

**St. Clair County  
Intergovernmental Grants Department /  
Community Development**

**PUBLIC FACILITIES  
&  
INFRASTRUCTURE PROJECTS**

**Policies And Procedures**



## Table of Contents

Key Terminology and Common Acronyms.....	4
Manual Structure.....	8
Part I: General Requirements for HUD-Funded Programs.....	9
Section 1: Introduction.....	9
1.1 Shared Objectives of CDBG and CDBG-DR.....	9
1.2 National Objectives.....	9
1.3 Program Implementation .....	9
Section 2: Procurement and Fiscal Controls.....	10
2.1 Procurement .....	10
2.2 Submitting Reimbursements (invoices).....	10
Section 3: Cost Analysis and Financial Oversight.....	10
3.1 Performance Monitoring.....	11
3.2 Steps to Avoid Fraud, Waste and Abuse of Funds .....	11
3.3 Professional Service Costs.....	11
Section 4: Conflict of Interest.....	12
Section 5: Contractor Compliance and Labor Standards.....	13
5.1 Debarment and Suspension Restrictions.....	13
5.2 Equal Opportunity.....	13
5.3 Non-Discrimination Policy .....	13
5.4 Section 3/Minority Business Enterprise (MBE) Requirements .....	13
5.5 Davis-Bacon Compliance .....	14
Section 6 : Environmental Review and Compliance .....	14
Section 7: Displacement and Relocation .....	15
7.1 Preventive Measures .....	15
7.2 Relocation Assistance For Displaced Persons .....	15
7.3 Temporary Relocation.....	16
7.4 Temporary Relocation Assistance .....	16
7.5 Conditions Where a Tenant is NOT Considered Displaced .....	16
Section 8: Appeals and Grievances.....	17
8.1 Types of Appeals & Grievances .....	17
8.2 Grievance & Appeals Process.....	17
Section 10: Record-Keeping Requirements.....	18
10.1 File Retention.....	19

Section 11: Monitoring .....	19
Part II: Community Development Block Grant (CDBG) Programs .....	21
Section 1: Program Overview .....	21
Section 2: Eligibility Criteria .....	21
Section 3: Program Awareness .....	22
3.1 Citizen Participation Plan .....	22
Section 4: Application Review and Project Selection .....	22
4.1 Selection Process .....	22
4.2 Project Agreement Process .....	23
Section 5: Construction Compliance .....	24
5.1 Build America, Buy America Act (BABA) .....	24
Part III: Community Development Block Grant Disaster Recovery (CDBG-DR) Programs .....	26
Section 1: Program Overview .....	26
Section 2: Eligibility Criteria .....	26
Section 3: Mitigation and Resilience Integration.....	28
Section 4: Program Awareness .....	29
4.1 Citizen Participation Plan .....	30
Section 5: Application Review and Process Selection .....	30
5.1 Who Can Apply .....	30
5.2 Selection Process .....	30
5.3 Project Agreement Process .....	31
5.4 Duplication of Benefits (DOB).....	32
Appendix I: Additional Resources.....	34
Appendix II: CDBG Public Facilities and Infrastructure Program Flow .....	35
Appendix III: Phases For Public Infrastructure Projects Involving CDBG Funding .....	42
Appendix IV: CDBG Project Flowchart.....	44
Appendix V: CDBG Public Facilities and Infrastructure Scoring Sheet .....	45
Appendix VI: CDBG-DR Public Facilities and Infrastructure Program Flow .....	46
Appendix VII: Phases For Public Infrastructure Projects Involving CDBG-DR Funding.....	50
Appendix VIII: CDBG-DR (2022/2024) Public Facilities and Infrastructure Scoring Sheet .....	52
Revision History .....	53

## Key Terminology and Common Acronyms

### ***Annual Action Plan***

The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. The Annual Action Plan applies to formula grant programs such as CDBG, HOME, ESG, and HOPWA. St Clair County IGD/CD's current action plan can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### ***BABA***

The Build America Buy America Act of 2021 establishes a “Buy America” preference for certain covered materials used in CDBG projects (CDBG-DR funds are exempt from BABA requirements). Covered materials under this Act include iron, steel, manufactured products and construction materials (e.g., metals other than iron, steel, plastic materials such as PVC pipe, glass, lumber, or drywall). The policy is effective for projects using iron and steel for all funds obligated on or after November 15, 2022. The policy will be effective for specifically listed construction materials as of the date HUD obligates new FFA from FY24 appropriations. For more detailed information, refer to St Clair County IGD/CD's BABA policy and procedure at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#) or [Build America, Buy America Act - HUD Exchange](#).

### ***CAPER***

Consolidated Annual Performance and Evaluation Report. Grantees report on accomplishments and progress toward Consolidated Plan goals in the CAPER for CDBG, HOME, ESG, and HOPWA. St Clair County IGD/CD's current CAPER can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### ***CDBG***

Community Development Block Grant Program, a federally funded, competitive grant program designed to help small cities and towns meet a broad range of community development needs.

### ***CDBG-DR***

Community Development Block Grant–Disaster Recovery Program, a federally funded, non-competitive grant program designed to help communities recover from Presidentially declared disasters. CDBG-DR funds are allocated by Congress and administered by HUD through Federal Register Notices, allowing grantees to address unmet housing, infrastructure, economic development, and mitigation needs not covered by other sources.

### ***CDBG-DR Action Plan***

The CDBG-DR Action Plan outlines how St. Clair County will use its Community Development Block Grant–Disaster Recovery (CDBG-DR) funds to address unmet needs resulting from a Presidentially declared disaster. Unlike the Annual Action Plan, which is part of the Consolidated Plan process for formula grants, the CDBG-DR Action Plan is a standalone document required by HUD and governed by Federal Register Notices specific to each disaster allocation. It includes a needs assessment, proposed activities, performance and expenditure projections, and details on

how the County will promote equity, resilience, and compliance with cross-cutting federal requirements. The current plan can be located at [current action plan can be located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### ***CFR***

Code of Federal Regulations is the codification of the general and permanent regulations published in the Federal Register by the executive departments and agencies of the federal government of the United States. The CFR is divided into 50 titles that represent broad areas subject to federal regulation. For more information on the federal regulations for CDBG and CDBG-DR, refer to [24 CFR Part 570](#)

### ***Citizen Participation Plan (CPP)***

A required plan outlining how a community will involve residents planning and implementation of its formula grant programs, such as CDBG, HOME, CDBG-DR and ESG. The CPP ensures transparency, public input, and accountability in the development of the Consolidated Plan and Annual Action Plans. St Clair County IGD/CD's current CPP can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### ***Consolidated Plan***

The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data-driven, place-based investment decisions. The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from HUD's Community Planning and Development (CPD) formula block grant programs, including CDBG, HOME, ESG, and HOPWA. St Clair County IGD/CD's current Consolidated Plan can be located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### ***Davis-Bacon Act***

A federal law requiring prevailing wages to be paid on construction projects using government funds. ([Davis-Bacon and Related Acts | U.S. Department of Labor](#))

### ***Entitlement Community***

A city or county receiving CDBG funds directly from HUD based on population size and other factors.

