



Training Will Begin at 1:30pm

Utilize the **CHAT** feature during the presentation.



RAISE your hand during the Q&A session.



REACT to provide live feedback.



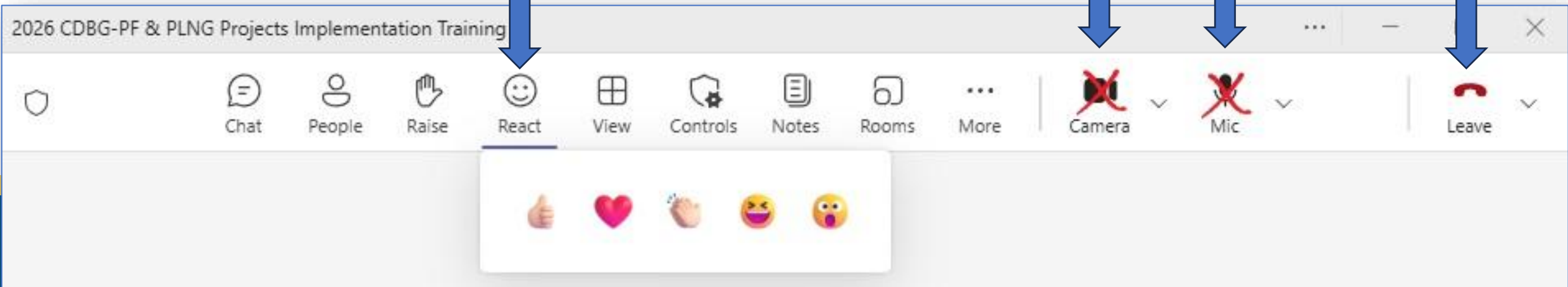
TURN OFF your camera.



MUTE your microphone.



LOG OUT



Recording & AI Transcription Services

The action of recording or use of AI transcription or other services during this webinar is prohibited.

The slide deck and a recording of this presentation will be made available after today's webinar. These items will be posted on our website for your future reference.





2026 CDBG Implementation Training

September 24, 2026 (Webinar)

Presenters: Sally Smarzinski & Joanna Storm

Division of Energy, Housing and Community Resources
Bureau of Community Development



Welcome to Training!

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



Purpose of Today's Training

1. Overview of requirements for administering Community Development Block Grant (CDBG) projects for:
 - Public Facilities (PF),
 - Planning (PLNG),
 - Economic Development (ED),
 - Disaster Recovery (DR), and
 - Public Facilities for Economic Development (PFED).
2. Introduce Bureau of Community Development (BCD) staff



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 (5 to 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) |

Training Logistics

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

Staff Introductions/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
- Sally Smarzinski, Grants Specialist – Advanced ← **Presenter / Trainer**
- Juli Speck, Grants Specialist – Advanced
- Joanna Storm, Grants Specialist – Advanced ← **Presenter / Trainer**

Important Reminders

- Timely Expenditure of Funds
- Project Timelines – *For 2026 CDBG-PF:*
 - July 1, 2027, required **construction start date**
 - October 31, 2028, required **construction end date**
 - December 31, 2028, required **performance end date**
- Timely communications (delays, Amendment requests)
 - Continued delays and/or lack of communication may result in CDBG award being rescinded





Getting Started

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



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).



CDBG Program Requirements

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

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

DOA.WI.GOV



Pre-Agreement Documentation

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

HUD National Objectives/Beneficiaries

Most Common

Low- and Moderate-Income (LMI)

Area Benefit

Limited Clientele

Housing

Jobs

Less Common

Slum and Blight

Area Basis

Spot Basis

Rare

Urgent Local Need

Prohibited Project Activities

Activities not allowed:

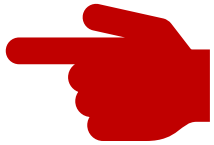
- Buildings for the general conduct of government, except to remove architectural barriers that will result in creating or improving accessibility for the disabled population
- General government expenses
- Political activities
- Operating and maintenance expenses for public facilities
- Lobbying activities

Additional Helpful Websites

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

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>

Reminder: Change in Use Restrictions

Project Site Use & Income Restrictions apply **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.



