Community Development Block Grant
Hurricanes Gustav and Ike Recovery

Infrastructure Program Internal Procedures

Version 2.0

Contents

1.0 OVERVIEW

Hurricane Gustav caused major wind and flood damage throughout the State, from the southern coastal parishes through central and north Louisiana. Two weeks later Hurricane Ike hit sending tidal surges across the State's southern coastal communities. Ike exceeded storm surges caused by hurricanes Rita and Katrina. More than 1.9 million Louisiana residents were forced to evacuate for hurricanes Gustav and Ike.

The Office of Community Development Disaster Recovery Unit (OCD-DRU) has developed several programs to make grant funds available to grantees located within the 53 impacted parishes from Gustav and Ike. The following are the internal procedures for the infrastructure staff to review, approve and implement the projects under each program.

Parish Implemented Recovery Program (PARA)
Municipalities Infrastructure Program (MIPS or MIPL)
Municipalities Infrastructure Program-Coastal Needs (MIPC)
Sustainable Coastal Communities Program (FSCC)
Coastal Communities Recovery (CPFI)
Interoperable Communications (INOP)
Economic Development Growth and Infrastructure (BEDI)

2.0 PROJECT APPROVAL

2.1 Pre-Application Review

A pre-application is not mandatory. Each grantee can elect to submit a pre-application in order to determine project eligibility and national objective prior to proceeding to incurring costs associated with completing an application.

Pre-applications are submitted through the OCD-DRU online system and capture general applicant and project information as well as a project description. (See Exhibit A – Sample Pre-Application Form)

The pre-application should include a detailed project description of the proposed project; identifying construction activities to be included, the objectives of the project and the expected results. Also, the project description must establish a relationship to either Hurricane Gustav or Ike (or both). This should include what happened as a result of the storm.

Once the pre-application has been reviewed by the analyst, it is reviewed by the staff and final approval is secured on the "Pre-Application Review Checklist" (Exhibit B) and posted through the online system. Following final staff approval, the grantee receives email notification of the pre-application approval. If there are edits required, the checklist will be signed and shown as pending with the notes posted in the online system and returned to the grantee for edits.

Pre-Applications that have been previously reviewed by the staff and returned with minimum edits in response to the requests made by the staff will undergo a follow up review by the analyst. If the revised pre-application is complete and ready for approval, the analyst will complete another review checklist and present to Infrastructure Manager for review and approval. This process is generally referred to as having a "sidebar with the Manager". If there are significant changes, the analyst may elect to bring for staff review again.

The analyst creates the project folder on the g drive and a hard file folder for the file cabinet.

Online System Pre-Application Review & Approval Phases:

- Desk Review – The analyst assigned reviews the pre-application
- Request Change – The analyst makes the determination that the pre-application requires additional information and/or corrections prior to presenting to the entire team for review.
- Staff Review – The analyst presents the application to the entire infrastructure staff for review and comments.
- Approve Pre-Application – Infrastructure Manager or appointed staff approves pre-application.

2.2 Application Review

An application is received by the analyst assigned for the grantee and the initial review is conducted using the Application Review Checklist. (See Exhibit C - Sample Application and Exhibit D - Sample Application Review Checklist)

2.2.1 Project Address, Census Tracts, Latitude and Longitude

All applications must contain the project address, census tracts, latitude and longitude information within the spaces provided in the online system. This information is pulled from the system in order to process requests for payment. If this information is not provided, funds cannot be requested from HUD.

The initial page of the application captures general information. Especially significant on this page is both the project address and national objective. This is also the location which identifies the amount of CDBG funds being requested for the project. The funds requested must be verified with the current allocation/award for the project.

2.2.2 National Objective

Before any activity can be funded in whole or in part with CDBG funds, a determination must be made as to whether the activity is eligible under Title I of the Housing and Community Development Act of 1974, as amended. Each proposed project must meet a national objective, and the applicant must identify only one national objective. A determination of the eligibility of an activity is made as a part of the OCD-DRU Project Application review process. OCD-DRU also reviews which national objective category a project will fall under. However, under the CDBG regulations, a project is not considered as meeting a national objective until it is complete. Therefore, applicants must be aware of the national objective category and document compliance appropriately. There are a number of different criteria by which an activity can meet one of the three National Objectives. [42 U.S.C. 5304(b)(3) and 24 CFR 570.483]

The three National Objectives are:

- Benefit low- and moderate-income (LMI) persons;
- Aid in the prevention or elimination of slums or blight; and,
- Urgent Need

The national objective must be included in the application's project description, along with an explanation as to why the project meets the selected national objective.