### ***Environmental Review (ER)***

The process of evaluating a project's impact on the environment as required by the [National Environmental Policy Act \(NEPA\) | US EPA](#)

### ***Grant Agreement***

The legal document between HUD and a grantee (or between a grantee and a subrecipient) outlining the terms and conditions of the award.

***Grantee***

The pass-through entity that receives a grant and administers funding (St. Clair County IGD is the grantee).

***HUD***

The United States Department of Housing and Urban Development.

***Low- and Moderate-Income (LMI)***

Low- and moderate-income. A low- and moderate- (L/M) income person is defined as a member of a family having an income equal to or less than the Section 8 Housing Assistance Payments Program low-income limits established by HUD applicable to the size of the person’s family. A family is defined as all people living in the same household who are related by blood, marriage, or adoption. An individual living in a housing unit that contains no other person(s) related to him/her is considered to be a one-person family for this purpose. Adult children who continue to live at home with their parent(s) are considered to be part of the family for this purpose and their income must be counted in determining the total family income. A dependent child who is living outside of the home (e.g., students living in a dormitory or other student housing) is considered for these purposes to be part of the family upon which he/she is dependent, even though he/she is living in another housing unit.

***Low- and Moderate-Income Area (LMA)***

An activity qualifies as an LMA benefit when it provides services or improvements that benefit all residents of a defined geographic area in which at least 51% of the residents are low- and moderate-income (LMI) persons. The service area must be primarily residential and may be supported by HUD-provided Census/ACS data or a methodologically sound income survey. Examples include infrastructure improvements, parks, and community facilities that serve an eligible neighborhood.

***Low- and Moderate-Income Limited Clientele (LMC)***

An activity qualifies under the LMC category when it benefits a specific group of individuals, at least 51% of whom are low- and moderate-income (LMI). Unlike the area benefit category, LMC eligibility is based on the actual income status of the beneficiaries, not the broader service area. Eligible activities include services or facilities for presumed LMI groups (e.g., homeless persons, seniors, persons with disabilities) or those that verify income eligibility. Examples include shelters, health clinics, or accessibility improvements for the disabled.

***MBE***

Minority-owned Business Enterprise.

***National Objective***

A requirement that CDBG and CDBG-DR funded activities meet one of HUD’s three objectives: benefiting low- and moderate-income persons, preventing or eliminating slums or blight, or addressing urgent needs.

***Procurement***

The process of acquiring goods and services in compliance with federal, state, and local regulations.

***Public Facilities***

Infrastructure improvements such as water/sewer systems, streets, sidewalks, and public buildings.

***Quarterly Report***

Required documentation submitted by Subrecipients four times each program year, to detail the progress toward accomplishments as described in the Subrecipient Agreement.

***RFP***

Request for Proposal

***Section 3***

A HUD requirement ensuring that economic opportunities generated by HUD-assisted projects benefit low-income residents and businesses.

***Subrecipient***

A public or private nonprofit agency, authority, or organization, or a for-profit entity authorized under 24 CFR 570.201 to provide microenterprise assistance, receiving CDBG or CDBG-DR funds from the grantee to undertake activities eligible under the program.

***Subrecipient Agreement***

The subrecipient agreement is a contract between the Subrecipient and the St. Clair County IGD, which outlines the grant award, project, and terms of the grant.

***Universal Notice***

A standardized HUD document that outlines the rights of individuals and households who may be displaced or otherwise affected by federally funded projects, including those funded through CDBG and CDBG-DR. It includes information on relocation assistance, eligibility, and appeal rights, and must be provided at the appropriate stage of project development in compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act (URA).

***URA***

Uniform Administrative Requirements is a federal regulation governing financial and administrative management of federal grant funds.

***USC***

United States Code is the codification by subject matter of the general and permanent laws of the United States.

***WBE***

Women-owned Business Enterprise

## Manual Structure

This manual is organized into three parts to clearly distinguish requirements that apply across all HUD-funded programs from those specific to CDBG and CDBG-DR:

- **Part I: General Requirements for HUD-Funded Programs**  
Covers compliance standards and procedures applicable to all public facilities and infrastructure projects funded by HUD programs.
- **Part II: CDBG-Specific Requirements**  
Outlines policies and procedures unique to the Community Development Block Grant program.
- **Part III: CDBG-DR-Specific Requirements**  
Provides guidance for projects funded through the Community Development Block Grant Disaster Recovery program, including requirements tied to disaster recovery and mitigation.

# **Part I:**

## **General Requirements for HUD-Funded Programs**

### **Section 1: Introduction**

St. Clair County Intergovernmental Grants Department (IGD)/ Community Development Division (CD) funding from the U.S. Department of Housing and Urban Development (HUD) through the CDBG: Community Development Block Grant and CDBG-DR: Community Development Block Grant Disaster Recovery. These programs support community improvements in alignment with the objectives of the Housing and Community Development Act of 1974 , as amended. All program-specific policies and procedures must align with the approved Action Plan and any subsequent amendments, ensuring consistency with HUD requirements and local recovery priorities.

#### **1.1 Shared Objectives of CDBG and CDBG-DR**

Both programs aim to:

- Providing decent housing
- Creating a suitable living environment
- Eliminating slums and blight
- Expanding economic opportunities

#### **1.2 National Objectives**

Low- and moderate-income is defined by HUD as a household's total income from all occupants, which does not exceed 80% of the Median Family Income for individual counties outside Metropolitan Statistical Areas (MSAs) or within MSAs. The maximum income limits are adjusted periodically by HUD, typically annually, and are published on the HUD website at: Income Limits | HUD USER

All CDBG and CDBG-DR funded activities will address at least one of the three CDBG National Objectives (24 CFR 570.208):

- 1) Benefit low- and moderate-income families
- 2) Aid in the prevention or elimination of slums or blight
- 3) Meet a need having a particular urgency (referred to as Urgent Need)

#### **1.3 Program Implementation**

This Policies and Procedures Manual is intended for use by the St Clair County IGD/ CD for guidance on how to implement the Public Facilities/ Infrastructure projects. The manual covers major operational aspects and procedures necessary for the implementation, and operation through CDBG and CDBG-DR funded projects.

