

# CDBG Subrecipient Training

July 11, 2024



**SAINT PAUL**  
MINNESOTA

[STPAUL.GOV](http://STPAUL.GOV)

# Agenda

1. Introductions – City Contacts
2. CDBG updates for 2024
3. Invoice and Payment Requirements and Benchmarks
4. Expectations for Monitoring
5. Environmental Reviews
6. Section 3 Requirements
7. Q & A





# Grants Points of Contacts @ PED

## Grants Specialists are first point of contact and contract manager

- Zong Vang (DBNHS, Neighborworks, Ramsey County Window, NENO + HOME and City Housing Projects)
- Tchu Yajh (ESNDC, Ramsey County Block Nurse, + City ED CDBG Projects and Monitoring/TA)
- Austria Castillo (on leave through March 2025)

## Grants Compliance Supervisor, PED

- Jessica Deegan (also ESG and Rondo CLT)

## Grants Administrator, PED

- Beth Ulrich

## Other City Contacts

- Contract compliance, Accounting
- Environmental Reviews (Chris Hong interim )
- Historic Preservation (George)



# Agenda

1. Introductions – City Contacts
2. **CDBG updates for 2024**
3. Invoice and Payment Requirements and Benchmarks
4. Expectations for Monitoring
5. Environmental Reviews
6. Section 3 Requirements
7. Q & A





# What's New in CDBG for 2024

	Applies to	What
BABA – <u>Build America, Buy America</u>	CDBG Construction Activities with Steel and Iron.	Contracts require sourced products
VAWA – Violence Against Women Act Reauthorization	All HUD funding	Contracts require evaluation of policies impacting right to report rules
NSPIRE - Inspection Standards	Housing activities	New standards in effect replacing HQS and UPCS. More guidance to come



# CDBG Proposed Rule

- CDBG Proposed Rule: Published January 10, 2024 (89 FR 1746). The public comment period closed in March 2024 (108 total comments).
  - Webpage: [Proposed Rule | HUD.gov / U.S. Department of Housing and Urban Development \(HUD\)](#)
- CDBG and ICDBG Proposed Rule
  - Economic Development: changes for CDBG and Section 108
  - Consolidated Plan: additional methods for public accessibility
  - Timeliness: changes to enable larger, transformational construction projects
  - Data Collection: improve data collection measures (tell the story and ensure efficient and timely use of funds)
  - Updates: removes outdated provisions and makes technical corrections



# CDBG 50<sup>th</sup> Anniversary

- August 22, 2024 is the 50<sup>th</sup> Anniversary of CDBG
- Participate in the CDBG 50th anniversary celebration!
  - All communities, organizations, and individuals impacted by CDBG are encouraged to participate and highlight the program's importance and impact over the past 50 years.





# Build America, Buy America

- Enacted in the Infrastructure Investment and Jobs Act
- Establishes the “Buy America Preference”
  - All iron, steel, manufactured produced, and construction materials used in covered infrastructure projects must be produced in the US.
- In a phased implementation
  - CDBG program is first to be implemented for HUD. All funds obligated after 11/15/22 will apply for Iron and Steel
  - Other construction materials and manufactured products will be phased in over following two years
- Waived for projects with \$250,000 or less in federal financial assistance. Potential for waiving under exigent circumstances or for specific project waivers (including nonavailability, unreasonable cost) but difficult as no current process in place at HUD





# National Standards for the Physical Inspection of Real Estate (NSPIRE)

- New standards HUD will use to assess whether housing meets minimum quality standards and can be assisted with HUD funds.
- Final rule published in May 2023, effective July 1, 2023
- Replaces UPCS and HQS
  
- [NSPIRE Final Rule](#)
- [NSPIRE website](#)

# Agenda

1. Introductions – City Contacts
2. CDBG updates for 2024
- 3. Invoice and Payment Requirements and Benchmarks**
4. Expectations for Monitoring
5. Environmental Reviews
6. Section 3 Requirements
7. Q & A



