Lessons Learned from Crisis Leadership

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Congressional City Conference

Lessons Learned from Crisis Leadership

Date of Session, 2017
Washington, DC
Blake Ratcliff, Steve Traina, Brian Delvaux, Erica Bueno
Institute for Building Technology & Safety

#NLCU
Workshop Agenda

Introduction

EDDR Overview

Eligibility

Grant Administration

Procurement

Subrecipient

In-Hand

Congressional City Conference

NLC NATIONAL LEAGUE OF CITIES
Our four topics are chosen based on the learned experiences in each section and the importance they play in a successful federal grant program.

- Grant Management provides an overview of all facets of a successful grant program implementation.
- The Subrecipient relationship outlines the risks and benefits of a subrecipient arrangement in lieu of conventional Program Administrator contracting methods.
- Procurement is one of the two highest risk areas of grant administration.
- Eligibility, on all levels, becomes the second highest risk area of grant administration.
About IBTS

IBTS is a 501(c)(3) nonprofit organization
• provides technical expertise to support government functions
• national presence
• 350+ employees
• 40 year track record

Mission:
• meet the challenges of governance at all levels
• enhance public safety, economic development, and the general welfare of the community.
Board of Directors

IBTS is guided by a Board of Directors consisting of representatives of five national associations.
What We Do

STATE & FEDERAL PROGRAMS

LOCAL GOVERNMENT SOLUTIONS

EDUCATION & TRAINING

COMPLIANCE RISK MANAGEMENT

TECHNOLOGY SERVICES

ENERGY SOLUTIONS LEADERSHIP

QUALITY ASSURANCE

DISASTER PREPAREDNESS & RECOVERY
What does EDDR (Economic Development & Disaster Recovery) do?

Disaster Planning
What does EDDR (Economic Development & Disaster Recovery) do?

Disaster Management/Recovery Programs
What does EDDR (Economic Development & Disaster Recovery) do?

Disaster Management/Recovery Programs

Grant Management Services
What does EDDR (Economic Development & Disaster Recovery) do?

Construction Management Services
## Client & Project Examples

<table>
<thead>
<tr>
<th>Location</th>
<th>Project Description</th>
<th>Monetary Value</th>
<th>Program Administrator</th>
<th>Case Management</th>
<th>Project Manager</th>
<th>Preliminary</th>
<th>Construction Management</th>
<th>A&amp;E Services</th>
<th>Damage Assessment</th>
<th>QM/QC</th>
<th>Project Completion</th>
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<tbody>
<tr>
<td>Louisiana - Katrina</td>
<td>CDBG-DR Housing Recovery Program</td>
<td>$3,900,000.00</td>
<td>X</td>
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<tr>
<td>Louisiana - Rita</td>
<td>CDBG-DR Housing Recovery Program</td>
<td>$2,700,000.00</td>
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<td>Harris CO - Ike</td>
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<td>Galveston - Ike</td>
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<td>$2,180,000.00</td>
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<tr>
<td>Amy Young Barrier Removal Program</td>
<td>TDHCA Accessibility Rehabilitation Program</td>
<td>$2,180,000.00</td>
<td>X</td>
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<td>Home Program</td>
<td>TDHCA HOME HRA Program</td>
<td>$827,000.00</td>
<td>X</td>
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<td>NYC - Sandy</td>
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</tr>
</tbody>
</table>
## Client & Project Examples

### Home Program
- **Project Description**: TDHCA HOME HRA Program
- **Location**: Texas
- **Monetary Value**: $827,000.00

### NYC - Sandy
- **Project Description**: CDBG-DR Housing Recovery Program
- **Location**: New York City
- **Monetary Value**: $59,000,000.00

### NY State
- **Project Description**: CDBG-DR Housing Recovery Program
- **Location**: New York State
- **Monetary Value**: $855,000.00

### Minot
- **Project Description**: CDBG-DR Housing Recovery Program
- **Location**: Minot, North Dakota
- **Monetary Value**: $768,000.00

### Illinois
- **Project Description**: CDBG-DR Housing Recovery Program
- **Location**: Chicago, Illinois
- **Monetary Value**: $692,000.00

### Cleveland County
- **Project Description**: CDBG-DR Infrastructure Recovery Program
- **Location**: Cleveland Co., Oklahoma
- **Monetary Value**: $1,225,000.00
Congressional City Conference

Grant Administration

Date of Session, 2017
Washington, DC
Blake Ratcliff
Director
Institute for Building Technology & Safety
What is a successful grant?

