before or On/After 11/30/2020? On or After DEH

Reporting Period (Choose ONE): X Year

October 1 - March 31

April 1 - September 30

Part 1. CONSTRUCTION PERIOD

1(a). Construction Start Date: [Red Triangle]

1(b). Construction End Date: [Red Triangle]

Part 2. CONSTRUCTION CONTRACTS AWARDED

2(a) Construction Prime Contractor Name

2(b) Total Awarded Contract Amount (CDBG Project Activities Only)

Example Builders-R-Us Inc. \$ 2,500,000.00

Prime Contractor #1

Reporting Info

Drop-Down Options

HUD Form 2516_Rev

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Instructions & Guidance (continued)

The screenshot shows a software interface with a table. The first column is labeled 'RIOD'. A red circle highlights a date field in the second column. A yellow tip box points to this field with the text: 'Tip: Enter *actual* Construction Start Date (e.g., 05/20/2023) (***Do Not*** enter a '*projected*' start date);'. The table has columns for 'Trade Codes' and 'Ra'.

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Reporting: Common Pitfalls


A 3D pyramid diagram with five levels, from top to bottom: 'Details', 'Timeliness', 'Unreported Issues', 'Supporting Documents', and 'Unauthorized Approvers'. A base layer at the bottom is labeled 'Required Content (per Grant Agreement)'.

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Helpful Websites

- [2 CFR 200 Subpart F \(Audit Requirements\)](#)
- [2 CFR 200.321](#)
- [Single State Audit Guidelines](#)
- [Wisconsin Statutes 16.283 - 16.287 \(Small Business, MBEs, WBEs, DVBs\)](#)



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Fair Housing Actions (FHAs)

- Must be completed by due date in Grant Agreement.
- Delayed completion may result in hold on grant payments until complete.

ATTACHMENT F

PROGRAM RULES

The Grantee shall comply with the Program Rules as follows:

1. DEPARTMENT POLICIES AND PROCEDURES

The Grantee agrees to follow policies and procedures of the Department including, but not limited to, the most recently published Program Implementation Handbook and 24 CFR Part 570, and any subsequent applicable amendments or changes to either.

The Grantee understands the Department has discretion to establish and revise the policies and procedures necessary to administer the CDBG Program.

In the event of a conflict between Department policies and procedures and 24 CFR Part 570, the Department, in its discretion, shall determine which Department policies and procedures or parts of Department policies and procedures apply.

2. FAIR HOUSING

The Grantee shall comply with Title VIII of the Federal Civil Rights Act of 1968 (as amended), and s. 106.50, Wisconsin Statutes, and any subsequent relevant laws or amendments.

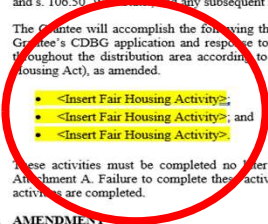
The Grantee will accomplish the following three (3) Fair Housing activities, as specified in the Grantee's CDBG application and response to the pre-agreement letter, to further Fair Housing throughout the distribution area according to Title VIII of the Civil Rights Act of 1968 (Fair Housing Act), as amended.

- <Insert Fair Housing Activity>.
- <Insert Fair Housing Activity>.
- <Insert Fair Housing Activity>.

These activities must be completed no later than the due date as listed in the Timetable in Attachment A. Failure to complete these activities may result in suspension of funds until these activities are completed.

3. AMENDMENTS


The Grantee understands that the Department will not entertain a request for an amendment within



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2nd Citizen Participation Public Hearing


Due Date	Activity
March 31, 2027	<ul style="list-style-type: none">Give proper notice for and conduct second Citizen Participation Public Hearing to report progress to, and receive input from, local community regarding the CDBG Project in accordance with the guidance and requirements specified in the Program Implementation Handbook, the Grantee's <i>Citizen Participation Plan</i>, and this Agreement. <i>The second hearing must be held <u>AFTER</u> construction has started and <u>DURING</u> the construction period.</i>

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2nd CP Public Hearing (continued)