Bidding Requirements

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

Procurement Requirements

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

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**)

Procurement for CDBG Projects

Requirements apply to ***ALL*** aspects of your CDBG-funded Project:

ALL Contracting

- Planning Services
- Training & Instructional Activities
- Grant Administration
- Environmental Reviews
- Financial Auditing
- Appraisals
- Acquisition/Relocation Agreements
- Construction Activities (including Large Item Equipment Installation)

ALL Purchasing

- Programming Supplies & Food
- Office/Facility Supplies & Equipment (including Equipment Installation)
- Construction Supplies
- Equipment Rentals/Leases
- Site Rentals/Leases

WI State Statutes: Public Works Procurement

Statute	Requirement Topic
§66.0901	GENERAL Info for Municipalities: Public works, contracts, bids
§59.52(29) - (31)	Specific to COUNTIES : Public contracts and competitive bidding
§60.47	Specific to TOWNS : Public contracts and competitive bidding
§61.50 - §61.57	Specific to VILLAGES : Ordinances, contracts, public works, acquisition of recycling or resource recovery facilities without bids
§62.15	Specific to CITIES : Public works



Procurement Decisions: Ask Yourself...

1. **WHO** will be performing the work?
2. What **TYPE** of work is needed?
3. What **FUNDS** will be used to pay for it?
4. What is the **AMOUNT** of the contract?

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):
• No procurement (“force account” work) • Intergovernmental agreements must be in writing	• Requires procurement • Agreements/contracts must be in writing

Type of work being done?

Construction-Related Contracts	Professional Services / Non-Construction Contracts
• Comply with Local, State, and Federal requirements (<i>regardless of funding source</i>) • Requires competitive process unless exception approved by DEHCR	• Competitive procurement required if <i>CDBG-funded</i> (except Inter-Governmental, RPCs, certain EDOs) • Comply with local policy(ies) if only <i>match-funded</i>; must include certain contract language

What funds will pay for the work?

All Contracts Funded (“In Whole” or “In Part”) Using <i>CDBG</i> Dollars:	Local/<i>Match-Only</i> Funds Used (<i>Non-Construction</i>):
• Must comply with the most restrictive requirements of the applicable Local, State, and Federal requirements.	• Know & comply with local policy(ies) • Consider updating to incorporate “Best Practices” in Ch. 3 and 2 CFR 200. • Still must comply with some <i>State/Federal requirements</i> for certain activities, e.g., contract content, construction.

What is the amount of the contract?

If \$15,000 or less, qualifies as a **MICRO-PURCHASE**.

- Micro-purchases do not require competitive procurement **UNLESS** local policy requires it.

Anything above \$15,000 requires some form of **COMPETITIVE PROCUREMENT**.

- The type of competitive procurement required is dependent on **AMOUNT** and **TYPE** of contract (as shown in **Attachment 3-F**).

The \$15K **THRESHOLD** amount is based on **TOTAL COST** of type of work/purchase (**cannot break-up** purchasing or contracting for the same type of item or work into smaller purchases/contracts **to circumvent** the competitive procurement requirements).

- Generally, construction as a whole must be \$15,000 or less to qualify as a micro-purchase (with some exceptions, reviewed on a case-by-case basis).



Contract Language & Attachments

Wisconsin CDBG DOA-Division of Energy, Housing and Community Resources

Wisconsin Department of Administration (DOA)
Division of Energy, Housing and Community Resources (DEHCR)
Community Development Block Grant (CDBG) Program

CONTRACT ATTACHMENT INSERTIONS SUMMARY For Community Development Block Grant Projects

(Revised 06/30/2026)

OVERVIEW

This document is intended to provide a summary of the Wisconsin Department of Administration (DOA) Division of Energy, Housing and Community Resources (DEHCR) [Community Development Block Grant \(CDBG\) program](#) related contract insertions and language, in accordance with the [CDBG Implementation Handbook](#) and federal and state regulation requirements

Important Note Regarding Bid Packets and Contracts

For construction-related contracting, the documents for the contract specified in the table that follows must also be included in the bidding packet for prime contracts.