#### **Cross-Referenced Policies**

St. Clair County IGD/CD maintains several stand-alone policies that apply to all HUD-funded programs and specific program activities. These policies are incorporated by reference and provide detailed guidance on compliance requirements beyond this manual. A complete list of cross-referenced policies is included in Appendix I.

For more information on available technical assistance and/or request for on-site visits, contact St. Clair County IGD, 19 Public Square, Suite 200, Belleville, IL 62220 Telephone: 618-825-3200; FAX 618-236-1190; or via email: [Christina.Anderson@co.st-clair.il.us](mailto:Christina.Anderson@co.st-clair.il.us).

## **Section 2: Procurement and Fiscal Controls**

### **2.1 Procurement**

St. Clair County IGD follows the procurement policies and procedures outlined in the Financial Policies and Procedures Manual. These policies ensure compliance with applicable federal, state, and local regulations including 2 CFR Part 200. All procurement activities related to CDBG and CDBG-DR must adhere to the standards and methods detailed in that manual.

For detailed procurement procedures, including purchasing thresholds, competitive methods, and documentation requirements, refer to the St. Clair County IGD Financial Policies and Procedure Manual and Risk Assessments located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#).

### **2.2 Submitting Reimbursements (invoices)**

- **Invoice Submission:**

All contractors and subrecipients must submit invoices for reimbursement in a timely manner and in accordance with the terms of the agreement or contract. Invoices should be submitted monthly or according to the agreed-upon payment schedule.

- **Required Documentation:**

Invoices must be accompanied by sufficient supporting documentation, including:

- a) Detailed breakdown of services rendered or goods delivered.
- b) Proof of payment (e.g., copies of receipts, canceled checks).
- c) Certified payroll reports (for construction projects, in compliance with Davis-Bacon requirements).
- d) For construction or renovation projects, the progress of work should be documented, including photos or work reports, as needed. This should also include the engineer's signed approval report or documentation. The engineer's approval ensures that the work meets the required standards and specifications.

- **Reimbursement Process:**

After submission, the IGD staff will review the invoice to ensure compliance with the terms of the agreement. Reimbursement will be made upon verification of the invoice, appropriate documentation, and confirmation of work completed or goods delivered.

## **Section 3: Cost Analysis and Financial Oversight**

- **Cost and Price Analysis:**

In compliance with 24 CFR 570.489 (CDBG) and 2 CFR 200.324 (CDBG-DR), IGD must conduct a cost or price analysis for all procurements exceeding \$25,000 to ensure fair pricing. Considerations include but are not limited to:

- a) **Complexity of the work:**

Assessing the technical requirements and complexity of the project to determine appropriate pricing.

**b) Contractor's investment and risk:**

Evaluating the contractor's financial commitment and the level of risk associated with the project.

**c) Industry profit rates:**

Reviewing industry standards for profit margins to ensure the pricing is reasonable.

**d) Past performance:**

Considering the contractor's history of performance on similar projects

**e) Degree of subcontracting**

Examining the extent of subcontracting and its impact on the overall cost structure.

• **Reconciliation of Expenses:**

IGD will ensure that all expenditures align with the approved project budget. Any discrepancies or overages must be addressed with an explanation and justification.

### **3.1 Performance Monitoring**

Payments will only be initiated after execution of a contractual agreement and verification of compliance with all applicable requirements, including Duplication of Benefits (DOB) for CDBG-DR projects. All drawdowns must be processed through HUD's approved systems (e.g., IDIS for CDBG and DRGR for CDBG-DR) and supported by documentation in accordance with HUD regulations. County funds must be deposited into an account with a County-approved Title Company and maintained in a separate federally insured account, contractually bound through an agreement detailing release terms.

### **3.2 Steps to Avoid Fraud, Waste and Abuse of Funds**

The County will assess all program policies and procedures from an anti-fraud, waste, and abuse perspective. The County provides anti-fraud training to program staff annually. Anyone with information regarding known or suspected misappropriation of funds or resources is encouraged to report the information to the County by sending a written report via U.S. mail to:

St. Clair County Intergovernmental Grants Department  
19 Public Square, Suite 200  
Belleville, IL 62220

or contact the HUD OIG Fraud Hotline at 1-800-347-3735 or email [hotline@hudoig.gov](mailto:hotline@hudoig.gov).

Refer to the Intergovernmental Grants Department's Anti-Fraud, Waste, and Abuse Policy, available on the County website at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#).

### **3.3 Professional Service Costs**

St. Clair County Intergovernmental Grants Department (IGD)/Community Development (CD) will not utilize Community Development Block Grant (CDBG) funds to pay for professional service costs associated with Public Facilities and Infrastructure projects, including engineering, architectural, design, and related services. An exception to this CDBG restriction applies to projects within the City of East St. Louis, which is a separate CDBG entitlement jurisdiction for which IGD administers funding on the City's behalf in accordance with HUD-approved

arrangements.

This limitation does not apply to CDBG-DR funded projects, which are governed by separate program requirements and approved project agreements.

#### **Section 4: Conflict of Interest**

In accordance with 2 CFR 200.318, 24 CFR 570.611 and 24 CFR 92.356, no IGD/CD employee, officer, or agent may participate in the selection, procurement, award, administration of a contract supported by CDBG funds if a real or apparent conflict of interest exists. If they have a real or apparent conflict of interest, including:

- The individual, a member of their immediate family, or their business partner has a financial or other interest in a firm competing for a contract.
- The individual has business or personal ties to a competing contractor or an organization involved in the process.
- Soliciting or accepting gratuities, favors, or anything of monetary value from contractors, potential contractors, or subrecipients

Any alleged violations of these standards shall be immediately referred to the St. Clair County Intergovernmental Grants Department (IGD) for review.