Due Date	Activity
April 15, 2027	<ul style="list-style-type: none">Submit <i>Semi-Annual Summary Narrative Report</i> (including all applicable supporting documentation) for the reporting period of October 1, 2026, through March 31, 2027. Reporting must follow the guidance provided in the Program Implementation Handbook.Report status of second Citizen Participation Public Hearing completion (in the 2nd Citizen Participation Public Hearing section of the <i>Semi-Annual Summary Narrative Report</i>) and submit supporting documentation to DEHCR CDBG Project Representative, including:<ul style="list-style-type: none">1. The hearing notice [with the affidavit of publication from the newspaper publisher and/or clerk certification of notice postings, as applicable in accordance with the Grantee's <i>Citizen Participation Plan</i>],2. 2nd Citizen Participation Public Hearing Certification form,3. Hearing minutes, and4. Attendance list (if all attendees are not listed in the hearing minutes).



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Monitoring

Projects are monitored **at least once**:

- (Generally) 30-Day Advance Notification Letter (some exceptions)
- Submit completed *Self-Monitoring Checklist* (**Attachment 2-B – Updated**) and *Acquisition/Relocation Monitoring Checklist* (**Attachment 5-K**)
- Follow-Up Project File Document Requests/Reviews by DEHCR
- Monitoring Report (Results Letter – lists Findings and/or Concerns, if applicable)



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Monitoring (continued)

- Corrective Actions (if applicable)
- Monitoring Completion Letter
- CDBG payments will be withheld until corrective actions are completed
- Refer to Grant Agreement re: non-compliance/failure to perform and cause(es) for termination of CDBG Agreement or payment denials
- **Notify DEHCR if finishing construction early**



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Finding vs. Concern

Finding:

- Issue of non-compliance with CDBG policy or regulatory requirements

Concern:

- Issue with documentation or procedure that does not necessarily represent non-compliance, but must be addressed to avoid rising to a "finding"


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Construction End Date

Due Date	Activity
October 31, 2027	<ul style="list-style-type: none">• Complete all construction activities.• End of construction period. <i>No construction expenses may be incurred after this date.</i>


No construction expenses incurred
after this date.

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Performance Period End Date / Final Payment Request Submission

Due Date	Activity
December 31, 2027	<ul style="list-style-type: none">• Submit final CDBG payment request and supporting documents.• Submit <i>Project Completion Report</i> (including the <i>Final Summary Narrative</i> for the period of October 1, 2027, through December 31, 2027, which appears within the <i>Project Completion Report</i>, and all supporting documentation). Reporting must follow the guidance provided in the Program Implementation Handbook.• Submit semi-annual <i>CDBG Project Data Report</i> for the reporting period of October 1, 2027, through March 31, 2028 (reporting project activities October 1, 2027, through December 31, 2027).• Submit <i>Final Labor Standards Compliance Report</i> (FLSCR) for each prime construction contractor.

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Project Completion

Documents Submission:

Refer to Grant Agreement Timetable for Due Dates

- Final **CDBG Payment Request**
(Late submissions are ineligible for payment!)
- **Project Completion Report & Certification (Attachment 10-A)**
- Final Semi-Annual **CDBG Project Data Report (Attachment 9-C)**
- Final **Financial Certification of Completion (Attachment 10-B)**
- Other final reporting as specified in Grant Agreement Timetable

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Project Completion (continued)

PROJECT COMPLETION REPORT (10-A)