Asterisk Notations in the Tables that Follows

*One asterisk denotes the Attachment or similar form is recommended to be included in the contract, but it is not required. All other items listed in the category must be included in the contract (not by reference only) unless otherwise noted.

**Two asterisks denote the document is required to be in the contract only if federal labor standards (i.e., Davis-Bacon and Related Acts [DBRA]) are applicable to the project.

***Three asterisks denote Section 3 requirements for which the insertion is not required/not applicable if the project has no construction (e.g., Planning-Only and Public Services-Only projects); or has a total costs of \$300,000 or less (including grant and match funds).

CONSTRUCTION CONTRACTS

Construction Contracts of \$10,000 or LESS

Must be included in contracts & bidding packets:

- **Attachment 3-C**
[24 CFR 570.489(h) Conflict of Interest Clause]
- **Attachment 6-B*****
[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)****

Refer to Attachment 3-I

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

DOA.WI.GOV

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, 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>
- ***Reminder:*** SAM registration (pre-agreement and throughout grant period)
- ***Update:*** BABA requirements and forms (**Attachments 3-J, 3-K, 3-L, 3-M, 3-N**)

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

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.

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.

BABA: Applicability & Specific Waivers

Project Applicability:

- 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**)

BABA: General Waivers

General Waivers:

1. De Minimus
2. CDBG awards from the State prior to 2023
3. Non-Infrastructure projects (for PLNG grantees),
4. Housing infrastructure projects for *fewer than 5* units
5. Projects with <\$250,000 total project budget (for PLNG)
6. Emergency assistance projects (for DR, MIT)
7. Projects with no use of BABA "covered materials"

BABA: Grantee Requirements

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](#).



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

Procurement: Pitfalls (continued)

- 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 checks:
 - At time of contracting,
 - For both the company **AND** owner names, and/or
 - For project files (i.e., having no SAM records on file)

Procurement: Monitoring (File Contents)

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

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 \](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)





Maintaining CDBG Program Compliance

- Grant Agreement
- Scope of Work
- Timeline



Program Compliance (continued)

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, watermains, 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	• 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)

Grant Agreement Timetable

Example Due Dates:

Due **PRIOR TO**
Starting Any
Acquisition/Relocation
and
Due **PRIOR TO**
Starting Any Construction

2. Timetable:

Due Date	Activity
Prior to Acquisition/Relocation (if applicable to project)	- 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	- 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.

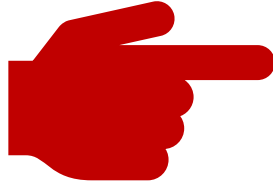
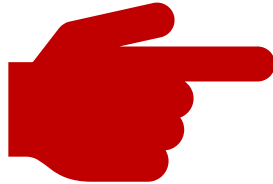
Continued on the Next Page -----

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) 	• 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 Environmental Report (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 	• Execute Grant Agreement. • Complete Environmental Report (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.

----- Continued on the Next Page -----

Environmental Review: Questions?

Email: DOAEnvironmentalDesk@wisconsin.gov



DOA.WI.GOV

Maintaining Compliance (continued)

Project Scope of Work (SOW)

Acquisition & Relocation

2. Timetable:	
Due Date	Activity
Prior to Acquisition/ Relocation (if applicable to project)	• 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.

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)
- 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

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)

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

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**)

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

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

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**

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

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](#)

Acquisition/Relocation (A/R): 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

A/R: 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).

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.***

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)*

A/R: 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

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): [CPD](#)

Notice number 1378-0 <https://www.hud.gov/hudclips/handbooks/cpd#1378-0>

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/>



DOA.WI.GOV

Maintaining Compliance: Timetable

- 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

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-B, 7B thru 7-T**
- U.S. Department of Labor (USDOL) Final Rule
(effective 10/23/2023)

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),
 - Economic Development (ED) projects

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

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.

