

**Non-Federal Cost Share Match
Program Grant Implementation
Checklist**

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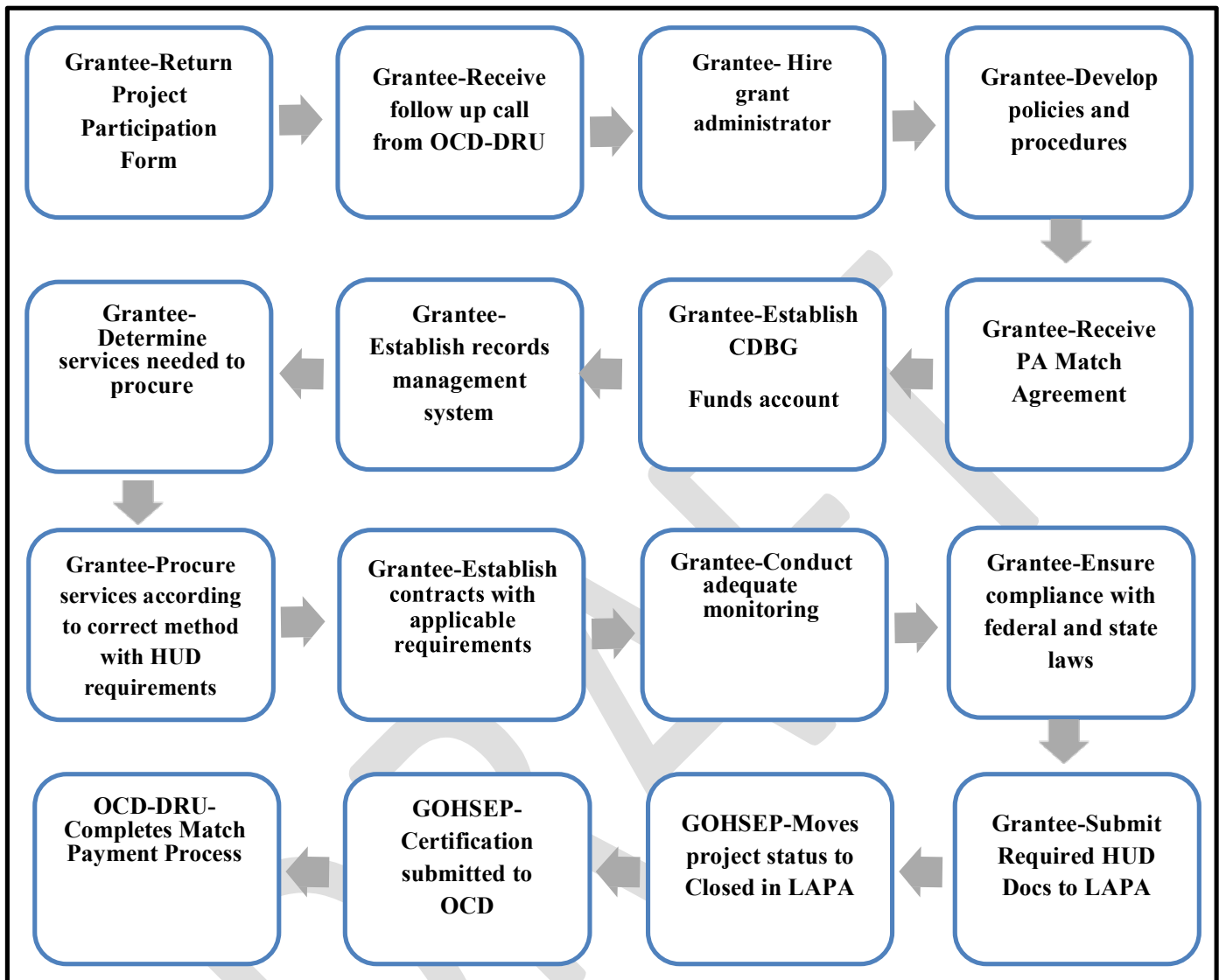
Non-Federal Cost Share Match Program Grant Implementation Checklist

1.0 Introduction

This Grant Implementation Checklist for the Non-Federal Cost Share Match Program has been modified and adopted from the Disaster Recovery Grantee Administrative Manual. This checklist is to be used specifically for this program as an overall guide for the implementation of the Non-Federal Cost Share Match Program. The checklist is general in nature, which means that some items may or may not be applicable based on the status of construction and the type of project. In addition to this checklist, some sections of the grantee manual contain specific samples for grantee use. The grantee should use this checklist to ensure CDBG compliance and that certain actions have been taken at various stages within the grant implementation process by marking “Yes” or “N/A” within the appropriate column. The checklist provides references to the appropriate sections of the Disaster Recovery Grantee Administrative Manual located on our website at <http://www.doa.la.gov/Pages/oed-dru/DRadminManual.aspx> for clarification on completing each step on the Checklist.