- Grant Management is a system, a process with many levels.
- Successful grant management starts long before the grant is awarded.
- You don’t have to be an expert, but you do have to know enough so that:
  (A) you aren’t dangerous
  (B) you’re aware when you’re out of your depth.

Successful grants start with the end in mind
Successful grants start with the end in mind

### Highlights

**What We Audited and Why**

We audited the State of Oklahoma because it received $93.7 million in Community Development Block Grant Disaster Recovery (CDBG-DR) allocations for presidentially declared disasters that occurred in 2011, 2012, and 2013. The substantial amount of CDBG-DR funding required a review of the State’s program. Our objective was to determine whether the State obligated and spent its grant in accordance with requirements.

**What We Found**

The State did not obligate and spend CDBG-DR funds in accordance with requirements. The State failed to document how it determined activity eligibility, existence, disaster event qualification, reasonableness of cost estimates, prioritization, and fund allocation as required. Additionally, it did not determine compliance with procurement and environmental requirements. Furthermore, it did not ensure payments based on incomplete, insufficient, or no supporting documentation.

The State believed its procedures for obligating and spending Federal funds were in place based on its understanding of CDBG requirements. The State’s failure to comply with requirements resulted in unsupported obligations and expenditures of more than $11.7 million and $4.3 million, respectively.

**What We Recommend**

We recommend that the Acting Deputy Assistant Secretary for Grant Programs require the State to (1) develop and implement policies and procedures to document and perform detailed review and testing to establish eligibility, existence, disaster event qualifications, reasonableness of cost estimates, prioritization, and fund allocation, both retrospectively and prospectively, which would put $18.9 million to better use; (2) support or properly obligate more than $11.7 million in unsupported obligations; and (3) support or repay more than $4.3 million in unsupported expenditures.

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**What We Audited and Why**

We audited the Municipality of Bayamón’s Emergency Shelter Grants and Emergency Solutions Grants programs. We selected this audit based on congressional and hotline complaints alleging that the Municipality improperly used Emergency funds to transport people from Puerto Rico to mainland U.S. cities to receive rehabilitation treatment. Our main audit objectives were to determine whether allegations included in the complaints had merit and whether the Municipality’s Emergency programs were administered in compliance with the U.S. Department of Housing and Urban Development’s (HUD) requirements.

**What We Found**

Although the Municipality assisted in the transportation of persons from Puerto Rico to mainland U.S. cities to receive treatment, HUD funds were not used to pay for the transportation costs of the participants. However, the Municipality improperly used Emergency funds to pay for travel costs of employees who went to mainland U.S. cities to follow up on clients. The Municipality’s financial management system did not properly identify the source and application of more than $1.14 million in Emergency funds and allowed the use of more than $189,000 for ineligible expenditures. In addition, it did not support the eligibility of more than $38,000 in program charges and reported inaccurate information in HUD’s information system. As a result, HUD lacked assurance that funds were adequately accounted for, safeguarded, and used for requested and eligible purposes and in accordance with HUD requirements.

**What We Recommend**

We recommend that the Director of the San Juan Office of Community Planning and Development require the Municipality to (1) complete the implementation of the new accounting system in accordance with HUD requirements, (2) submit all supporting documentation showing the eligibility and propriety of $189,227 in Emergency funds, and (3) reimburse its program $189,227 from non-Federal funds in ineligible expenditures.
Audit Report Number: 2016-FW-1010
Date: September 30, 2016

The State of Oklahoma Did Not Obligate and Spend Its Community Development Block Grant Disaster Recovery Funds in Accordance With Requirements

Highlights

What We Audited and Why
We audited the State of Oklahoma because it received $93.7 million in Community Development Block Grant Disaster Recovery (CDBG-DR) allocations for presidentially declared disasters that occurred in 2011, 2012, and 2013. The substantial amount of CDBG-DR funding required a review of the State’s program. Our objective was to determine whether the State obligated and spent its grant in accordance with requirements.

What We Found
The State did not obligate and spend CDBG-DR funds in accordance with requirements. The State failed to support how it determined activity eligibility, existence, disaster event qualification, reasonableness of cost estimates, prioritization, and fund allocation as required. It routinely did not determine compliance with procurement and environmental requirements. Further, it routinely made payments based on incomplete, insufficient, or no supporting documentation.

The State believed that its procedures for obligating and spending Federal funds were its choice based upon its understanding of CDBG requirements. The State’s failure to comply with requirements resulted in unsupported obligations and expenditures of more than $11.7 million and $4.3 million, respectively.