In addition, if the national objective is "Urgent Need," the governing authority is required to include in the application a resolution stating that other funds are not available. Attached is a sample resolution to use as a guide in developing the resolution specific for the urgent need project. (See Exhibit E)

If other funds are included in the urgent need project, then the exact amount of those funds must be included in the urgent need resolution. (See Exhibit F for sample resolution including local funds.)

For any application for which "Slum/Blight Elimination or Prevention" is the national objective of the project, the application should include the following:

1. The area of the project is designated as "Slum/Blight." This determination can be from the "Road Home Slum/Blight Determination (for Katrina/Rita only) document that was published after the storm, or any other Slum/Blight determination the grantee has for the area. There is no need to reference specifics of the report; just that the area was determined to be Slum/Blight by the report.
2. Describe the Slum/Blight. Example: "The area has multiple units of vacant housing and commercial space."
3. Describe the case of the Slum/Blight. Example: "The area is in a state of blight due to flooding that resulted from Hurricane Gustav" or "the back-up of sewers into homes made reoccupation difficult".
4. Describe how the project addresses the Slum/Blight condition or the root cause of the Slum/Blight condition. Example: "The improvements to the drainage system will prevent or reduce the effects of future potential flood events."

The analyst should be able to respond to this question on the review checklist: Is the stated national objective appropriate for the proposed project? The question should be answered on the review checklist.

2.2.3 Eligible Activity and Budget Summary Form

The second page of the application is the budget summary form which identifies the project activities and the breakdown of funds for each activity.

If the application is for the parish program, the analyst should be able to answer this question on the review checklist: Is the proposed project included in the parish's approved plan and on the approved priority list? Are the requested funds within the approved budget amount?

2.2.4 Eligible Activity

The analyst must confirm that the activity identified on the budget summary form is appropriate for the project.

All applications must include a separate activity titled "Project Delivery" in the Budget/Cost Summary. Project Delivery may include the hiring of consultants to assist in application development, environmental reviews, land acquisition, labor compliance, procurement, etc. (refer to Exhibit 6-10 Part III of the Grantee Administrative Manual for more specific tasks directly related to project delivery). Project Delivery would NOT include project design costs incurred by the architect or engineer (A/E) (i.e. basic services, project representation, additional costs incurred by A/E such as geotechnical testing, permits, etc.).

The analyst should be able to respond to this question on the checklist: Are the proposed activities eligible and appropriate and do they support the national objective?

2.2.5 Commitment of Other Funds

If other funds are committed to the project, proof of the availability of those funds must be included in the application. In most cases, the award letter from the funding agency would meet this requirement. However, if it is a commitment of local funds, it will require documentation showing an official action by the governing body authorizing the commitment of the funds (i.e. resolution, motion, adopted annual budget specifically identifying project and amount, etc.) *A letter from the governing authority stating the commitment of funds would not be sufficient documentation of the commitment of funds.*

2.2.6 Matching Funds

Some applications may include the matching of funds for another federal project. In this case, the grantee is using the CDBG funds for the required matching funds for another program. This type of application is no different than any other application that involves other funds. Initially the Consolidated Appropriations Act of 2010 -- HR 3288 Title II (Page 73) SEC. 236, did not allow for the use of CDBG funds as matching funds; however, that has since been stricken from the Act.

The matter under the heading ''Community Development Fund'', under the heading ''Community Planning and Development'', under the heading ''Department of Housing and Urban Development'' in chapter 10 of title I of division B of the Consolidated Security, Disaster Assistance, and Continuing Appropriations Act, 2009 (Public Law 110–329; 122 Stat. 3601) is amended by striking '': Provided further, That none of the funds provided under this heading may be used by a State or locality as a matching requirement, share, or contribution for any other Federal program''.
This title may be cited as the ''Department of Housing and Urban Development Appropriations Act, 2010''.