For clarification on any aspect of the grant implementation process, contact the OCD-DRU for guidance at DRU.Match.Program@la.gov.

2.0 Grant Implementation Process Flow



3.0 Grant Implementation Checklist

3.1 Grant and Project Approval

Grant and Project Approval				
Action	Timing	Reference	Yes	N/A
Return Program Participation Form	Once	Grantee		
Receive Follow-Up Call from OCD-DRU	Ongoing	Grantee		
Procure Project Administrator, if needed, not covered by Grant.	Once	Section 6		
Execute Contract with Project Administrator, if required	Once	Section 6		
Procure Project Engineer/Architect, if required	Once	Section 6		
Execute Contract with Project Engineer/Architect, if required	Once	Section 6		
Execute Change Orders with contractor as needed	As needed	Section 2		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.2 Grantee Administrative Set-Up

Grantee Administrative Set-Up				
Action	Timing	Reference	Yes	N/A
Ensure written policies and procedures are updated and consistent with federal requirements				
Monitoring Plan	Once	Section 12		
Procurement policy and procedures	Once	Section 6		
Property Management procedures	Once	Section 11		
Establish and Maintain Records Management Filing System	Ongoing	Section 4		
OCD-DRU will send the Grantee the applicable forms listed below.				
Receive PA Match Agreement	Once	Section 5		
Submit Executed Statement of Assurances to OCD-DRU	Once	Section 5		
Submit Authorized Signature Form	Once	Section 5		
Submit Electronic Funds Transfer (EFT) Enrollment Form to OSRAP	Once	Section 5		
Submit Request for Vendor Information Form	Once	Section 5		
Submit IRS Form W-9	Once	Section 5		
Submit HUD Form 2880	Once	Section 5		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.3 Procurement

Procurement				
Action	Timing	Reference	Yes	N/A
Write and adopt a Procurement Policy to contain all federal requirements contained in 2 CFR 200.318 - 200.326	Once	Section 6		
Write and adopt procedures for procurement transactions prior to securing contract services	Once	Section 6		
Establish a contract administration system	Once	Section 6		
Advertise as an Equal Opportunity Employer	Once	Section 6		
Document efforts to solicit Minority and Women's Businesses	Once	Section 6		
Verify contractor clearance for awarding a construction, consulting, and engineering contracts	Ongoing	Section 6 Section 7		
Make sure that all contractors advertise as Equal Opportunity Employers	Ongoing	Section 6 Section 8		

Maintain all records sufficient to detail the significant history of a procurement	Ongoing	Section 6 Section 4		
Make sure that all contractors and subcontractors develop written employment policies and procedures	Ongoing	Section 8		
Determine appropriate procurement method to procure materials or services	As needed	Section 6		
Maintain documents as described within Section 4	Ongoing	Section 4		

Procurement				
Action	Timing	Reference	Yes	N/A
Procurement by Small Purchase				
Per CFR Part 200.323, Non-Federal entity must make independent estimates before receiving bids or proposals		Section 6		
Receive at least three quotes	As needed	Section 6		
Perform cost/price analysis		Section 6		
Maintain written documentation for the basis of selecting the winning firm		Section 6		
Execute appropriate contract (Purchase Order or Fixed Price)		Section 6		
Maintain documents as described within Section 4		Ongoing	Section 4	
Procurement by Sealed Bids				
Per CFR Part 200.323, Non-Federal entity must make independent estimates before receiving bids or proposals	As Needed			
Publish three advertisements for bids (“invitation for bids”)		Section 6		
Hold public bid opening at the time and place set in the advertisement for bids		Section 6		
Perform a tabulation of the bids and award contract to lowest responsible and responsive bidder		Section 6		
Maintain written documentation for the basis of selecting the winning firm and rejecting any or all bid		Section 6		
Perform cost/price analysis		Section 6		
Award a fixed price contract to the lowest responsive and responsible bidder within 45 days of bid opening	45 days after bid opening	Section 6		
Complete a Notice of Contract Award and send to the OCD-DRU along with certified and itemized bid tabulation	Within 30 days of awarding contract	Section 6		
Maintain documents as described within Section 4	Ongoing	Section 4		
Procurement by Competitive Proposals				
Draft the RFP/RFQ for materials or services to be procured	As needed	Section 6		