Wisconsin Community Development Block Grant (CDBG) Program

PART 1 - GRANTEE INFORMATION

A. NAME OF UGLG / GRANTEE:
 B. DEHC GRANT AGREEMENT #:
 C. BUSINESS OR SUBRECIPIENT NAME(S):

D. REPORTING PERIOD: (select one)

☐ October 1, 20__ to March 31, 20__
☐ April 1, 20__ to September 30, 20__

PART 2 - CERTIFICATION OF PROJECT COMPLETION REPORT

A. DOCUMENTS SUBMISSION:

DOCUMENTS	ATTACHED	N/A	SEPARATE SUBMISSION	DATE(S) OF SEPARATE SUBMISSION
Project Completion Report	<input type="checkbox"/>	<input type="checkbox"/>		
Final Summary Narrative Supporting Documents (as listed in the Final Summary Narrative, Part 3.4, within this Report)	<input type="checkbox"/>	<input type="checkbox"/>		
Final Semi-Annual CDBG Project Data Report & Supporting Documents	<input type="checkbox"/>	<input type="checkbox"/>		
Final Labor Standards Compliance Report(s)	<input type="checkbox"/>	<input type="checkbox"/>		
Section 5.7 Labor Standards Enforcement Report(s)	<input type="checkbox"/>	<input type="checkbox"/>		
Accessibility Self-Evaluation Checklist	<input type="checkbox"/>	<input type="checkbox"/>		
Lobbying Cert. Form(s) (for ALL connectors and subrecipients)	<input type="checkbox"/>	<input type="checkbox"/>		
Final CDBG Jobs Project Employee Self-Cert. Report & Forms	<input type="checkbox"/>	<input type="checkbox"/>		
Final CDBG Income Cert. Report & Forms (non-CV)	<input type="checkbox"/>	<input type="checkbox"/>		
Final CDBG-CV client Income Cert. Report & Forms	<input type="checkbox"/>	<input type="checkbox"/>		
Final CDBG-CV Microenterprise Cert. Report & Forms	<input type="checkbox"/>	<input type="checkbox"/>		
Single Audit Statement (most recent year-end)	<input type="checkbox"/>	<input type="checkbox"/>		
Final CDBG Payment Request & Supporting Documents	<input type="checkbox"/>	<input type="checkbox"/>		
Cash Control Register for Final Payment Request	<input type="checkbox"/>	<input type="checkbox"/>		
CDBG Disbursements Journal for Final Payment Request	<input type="checkbox"/>	<input type="checkbox"/>		
Matching Funds Journal for Final Payment Request	<input type="checkbox"/>	<input type="checkbox"/>		

B. PROJECT COMPLETION REPORT CERTIFICATION BY UGLG / GRANTEE:

Prepare Full Name and Title

Prepare Company/Organization

Prepare Email Address:

As the Chief Elected Official (CEO) of the Unit of General Local Government (UGLG) / Grantee, I approve the submission of this Project Completion Report to DEHC and certify that, to the best of my knowledge, the activities undertaken for the project have been carried out and completed in accordance with the Grant Agreement, and the information provided in Parts 1-8 of this Project Completion Report is accurate.

Date Certified Signed

Type/Print Name and Title of Chief Elected Official (CEO)

Signature of UGLG CEO

CDBG Report is accurate

CEO Title:

UCL

C. PROJECT COMPLETION REPORT CERTIFICATION BY DEHC:

Date Certified Signed

Name and Title of Authorized DEHC Representative

Signature of Authorized DEHC Representative

Division of Energy, Housing and Community Resources

← Project Completion Report

Financial
Certification of
Completion →

FINANCIAL CERTIFICATION OF COMPLETION (B)(3) Wisconsin Community Development Block Grant (CDBG) Program <i>Submit this form to DEICHR within 60 days after receiving the final CDBG payment.</i>									
A. NAME OF UGLG / GRANTEE: B. DEICHR GRANT AGREEMENT/ CONTRACT #: C. BUSINESS OR SUBJECT/ FUNDING NAME(S):									
D. DOCUMENTS ATTACHED TO THIS FINANCIAL CERTIFICATION OF COMPLETION									
Documents:		Attached:		N/A:		Separate Submission:		(Date) of Separate Submission:	
Final Cash Control Register (required)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Final CDBG Disbursements Journal (required)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Final Matching Funds Journal (if UGLG contributed Match for project)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Check/Payment Records for Disbursement of Final CDBG Payment (if applicable)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Check/Payment Records for Unpaid/Other Funds Used to Pay Invoices That Remained Unpaid/Outstanding at the Time of Submission of the Final CDBG Payment Request (if applicable)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Final Bank Statement(s) (Check Register Document(s)) Showing the Deposit and Disbursement of the Final CDBG Payment (required)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
Payment Records Showing Return of Grant Funds to DEICHR (if applicable)		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
F. FINAL FINANCIAL STATEMENT OF COSTS & CDBG DISBURSEMENT									
CDBG Financial Activity (1)	CDBG Funds Budgeted (2)	CDBG Funds Drawn (3)	CDBG Funds Disbursed (4)	CDBG Funds To Be Cancelled (5)					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
TOTALS:	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00					
Not CDBG Cost (See DEICHR Records)		\$	\$	\$	\$				
F. FINANCIAL CERTIFICATION OF COMPLETION BY UGLG / GRANTEE									
As the Chief Executive Officer (CEO) of this City of Geneva Local Government (UGLG) / Grantee, I approve the submission of this Financial Certification of Completion to DEICHR and certify that, to the best of my knowledge, the activities undertaken using CDBG funds as listed in section E. above have been carried out in accordance with the Grant Agreement, and the amounts entered in section F. above are correct.									
Date Certified / Signed _____			Typed/Printed Name and Title of Chief Executive Officer (CEO) _____ Title: _____ CEO Title: _____			Signature of UGLG Chief Executive Officer (CEO) _____			
G. FINANCIAL CERTIFICATION OF COMPLETION BY DEICHR									
Date Certified / Signed _____			Name and Title of Authorized DEICHR Representative _____			Signature of Authorized DEICHR Representative _____			
Division of Energy, Housing and Community Resources									