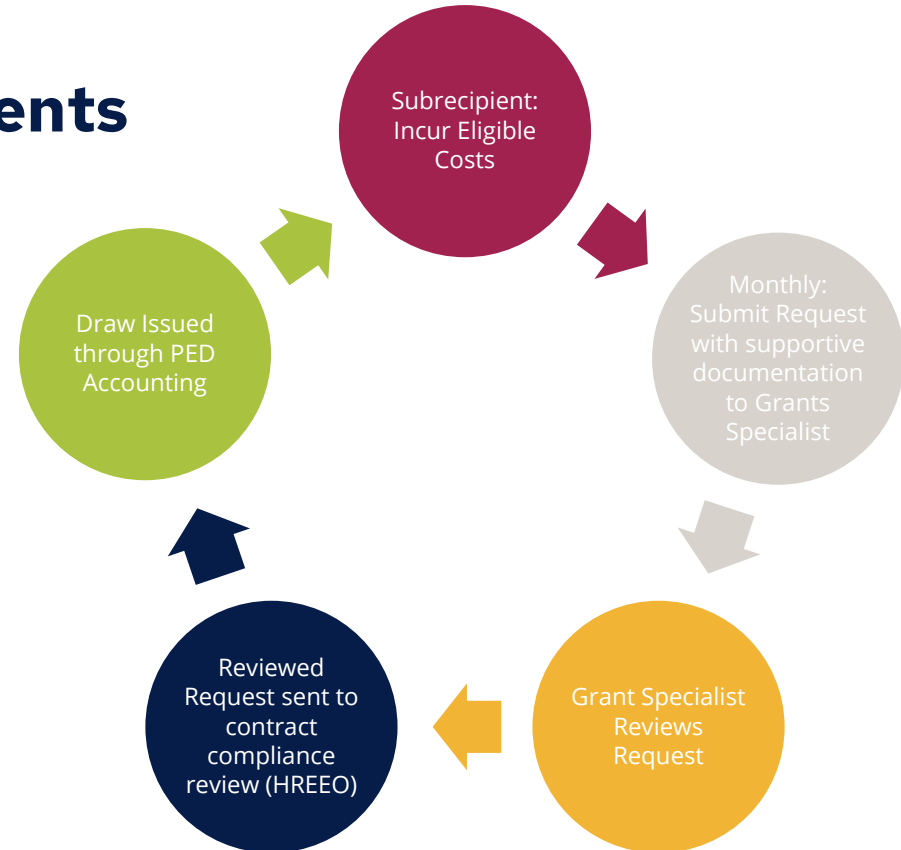


# Process for Reimbursements

### Tips:

Provide adequate documentation to support reimbursement requests

- Timesheets : Please provide tracked time spent on CDBG program/project within the subrecipient agreement terms. And provide supporting payment documents i.e, paystubs , payroll, or copy of check.
- Commercial projects under subgrant programs would be carved out from award via our internal accounting process. This can take 3-4 weeks before it's approved and added to the reimbursement request form for payment.



# Agenda

1. Introductions – City Contacts
2. CDBG updates for 2024
3. Invoice and Payment Requirements and Benchmarks
4. **Expectations for Monitoring**
5. Environmental Reviews
6. Section 3 Requirements
7. Q & A





# What to Expect with Monitoring of Your Programs

- The City of Saint Paul conducts subrecipient monitoring in accordance with federal regulations and HUD requirements.
- The City currently contracts with AHC to conduct desktop and onsite monitoring.
  - Desktop includes items that may be requested with reimbursement requests:
    1. Program Benefit, 2. Eligible Activity, 3. National Objective, 4. Environmental Review Record, 5. Contract, 6. Financial Documents, 7. Procurement, 8. Reports, 9. Review Expenditures, 10. Other Relevant Documents
- Monitoring may occur at any time during program year, and you will be provided with notice requested files and timing at least two weeks ahead of scheduled onsite monitoring.

# Agenda

1. Introductions – City Contacts
2. CDBG updates for 2024
3. Invoice and Payment Requirements and Benchmarks
4. Expectations for Monitoring
- 5. Environmental Reviews**
6. Section 3 Requirements
7. Q & A



# Agenda

1. Introductions – City Contacts
2. CDBG updates for 2024
3. Invoice and Payment Requirements and Benchmarks
4. Expectations for Monitoring
5. Environmental Reviews
6. **Section 3 Requirements**
7. Q & A





## Questions for Us?

- We can provide ongoing assistance for clarifications and interpretations of federal, state and local requirements.