2.2.7 Supplemental Information

The supplemental information page captures the legislative districts related to the project and grantee. We only verify that districts have been selected. We do not verify if the districts are correct for the grantee and project. However, we do verify the projects latitude and longitude listed on this page so that the project location can be clearly identified for reporting. This is also the location where the grantee would indicate if any FEMA public assistance was received for the project. There may be cases where the grantee's response is no, but based on OCD-DRU review of the project, a duplication of benefits analysis must be completed.

The *Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act)* requires that recipients of federal disaster recovery funding make certain that no "person, business concern or other entity" will receive duplicative assistance. Because disaster assistance to each person/entity varies widely based on their insurance coverage and eligibility for federal funding, OCD-DRU cannot comply with the Stafford Act without first completing a duplication of benefits analysis specific to each grantee.

A duplication of benefits occurs when a beneficiary receives assistance from multiple sources for a cumulative amount that exceeds the total need for a particular recovery purpose.

Because disaster CDBG funds may be used for some purposes similar to those for which FEMA's Public Assistance funds are used, and because FEMA has issued guidance that Public Assistance funds have a higher priority in the payment delivery sequence than disaster CDBG funds, an application for any project that appears to be eligible for FEMA Public Assistance must also include proof that FEMA either:

- has provided specific guidance on the project, in the form of a Project Worksheet (PW) or other correspondence denying eligibility (this could be in the form of a letter or email); or
- is being contacted to evaluate FEMA eligibility. If FEMA has not made a determination, or if no request for public assistance was made prior to submission of the application, a letter from the Chief Elected Official to the Governor's Office of Homeland Security (GOHSEP) making that request must be included with the application to demonstrate that the process is underway (See Exhibit G - for sample letter). Prior to OCD-DRU closing out the project, the grantee must provide OCD-DRU with either the Project Worksheet (PW) or other correspondence denoting FEMA's determination of eligibility.

No project that appears to be eligible for FEMA's Public Assistance funds can be closed out until the duplication of benefits analysis has been completed. Otherwise, grantees must address the availability of other sources of funds for the specific project.

The analyst should be able to answer this question on the review checklist: If the proposed improvements involve repair/rehabilitation of public infrastructure, is there evidence presented as to why FEMA funds are not being used?

2.2.8 Program Schedule

The program schedule identifies the activities to be performed to complete the proposed project and a timeline for that process. Specific dates are also captured to identify key milestones in the project like ERR complete, design complete, construction begin and construction end dates.

2.2.9 Beneficiary Form

The beneficiary form captures the detailed information regarding the beneficiaries for the project. If there are several target areas and the national objective is to benefit low/mod persons, then a beneficiary form must be provided for each target area to demonstrate that each target area is 51% or higher LMI.

Determining if a survey is required

1. If ten percent or less of the houses in the target area (where census data is available and the project area is generally contiguous with the census data area) are not currently served by nor will be served by the proposed project, census data, rather than survey data, must be used to determine the benefit to low/moderate income persons. For example, if there are 100 occupied houses in the project area and 10 of those houses are not connected to the system, the applicant must still utilize census data rather than a local survey to determine income data, (if census data is available for the project area).

2. When a project area does not coincide with census tracts, block groups, or logical record numbered areas, an applicant must conduct a local survey or combine census data with a local survey. For instance, if a project area encompasses an entire logical record numbered area, but

is larger than the logical record numbered area, (however does not encompass the entire neighboring logical record numbered area), the applicant would utilize the census data for the logical record numbered area, and conduct a survey of the additional area(s) which are outside of the logical record numbered area and combine the data. An Activity Beneficiary Form would be completed for the logical record number area, a Survey Tabulation Form and Activity Beneficiary Form for the surveyed area(s), then an Activity Beneficiary Form combining the information from the two. If there is more than one outside area, and the areas are not contiguous with each other but are both contiguous with the logical record number area, one survey would cover both areas.

For target areas that are more than 10% smaller by population than the logical record numbered area they are located in, generally, a household survey would be conducted. However, census data must be utilized, if 10% or less of the households in the logical record numbered area are not served by the project.

Refer to Exhibit H - Guide for Determining Beneficiary Information Using Survey Method

2.2.10 Maps

Maps are required to show the existing project area and the proposed improvements. These maps should clearly identify the project location and the identified target area. The location should be correlated with the latitude and longitude provided to confirm location.