What We Recommend
We recommend that the Acting Deputy Assistant Secretary for Grant Programs require the State to (1) develop and implement policies and procedures to document and perform detailed review and testing to establish eligibility, existence, disaster event qualifications, reasonableness of cost estimates, prioritization, and fund allocation, both retroactively and prospectively, which would put $81.9 million to better use; (2) support or properly obligate more than $11.7 million in unsupported obligations; and (3) support or repay more than $4.3 million in unsupported expenditures.
Audit Report Number: 2016-AT-1012
Date: August 29, 2016
The Municipality of Bayamon, PR, Did Not Always Ensure Compliance With HUD Program Requirements

Highlights

What We Audited and Why
We audited the Municipality of Bayamon’s Emergency Shelter Grants and Emergency Solutions Grants programs. We selected this audit based on congressional and hotline complaints alleging that the Municipality improperly used Emergency funds to transport people from Puerto Rico to mainland U.S. cities to receive rehabilitation treatment. Our main audit objectives were to determine whether allegations included in the complaints had merit and whether the Municipality’s Emergency programs were administered in compliance with the U.S. Department of Housing and Urban Development’s (HUD) requirements.

What We Found
Although the Municipality assisted in the transportation of persons from Puerto Rico to mainland U.S. cities to receive treatment, HUD funds were not used to pay for the transportation costs of the participants. However, the Municipality improperly used Emergency funds to pay for travel costs of employees who went to mainland U.S. cities to follow up on clients. The Municipality’s financial management system did not properly identify the source and application of more than $1.14 million in Emergency funds and allowed the use of more than $189,000 for ineligible expenditures. In addition, it did not support the eligibility of more than $38,800 in program charges and reported inaccurate information in HUD’s information system. As a result, HUD lacked assurance that funds were adequately accounted for, safeguarded, and used for requested and eligible purposes and in accordance with HUD requirements.

What We Recommend
We recommend that the Director of the San Juan Office of Community Planning and Development require the Municipality to (1) complete the implementation of the new accounting system in accordance with HUD requirements, (2) submit all supporting documentation showing the eligibility and propriety of $982,851 in Emergency funds, and (3) reimburse its program $189,227 from non-Federal funds in ineligible expenditures.
Six Areas of Grant Management
Six Areas of Grant Management

- Procurement
- Financial
- Building Department
- Monitoring and Oversight
- Special Requirements
- Staffing
- Program requirements exceed current standards
- Existing standards require deviations
- Policies don’t support program goals

Procurement Challenges
- Review guidelines
- Modify guidelines
- Create “program” specific policy
- Professional review of policy and compliance
- 3rd party QA/QC
- Reporting requirements
- Understanding Federal/State requirements
- Training and software required by Federal/State systems

Financial Challenges
- Verifying eligible activities
- Accessible documentation of all transactions
- Compliance is followed
- Reporting processes are immediately instituted
- Augment staff
- 3rd Party QA/QC oversight

Financial Solutions
- Additional or updated codes
- Plan Review and/or Field Inspection augmentation
- Additional training or certifications
- Update department standards
- Anticipate department workload
- Provide training
- Augment department staff
- 3rd party QA/QC

Building Department Solutions
- Eligibility
- National Objective
- Federal/State requirements
- Oversight and Quality Control

Monitoring & Oversight Challenges
- Anticipate planning & zoning requirements
- Prepare for special sessions and emergency meetings

Monitoring & Oversight Solutions
- City/Council could need revisions
- Special City Council and Commissioners Court meetings may be required
- Anticipate the needs to adjust planning & zoning requirements
- Be prepared for special sessions and emergency meetings

Special Requirements Solutions
- Staff assigned to multiple projects
- Technical requirements
- Temporary staff still requires training & management support
- Specific expertise may be required

Staffing Challenges
- Evaluate potential requirements prior to grant award
- Utilizing professional consultants
- Implementing a program administrator

Staffing Solutions
The 2 priority areas

Procurement

Monitoring & Oversight
Areas of Grant Management

- Staffing
- Procurement
- Financial
- Building Department
- Monitoring & Oversight
- Special Requirements
Understanding a Subrecipient Agreement

Date of Session, 2017
Washington, DC
Steve Traina
Program Director
Institute for Building Technology & Safety
What is a Subrecipient?

§ 200.93 Subrecipient.

*Subrecipient* means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
What is a Subrecipient?

