

## **CDBG Certified Grant Administrator Policy. As of December 15, 2022**

### **Overview**

Administration of a Community Development Block Grant (CDBG) project requires an in-depth knowledge of state and federal requirements and regulations. Well-trained grant administrators are critical to the proper functioning of the state of Iowa's CDBG programs.

To ensure compliance at the state and local levels with all CDBG related requirements, the Iowa Economic Development Authority (IEDA) has developed a certified CDBG grant administrator program.

Individuals wishing to administer an IEDA CDBG grant award must meet all requirements to become a certified CDBG grant administrator, as described in this policy and determined by IEDA.

Communities receiving CDBG funding must have a certified grant administrator (CGA) on staff or hire/procure a certified CDBG grant administrator to manage the CDBG award. IEDA will maintain a list of certified grant administrators in the state of Iowa.

For purposes of this policy, a grant administrator is defined as any staff member that works on any portion of CDBG project compliance. Staff involved in any aspect of the administration or compliance of a CDBG project in Iowa must be a CGA.

### **Administrator responsibilities**

A CGA is responsible for assisting a recipient (local government) with grant administration of a CDBG funded project.

A CGA's responsibilities include:

- **Release of funds**- Assisting recipients with all documents/ policies necessary prior to release of funds
- **Environmental review**- Correctly completing/ submitting environmental/ Section 106 related documents
- **Labor standards compliance**- Completing, reviewing and submitting all necessary documents
- **Procurement**- Ensuring IEDA procurement policy is followed and federal contract language is included in all CDBG related contracts.
- **Section 3 compliance**- Collecting, reviewing, and submitting information regarding Section 3 compliance
- **Civil Rights/ Fair Housing**- Ensuring recipients conduct required Fair Housing activities and comply with federal requirements
- **Reporting**- preparing and submitting all project reports to IEDA.

- **Reimbursements-** Ensuring recipients submit requests for reimbursement every 6 months for both a CDBG activity and grant administration, as required in the CDBG contract
- **Project monitoring-** participating in and working with IEDA staff through project monitoring. Providing information required for IEDA staff to monitor the CDBG project. Providing follow up information identified during a project monitoring.
- **Income Verification/Survey-**Ensuring proper documentation and procedures are followed as applicable to document compliance with an LMI National Objective.
- **Providing additional project information-** Responding to information requests from IEDA staff in a timely manner when additional information is needed
- **Close out-** Ensuring projects are closed by the project end date and all reimbursement requests are submitted and processed prior to this date. CGAs should assist recipients with submitting any contract extensions or contract amendments.
- **Other general compliance-** Assisting communities with complying with any program specific requirements specific to Upper Story Housing, Downtown Revitalization, Community Facilities, Water/Sewer, Housing Sustainability and any other CDBG programs.

### **Training**

All individuals, not employed by the State, who administer CDBG fund awards in Iowa, must receive a Certified Grant Administrator (CGA) certification. Certification is accomplished by attending training and successfully completing a written examination offered by IEDA.

Individuals who do not successfully complete the training and the exam will not be certified. Certification is good for three (3) years from the date the administrator is certified by IEDA. IEDA will notify an administrator they are certified upon completion of required training and passing required tests/ assessments.

Training and exams will cover, but is not limited to, the following topics:

Environmental & Section 106 reviews  
 Federal labor standards  
 Procurement requirements  
 Acquisition and relocation  
 Civil Rights/ Fair Housing requirements  
 Section 3 requirements  
 Financial management  
 Project monitoring preparation  
 Administrative Procedures- contract amendments, submitting draws, reporting, etc.

Training will be conducted primarily by IEDA staff; IEDA may also utilize consultants to conduct some portions of certification training. Consultants will have experience with the CDBG program and conducting CDBG related training.

Training may be offered in person and/or virtually. Training will be offered at least once per year.

IEDA may require CGAs to attend additional training throughout the year to focus on specific topics, new rules, policies or guidelines. IEDA will inform CGAs when a workshop or training is required to maintain certification; If a CGA is unable to attend a mandatory training session, the CGA must inform IEDA prior to the training. In this instance, IEDA will provide the CGA with materials to be covered and may require an exam or quiz on the material covered at the mandatory training.

### **Certification exams**

Certification exams will be given at the end of each certification class. Exams will be open book. To pass the certification exam, attendees must score at least 85% on all sections of the exam. If an attendee does not pass the exam, one retest is allowed. If the attendee does not pass the retest, the attendee will not be certified as a CGA and will need to retake the certification training before testing again.

IEDA will maintain and post on its website a list of certified grant administrators.

CGA certification is specific to the individual, not the agency for who the CGA is employed by.

### **Recertification**

CGAs must recertify every three (3) years, prior to their certification expiration date.

If a CGA does not recertify prior to the expiration of their certification, they will not be allowed to administer CDBG projects until they complete required training/ testing and receive recertification notification from IEDA.