2.2.11 Project Description

The project description should include a concise description of the proposed project; identifying construction activities are to be included the objectives of the project and the expected results. The project content should identify if this project is reliant upon any other projects and whether or not CDBG requirements would be applicable to the other project. A brief description of the proposed target and the beneficiaries of the project should be included in the project description.

The project description must establish a relationship to either Hurricane Gustav or Ike (or both). This should include what happened as a result of the storm, did the project fail to function as designed, and does the project foster the recovery of the community. Applications may use "economic revitalization" as a rationale for eligibility without the need to establish a direct relationship to the effects of the disaster; the effect being addressed is a damaged economy (Gustav/Ike ONLY). These applications will need to include data, statistics, narrative, and/or other information that demonstrates that the project will have the effect of revitalizing the economy of the affected area. In other words, instead of demonstrating a "relationship to the disaster", these projects will have to demonstrate that they will positively impact the economic condition of the target area.

A general explanation of the construction to be performed with the proposed project including whether or not any acquisition will be required should be included in the project description. The grantee should acknowledge the need to follow URA regulations if the project involves acquisition activities. The grantee should indicate if the project has been considered in the mitigation plan, indicating whether the project addresses the identified need and will prevent the same in a future event.

If any income is anticipated with the project, the grantee should acknowledge whether or not program income is anticipated. If program income is anticipated, the project description should include a statement(s) outlining the use of the generated program income or acknowledgement that further arrangements will be discussed and confirmed with the OCD DRU.

The analyst should be able to respond to this question on the checklist: Does the project description provide clear evidence that the proposed improvements are related to disaster recovery? If mitigation is a component, was there a failure of function? Does the project consider and/or propose a mitigation plan?

2.2.12 Project Cost Estimate

Project cost estimate must include all the work to be performed to implement the entire project and be signed by a licensed engineer or architect. Since this is a cost estimate prior to beginning design work, this can be high level, but with enough details to capture the overall proposed construction required. The detailed final estimate is required prior to bidding the project and will be compared to the cost estimate approved in the application for consistency of scope of work.

2.2.13 Statement of Assurances

Statement of Assurances must be signed by the authorized individual and included in the application.

2.2.14 Disclosure Report

The Disclosure Report must disclosure any firms and/or persons who have a financial interest in the project at the time of application. This report should be updated periodically if any additional interested parties are identified throughout the project.

2.2.15 Signed Application

The signed application page may be either attached to the uploaded application in the online system or a hard copy mailed to the OCD-DRU offices. This is required since in some cases, the consultant has submitted the application in the online system and the grantee's signature is required to confirm their approval of the application.

After reviewing all the submitted information, the analyst must complete the Application Review Checklist and determine if the application is ready for staff review. If the application is ready for staff review, the analyst is to make copies of the application for each member of the review team and be prepared to discuss at the next staff meeting.

Once the application has been reviewed by the analyst, it is reviewed by the staff and final approval is secured from the Infrastructure Manager or appointed designee on the "Application Review Checklist" and posted in the online system. At that time, the analyst creates the approval letter (See Exhibit I), prints and brings the letter along with the project file to the Infrastructure Manager or appointed designee for signature.

If there are questions noted at the staff review meeting, the checklist will be signed and shown as pending with the notes posted in the online system and returned to the grantee for edits.

Applications that have been reviewed by the staff and returned to the grantee with minimum edits in response to the requests made by the staff, the analyst will review and, if complete and ready for approval, the analyst will complete another review checklist and present to the Infrastructure Manager for review and approval. This process is generally referred to as having a "sidebar with the Manager". If there are significant changes, the analyst may elect to bring for staff review again.

The analyst creates the project folder on the g drive and a hard file folder for the file cabinet, if not created with the pre-application. This would include all the file subfolders for the hard file including application, draw requests, monitoring/closeout and other documents.

Online System Application Review & Approval Phases:

Desk Review – The analyst assigned reviews the application
Request Change – The analyst makes the determination that the application requires additional information and/or corrections prior to presenting to the entire team for review.
Staff Review – The analyst presents the application to the entire infrastructure staff for review and comments.
Approve Application – Infrastructure Manager or appointed staff approves application.
Grant Approval – Director signs approval letter and the date signed is posted in the system and letter mailed.