Failure to Comply

Noncompliance may result in:

- Loss of awarded grant
- Grantee's ineligibility for future grant awards
- Contractors being subject to:
 - Fines,
 - Imprisonment, and/or
 - Debarment from future federally funded projects

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*



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.

Labor Standards Officer (LSO)

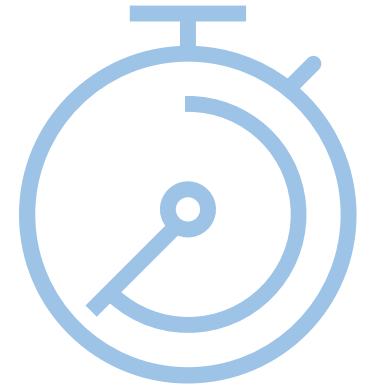
Responsibilities:

- 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

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.

Wage Determinations (continued)

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

Grantee 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

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)

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

Bid Packet & Contract Requirements (continued)

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

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 – by company ***and*** owner/officer names)
- Contact DEHCR ***immediately*** if any debarment discovered

Pre-Construction & Payroll Monitoring

- Pre-Construction Conference ← ***strongly recommended***
- Payroll Compliance Monitoring
 - ✓ *Certified Payroll Records*
 - ✓ *Wage Rate Compliance – Regular & Overtime*
 - ✓ *Fringe Benefits*
 - ✓ *Payroll Deductions*
 - ✓ *Job Classifications*
 - ✓ *Apprentices & Trainees' Indenture Papers*

Work Site Monitoring & Compliance Enforcement

- Work Site Monitoring
- Work Site Signage
 - Refer to Ch. 7 and **Attachment 7-T** template (Updated – Logos Required)
- Compliance Enforcement
- Documentation Submissions to DEHCR
- Maintaining Paperwork / File Contents / Monitoring Prep



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

Labor Standards: Common Pitfalls (continued)

- 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

Labor Standards: 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>

Financial Management: 1st Payment Request Pre-Requisites

First CDBG Payment Request Pre-Requisites

- Internal financial management system established
- Pre-agreement documents accepted by DEHCR (refer to Award Letter)
- Executed Grant Agreement
- Certified Environmental Review
- At least \$25,000 in eligible CDBG costs incurred and invoiced
- CDBG Payment Request Form – must request from DEHCR for your project
- In grant “compliance” status



Financial Management: Payment Request Documentation

CDBG Payment Request Documentation Required:

- CDBG Payment Request Form approved by *authorized* representatives
- Financial Journals: *Cash Control, CDBG Disbursements, Matching Funds* (Attachments **8-G** thru **8-I**)
- Invoices, payment records, and other supporting documentation
- Contractors' BABA forms & updates (see Chapter 3; Attachments **3-L** thru **3-N**)
- "Final" Payment Request
 - Additional Requirements (see Chapter 10)
 - ***Ineligible*** if submitted late