Procurement				
Action	Timing	Reference	Yes	N/A
Per CFR Part 200.323, Non-Federal entity must make independent estimates before receiving bids or proposals		Section 6		
Advertise the RFP/RFQ ensure the bid includes all the CDBG-DR requirements within the RFP/RFQ		Section 6		
Solicit responses to the RFP/RFQ from an adequate number of qualified sources		Section 6		
Conduct a technical evaluation of the proposals received		Section 6		
Proposals received in response to the RFP/RFQ				
Maintain written documentation for the basis of selecting the winning firm and rejecting any or all proposals		Section 6		
Perform cost/price analysis		Section 6		
Award the appropriate contract to the firm with the winning proposal (cost reimbursement or fixed price contract only)		Section 6		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.4 Construction Management

Construction Management Contract Additional Steps				
Action	Timing	Reference	Yes	N/A
Execute contract documents and applicable bonding and insurance requirements		Section 2 Section 6		
Review the contract file and associated compliance files to ensure that documentation is complete		Section 2		
Inform the prime contractor(s) of his/her responsibilities (via an optional pre-construction conference or other means of notification)	As needed for all applicable Contracts	Section 2 Section 7		
For any subcontractors not identified in the bid, obtain the data necessary to verify eligibility, signed required certifications, and written Section 3 (of the HUD Act of 1968) Compliance Plan		Section 2		
Issue a Notice to Proceed to each prime contractor.		Section 2		
Check the contractors equal opportunity and labor standards compliance files for adherence prior to making partial payments		Section 2		
Monitor contractor progress, make progress payments		Section 2		
Perform a final inspection upon receipt of the contractor's Final Request for Payment		Section 2		
Receive all weekly payrolls and Statements of Compliance; resolve discrepancies		As needed for all applicable Contracts	Section 2	
Issue acceptance of work and final payment, less the retainage	Section 2			
Prepare and Submit the Final Wage Compliance Report	Section 2 Section 13			
Release the retainage upon the receipt of a clear lien certificate from the contractor	Section 2			
Utilize the comprehensive construction contract checklist to ensure all steps are taken		Section 2		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.5 Record Keeping and Reporting

Record Keeping and Reporting				
Action	Timing	Reference	Yes	N/A
All records should be maintained, updated and organized on a regular basis	Ongoing	Section 4		

3.66 Financial Audits and Monitoring

Financial Audits and Monitoring				
Action	Timing	Reference	Yes	N/A
Submit a copy of the written engagement agreement to the Legislative Auditor of the State of Louisiana for approval of the engagement terms and conditions (only if an independent CPA is engaged to prepare an audit or compilation)	As needed	Section 5		
If \$50,000 or less and revenue received, submit annual sworn financial statements	Annually	Section 5		
If more than \$50,000 but less than \$200,000 and revenue received, submit annual compilation to the LLA	Annually	Section 5		
If \$200,000 or more but less than \$500,000 and revenue received, submit an annual review, accompanied by an attestation report	Every two years	Section 5		
If less than \$750,000 in federal funds are expended within a fiscal year, submit financial reports	Annually	Section 5		
If more than \$750,000 in federal funds are expended within a fiscal year, conduct a financial audit.	Annually	Section 5		
If more than \$750,000 in federal funds are expended within a fiscal year, conduct a Single Audit.	Annually	Section 5		
Submit data collection form and reporting package of the annual Single Audit to the Federal Audit Clearinghouse (FAC)	Annually	Section 5		
Within 30 days after receipt of auditor's report, submit final copies to the FAC and OCD-DRU	Annually	Section 5		
Respond in writing to the OCD-DRU regarding any findings of noncompliance	As needed	Section 5		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.7 Requesting Payments

Requesting Payments				
Action	Timing	Reference	Yes	N/A
If needed, OCD will Collect additional Support Documentation from the Grantee <ul style="list-style-type: none"> • Invoices must be on Vendor's letterhead and dated • Timesheets must detail hours worked and detailed duties performed 	As needed	Section 5		
Once a project is pushed to closed in LAPA, GOHSEP will issue a certification to OCD	As needed	GOHSEP		N/A
OCD will create data sheet and pay request to send to grantee	Once	OCD-DRU		N/A