The Infrastructure Manager can appoint a staff person to review and approve in his/her absence.

2.3 Application Amendment Review

The grantee must contact the infrastructure analyst to amend an application submitted online. Although the amendment process is conducted online, a hard copy of the form is provided in the Grantee Manual as Exhibit 2 – 1 for your reference. This exhibit would be used by those grantees who did not submit an application online and could be initiated and submitted without first speaking with an analyst.

If an OCD-DRU analyst is contacted by the grantee requesting an amendment, the analyst opens the amendment form in the online system and submits to the grantee for completion and submission back to OCD-DRU.

Once the amendment is received by the OCD-DRU Analyst, the Application Amendment Review Checklist (See Exhibit J) will be used to complete the review and secure approval from all required parties: Infrastructure Manager and Environmental Manager.

2.3.1 Type of Amendment

What type of amendment? If budget, then an updated cost estimate must be included with the amendment. Any application documents that would be changed with the proposed amendment must be included with the amendment.

2.3.2 CDBG Program Schedule

The grantee is to provide a status update regarding specific dates: ERR Complete, Acquisition/Closing, Design Complete, Construction Start and Construction End. In some cases, the online system is not allowing these dates to be edited so the Grantee may need to leave as is, but ensure the status is updated on the Request for Payment submissions.

2.3.3 Explanation of Request

The amendment form must give a detailed explanation of why the amendment is being requested. The information provided must enable the Analyst to answer the following questions:

- Is the stated national objective appropriate for the proposed project?
- Are the proposed activities eligible and appropriate and do they support the national objective?
- Does the project description provide clear evidence that the proposed improvements are related to disaster recovery? If mitigation is a component, was there a failure of function?
- If the proposed improvements involve repair/rehabilitation of public infrastructure, is there evidence presented as to why FEMA funds are not being used?
- If a budget amendment, is the new budget within the approved parish plan
- Does the project consider and/or propose a mitigation plan?

Online System Amendment Review & Approval Phases:

Desk Review – The analyst assigned reviews the amendment submission
Request Change – The analyst makes the determination if the amendment requires additional information and/or corrections prior to presenting to the entire team for review.
Staff Review – The analyst presents the application to the Infrastructure Manager for review and comments.
Approve Application – Infrastructure Manager or appointed staff approves amendment.
Grant Approval – Environmental Manager reviews and signs the checklist, if approved.

All approval signatures must be captured on the Amendment Review Checklist and the original filed in the project folder.

If the amendment is based on a hard copy submission, the hard copy must be signed and sent to the grantee. If online submission, the grantee will receive an approval message from the online system once the amendment is approved online.

If the amendment is a significant change, then an amended approval letter must be created and issued as well as the automatic email message sent by GIOS.

2.4 Cost Reasonableness Review

OCD – DRU has contracted with Pan American Engineers, LLC, to provide required reviews of professional services fees, architectural / engineering documents, and construction cost estimates included with each application. In the event that the Pan American Engineers personnel performing the review require additional information on the project, the following communication (e-mail or phone) is to be provided to the grantee (Note: OCD-DRU has directed Pan American Engineers to contact the grant consultant identified on the application *FIRST* prior to contacting engineers or other personnel directly):

> *Dear Sir or Ma'am:*
>
> *Pan American Engineers, LLC is contracted with the Office of Community Development - Disaster Recovery Unit to perform cost reasonableness reviews of Gustav/Ike CDBG applications on their behalf. We are reviewing the attached application cost estimate as prepared by John Doe, P.E. on 04/15/11 for the Levee Project in Sample Parish and request the following clarifications:*
>
> - *Please provide basis for the lump sum cost for land acquisition ($500,000), utility pipe relocation ($320,000), and Miscellaneous Fees ($373,122).*

OCD-DRU consultant, Pan American Engineers (PAE), will perform a cursory review of each application and application amendment to determine if the estimates are generally reasonable at the application/amendment approval stage.

PAE will email a copy of the review checklist (Refer to Exhibit K for sample checklist) to the analyst assigned the project and a copy of the checklist is filed in the "Other Documents" folder for the project.