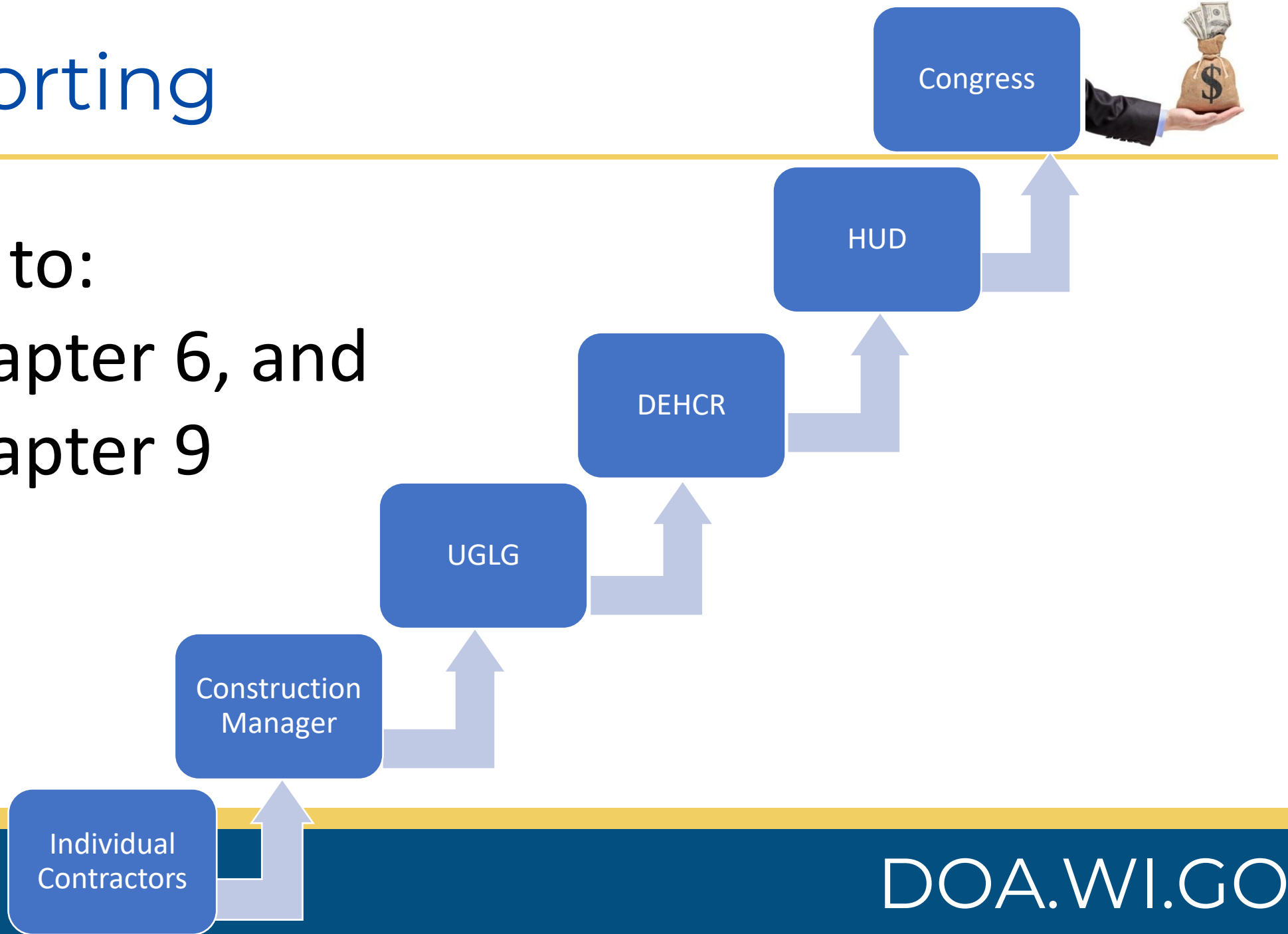
Refer to **Chapter 8** for details.



Reporting

Refer to:

- Chapter 6, and
- Chapter 9



Important Reporting Due 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 **(OR EARLIER)	Annual Single Audit Report <i>(if Single Audit required for CY) **</i> Refer to Chapter 9
OCTOBER 15 TH	Semi-Annual Summary Narrative Report
DECEMBER 31 ST *(OR AS LISTED IN TIMETABLE)	Project Completion Report & Certification* and CDBG Final Payment Request* (for 2026 CDBG-PF projects)
WITHIN 60-DAYS OF RECEIVING FINAL CDBG PAYMENT	Financial Certification of Completion



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 – no current grantees)
- CDBG Jobs Project Employee Self Certification Report (if applicable)

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

Reports, Actions, & Compliance (Part 2)

- 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

Reports, Actions, & Compliance (Part 3)

- 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/unapproved nor incomplete documents

Reporting: Use Updated Online Forms

CDBG Implementation Handbook

The Implementation Handbook is designed to provide project implementation guidance to Grantees awarded funds through Community Development Block Grant (CDBG) programs (e.g., CDBG-CV, CDBG-ED, CDBG-PF, CDBG-PFED, and CDBG-PLNG) administered by the Department of Administration (DOA) - Division of Energy, Housing and Community Resources (DEHCR) - Bureau of Community Development (BCD). Some documents are also applicable to other federally funded grant programs administered by DEHCR.