Grantee will review data sheet and request for payment to ensure accuracy	As needed	Grantee		
Person designated on the Authorized Signature Form must sign the Request for Payment	Once	Section 5		N/A
Upload Request for Payment Form with any other supporting documentation requested by OCD	As needed	Section 5		
Maintain documents as described within Section 4	Ongoing	Section 4		

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3.8 Labor

Labor (if applicable)				
Action	Timing	Reference	Yes	N/A
Designate a Labor Compliance Officer (LCO)	Once	Section 7		
Determine effective wage decision(s)	Ongoing	Section 7		
Verify wage decision	Ongoing	Section 7		
Ensure Prime Contractors clear subcontractors, if applicable	Ongoing	Section 7		
Inform the prime contractor(s) and all available subcontractors of his/her responsibilities (via preconstruction conference)	Ongoing	Section 2 Section 7		
Provide additional classifications, if needed	Ongoing	Section 7		
Conduct employee interviews and periodic field inspections to ensure labor compliance	Ongoing	Section 7		
Obtain notification from prime contractor of contract awards to any Subcontractor prior to the subcontractor beginning work on the project.	Ongoing	Section 7		
Ensure all payroll reports are properly submitted and reviewed	Ongoing	Section 7		
Notify prime contractor if back wages are required	Ongoing	Section 7		
Verify fringe benefits if problems are suspected	Ongoing	Section 7		
Document when no work is performed to reflect no payrolls received	Ongoing	Section 7		
Submit the Labor Standards Enforcement Report to OCD-DRU. Required only if a contractor has restitution of \$1000.00 or more.	Once	Section 7		
Contact OCD-DRU if restitution is not paid within 30 days of the second notice of underpayment or if there is a disagreement regarding the finding of restitution owed	As needed	Section 7		
Notify OCD-DRU if intentional falsification of a payroll report by a contractor is suspected	As needed	Section 7		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.9 Civil Rights

Civil Rights				
Action	Timing	Reference	Yes	N/A
Employment				
Publish an annual statement of nondiscrimination and/or include such statement in any publicity on a Disaster Recovery CDBG Program.	Annually	Section 8		
Develop or implement an Affirmative Action Plan	Once	Section 8		
Develop Plan to ensure compliance with Section 3 of the HUD Act of 1968 plan	Once	Section 8		
Display Equal Opportunity posters prominently	Ongoing	Section 8		
Notify OCD-DRU if complaints are registered	As needed	Section 8		
Contracting				
Advertise as an equal opportunity employer in bid solicitations.	Ongoing	Section 8		
Solicit bids from minority, women and locally owned businesses.	Ongoing	Section 8		
Maintain a list of locally owned businesses that were awarded Contracts.	Ongoing	Section 8		
Require a Section 3 (of the HUD Act of 1968) clause in all contracts	Ongoing	Section 8		
Inform contractors of equal opportunity (via an optional pre-construction conference or other means of notification)	Ongoing	Section 8		
Require contractor to submit monthly utilization reports.	Ongoing	Section 8		
Monitor contractor compliance at work site	Ongoing	Section 8		
Housing				
Disseminate Information concerning housing services and activities to agencies and organizations which routinely provide services to protected groups	Ongoing	Section 8		
Evaluate criteria for selecting recipients of housing assistance for any discriminatory effects	Once	Section 8		
Participate in Fair Housing Activities (only applicable to jurisdictional authorities).	Annually	Section 8		
Conduct at least one Fair Housing activity during the project Period (only applicable to jurisdictional authorities).	Annually	Section 8		
Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 754)				
Publish a statement of compliance with Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. 754 and/or include such statement in any publicity on a Disaster Recovery CDBG program.	Ongoing	Section 8		
Make available a TDD or equally effective method for communicating with hearing impaired persons	Once	Section 8		
Maintain Summary of Actions Taken to Achieve Compliance with Section 504	Ongoing	Section 8		
Execute Section 504 Assurance	Annually	Section 8		
Complete a self-evaluation of current policies and practices to determine if they meet the requirements of being accessible to individuals with disabilities within 6 months of grant award	Within 6 months of receiving grant award	Section 8		
Develop a transition plan for those areas which cannot be made accessible administratively	As needed	Section 8		
Complete construction activities identified in the transition plan	Within 3	Section 8		