If the review identifies that a task appears to be unreasonable, the analyst will request additional information or explanation to determine if the costs can be deemed reasonable. If costs are determined unreasonable, a reduction in award may be warranted.

3.0 PROJECT IMPLEMENTATION

3.1 Procurement

Two (2) forms are required to be submitted to OCD-DRU by the grantee after specific procurement instances:

<u>Verification of Professional Services Eligibility</u>

Only those firms that have not worked with the Office of Community Development within the last five (5) years require OCD-DRU staff to determine eligibility. If a firm has worked with the LCDBG program or any DRU programs, then submission and determination is not required.

Notice of Contract Award

A Notice of Contract Award (Exhibit 6-14 of the Grantee Administrative Manual) must be submitted to OCD-DRU within 30 days of awarding a prime construction contract.

3.2 Environmental

The Environmental Manager issues the original signed "Authority to Use Funds" to the assigned project analyst. It is the responsibility of the analyst to make a copy of the form for the hard file and create a scanned copy. The scanned copy is saved in the project folder on the g drive and emailed to the project consultant. The hard copy is filed in the "Other Documents" folder for the specific project.

The Gustav/Ike HUD Grant number which is required for the environmental forms is B-08-DI-22-0001.

3.3 Required Approvals

The OCD-DRU consultant, Pan American Engineers (PAE), performs professional services related to the following tasks for Gustav/Ike Disaster Recovery:

- Review of Plans, Specifications and Final Cost Estimate
- Review of Bid Addenda
- Review of Construction Change Orders

Refer to the Exhibit K– Execution Plan for A/E Reviews" for more details on the specific PAE reviews for each task.

In instances where a conflict of interest is identified, the LCDBG program engineer will provide the required reviews on behalf of OCD-DRU.

3.3.1 Plans, Specifications and Cost Estimate Review

The OCD-DRU consultant, Pan American Engineers (PAE), reviews final plans, specifications and cost estimates for each Gustav/Ike construction project to verify conformance with project scope and cost in approved grant application and to confirm general inclusion of typical contract documents, inclusion of updated CDBG compliance provisions and the correct wage decision.

PAE is responsible for issuing on behalf of OCD-DRU, an authorization for the applicant to advertise the project for bids. The letter authorizing the advertisement for bid and the review checklist are emailed to the analyst assigned the project and the analyst is to print a copy and file in the "Other Documents" folder for the project.

One (1) hard copy and one (1) electronic copy of the construction plans, specifications and final cost estimate are to be submitted for review and approval prior to advertising for bids to the following contact:

Jennifer Gallagher
Pan American Engineers, LLC
P.O. Box 89
Alexandria, LA 71309
tel: (318)473-2100
fax: (318)473-2265
jgallagher@paealex.com

All change orders that affect the project eligibility, scope or ERR must be submitted to above address for review and approval prior to final execution of change order by grantee.

3.3.2 Drainage Project Review

If the project is for drainage improvements, the grantee must also submit one (1) hard copy of the plans, specifications, final cost estimate and drainage impact study to the State of Louisiana, Department of Transportation and Development (LDOTD) for review.

For drainage projects only, LDOTD will perform a concurrent review of final plans and specifications for impacts upstream and downstream drainage system and for conformance with the Statewide Flood Control Program.

LDOTD is responsible for issuing a review to PAE. If no issues are identified by LDOTD, PAE can proceed with reviewing the drainage project for authorization to bid.

3.3.3 Bid Addendum Review

PAE will review bid addenda to verify that changes made during the bid process and included in the addenda are in conformance with the project scope and budget in the approved grant application.

PAE emails a copy of the review checklist to the analyst assigned the project and a copy of the checklist is filed in the “Other Documents” folder for the project.

3.3.4 Change Order Review

PAE will review change orders to verify conformance with the project scope and budget in the approved grant application and to verify that costs are reasonable and allowable.

PAE emails a copy of the review checklist to the analyst assigned the project and a copy of the checklist is filed in the “Other Documents” folder for the project.