Chapters

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

Chapter Attachments/Fillable Forms

Chapter 2 Attachments

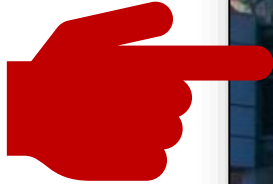
-  [2-A: File Checklist \(Word\)](#)
-  [2-B: Self-Monitoring Checklist \(Word\)](#)

Use the **CURRENT** version of forms
(for **EACH** reporting period) posted on
the [Implementation Handbook website](#)

Instructions & Guidance Available

- 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

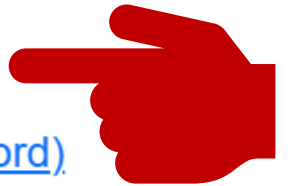
Instructions & Guidance (Part 2)



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

Chapter 9 Attachments

-  [9-A: Semi-Annual Summary Narrative \(Word\)](#)
-  [9-B: Semi-Annual Summary Narrative Instructions \(PDF\)](#)
-  [9-C: CDBG Project Data Report \(Excel\)](#)
-  [9-C\(1\): CDBG Project Data Report Instructions \(PDF\)](#)
-  [9-F: CDBG Jobs Project Employee Self Certification Report \(Word\)](#)
- [9-F\(1\): CDBG Jobs Project Employee Self Certification Forms](#)
-  [9-G: Single Audit Statement - Audit Required \(Word\)](#)
-  [9-H: Single Audit Statement - Audit NOT Required \(Word\)](#)
-  [9-G&H\(1\): Single Audit Statement Examples \(PDF\)](#)



Instructions & Guidance (Part 3)

14	Contract Amount:			\$45,333.00	
15					
16	CDBG-Funded Activity		IDIS Activity Number	Previous Request Number	Current Request Number
17					
18	Planning		23784	0	
19					
20					
21					
22					
23					
24					
25	TOTALS:				
26	Match-Funded Activity (Non Close)		REMINDER	Minimum Required Match	
27					
28	Planning		The minimum required Match percentage for	33.33%	#DIV/0!
29					

A1

1

2

3

4

5

6

7

8

9

This payment n
available grant
shaded cells):

- Person Comp

- Phone Num

- Construction

- Request Date

<

>

Ready

<

>

CDBG Expenditure Report

Instructions

+

Ready

Accessibility: Investigate

A1

Instructions for CDBG Request for Payment

1

Instructions for CDBG Request for Payment

2

3

This payment request includes macros to automatically calculate and track your individual and project available grant balance. To assure the macros work properly, the following cells are unlocked for manual entry (shaded cells):

4

5

6

- Person Completing this Form

7

- Phone Number

8

- Construction Start Date

9

- Request Date

< >

CDBG Expenditure Report

Instructions

+

Ready

Accessibility: Investigate



Instructions & Guidance (Part 4)

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, and Section 3) (9-C)

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**):

☒	Year
☐	October 1 - March 31
☐	April 1 - September 30

If the "Approver" is not the one submitting

PART 1. CONSTRUCTION PERIOD

1(a). Construction Start Date:

1(b). Construction End Date:

Trade Codes:

Racial / Ethnic Codes:

- 1 = White Americans
- 2 = Black Americans
- 3 = Native Americans
- 4 = Hispanic Americans
- 5 = Asian / Pacific Americans
- 6 = Hasidic Jews

PART 2. CONSTRUCTION CONTRACTS AWARDED

Tip: Enter *actual* Construction Start Date (e.g., 05/20/2023) (**Do Not** enter a 'projected' start date);

OR
Enter "Not Started" if construction has not started yet for the CDBG Project.

OR
Enter "N/A" if no constructions is included in the CDBG Project Scope of Work.