Civil Rights				
Action	Timing	Reference	Yes	N/A
	years of completing self-evaluation			
<p>• Section 3 of the HUD Act of 1968 Thresholds for section 3 covered housing and community development assistance.</p> <ul style="list-style-type: none"> ▪ Grantee/Subrecipient thresholds – The requirements of this part apply to recipients of other housing and community development program assistance for a section 3 covered project(s) for which the amount of assistance exceeds \$200,000. <p>Contractor and subcontractor thresholds – The requirements of this part apply to contractors and subcontractors performing work on section 3 covered project(s) for which the amount of assistance exceeds \$200,000; and the contract or subcontract exceeds \$100,000.</p>				
Include Section 3 clause in all Section 3 covered contracts	Ongoing	Section 8		
Employ efforts to assist in reaching Section 3 residents for employment opportunities	Ongoing	Section 8		
Employ efforts to assist in reaching Section 3 businesses for contracting opportunities	Ongoing	Section 8		
Maintain data to report compliance with Section 3 (of the HUD Act of 1968) as required	Ongoing	Section 8		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.10 Environmental Review - **THIS STEP COMPLETED BY FEMA FOR PA ENTITY**

Unless the grantee changes the scope of work approved in a PW

Environmental Review				
Action	Timing	Reference	Yes	N/A
Aggregate (group together) all individual activities which are Related either geographically or functionally, or are logical part of a composite of contemplated action.	Ongoing	Section 9	FEMA	
Create and maintain an Environmental Review Record (ERR) for all aggregated activities	Ongoing		FEMA	
Exempt Activities				
Prepare and submit the executed “Certification of Exemption for HUD-funded Projects” to the OCD-DRU (Exhibit 9-1)	Ongoing	Section 9	FEMA	
Obtain “Notice of Acceptance of Exemption” from the OCD-DRU	Ongoing	Section 9	FEMA	
Obligate or incur the costs, as listed on the “ <i>Certification of Exemption</i> ” and request payment of these funds	Ongoing	Section 9	FEMA	
Categorically Excluded Activities Subject to 58.5				
Prepare and submit the executed Certification of Categorical Exclusion – (Subject to 58.5) to the OCD-DRU	As needed	Section 9	FEMA	
Prepare and submit the executed Statutory Checklist for Categorical Excluded Project Only	As needed	Section 9	FEMA	
Prepare a “Notice of Intent to Request a Release of Funds” (NOI/RROF)	As needed	Section 9	FEMA	
Send a copy of the “ <i>Request for Release of Funds</i> ” and newspaper copy of the <i>NOI/RROF</i> to the OCD-DRU	As needed	Section 9	FEMA	
Receive the “Notice of Release of Funds” from the OCD-DRU	As needed	Section 9	FEMA	
Begin to obligate or incur costs and request payment of funds	As needed	Section 9	FEMA	
Categorically Excluded Activities Not Subject to 58.5				
Submit the executed “Certification of Categorical Exclusion (Not Subject to 58.5)”	As needed	Section 9	FEMA	

Environmental Review				
Action	Timing	Reference	Yes	N/A
Receive the “Notice of Acceptance of Categorical Exclusion” from the OCD-DRU	As needed	Section 9	FEMA	
Begin to obligate or incur costs and request payment of funds	As needed	Section 9	FEMA	
Environmental Assessment				
Complete the Statutory Checklist (SC)	As needed	Section 9	FEMA	
Complete the Environmental Assessment (EA)	As needed	Section 9	FEMA	
Post/Publish combined notice which merges the FONSI and the RROF	As needed	Section 9	FEMA	
Complete and submit the Request for Release of Funds (7015.15)	As needed	Section 9	FEMA	
Submit a copy of the published public notice	As needed	Section 9	FEMA	
Begin to obligate or incur costs and request payment of funds	As needed	Section 9	FEMA	
Maintain documents as described within Section 4	Ongoing,	Section 4		

3.11 Voluntary Acquisition of Real Property

Voluntary Acquisition of Real Property				
Action	Timing	Reference	Yes	N/A
Prepare a formal, written Voluntary Acquisition Policy	Once	Section 10		
Publish a public notice	For each applicable property	Section 10		
Determine Ownership		Section 10		
Execute a professional services contract with an independent appraiser if appraisals are needed		Section 10		
Formally invite the property owner to accompany the appraiser during inspection of the property		Section 10		
Obtain an appraisal or Written Opinion		Section 10		
Prepare and execute an Act of Sale		Section 10		
Provide a Statement of Settlement Costs to owner		Section 10		
Record any required documents		Section 10		
Maintain documents as described within Section 4		Section 4		