*HUD may grant limited exceptions to these restrictions under 24 CFR 570.611(d).*

#### ***Requesting a Conflict of Interest Exception***

In cases where a real or apparent conflict of interest exists, IGD/CD may request an exception from HUD as permitted under 24 CFR 570.611(d). The following conditions must be met for HUD to grant an exception:

- 1) **Full Disclosure** – The individual or entity with a potential conflict must provide **written disclosure** of the nature of the conflict, including financial or relational interests.
- 2) **Public Benefit Justification** – The request must include a written justification explaining why granting the exception serves the public interest and will not compromise program integrity.
- 3) **Approval Process** – IGD/CD must submit the exception request to HUD, along with:
  - A detailed explanation of the conflict.
  - Steps taken to mitigate any undue influence in procurement or funding decisions.
  - Public notice (if applicable) to ensure transparency in decision-making.
- 4) **HUD Determination** – HUD will review the request and issue a decision in writing, either approving or denying the exception.

*Any conflict of interest exception request must be approved in writing by HUD before proceeding with the affected contract, funding, or procurement.*

## **Section 5: Contractor Compliance and Labor Standards**

### **5.1 Debarment and Suspension Restrictions**

Per, 48 CFR Part 9 Subpart 9.4 funds may not be used to directly or indirectly to employ, award contracts to, or otherwise engage the services of any contractor or subrecipient during any period of debarment, suspension, or placement of ineligibility status. Prior to entering into any HUD-funded agreement, IGD/CD will verify all known contractors, subcontractors, consultants, and subrecipients' UEI numbers in the System for Award Management (SAM), found at Home | SAM.gov

General contractors are required to:

- 1) Check SAM for subcontractors.
- 2) Provide completed SUBCONTRACTOR UEI NUMBER & DEBARMENT STATUS Form to IGD/CD staff.

### **5.2 Equal Opportunity**

The regulations pursuant to Title I of the Housing and Community Development Act of 1974, as amended, require recipients to assure, through certification to the U.S. Department of Housing and Urban Development (HUD), that all activities will be conducted in accordance with Section 109 of the Act, Title VI of the Civil Rights Act of 1964, and Section 3 of the Housing and Urban Development Act of 1968. More responsibilities have been placed on the local governments to carry out housing and community development decisions. St. Clair County IGD/CD is responsible for ensuring compliance with all Equal Opportunity requirements and will monitor subrecipients and contractors for adherence to Section 109, Title VI, and other applicable laws. Contractors and subrecipients must certify compliance as a condition of participation in CDBG-DR funded activities.

### **5.3 Non-Discrimination Policy**

St. Clair County shall comply with all applicable non-discrimination laws and regulations, including those enforced by the U.S. Department of Housing and Urban Development (HUD) or any other applicable funding source, and shall ensure that no person is excluded from participation in, denied the benefits of, or subjected to discrimination under any program or activity funded in whole or in part by HUD and/or any other applicable funding source.

### **5.4 Section 3/Minority Business Enterprise (MBE) Requirements**

If applicable, compliance with Section 3 of the Housing and Urban Development Act of 1968 is required wherever HUD financial assistance is expended for housing or community development. To the greatest extent feasible, economic opportunities will be given to Section 3 residents and businesses in that area. Section 3 residents include public housing residents, low-and very low-income persons who live in the metropolitan area or non-metropolitan county where the HUD assisted project is located.

HUD has mandated that recipients of HUD funding, including CDBG and CDBG-DR, take all necessary, steps to ensure awarded contractors make efforts to encourage the use of minority and women business enterprises, referred to as a Minority Business Enterprise (MBE). The IGD/ CD

has set an overall goal of fifteen percent (15%) for the Minority Business Utilization Rate. Public Facilities/ Infrastructure Projects funded through HUD programs shall include, to the maximum extent possible, the use of minorities and women, and entities owned by minorities and women, including, without limitation, real estate firms, construction firms, appraisal firms, management firms, financial institutions, investment banking firms, underwriters, accountants, and providers of legal services, in all contracts entered into as a result of HUD funding.

Compliance with Section 3 requirements will be monitored by St. Clair County IGD/CD through documentation review, labor hour tracking, and reporting. Contractors and subrecipients are responsible for implementing Section 3 provisions and maintaining records of outreach and recruitment efforts to meet HUD benchmarks. In addition, St. Clair County IGD/CD will establish Minority Business Enterprise (MBE) utilization goals and monitor compliance through contract reviews and reporting. Contractors and subrecipients are responsible for actively soliciting minority- and women-owned businesses and documenting all efforts to meet participation goals.

### **5.5 Davis-Bacon Compliance**

In accordance with 24 CFR 570.603 and the Davis-Bacon and Related Acts (DBRA), every CDBG and CDBG-DR funded construction contract over \$2,000 for public facilities or public improvements must include provisions requiring the payment of prevailing wages set by the U.S. Department of Labor.

#### **1) Prevailing Wage Determinations:**

CDBG-funded construction contracts must include the applicable DOL wage determinations, ensuring that all laborers and mechanics are paid no less than the prevailing wages for their job classification and location.

#### **2) Applicability Across Projects:**

Davis-Bacon applies regardless of the number of units when HUD funds are used for public facilities or infrastructure projects. *Contractors may not split projects into multiple contracts to avoid Davis-Bacon requirements.*

#### **3) On-Site Compliance & Enforcement:**

- Conducting on-site inspections and worker interviews
- Collecting and reviewing certified weekly payroll reports
- Requiring correction of any labor standards violations
- Maintaining proper documentation of enforcement activities
- Ensuring compliance certification before processing any contractor payments

## **Section 6 : Environmental Review and Compliance**

The Public Facilities and Infrastructure projects must comply with the environmental review requirements outlined 24 CFR Part 58. No funds may be committed or expended prior to completion and approval of the environmental review. This includes any choice-limiting activities. These requirements are detailed in St. Clair County IGD/CD's Environmental Policies and Procedures, which can be accessed at: [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development \(RC Version: 9.13.3.0\)](#)

## **Section 7: Displacement and Relocation**

The county will ensure that it has taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted with CDBG and CDBG-DR funds consistent with Section 104(d) of the Housing and Community Development Act 42 U.S.C. 5304(d), 24 CFR Part 42, and 24 CFR 570.606. St. Clair County will not fund any infrastructure project that is anticipated to cause displacement of persons, businesses, or nonprofits. All projects will undergo a site selection review during planning to confirm that displacement is not expected. This review will be documented in the project file.

### **7.1 Preventive Measures**

- Prioritize vacant land or underutilized parcels for new construction.
- Require developers to certify that proposed sites do not involve occupied structures or active businesses.
- Include displacement screening in the Environmental Review Record (ERR) and underwriting checklist.