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Project Completion (continued)


Final Steps:

- Final financial documentation and project file review by DEHCR
- Project completion letter & certifications issued by DEHCR
- Final single audit related reporting by UGLG (if applicable)
- Records retention of all project file documents by UGLG (indefinitely)



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Preparing for Success

Follow Best Practices:


- Utilize Templates
- Calendar Reminders
- Check-In Frequently
- Review Processes
- Prep for the Unexpected



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Preparing for Success

- Get Organized / Use DEHCR’s Templates (may start now)
 - Chapter 2 Attachments
 - Project File Checklist (*recommended*) (**Attachment 2-A**)
 - Self-Monitoring Checklist (*required* at time of monitoring) (**Attachment 2-B**)
- Utilize Calendar Reminders
- Communicate (expectations, roles/responsibilities, schedules/availability, processes, questions)



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Best Practices (continued)

Be Prepared for the Unexpected:

- Hold Pre-Construction Meeting(s)
- Have **Financial/Payment Alternatives** Ready To Go (if needed)
- Stress Importance of Reporting Issues/Delays ASAP
- Must Obtain Approval from DEHCR **Before** Making Any Changes (changes *may* require contract amendment and *may* impact grant eligibility)



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Amendment Provisions

- Circumstance(s) must have occurred outside the control of the UGLG.
- Re-bidding is **not** an eligible reason if the issue was caused by the UGLG delaying initial bidding.
- Issue(s) resulting in need for Amendment should be documented in the Semi-Annual Narrative Report(s), if applicable.
- Amendment Proposal must be submitted **at least 30 days prior** to the end of the Grant Agreement Performance Period (as listed in your contract).

**Do not rely on Amendments to remain in compliance
with the Grant Agreement**



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Reasons for Amendments

New Information Is Learned:

- Engineering/Design Issues
- Project Scope of Work Change(s)


Unexpected Acquisition(s)/Relocation(s) Needed

Project Finances/Budget:


- Unforeseen Costs Arise (from design issues, SOW changes, other funding source requirement changes, etc.)

Project Timeline:

- Unforeseen Construction Delays (weather, supply chain issues if unavoidable, etc.)


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Additional Resources

- DEHCR Staff
- Implementation Handbook
- CDBG Forms / Templates
- Recorded Trainings



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Resources

DEHCR - Bureau of Community Development

Email: DOACDBG@Wisconsin.gov

Bureau Website:

<https://energyandhousing.wi.gov/Pages/CommunityResources.aspx>

CDBG Implementation Handbook:

<https://energyandhousing.wi.gov/Pages/AgencyResources/CDBG-Implementation-Handbook.aspx>



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Presentation Wrap-Up

Submitting Questions for the Q&A Discussion

- Utilize Chat
- Raise Your Hand, or
- Unmute Your Microphone

Staff Will Be Available for Follow-up Questions



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