Recertification training may be offered in person and/or virtually.

To be recertified, a CGA must be in good standing at the time the CGA attends recertification training. Please refer to the section below for the definition on good standing.

### **Conditional certification**

If a new employee is hired by an agency in between IEDA training opportunities, the employee may be granted interim certification by IEDA.

The new employee must contact IEDA to schedule a time to take the certification exam. It is the responsibility of the individual to prepare for the certification exam. Those passing the exam with at least an 85% on all sections will receive conditional certification. Conditional certification will only be recognized until the next available certification training. Individuals receiving conditional certification training must attend the next available training and successfully complete the exam.

A CGA with conditional certification may not have any Good Standing violations prior to attending certification training. If a CGA with conditional certification does have a violation, IEDA will decertify the CGA. In this case, IEDA will require another CGA in good standing within the agency to take over all projects managed by the decertified CGA.

**Good standing**

To maintain certification, CGAs must maintain good standing. Good standing means:

1. The administrator has completed and submitted the environmental review documents to IEDA within 6 months of the contract start date AND environmental review documents are complete upon submittal and are completed correctly.
2. Forms submitted to IEDA for review and approval including claims, status reports, compliance forms, etc. are filled out fully and accurately with minimal errors. Forms should not need to be sent back for corrections multiple times for the same errors and omissions.
3. The administrator has resolved all missing items or deficiencies identified in monitoring visits within 30 days of IEDA's final monitoring report.
4. The administrator is timely in responding to IEDA staff with information requests, project updates, and other materials requested by IEDA for the CDBG program.
5. The administrator has submitted draw requests at least every six months for each activity for each CDBG project.
6. The administrator has provided all project close-out materials to IEDA within 60 days of a contract end date OR has requested a contract extension prior to the contract end date.
7. The administrator completes monitoring visits with no findings/ issues OR any such issue is minor and can be easily remediated.
8. The administrator has not committed any action that would lead IEDA to initiate decertification.
9. The administrator attends mandatory CDBG trainings.

**Probation**

The Federal Programs Team Lead or designated IEDA staff, with approval from the Chief Programs Officer, may place a CGA on administrative probationary status for a period of up to one year if the CGA has accumulated three (3) Good Standing violations within a two (2) year period.

The Federal Programs Team Lead or designated IEDA staff will document reasons for the probationary status. The CGA may continue to administer current CDBG contracts to which they are a party but may not administer new CDBG contracts during the probationary period.

After one-year of probationary period the CGA holder may be fully reinstated if there are no further documented Good Standing violations within that period. If other Good Standing violations are documented, the probationary period ends, and decertification process will proceed. Should the CGA's certification expire during the one-year probationary period, the individual will allowed to participate in the recertification process and receive recertification.

**Decertification**

IEDA may immediately decertify an administrator after determining any of the following has occurred:

1. The administrator consistently circumvents federal or state policies and regulations
2. The administrator fails to disclose a conflict of interest the administrator has with the CDBG project
3. The administrator takes inappropriate actions that result in deobligation or refund of CDBG grant funds.
4. IEDA has received multiple, written, substantiated complaints from a grantee regarding the administrator (employee or elected official).
5. The administrator has engaged in any conduct that is significantly prejudicial to the administration of the CDBG program.
6. The administrator routinely allows other staff that are not CGAs to carry out administrative or compliance duties associated with a CDBG project.

IEDA reserves the right, with cause, to add to this list any actions deemed detrimental to the efficient conduct and timely execution of the grant award attributable to the performance of a CGA.

**Decertification process**

The decertification process shall begin with written notice from the Federal Programs Team Lead or designated IEDA staff, with approval from the Chief Programs Officer, notifying the CGA that IEDA is seeking decertification. The decertification notice will include: (1) a statement of the reasons for the proposed decertification, and (2) a statement that the CGA is entitled to an opinion by the IEDA Director or Director's designee on the matter.

Upon receipt of the notice, the CGA may request an opinion on the proposed decertification making such a request in writing to the IEDA Federal Programs Team Lead or designated IEDA staff. Such a request shall occur within 15 days from the date of the decertification notice. The IEDA Director or Director's designee will make a request for information to inform the CGA regarding what information is required to receive an opinion.

The CGA must provide the information requested for the opinion within 30 days from the date of the IEDA Director or Director's designee's request for information. Failure to respond to written decertification notices from the Director will result in Decertification.

Once requested information is received from the GCA, the IEDA Director or Director's designee will review the information and make a final determination regarding decertification.

If a CGA is decertified by IEDA, the decertification is effective for 2 years from the date of the initial notification from the IEDA Federal Programs Team Lead or designated IEDA staff. However, if the CGA only had conditional certification, the 2-year timeframe does not apply and the individual may attend the next certification training.

Upon decertification, any projects managed by the CGA must be transferred to another certified grant administrator. A decertified CGA will be considered a new administrator; The CGA will be required to attend certification training and pass all certification exams to again become certified.