3.4 REQUEST FOR PAYMENT REVIEW

All requests for payment are processed through the Gustav/Ike Online System (GIOS). The grantees were provided with the Draw Request Guide (Exhibit L) to assist with the specific instructions and requirements for submission. The analyst uses the review checklist (Exhibit M) as a guide in reviewing the received draw request. This checklist is not completed nor is it saved in the file folders. Once the request is approved by the analyst, it is submitted to the Program Manager in GIOS for review and approval. The Program Manager submits to finance for processing if approved or returns to analyst for edits. If there are any issues during the initial review or after the manager review, the analyst sends the RFP back to the grantee for correction in GIOS. In some cases, the missing information may be provided via email to the analyst and the analyst uploads to GIOS for processing without returning the request to the grantee in GIOS.

The Program Manager may appoint a staff person to review and approve in his/her absence.

As a matter of policy, when OCD/DRU finds invoice errors or omissions, the RFP will be returned to the applicant through the GIOS system, along with detailed notes explaining what additional information is needed in order to process the RFP. Requests for Payment will not be held at OCD/DRU in lieu of additional information being submitted via e-mail.

There are specific requirements regarding supporting documents:

3.4.1 Timesheets

Any individual who charges a rate to provide a service for a D-CDBG project must provide a signed, approved timesheet in support of the activity. All timesheets must include a description of the task performed and be signed by both the employee and the supervisor.

If a firm does not produce timesheets and an invoice is automatically generated from a timekeeping system, OCD/DRU will review the firm's procedures for review/approval of time in order to determine whether timesheets will be required.

Additionally, if an RFP contains invoices that align provided services with employee timesheets, the analyst must ensure that the dates on the timesheets and invoices match. If the dates do not align, the OCD-DRU analyst must return for correction.

3.4.2 Rate Schedules

All rate schedules must be provided as a one-time item in support of the rates charged for services for each contract. This rate sheet should be included with the initial invoice and if rates are changed during the course of the contract, the revised rate schedule must be included in the first invoice with updated rates.

3.4.3 Proof of Reimbursable Expenses

Any reimbursable expenditures for incurred costs associated with a subcontractor, rental fees, supplies, shipping, etc., must include a receipt or invoice for those services. Only the exact cost of the expense will be eligible for reimbursement, based on the receipt or invoice. If the subcontractor invoice includes time by rate or mileage, then a timesheet and/or mileage sheet is required, just the same as the primary contract.

3.4.4 Travel Regulations (STATE PPM 49)

All contracts and sub-contractors must follow the State of Louisiana's travel regulations and allowances (Travel Guide / PPM 49).

3.4.5 Supporting Narratives

Narratives supporting the partial or full completion of activities must be included in support of completed work on a project for each invoice. Examples include:

Consultant Invoice Example:
Description of Completed Work during the billing period of January 1, 2012 – January 31, 2012

- *Met with engineer to discuss CDBG requirements to be included in specifications*
- *Reviewed received invoices and drafted RFP for client submission*
- *Created file management system of project for client*
- *Drafted letters to agencies for environmental review record*

Or, verifiable use of milestones is also permitted, such as:
Implementation

- *A/E Procurement*
- *ERR Complete*
- *Project Development*
- *Bidding/Pre-Construction*
- *Construction*

Engineer Invoice Example:
Description of Work Completed during the billing period of January 1, 2012 – January 31, 2012

- *Attended meeting with consultant to review CDBG requirements*
- *Attended meeting with public works director to discuss project design*
- *Completed initial draft specifications*
- *Researched land ownership*
- *Completed draft of permits required for project*

Or, verifiable use of milestones is also permitted, such as:
Basic Services

- *Approval Drawings*
- *Plans & Specs Issued to OCD/DRU*
- *Bidding Process*
- *Contracting*

If milestones are used for the description of work and a milestone is not invoiced 100 percent, then a description of the work completed for the percentage being invoiced must be provided.

3.4.6 Invoice Summary Sheet

RFPs are required to have a summary sheet listing all the invoices included in the RFP. If the RFP includes several employees and/or invoices, provide a summary sheet listing all employees and the amount being requested for reimbursement and/or each invoice being submitted. The summary page should total the amount being requested for reimbursement. If there are multiple items charged to the grantee on an invoice, but only specific items are being requested for reimbursement, the grantee is asked to highlight or identify those specific items on the invoice.