The best way to identify what a subrecipient is, would be to compare it to the well known contractor.

§ 200.93 Subrecipient.

*Subrecipient* means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.
Contractor/Subrecipient

- A contractors purpose is to obtain goods or services.

- A subrecipients purpose is to carry out a portion of the Federal award.
## Contractor/Subrecipient

<table>
<thead>
<tr>
<th></th>
<th>Contractor</th>
<th>Subrecipient</th>
</tr>
</thead>
<tbody>
<tr>
<td>Original Procurement</td>
<td>90 Days</td>
<td>5 – 10 Days</td>
</tr>
<tr>
<td>Fees</td>
<td>$150 - $250/hour</td>
<td>30% - 40% less</td>
</tr>
<tr>
<td>Responsibilities</td>
<td>Limited/Contractual</td>
<td>Vested, Direct Flow Down from Grantor</td>
</tr>
</tbody>
</table>
Contractor/Subrecipient

- **Subrecipient characteristics:**
  - Performance is measured against objectives of the Federal program
  - Responsible for programmatic decision-making
  - Required to adhere to Federal program requirements

- **Contractor characteristics:**
  - Provides goods or services within the normal operations
  - Goods or services are viewed as just support to the operation of the Federal program.
  - NOT accountable for the requirements of the agreement made by the Federal program
Subrecipient

This arrangement ensures absolute “alignment” between the subrecipient and community.
§ 200.101

sets forth standards for obtaining consistency and uniformity among Federal agencies for the audit of non-Federal entities expending Federal awards. These provisions also provide the policies and procedures for Federal awarding agencies and pass-through entities when using the results of these audits.

(c) For OMB guidance to Federal awarding agencies on Challenges and Prizes, please see M–10–11 Guidance on the Use of Challenges and Prizes to Promote Open Government, issued March 8, 2010, or its successor.

§ 200.101 Applicability.

(a) General applicability to Federal agencies. The requirements established in this part apply to Federal agencies that make Federal awards to non-Federal entities. These requirements are applicable to all costs related to Federal awards.

(b)(1) Applicability to different types of Federal awards. The following table describes what portions of this part apply to which types of Federal awards. The terms and conditions of Federal awards (including this part) flow down to subawards to subrecipients unless a particular section of this part or the terms and conditions of the Federal award specifically indicate otherwise. This means that non-Federal entities must comply with requirements in this part regardless of whether the non-Federal entity is a recipient or subrecipient of a Federal award. Pass-through entities must comply with the requirements described in Subpart D—Post Federal Award Requirements of this part, §§200.330 Subrecipient and contractor determinations through 200.332 Fixed amount Subawards, but not any requirements in this part directed towards Federal awarding agencies unless the requirements of this part or the terms and conditions of the Federal award indicate otherwise.
Original Procurement

There are no competitive procurement requirements because selecting a subrecipient is *NOT CONSIDERED A PROCUREMENT.*
Original Procurement

- State or Local Governments should follow their applicable administrative statutes, regulations, and policies.
- Ensure potential Subrecipient is not debarred or suspended.
- Evaluate the Risk Posed by the Subrecipient.
  - This is a critical step because the Subrecipient will be held accountable for compliance throughout the agreement.
Evaluating Risk

(b) Evaluate each subrecipient’s risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraph (e) of this section, which may include consideration of such factors as:

(1) The subrecipient’s prior experience concerning closeout of the subaward.
Evaluating Risk

- (1) The subrecipients prior experience with the same or similar subawards
- (2) The results of previous audits
- (3) Whether the subrecipient has new personnel or new or substantially changed systems
- (4) The extend and results of Federal awarding agency monitoring
Evaluating Risk

As good practice, PTEs should also consider the Federal Agency evaluation factors listed at 2 CFR 200.205.
Evaluating Risk

When evaluating a subrecipient, the FTE should use a risk-based approach and could consider the following.

- Financial stability
- Quality of management systems and ability to perform management standards
- History of the subrecipients performance including timeliness of compliance and conformance to terms
- Previous findings from audits
- Subrecipients ability to effectively implement statutory, regulatory, or other requirements imposed
Common Interests

- **Federal program regulations and standards**
  - Purpose of award
  - Reporting requirements
  - Performance metrics
  - Compliance Requirements

- **Payment right**
  - Allowable or unallowable costs
  - Payment schedule and terms
  - Audit and reconciliation requirements
As per HUD guidelines, subrecipients are not allowed to profit from program administration activities.