Although displacement is not anticipated, St. Clair County acknowledges that the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), as amended, applies if displacement occurs unexpectedly.

### **7.2 Relocation Assistance For Displaced Persons**

To the extent feasible, residential tenants must be provided a reasonable opportunity to lease and occupy a suitable, decent, safe, sanitary, and affordable dwelling unit in the building/complex upon completion of the project. If an owner/developer displaces a person, that person must be provided relocation assistance at the levels described in, and in accordance with the requirements of the (42 Usc Ch. 61:) Uniform Relocation Assistance And Real Property Acquisition Policies Act of 1970 and 24 CFR 570.606 . This applies to any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

- 1) After notice by the owner/developer to move permanently from the property, if the move occurs on or after the date of the submission of an application to the County, if the applicant has site control and the application is later approved; or
- 2) After the date the jurisdiction approves the applicable site, if the applicant does not have site control at the time of the application; or
- 3) Before the notice by the owner/developer to move permanently from the property, if the County determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or By a tenant-occupant of a dwelling unit, if any one of the following three situations occurs:
- 4) The tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition and the move occurs before the tenant is provided written notice offering the tenant the opportunity to lease and occupy a suitable, decent, safe, and sanitary dwelling in the same building/complex upon completion of the project under reasonable terms and conditions.

*St. Clair County will ensure that any relocation assistance provided under URA at 49 CFR Part*

24 includes reasonable accommodations for displaced persons with disabilities, including accessible housing options and advisory services consistent with Section 504.

### **7.3 Temporary Relocation**

If an owner/developer plans to relocate residents temporarily such tenants must be provided:

- 1) **Reimbursement** for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation, including the cost of moving to and from the temporarily occupied housing and any increase in monthly rent/utility costs (49 CFR 24.202).
- 2) **Appropriate advisory services**, including reasonable advance written notice of:
  - a) The date and approximate duration of the temporary relocation (49 CFR 24.203);
  - b) The location of the suitable, decent, safe, and sanitary dwelling to be made available for the temporary period (49 CFR 24.205) ;
  - c) The terms and conditions under which the tenant may lease and occupy a suitable, decent, safe, and sanitary dwelling in the building/complex upon completion of the project (49 CFR 24.205); and
  - d) The provisions of related to out of pocket expenses (49 CFR 24.205)

### **7.4 Temporary Relocation Assistance**

A tenant who is required to relocate temporarily and does not return to the building/complex, may experience one of the following:

- 1) The tenant is not offered payment for all reasonable out-of-pocket expenses incurred in connection with the temporary relocation; or
- 2) Other conditions of the temporary relocation are not reasonable; or
- 3) The tenant is required to move to another dwelling unit in the same building/complex but is not offered reimbursement for all reasonable out-of-pocket expenses incurred in connection with the move, or other conditions of the move are not reasonable.

### **7.5 Conditions Where a Tenant is NOT Considered Displaced**

A person does not qualify as a displaced person if

- 1) The person has been evicted for cause based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement, violation of applicable federal, State or local law, or other good cause, and the County determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance.
- 2) The person moved into the property after the submission of the application but, before signing a lease and commencing occupancy, was provided written notice of the project, it's possible impact on the person (e.g., the person may be displaced, temporarily relocated, incur a rent increase), and the fact that the person would not qualify as a "displaced person" (or for any assistance under this section) as a result of

the project.

## **Section 8: Appeals and Grievances**

This section outlines the process for filing appeals and grievances related to Public Facilities and Infrastructure projects, including procurement disputes, funding decisions, and contractor or labor complaints.

### **8.1 Types of Appeals & Grievances**

Stakeholders, including applicants, contractors, and community members, may file a grievance for:

- **Procurement Dispute:**  
Complaints regarding bid evaluations, contract awards, or selection processes.
- **Funding Decisions:**  
Appeals related to denial or reduction of funding.
- **Labor Standards Complaints:**
  - Concerns about Davis-Bacon wage violations or unfair labor practices.
- **Program Administration Issues:**  
Complaints regarding IGD/CD decision-making or compliance matters.

### **8.2 Grievance & Appeals Process**

The process ensures that the aggrieved party has the opportunity to formally express concerns and seek resolution through a structured and fair review by the St. Clair County IGD. The purpose of this Grievance and Appeals Process is to provide a clear, transparent, and an accessible method to address concerns or disagreements with decisions related to the Public Facilities and Infrastructure Project. **IGD is not responsible for third parties, therefore, grievances and appeals to the IGD should be specific to the Public Facilities Project.**

- 1) **Filing the Appeal:**  
Participant should submit all grievances/appeals in writing, addressed to the CDBG or CDBG-DR Public Facilities/ Infrastructure Program Specialist. They can mail their submissions or place them in the drop box at the St. Clair County IGD (St. Clair County Intergovernmental Grants Department 19 Public Square, Suite 200 Belleville, IL 62220).
- 2) **Documenting the Appeal:**  
The Program Specialist will review the submission and forward it to the Community Development Coordinator within five (5) business days of receipt. The Community Development Coordinator will document the information at the time the appeal is received.
- 3) **Investigating the Complaint:**  
The investigation of the complaint will be completed within 60 working days of the appeal being filed with the Community Development Coordinator.
- 4) **Communicating the Results:**  
The results of the investigation and the recommendations made Community Development Coordinator will be sent in writing to the client.

- A copy of the report will be filed at the St. Clair County IGD

## Section 10: Record-Keeping Requirements

Accurate and thorough record-keeping is essential to ensure compliance with federal regulations and facilitate reviews and audits related to the administration of HUD-funded programs, including CDBG and CDBG-DR. These requirements are governed by 24 CFR 570.506 unless otherwise modified by applicable Federal Register Notices. IGD/CD will maintain records sufficient to document compliance, support financial and performance reporting, and respond to monitoring or audit inquiries.