3.4.7 General

- All RFPs must be a minimum of $1,500 unless it is the final request. Grantees may submit a request to OCD/DRU if a RFP below this threshold is required.
- Only two RFPs per project are to be submitted within a 30 day period for a project.
- All uploaded documents in GIOS must be a pdf or Word version of the document. Documents created in other programs cannot be opened and will have to be returned for correction.
- Attachments uploaded in GIOS are limited to 10MB in file size. Each RFP allows three (3) attachments for additional documentation. Several invoices can be scanned and included in one electronic document. Invoices do not need to be scanned and attached as separate documents.
- No uploaded documents can have symbols (*examples:* "#", "*", "$") in the filename of an uploaded document. If this occurs and the analyst cannot open, the submission will be returned for correction.
- If the analyst experiences log-in problems with GIOS or any problems uploading information, they are to contact the Help Desk at 225-330-0911.

3.4.8 Authority to Use Grant Funds

The HUD environmental review process must be completed before any Disaster Recovery CDBG funds can be accessed for program-eligible activities. In order to receive funds not related to construction costs, the grantee must submit a "Certification of Exemption for HUD funded projects" to the OCD/DRU environmental staff for each project. OCD-DRU will issue a "Notice of Acceptance of Exemption" (See Exhibit N) to indicate that this grant condition has been satisfied. This Notice must be issued prior to the grantee submitting the first request for payment for non-construction costs. All requests for payment must have funds cleared and identified in GIOS under the "environmental tab". If the funds are under exemption, the analyst must compare the types of services that were included in the exemption and to the invoices received to ensure the funds are available for that activity.

Also, the analyst should verify the amount of funds exempted as RFPs are submitted, as there has been cases where the exemption amount was either incorrect or cleared the services prior to a contract amount and the amount was not included in the exemption.

4.0 PROJECT MONITORING

The compliance and monitoring team will organize any onsite visits. The projects identified to be monitored will be communicated to the analyst and the analyst will coordinate with the compliance team lead to complete the checklist. Refer to Monitoring Internal Procedures. (See Exhibit O)

The Catalog of Federal Domestic Assistance (CFDA) number is 14.228. This may be requested from the grantee's auditors for their financial statements or A-133.

5.0 PROJECT CLOSEOUT REVIEW

Project closeout packages are submitted by the grantees to OCD-DRU. Upon receipt of the package, the analyst is to adhere to the Closeout Internal Procedures. (See Exhibit P)

6.0 TECHNICAL ASSISTANCE

It is the responsibility of each analyst to provide technical assistance when needed to each grantee or consultant. If subject matter expects (SMEs) are required, refer to the OCD-DRU website on the Grantee Administrative Manual page for a listing. The grantee or consultant can contact the SME directly or the analyst can secure a response from the SME.

The analyst is also responsible for reporting all scheduled technical assistance provided. This is to be submitted monthly on the Info form directly to reporting. (See Exhibit Q)

Monthly e-blast messages are sent to all registered users of the online system. These messages include announcements for opportunities for technical assistance and general information where a pattern of technical assistance has been identified. The monthly communications are captured on the OCD-DRU website under Gustav/Ike.

In addition, any training opportunities including all webinars held by OCD-DRU are posted on the website.

The outreach team will consult with the infrastructure analyst to identify any technical assistance needs based on conversations with grantees and consultants. In addition, analysts will participate in the quarterly performance monitoring meetings to provide assistance during project reviews.

7.0 EXHIBITS

Exhibit A – Sample Pre-Application Form
Exhibit B – Pre-Application Review Checklist
Exhibit C – Application Form
Exhibit D – Application Form Review Checklist
Exhibit E – Sample Urgent Need Resolution
Exhibit F – Sample Urgent Need Resolution with local funds

Exhibit G – Sample FEMA letter from grantee
Exhibit H – Guide for Determining Beneficiary Information Using Survey Method
Exhibit I – Sample Application Approval Letter
Exhibit J – Project Amendment Review Checklist
Exhibit K – Pan American Engineers Execution Plan for A/E Reviews
Exhibit L – Request for Payment Review Checklist
Exhibit M – Notice of Acceptance of Exemption
Exhibit N - Draw Request Guide
Exhibit O – Monitoring Internal Procedures
Exhibit P – Closeout Internal Procedures
Exhibit Q – Monthly Technical Assistance Form