- Subrecipients can be reimbursed for allowable cost such as:
  - Indirect cost from contractors or vendors, with no mark up
  - Direct labor wages with Federal and State taxes, fees, and benefits if applicable
Closeout Compliance

The Pass Through Entity (PTE) will always be responsible for the proper use and management of federal funds by the subrecipient.
Closeout Compliance

- At closeout, the PTE should
  - Review and document that all proposed programmatic activities were carried out
  - Review and document that cost were allowable and ensure that contract terms are completed
Qualified Builder Selection Process

Each subrecipient has the option of either utilizing a list of builders whom have been prequalified by the GLO (Option 1) or to prepare a RFQ and qualify builders on their own to bid on the construction of housing units in their jurisdiction (Option 2).

<table>
<thead>
<tr>
<th>Builders prequalified by GLO</th>
<th>Builders prequalified by the Subrecipient</th>
</tr>
</thead>
<tbody>
<tr>
<td>This option allows the subrecipient to utilize the prequalified list of builders and proceed to the next step of preparing the RFP which will be used to acquire construction cost estimates for the plans.</td>
<td>Under this option, each subrecipient will use local procurement methods to qualify builders such as preparing a RFQ and submitting it through public advertisement to solicit proposals from prospective builders in order to qualify companies to undertake reconstruction services.</td>
</tr>
</tbody>
</table>
Once the prequalified builders have been selected, the subrecipient may prepare an RFP Bid Package that should include the scope of work and cost proposal template.
The RFP may include the following information:

- A clearly defined scope of work that addresses the number of homes to be reconstructed and other services as required
- The standardized house plans and construction specifications or the format in which builders should supply their plans and specifications
- Standardized cost proposal template for each floor plan and building footprint
- A timeline for completing the bid package
CDBG Procurement Regulations

OMB Guidance

§ 200.318 General procurement standards.

(a) The non-Federal entity must use its own documented procurement procedures which reflect applicable State and local laws and regulations, provided that the procurements conform to applicable Federal law and the

- Regulations are shown in 2 CFR 200.318 through 200.326. Some highlights;
  - 200.318a – Must have written procurement procedures
  - 200.318b – Must maintain oversight to ensure selected contractors perform
  - 200.318i – Must maintain records of procurement activities
Simplified Acquisition Threshold (SAT)

The Value Tiers of SAT guides how an entity conducts procurement from RFP selection to engagement of a contractor.
Simplified Acquisition Threshold (SAT)

The Value Tiers of SAT guides how an entity conducts procurement from RFP selection to engagement of a contractor.

- **Less than or equal to $3,500** – very informal procurement process
- **Between $3,501 and $150,000** - informal procurement process
- **Greater than $150,000** – formal procurement process
Simplified Acquisition Threshold (SAT)

- **Less than or equal to $3,500** – very informal procurement process

(a) Procurement by micro-purchases. Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does **not exceed $3,000** (or $2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

(b) Procurement by small purchase...
Simplified Acquisition Threshold (SAT)

- *Between $3,501 and $150,000* - informal procurement process

(b) *Procurement by small purchase procedures.* Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.
Simplified Acquisition Threshold (SAT)

- **Greater than $150,000** – formal procurement process

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§ 200.323  **Contract cost and price.**

(a) The non-Federal entity must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the non-Federal entity must make independent estimates before receiving bids or proposals.

(b) The non-Federal entity must...
Procurement by Sealed Bids

- Preferred for procuring construction
- Public solicitation

PREFERRED
Procurement by Sealed Bids

To facilitate a sealed bid procurement, you need to have:

- An adequate specification and/or scope of work description;
- For contracts in excess of $2,000, solicitation needs to have a provision for contractor to comply with Davis-Bacon Act, including placing a copy of the current wage determination issued by the Dept of Labor in each solicitation. Part 200, App. II(D)
- Two or more responsible bidders are willing and able to compete for the business
- Awarded to lowest responsible bidder
- Firm fixed-price contract. Cost-plus-percentage-of-cost or percentage of construction cost methods cannot be used. 2 CFR 200.323(d)
- You can reject any or all bids as long as you have a sound, documented reason for doing so. 2 CFR 200.320(c)(2)(v)
Procurement by non-competitive proposals

You may procure through solicitation of a single source only if:

- A public emergency will not allow the time to perform competitive solicitation; and/or
- The needed item or service is available from only a single source; and/or
- After soliciting from a number of sources, there is only one respondent (i.e. competition is inadequate); and/or
- You make a written request to the Federal awarding agency to allow sole-source, and that agency expressly authorizes it.
Contracting with MWSBE