Category	Required Records
<b>General Administration</b>	<ul style="list-style-type: none"> <li>- Award Letter</li> <li>- Application</li> <li>- Executed Written Agreements &amp; Amendments</li> <li>- Eligibility and National Objective Determinations</li> <li>- Environmental Review (Executed)</li> <li>- Notice to Proceed</li> </ul>
<b>Procurement &amp; Contractor Selection</b>	<ul style="list-style-type: none"> <li>- Procurement Method Rationale</li> <li>- Contract Selection Criteria</li> <li>- Contractor Evaluations and Decisions</li> <li>- Cost or Price Analysis Results</li> <li>- Procurement Policy and Documentation</li> <li>- Bid Tabulation &amp; Award</li> <li>- Bids Received (minimum of three)</li> <li>- Pre-Bid Sign-In Sheet</li> <li>- Bid Advertisement</li> <li>- Cost Analysis &amp; Specifications</li> <li>- Change Orders (if applicable)</li> </ul>
<b>Financial &amp; Compliance</b>	<ul style="list-style-type: none"> <li>- Financial Records Detailing Fund Use</li> <li>- Documentation of Funding Decisions and Selection Criteria</li> <li>- Certified Payrolls (General Contractor/Subcontractors)</li> <li>- Payment Bond (General Contractor)</li> <li>- Executed Contracts (General Contractor-Subcontractor &amp; Subrecipient-General Contractor)</li> <li>- Compliance Records (including demographic data)</li> <li>- EPLS Verification (<a href="http://www.sams.gov">www.sams.gov</a>) (General Contractor &amp; Subcontractor)</li> <li>- Contact Sheets &amp; List of Subs (General Contractor, Subcontractor)</li> <li>- HUD Program Certifications</li> </ul>
<b>Labor Standards &amp; Section 3 Compliance</b>	<ul style="list-style-type: none"> <li>- Labor Standards Compliance Documentation</li> <li>- Davis-Bacon Wage Decision and Interviews (All</li> </ul>

Category	Required Records
	Workers on Project – Section 3 Reports (Monthly)
<b>Public Access &amp; Transparency</b>	– Records of Past Use of Funds (available to the public per state/local privacy laws)

*Residents shall also be provided reasonable access to records regarding the past use of CDBG and CDBG-DR funds, consistent with state and local privacy laws.*

### **10.1 File Retention**

Records shall be retained for a minimum period of three years from the closeout of the grant or for the period required by other applicable laws and regulations, including those outlined in 24 CFR 570.487 (CDBG) and 2 CFR 200.334 (CDBG-DR). Supporting documentation must be maintained to verify compliance with all programmatic and financial requirements, and to support audits, monitoring, and performance reporting.

### **Section 11: Monitoring**

The St Clair County Intergovernmental Grants Department (IGD)/ Community Development Group (CD) is responsible for ensuring all HUD-funded programs, including CDBG and CDBG-DR, are implemented in compliance with applicable federal regulations, program requirements, and written agreements.

IGD/CD conducts internal self-monitoring to assess program performance, identify areas for improvement, and proactively address compliance issues. Monitoring activities are guided by HUD regulations, including 2 CFR Part 200, applicable Federal Register Notices, and the County’s internal Compliance Monitoring Policy and Procedures Manual, available on St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

#### **Monitoring Approach**

IGD-CD uses a risk-based monitoring framework that applies to both CDBG and CDBG-DR projects. Monitoring activities may include:

- Desk reviews of project files to verify eligibility, procurement documentation, environmental review, and financial records.
- On-site monitoring visits to assess construction progress, inspect work, verify beneficiary information, and review compliance documentation.
- Construction oversight, including review of bids, change orders, invoices, draw requests, and substantial completion documentation.
- Financial compliance checks, including verification of allowable costs, internal controls, and adherence 2 CFR Part 200 cost principles.
- Review of reporting requirements, including performance measures and timelines established in project agreements.

Monitoring frequency is determined using a risk assessment that considers factors such as project complexity, funding amount, prior performance, and audit history. IGD-CD conducts monitoring activities at intervals appropriate to the level of risk and the needs of the project, using a combination of desk reviews, file reviews, and on-site assessments as warranted.

### **General Monitoring Standards**

Monitoring for all HUD-funded PF and infrastructure projects will evaluate compliance with:

- Environmental review requirements under 24 CFR Part 58
- Procurement regulations under 2 CFR 200.317-327
- Labor standards, including Davis-Bacon (if applicable)
- Civil rights and fair housing requirements, including Section 3 and Section 504
- National objective compliance (for CDBG and CDBG-DR)
- Contract provisions and performance requirements
- Financial management and documentation standards

IGD-CD issues written monitoring results, identifies findings or concerns, and requires corrective actions within established timelines. Documentation of all monitoring activities is maintained in the project file.

### **CDBG-DR Monitoring Cross-Reference**

Public facilities and infrastructure projects funded with CDBG-DR are subject to enhanced monitoring requirements, including verification of tie-back to the qualifying disaster event, unmet need, duplication of benefits (DOB), construction progress documentation, DRGR reporting, and expenditure deadlines. These DR-specific monitoring procedures are described in the St. Clair County, Illinois Community Development Block Grant Disaster Recovery Policies & Procedures Manual — Financial Administration and Management of the HUD Community Development Block Grant Disaster Recovery Grant located at [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#). This document supplements and expands upon the general monitoring standards established in Part I of this manual.

## Part II: Community Development Block Grant (CDBG) Programs

### Section 1: Program Overview

Under the St. Clair County IGD/CD Annual Action Plan, local recipients may utilize Community Development Block Grant (CDBG) funds for public facilities and infrastructure improvement projects in accordance with 24 CFR 570.201(c) and (d). This section outlines the requirements and key implementation steps for these activities.

The **CDBG Program** is authorized under Title I of the Housing and Community Development Act of 1974, as amended. It was created as the first federal block grant to local governments through the consolidation of individual categorical HUD programs. It provides flexible funding to support housing, infrastructure, and economic development activities that primarily benefit low- and moderate-income (LMI) residents.

CDBG funding is a valuable resource for strengthening and enhancing communities, making them more livable and sustainable. Given limited resources, it is essential to be strategic and selective, targeting investments toward priority needs and long-term impact. Sustainability means meeting present needs without compromising the ability of future generations to meet their own, balancing economic, environmental, and social equity considerations.

### Section 2: Eligibility Criteria

In the context of Community Development Block Grant (CDBG) funding, a public facility refers to infrastructure and buildings that are publicly owned or operated and serve the general public or a specific group of low- and moderate-income (LMI) individuals/ LMA/ LMC. Public facility projects must meet one of the CDBG National Objectives as outlined in 24 CFR 570.208 . Activities must comply with eligible requirements in 24 CFR 570.201.