Engineering Appraisal

2(e)

2(f)

	2(a)	2(b)
	Construction Prime Contractor Name	Total Awarded Contract Amount (CDBG Project Activities Only)
Example	Builders-R-Us Inc.	\$ 2,500,000.00
Prime Contractor #1		\$ -

City	State	ZIP
Centerville	WI	58724
		/

Reporting Info

Drop-Down Options

HUD Form 2516_Rev

+

:

←

DOA.WI.GOV

Instructions & Guidance (Part 5)

RIOD		Trade Codes:		Ra

Tip:
Enter *actual* Construction Start Date
(e.g., 05/20/2023) (***Do Not*** enter a
'*projected*' start date);

Reporting: Common Pitfalls



Reporting: Helpful Websites

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



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, Wis. Stats., 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 >; and
- < 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.

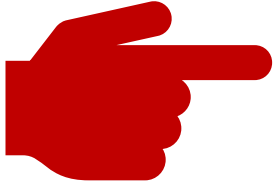
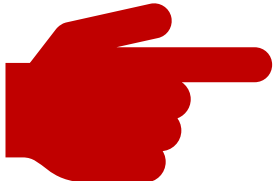
3. AMENDMENT

The Grantee understands that the Department will not entertain a request for an amendment within thirty (30) days of the end of this Agreement.

2nd Citizen Participation Public Hearing

Due Date	Activity
March 31, 2028	• 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 after construction has started and during the construction period.</i>

2nd CP Public Hearing (continued)

Due Date	Activity
April 15, 2028  	• Submit <i>Semi-Annual Summary Narrative Report</i> (including all applicable supporting documentation) for the reporting period of October 1, 2027, through March 31, 2028. 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: 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, and 4. Attendance list (if all attendees are not listed in the hearing minutes).

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, which lists any Findings and/or Concerns, if applicable)

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***

Construction End Date

Due Date	Activity
October 31, 2028	• 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.

Performance Period End Date & Final Payment Request Submission

Due Date	Activity
December 31, 2028	• 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, 2028, through December 31, 2028, 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, 2028, through March 31, 2029 (reporting project activities October 1, 2028, through December 31, 2028). • Submit <i>Final Labor Standards Compliance Report</i> (FLSCR) for each prime construction contractor.

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

Project Completion (Part 2)

PROJECT COMPLETION REPORT & CERTIFICATION (10-A)				
Wisconsin Community Development Block Grant (CDBG) Program				
PART 1: GRANTEE INFORMATION				
A. NAME OF GRANTEE / UGLG:				
B. DEHCR 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:
(1) Project Completion Report	☐			
(2) Final Summary Narrative Supporting Documents (as listed in the Final Summary Narrative (Part 3-A) within this Report)	☐	☐	☐	
(3) Semi-Annual CDBG Project Data Report & Supporting Documents (for final reporting period)	☐		☐	
(4) Final Labor Standards Compliance Report(s)	☐	☐	☐	
(5) Section 5.7 Labor Standards Enforcement Report(s)	☐	☐	☐	
(6) Accessibility Self-Evaluation Checklist or DSPS Approval Letter	☐	☐	☐	
(7) Lobbying Cert. Form(s) (For ALL Contractors and Subrecipient(s))	☐	☐	☐	
(8) Final CDBG Jobs Project Employee Self-Cert. Report & Forms	☐	☐	☐	
(9) Final Client Income Cert. Report & Forms (non-CV)	☐	☐	☐	
(10) Final CDBG-CV Client Income Cert. Report & Forms	☐	☐	☐	
(11) Final CDBG-CV Microenterprise Cert. Report & Forms	☐	☐	☐	
(12) Final Plan (CDBG PLNG projects only)	☐	☐	☐	
(13) Record of Approval or Adoption of Final Plan by Governing Body (CDBG PLNG projects only)	☐	☐	☐	
(14) Single Audit Statement (most recent year-end)	☐		☐	
(15) Final Grant Payment Request & Supporting Documents	☐		☐	
(16) Cash Control Register for Final Payment Request	☐		☐	
(17) Disbursements Journal for Final Payment Request	☐		☐	
(18) Matching Funds Journal for Final Payment Request	☐	☐	☐	
B. PROJECT COMPLETION REPORT CERTIFICATION BY UGLG / GRANTEE:				
(1) Preparer Full Name and Title		(2) Preparer Company/Organization		(3) Preparer 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 DEHCR 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:				
(4) Date Certified/Signed	(5) Typed/Printed Name & Title of Chief Elected Official (CEO)		(6) Signature of Grantee / UGLG CEO	
	CEO Name: CEO Title:			
C. PROJECT COMPLETION REPORT CERTIFICATION BY DEHCR:				
Date Certified/Signed	Name and Title of Authorized DEHCR Representative		Signature of Authorized DEHCR Representative	
	Division of Energy, Housing and Community Resources			