You must take affirmative steps to assure that minority / women’s / small businesses are used when possible.
Contracting with MWSBE

- **Affirmative steps must include:**
  - Including MWSBEs on your solicitation lists;
  - Divide up the total scope into smaller task/quantities to encourage participation by MWSBE enterprises;
  - Establish delivery schedules which encourage participation by MWSBE enterprises;
  - Require the prime contractor to take these same affirmative steps in letting any subcontracts.
Congressional City Conference

Eligibility Requirements

Date of Session, 2017
Washington, DC
Erica Bueno
Program Coordinator
Institute for Building Technology & Safety
Eligibility Levels

Program

- Program Requirements will vary with Grant requirements.
- Some common requirements are:
  - National Objectives
  - Meet unmet needs
  - Disaster tie backs if applicable
Eligibility Levels

**Program**

- Grant award does not imply that submitted program has been approved.
- Supporting documentation must be available to demonstrate that program meets the stipulated objectives.
Eligibility Levels

**Project**

- **THE PROJECT MUST BE DOCUMENTED IN THE UNMET NEED ASSESSMENT (UNA) REPORT**
  - UNA is the first phase in a three phase process a DR grant recipient will undertake in the implementation of their long-term recovery efforts.
Eligibility Levels

Project

- DOCUMENT THE PROJECT IS IMPACTED AND DIRECTLY RELATED TO THE DECLARED DISASTER.
Eligibility Levels

Project

- DETERMINE THE PROJECT NATIONAL OBJECTIVE.
  - Each activity funded with CDBG-DR funds is required to meet one of the three national objectives. The three objectives are Benefit to low and moderate income (LMI) persons, aid in the prevention or elimination of slums or blight, and meet a need having a particular urgency (referred to as Urgent Need).
Eligibility Levels

**Project**

- All projects should be able to
  - tie-back to related disaster
  - Benefit the LMI population
Eligibility Levels

Homeowner

- Income documentation that is required from all members of the household that are over the age of 18 and the request applies
Eligibility Levels

Homeowner

- Ownership Verification
  - Clear and marketable title/deed to home
  - Verification of residence
  - Paid tax statements or proof of current payment plan or deferment
  - Death certification, will, or divorce decree to determine ownership
Eligibility Levels

Homeowner

- Benefit Verification
  - Home owners insurance, claim information
  - Flood insurance claim and benefit information
  - FEMA acceptance, appeal, or denial letters
  - SBA acceptance or denial letters
Eligibility Levels

Homeowner

- Accurate reporting of damages
  - Receipts for any and all work done to damaged property
  - Photos of damage
  - Determine if third party verification is required
  - Calculate if homeowner has duplication of benefits
Introduction to www.IBTSOnHand.org
Challenges

- Develop solutions to address stakeholder challenges:
  - I didn’t know that... **UNDERSTANDING**
  - I didn’t mean to do that... **RISK**
  - I didn’t have people to do that... **RESOURCES**
  - I didn’t think that was possible... **AWARENESS**
  - I didn’t believe that would ever happen...
Solution: Website

- Beta-test version functional & available to share
- Content development & prioritization underway
Solution: Customization

CUSTOMIZE YOUR CONTENT

Customized, actionable content at your fingertips.
Find information by peril, stakeholder group, location and more.

DEMOGRAPHIC
- ANY
- COMMUNITY SIZE
- DISABLED
- EXTREME LOW INCOME
- HOMELESS
- LARGE FAMILIES
- LOW INCOME
- MENTALLY ILL
- MIDDLE INCOME
- MODERATE INCOME
- OTHER
- POPULATION DENSITY
- RURAL
- SENIORS
- SUBURBAN
- URBAN

ROLE
- ANY
- ACADEMIA
- ACCOUNTING/FINANCE
- ADMINISTRATIVE SERVICES
- BUILDING AND SAFETY
- BUILDING DEPARTMENT
- CITY MANAGER
- COUNTY ADMINISTRATOR
- DESIGN AND CONSTRUCTION
- ECONOMIC DEVELOPMENT
- EMERGENCY MANAGEMENT
- EMERGENCY SERVICES
- FEDERAL AGENCY
- INSURANCE
- LEGAL
- LOCAL AGENCY
- MEDIA
- NGO
- PLANNING AND ZONING
- PROFESSIONAL ASSOCIATION
- PUBLIC INFORMATION OFFICER
- PUBLIC SAFETY
- RESEARCH ORGANIZATION
Solution: Tools