#### CDBG-funded public facilities and infrastructure:

Category	Examples	Key Considerations
<b>Infrastructure Improvements</b>	<ul style="list-style-type: none"> <li>– Water and sewer systems</li> <li>– Streets and sidewalks</li> <li>– Drainage and flood control</li> <li>– Street lighting</li> <li>– Utility lines</li> </ul>	<ul style="list-style-type: none"> <li>– Must benefit LMI areas or populations</li> </ul>
<b>Public Buildings</b>	<ul style="list-style-type: none"> <li>– Community centers</li> <li>– Libraries</li> <li>– Health clinics</li> </ul>	<ul style="list-style-type: none"> <li>– Must be publicly owned or operated for public benefit</li> </ul>

Category	Examples	Key Considerations
		<ul style="list-style-type: none"> <li>- Municipalities must request ADA projects</li> </ul>

**Ineligible Government Facilities for CDBG Funding**

CDBG funds may not be used to assist buildings or portions of buildings used for the general conduct of government. This includes city halls, county administrative buildings, state capitols, office buildings, courthouses, and other facilities where legislative or general administrative affairs of government take place. Additionally, CDBG funds may be used for the removal of architectural barriers under 24 CFR 570.201 even within such government buildings, to improve accessibility.

**Section 3: Program Awareness**

Information about the program is available through multiple sources, including:

- The St. Clair County IGD website Intergovernmental Grants | Departments | St. Clair (RC Version: 9.13.3.0)
- Correspondence with city/ townships leadership
- Public hearings
- Citizen Participation Plan

**3.1 Citizen Participation Plan**

To ensure public input and involvement in the planning, implementation, and evaluation of the CDBG Public Facilities projects, in accordance with 24 CFR 91.105.

***Public Participation Opportunities:***

- Hearings & Meetings: Gather input on funding priorities and program performance.
- Public Comment Periods: Provide feedback on plans and reports.
- Community Outreach: Engage residents, especially low-income households

Notices for hearings, meetings, and public comment periods will be published in accessible formats, including online postings on the St. Clair County IGD website St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0).

**Section 4: Application Review and Project Selection**

**4.1 Selection Process**

Once an activity has been determined eligible and included in the Annual Action Plan, IGD/CD follows a structured process to finalize project selection and funding allocation.

- 1) Public Comment and Approval (24 CFR 91.105).
  - Publish a draft of the plan on the county’s website, located at St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development (RC Version: 9.13.3.0) for public comment for a 30 day public comment period

- Holds a public hearing, in accordance with the city's Citizen Participation Plan (24 CFR 91.105).
- After incorporating public feedback, the final Annual Action Plan must be approved by the County Board Chairman and submitted to HUD for review and approval.

## 2) Application Review and Scoring

- IGD staff will review applications for eligibility based on criteria that align with 24 CFR 570.208, 24 CFR 570.207, 24 CFR 570.201, 24 CFR 570.200
- Staff will score eligible projects using a rating sheet including community need, past performance, and the percentage of low/mod income population, and other factors. Refer to Appendix V for Scoring Sheet.
- Only eligible projects will be reviewed and ranked. The scoring is a general indication of the project's critical need for funding; however, the highest-scoring projects may not necessarily be recommended for funding.
- Communities or townships are eligible to submit an application. Other entities may seek support from a community/township to submit an application on their behalf.
- Staff recommendations will be submitted to the Community Development Coordinator and IGD Executive Director for review. They may modify staff recommendations based on their knowledge of County needs, regardless of scoring. The highest-scoring projects may not necessarily be recommended.
- The Executive Director will review the projects with the County Board Chairman for final approval. Recommendations may be submitted to the County Board Grants Committee for approval.

## 3) Award Notification

- Once HUD approves the Annual Action Plan, the IGD/CD issues formal award letters to all subrecipients, detailing the award amount and anticipated project start date.
- Award letters include pre-award conditions, such as any required compliance documents that must be submitted before contract execution.

## 4.2 Project Agreement Process

### *Purpose*

The agreement specifies what the subrecipient or contractor must do in exchange for receiving grant funds, including any reporting requirements to demonstrate regulatory compliance. It is the responsibility of the IGD/CD staff to ensure that:

- All necessary documentation is properly established and referenced in the agreement.
- The city complies with all obligations under its agreement with HUD.
- All agreements contain the required provisions necessary for compliance with CDBG program regulations.

The written agreement serves as a critical management tool for:

- Verifying compliance with HUD regulations

- Monitoring subrecipient performance
- Ensuring proper documentation of expenditures

### ***Agreement Process***

Along with the award letters, St. Clair County IGD staff shall prepare written agreements for each funded activity. These agreements disseminate all applicable federal, state, and local requirements to subrecipients and city departments implementing CDBG-funded activities. Under 24 CFR 570.501, the grantee (St. Clair County IGD) remains responsible for ensuring that all projects comply with applicable CDBG requirements, regardless of any written agreement.

Set forth by 24 CFR 570.503, grantees must have a written agreement in place with each project before disbursing any CDBG funds. This agreement must remain in effect until project completion including program income.

St. Clair County IGD prepares Subrecipient Agreements for all CDBG funds awarded to subrecipient organizations.

### ***Amendments & Modifications:***

These agreements must be amended as needed to reflect:

- Changes in funding amounts
- Revised project timelines or completion dates
- Updated HUD or local requirements

*Amendments must be authorized by IGD.*

### ***Non-CDBG Fund Requirements:***

The Agreement may also require the use of non-CDBG funds, if the project originally pledged additional funding for the CDBG-assisted activity. For all new project Agreements, any required non-CDBG funds must be expended. To document these expenditures, project communities must provide St. Clair County IGD with:

- Copies of invoices
- Copies of checks
- Accounting system reports

## **Section 5: Construction Compliance**

### **5.1 Build America, Buy America Act (BABA)**

The St. Clair County Intergovernmental Grants Department/ Community Development Division (IGD/CD) must comply with the Build America, Buy America Act (BABA) (41 USC Ch. 83) and all applicable HUD rules and notices, as may be amended, for CDBG-funded public facilities and infrastructure projects.

Pursuant to HUD's Notice, Federal Register :: Public Interest Phased Implementation Waiver for FY 2022 and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance, any CDBG funds obligated by HUD on or after the applicable listed effective dates are subject to BABA requirements, unless exempted by a waiver.

St. Clair County IGD/CD's Build America, Buy America Policies and Procedures can be found at:  
[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)  
(RC Version: 9.13.3.0).