3.12 Involuntary Acquisition of Real Property

Involuntary Acquisition of Real Property				
Action	Timing	Reference	Yes	N/A
Determine Ownership	For each applicable property	Section 10		
Send Preliminary Acquisition Notice		Section 10		
Send HUD “When a Public Agency Acquires your Property” brochure to owner		Section 10		
Send local Voluntary Acquisition Policy to owner		Section 10		
Execute a professional services contract with an independent appraiser if appraisals are needed		Section 10		
Formally invite the property owner to accompany the appraiser during inspection of the property		Section 10		
Determine if an appraisal is needed		Section 10		
If yes, perform appraisal and review appraisal		Section 10		
If no, obtain a written valuation of the property		Section 10		
Prepare and send the Statement of Just Compensation		Section 10		
Prepare and send the Offer to Purchase		Section 10		
Conclude Negotiations		Section 10		

Involuntary Acquisition of Real Property				
Action	Timing	Reference	Yes	N/A
Obtain approval from the OCD-DRU to purchase property above the market value		Section 10		
Prepare and execute an Act of Sale		Section 10		
Provide a Statement of Settlement Costs to owner		Section 10		
For donated property, obtain a waiver of URA benefits from owner		Section 10		
For expropriation proceedings, contact the OCD-DRU and submit required forms (including if the “Quick-Take” process is used)		Section 10		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.13 Residential Permanent Relocation

Residential Permanent Relocation				
Action	Timing	Reference	Yes	N/A
Provide Notice of Eligibility for Relocation Assistance	For each applicable property	Section 10		
Send a HUD “When a Public Agency Acquires your Property” brochure to owner		Section 10		
Send a copy of the Grievance Procedure taken from the grantee’s local Relocation Policy to owner		Section 10		
Conduct interview and survey with each URA recipient		Section 10		
Locate and inspect replacement housing		Section 10		
Provide counseling and appropriate referrals to social service agencies		Section 10		
Offer or pay for transportation (e.g., taxi, rental car) to inspect housing for all displaced persons		Section 10		
Send 90-day Notice to Vacate		Section 10		
Provide permanent relocation benefits		Section 10		
Maintain documents as described within Section 4		Ongoing	Section 4	

3.14 Residential Temporary Relocation

Residential Temporary Relocation				
Action	Timing	Reference	Yes	N/A
Send Notice of No displacement to tenant	For each applicable property	Section 10		
Determine if relocation is needed		Section 10		
Send Temporary Relocation Notice		Section 10		
Inspect Temporary Relocation Unit		Section 10		
Provide temporary relocation benefits		Section 10		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.15 Business Relocation

Business Relocation				
Action	Timing	Reference	Yes	N/A
Provide General Information Notice to business to be displaced	For each applicable property	Section 10		
Send HUD Information Booklet, Relocation Assistance to Displaced Businesses, NPOs, and Farms (HUD 1043-CPD)		Section 10		
Send Notice of Relocation Eligibility		Section 10		
Provide business relocation benefits		Section 10		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.16 Property Management

Property Management				
Action	Timing	Reference	Yes	N/A
Obtain title to property	For all	Section 11		
Maintain adequate records documenting the proper use of property	property	Section 11		
Conduct a physical inventory of the property at least once per year		Section 11		
Properly dispose of equipment		Section 11		
Document the proceeds of the sale of Disaster Recovery CDBG		Section 11		
Request approval from OCD-DRU to use equipment acquired with	As	Section 11		N/A
Maintain Property Control Tracking log	Ongoing	Section 11		
Maintain documents as described within Section 4	Ongoing	Section 4		

3.17 Close-out

Close-out				
Action	Timing	Reference	Yes	N/A
Conditional Close-out (for each project)				
Prepare Project Completion Report; submit 1 copy to OCD-DRU	For each project	Section 13		
Receive Conditional Close-out Letter from the OCD-DRU		Section 13		
Final Close-out (for each project)				
Submit all financial reports to the OCD-DRU	For each Project	Section 13		
Conduct an audit in accordance to Single Audit, if applicable		Section 13		
Receive Final Project Close-out Letter from the OCD-DRU		Section 13		
Dispose of all property accordingly	Ongoing	Section 11 Section 13		

Sample documents can be found in the Grantee Administrative Manual: <http://www.doa.la.gov/Pages/ocd-dru/Index.aspx>