Example: Developed FEMA financial management tool

Wizard integrates field data collection with in-office data management

Real-time FEMA database interaction
www.IBTSOnHand.org Feedback

Login: NLCU
Password: NLCUpass
Feedback & suggestions for content, case studies, functionality, tools, etc.
Website Partial Sitemap

BEFORE
- Disaster Planning
  - Engage Professionals
- Funding Options
- Revise Existing Policies
- Staffing Evaluation
- Determine Recovery Strategy
  - Plan Activation
    - Comm. Coordination Program
    - Emergency Management Services
    - Utilities
    - Local Police & Fire
    - Staffing
    - State Admin Interface
  - Response Phase
    - Rescue Effort
    - Emergency Medical
    - Initial Damage Evaluation
    - Temp Infrastructure Utilities
    - General Public Communication
    - Provide Temp Shelters
    - Stakeholder Communications

DURING
- Post Disaster Response
  - Debris Removal
  - Restore all Infrastructure
  - Temporary Housing
  - FEMA Mapping
  - FEMA Funding Disbursement
- Recovery Administration
  - Action Plans
  - Needs Assessment
  - Policy & Procedure Management
  - SOPs
  - Project Execution Plan
  - Outreach
  - Eligibility
  - Applicant Communications
  - Oversight

AFTER
- Active Recovery
  - Damage Assessment
  - Contractor Procurement
  - Construction Management
  - Customer Service
  - Appeals
- Grant Closeout
  - Compliance
  - Record Keeping
  - Final Inspection
  - HUD Audit Prep
  - Accounting Closeout
- Resilience Planning
  - Lessons Learned
  - Identify Disaster Planning Revisions
  - Codes, Ordinance Review & Revisions
  - Policy & Organizational Reviews

Closeout Report
Questions? Contact us.

Steve Traina
Project Director
IBTS
straina@ibts.org
Workshop #1 - Grant Administration

Staffing

Special Requirement

Procurement

Monitoring & Oversight

Financial

Building Department
Workshop #2 – Subrecipient

In this workshop, please read the following outlined scenarios to determine whether the community should create a Subrecipient or Contract relationship.

1. A community is looking to purchase 2000 street light bulbs. They are needing competitive pricing and the delivery of product within 30 days.

2. A community is contemplating applying for a State Beautification Grant for their downtown area. They expect the Grant Administrator to deliver turn-key solution, exclusive of executive oversight.

3. A community is intending to apply for a federal grant to provide computers and IT services to local libraries. The grant administrator is expected to make grant application and support the community through delivery of equipment.

4. The Fire Department requires support with grant writing for new fire trucks and replacement apparatuses. Grant Manager should provide needs assessment to grantor, provide full description of apparatuses lost, and requirements for each fire house.
5. Community suffers city wide damage from wild fires, they are now seeking a long term disaster recovery grant. The grant administrator should provide a needs assessment and work with community to develop an action plan for the recovery of the damage housing and infrastructure. The developing program should be managed from cradle to grave because of the inadequate community staff.
Workshop #3 - Procurement

Please read the following statements to determine if it is following the proper procurement regulations. List a true or false when the answer is decided.

1. In deciding what firms to send my formal RFP / Bid Package out to, I can pick contractors right out of my local Yellow Pages.

2. CDBG regulations require me to always place procurement orders by way of a formal written Purchase Order.

3. CDBG regulations require me to always obtain multiple quotes on goods or services that I need for a CDBG project.

4. If I am going to obtain quotes for a scope of work that is valued at approximately $90,000, the regulations require me to send out a written RFP and to call for competitive written proposals.

5. From a set of bids that I receive on a $200,000 project, I have a bid from a contractor I’ve used before and am comfortable with. Because I’ve worked with him before (past experience was good), I don’t need to check to see if he’s on the SAM List.
6. Although I need to solicit multiple formal proposals for work valued at more than $150,000, I can select the winning bidder subjectively, based on how I feel about the contractor.

7. The best value for goods or services is determined by which company stops by my office most often and leaves Astros box tickets for me.

8. Even if I think that none of the sealed bids submitted to me will meet project requirements, I still must pick the lowest-priced bidder.

9. The CDBG regulations allow me to obtain only one quote for a $165,000 scope of work if I run out of time to go out for competitive bids, because I was on vacation for two weeks.