← Project Completion Report

Financial Certification of Completion →

FINANCIAL CERTIFICATION OF COMPLETION (10-B)				
Wisconsin Department of Administration (DOA) DEHCR Grant Programs				
Submit this form to DEHCR within 60 days after receiving the final grant payment from DEHCR.				
A. NAME OF GRANTEE / UGLG:				
B. DEHCR GRANT AGREEMENT/CONTRACT #:				
C. BUSINESS OR SUBRECIPIENT NAME(S):				
D. DOCUMENTS ATTACHED TO THIS FINANCIAL CERTIFICATION OF COMPLETION				
Documents:	Attached:	N/A:	Separate Submission:	Date(s) of Separate Submission:
(1) Final Cash Control Register (required)	☐		☐	
(2) Final Grant Disbursements Journal (required)	☐		☐	
(3) Final Matching Funds Journal (if Match was contributed to project)	☐	☐	☐	
(4) Check/Payment Records for Disbursement of Final Grant Payment (if applicable)	☐	☐	☐	
(5) Check/Payment Records for Any Match/Other Funds Used to Pay Invoices That Remained Unpaid/Outstanding at the Time of Submission of the Final Grant Payment Request (if applicable)	☐	☐	☐	
(6) Final Bank Statement(s)/Check Register Document(s) Showing the Deposit and Disbursement of the Final Grant Payment (required)	☐	☐	☐	
(7) Payment Records Showing Return of Grant Funds to DEHCR (if applicable)	☐	☐	☐	
E. FINAL FINANCIAL STATEMENT OF COSTS & GRANT DISBURSEMENT				
(1) DEHCR Grant-Funded Activity	(2) Grant Funds Budgeted	(3) Grant Funds Drawn	(4) Grant Funds Disbursed	(5) Grant Funds To Be Canceled
	\$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
(6) TOTALS:	\$0.00	\$0.00	\$0.00	\$0.00
FOR DEHCR USE ONLY: Enter Totals Based on DEHCR Records.				
	\$	\$	\$	\$
F. FINANCIAL CERTIFICATION OF COMPLETION BY GRANTEE / UGLG				
As the Chief Elected Official (CEO) of the Grantee / Unit of General Local Government (UGLG), I approve the submission of this Financial Certification of Completion to DEHCR and certify that, to the best of my knowledge, the activities undertaken using the grant funds from DEHCR as listed in section E. above have been carried out in accordance with the Grant Agreement; and the amounts entered in section E. above are correct.				
(1) Date Certified / Signed	(2) Typed/Printed Name & Title of Chief Elected Official (CEO)		(3) Signature of Chief Elected Official (CEO)	
	CEO Name: CEO Title:			
G. FINANCIAL CERTIFICATION OF COMPLETION BY DEHCR				
(1) Date Certified / Signed	(2) Name and Title of Authorized DEHCR Representative		(3) Signature of Authorized DEHCR Rep.	
	Division of Energy, Housing and Community Resources			

Project Completion (Part 3)

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)

Reasons for Amendments

New Information Is Learned:

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

Unexpected Acquisitions and/or Relocations 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.)

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



Preparing for Success

Follow Best Practices:

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



Best Practices

- 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)

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 (*may* require contract amendment and *may* impact grant eligibility)



Additional Resources

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



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>



DOA.WI.GOV

Presentation Wrap-Up: Q&A Discussion

Submitting Questions for the Q&A Discussion:

- Utilize Chat, or
- Raise Your Hand

Staff Will Be Available for Follow-up Questions.