10. As long as I’m SURE that no local MWSBE’s can handle the scope of work we’ve got planned, I don’t need to bother with soliciting quotes from any MWSBE’s.
Workshop #4 – Eligibility

Duplication of Benefits: Sample

Mark & Lisa Baker live in a single-family home and suffered significant damage after a flood destroyed their community. The family had home owners insurance but the claim was denied. The Bakers did receive funds from FEMA. The home still is not completely repaired. Based on the data below, determine whether CDBG disaster recovery funds can be used for the rehabilitation of the home, and if yes, how much.

General benefit information:

<table>
<thead>
<tr>
<th>Recipient</th>
<th>Source</th>
<th>Stated Purpose</th>
<th>Award</th>
<th>Spent</th>
<th>Use of funds</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mark &amp; Lisa Baker</td>
<td>FEMA</td>
<td>Rental Assistance</td>
<td>$4,000</td>
<td>$4,000</td>
<td>Apartment Rental</td>
</tr>
<tr>
<td>Mark &amp; Lisa Baker</td>
<td>FEMA</td>
<td>Home Repairs</td>
<td>$23,000</td>
<td>$23,000</td>
<td>Living Cost and Repairs</td>
</tr>
<tr>
<td>Mark &amp; Lisa Baker</td>
<td>Insurance</td>
<td>Home Repairs</td>
<td>$0</td>
<td>$0</td>
<td>n/a</td>
</tr>
<tr>
<td>Mark &amp; Lisa Baker</td>
<td>SBA</td>
<td>Home Repairs</td>
<td>$0</td>
<td>$0</td>
<td>n/a</td>
</tr>
</tbody>
</table>

TOTAL: $27,000 $27,000

Can CDBG funds be used to help the Baker family?

Does the Baker family have a duplication of benefits? If so, how much?
Workshop #4 – Eligibility

Ownership: Sample

Mary Jackson lives in a single-family home and suffered significant damage after a hurricane. Ms. Jackson has applied for the CDBG Disaster Recovery program. During the eligibility it shows the Mary Jackson is delinquent on her property taxes. Does Ms. Jackson qualify for the program?

Tax Information:

<table>
<thead>
<tr>
<th>Taxing Jurisdiction</th>
<th>Exemption</th>
<th>Taxable Value</th>
<th>Tax Rate</th>
<th>Taxes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Houston ISD</td>
<td>0</td>
<td>13,500</td>
<td>1.206700</td>
<td>$162.96</td>
</tr>
<tr>
<td>Harris County</td>
<td>0</td>
<td>13,500</td>
<td>0.416660</td>
<td>$56.24</td>
</tr>
<tr>
<td>Harris County Flood Control</td>
<td>0</td>
<td>13,500</td>
<td>0.028290</td>
<td>$3.82</td>
</tr>
<tr>
<td>Port of Houston Authority</td>
<td>0</td>
<td>13,500</td>
<td>0.013340</td>
<td>$1.80</td>
</tr>
<tr>
<td>Harris County Hospital</td>
<td>0</td>
<td>13,500</td>
<td>0.171790</td>
<td>$23.19</td>
</tr>
<tr>
<td>District</td>
<td>0</td>
<td>13,500</td>
<td>0.005200</td>
<td>$0.70</td>
</tr>
<tr>
<td>Harris County Dept. of</td>
<td>0</td>
<td>13,500</td>
<td>0.100263</td>
<td>$13.54</td>
</tr>
<tr>
<td>Education</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Houston Community College</td>
<td>0</td>
<td>13,500</td>
<td>0.586420</td>
<td>$79.17</td>
</tr>
<tr>
<td>System</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>City of Houston</td>
<td>0</td>
<td>13,500</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Total 2016 Taxes Due by January 31, 2017: $341.36
Payments applied to 2016 taxes: $199.50
Total Current Taxes Due: $154.63
Prior year(s) taxes due (if any): 2015 - 2015: $202.45
Total Amount Due For March 2017: $357.08

Can CDBG funds be used to help the Ms. Jackson?
Key Take-Aways
NLC University – Lessons Learned from Crisis Leadership

March 11, 2017
9:00 – 5:00

Presenters: Steve Traina, Erica Bueno, Blake Ratcliff, Brian Delvaux, Chris Fennell

- IBTS will share experiences gained through delivery of disaster planning, response, and recovery services across the country.
- Participants will learn how to adapt these experiences, best practices, and recommendations to suit the needs of their own communities.
- Participants will be introduced to an IBTS on-line portal of disaster-related case studies and tools developed to meet the needs of stakeholders at the local level.