## **Part III: Community Development Block Grant Disaster Recovery (CDBG-DR) Programs**

### **Section 1: Program Overview**

Under the St. Clair County IGD/CD CDBG-DR Action Plan, public facilities and infrastructure projects funded through CDBG-DR are designed to address unmet recovery needs or contribute to long-term resilience following a presidentially declared disaster. These activities must comply with the requirements outlined in 24 CFR Part 570, applicable Federal Register notices, and the county's Mitigation Needs Assessment. All CDBG-DR activities must demonstrate a tie-back to the disaster, comply with HUD waivers and alternative requirements, and be outlined in the Action Plan for Disaster Recovery (APDR) approved by HUD. Mitigation measures will be integrated into all CDBG-DR-funded construction and rehabilitation activities. Projects will incorporate hazard-resistant design standards and resilience performance measures, which will be tracked in DRGR as required by HUD.

#### **St. Clair County received CDBG-DR funding for the following disasters:**

- **2022 Flood Disaster:** \$30 million allocated by *88 FR 32046*, published May 18, 2023.
- **2024 Flood Disaster:** \$89 million allocated by *90 FR 4759*, published January 16, 2025.

CDBG-DR funding for public facilities and infrastructure is established in the County's HUD-approved Action Plans. The 2022 allocation includes \$28,525,650 for Infrastructure and Public Facilities, and the 2024 allocation includes \$80,056,350. Award amounts for individual projects are based on documented unmet need, cost reasonableness, eligibility, and available program funds. Minimum or maximum award amounts are not fixed and may vary depending on project scope and allocation requirements.

CDBG-DR funding is designed to support strategic investments that not only restore damaged infrastructure but also reduce future risk and improve community resilience. Projects must demonstrate a clear tie-back to the qualifying disaster and align with broader recovery and mitigation goals. Given the scale and urgency of disaster recovery, it is essential to prioritize projects that serve vulnerable populations, promote equitable outcomes, and strengthen the county's capacity to withstand future hazards.

### **Section 2: Eligibility Criteria**

Public facilities and infrastructure projects funded through CDBG-DR must meet specific eligibility criteria that reflect the program's core purpose:

- Addressing unmet needs resulting from a presidentially declared disaster
- Reducing future risk through resilient investments
- Serving areas or neighborhoods that are predominantly low- to moderate-income (LMI)

Eligible activities typically include the rehabilitation, reconstruction, or new construction of public facilities such as water and sewer systems, streets, drainage improvements, and public buildings, provided they demonstrate a clear tie-back to the disaster and are consistent with the priorities outlined in the county's Action Plan and Mitigation Needs Assessment.

**CDBG-DR funded public facilities and infrastructure:**

<b>Eligibility Requirement</b>	<b>Description</b>
<b>Disaster Tie-Back</b>	The project must address a documented impact from the qualifying disaster.
<b>National Objective</b>	All public facilities and infrastructure activities funded under CDBG-DR will exclusively meet the Low- and Moderate-Income (LMI) benefit national objective, as outlined in the approved Action Plan.
<b>Location</b>	The project must be located within the designated disaster impact areas.
<b>Regulatory Compliance</b>	The project must comply with applicable environmental, procurement, and labor standards.

**Infrastructure Planning Requirements**

Infrastructure projects will include a plan for long-term operation and maintenance, identify alignment with regional/local risk reduction plans, and demonstrate coordination with other planned capital improvements. IGD/CD will document efforts to leverage additional funding sources. CDBG-DR does not require non-federal match for public facilities and infrastructure projects. However, CDBG-DR funds may be used as a non-federal cost share for eligible FEMA Public Assistance projects, in accordance with the applicable Federal Register Notice(s) and the County’s Action Plan(s).

Applicants must provide documentation demonstrating consistency with regional or local risk reduction plans, such as the County’s Multi-Hazard Mitigation Plan or Capital Improvement Plan. This documentation may include:

- A description of how the proposed project reduces future risk to the jurisdiction.
- References to specific goals, objectives, or strategies in the applicable plan(s).
- Supporting materials, such as plan excerpts or letters of consistency from the planning agency responsible.
- IGD/CD will review this documentation during eligibility determination and maintain it in the project file.

Applicants must demonstrate long-term sustainability of funded projects by submitting an Operation and Maintenance (O&M) Plan as part of the application package. This plan must identify the responsible entity, funding sources for ongoing costs, and a commitment to maintain the project for its useful life. CDBG-DR funds cannot be used for routine maintenance. This plan must:

**1. Identify Responsible Entity**

Specify the unit of local government, quasi-government entity, or nonprofit that will

assume ownership and operational responsibility for the completed infrastructure or public facility.

**2. Funding Source for O&M**

Provide documentation of the funding source(s) that will cover ongoing maintenance and repair costs. Examples include: - Local government general funds - Utility rate structures - Special service districts - Intergovernmental agreements

**3. Maintenance Schedule and Standards**

Outline the anticipated maintenance schedule (e.g., annual inspections, routine servicing) and standards to ensure compliance with applicable codes and resilience measures.

**4. Sustainability Commitment**

Include a resolution or letter of commitment from the governing body confirming: - Acceptance of ownership and responsibility for O&M - Assurance that CDBG-DR funds will not be used for routine maintenance - Agreement to maintain the project for its useful life Applications without a complete O&M Plan will be deemed ineligible for funding.

**Ineligible Projects**

- Projects may be deemed ineligible if they:
- Do not demonstrate a direct tie-back to the disaster or its impacts.
- Are primarily for routine maintenance or operations.
- Do not meet a national objective.
- Duplicate assistance already provided by FEMA, SBA, insurance, or other sources without proper DOB documentation.
- Fail to comply with applicable federal requirements, including environmental review or procurement standards.

All proposed projects must undergo a thorough eligibility review by IGD/CD staff prior to approval, ensuring alignment with federal regulations and local recovery priorities. Assistance under the CDBG-DR Public Facilities and Infrastructure Program is provided in the form of grants. Repayment is required only if duplicative assistance is later identified.

**Section 3: Mitigation and Resilience Integration**

St. Clair County will incorporate mitigation measures and resilience strategies into all CDBG-DR funded construction, reconstruction, and rehabilitation activities for residential and non-residential buildings. Each project will be required to demonstrate how it reduces natural hazard risks and withstands chronic stresses and extreme weather events.

**How Mitigation Measures Will Be Integrated:**

- Engineering design standards will include forward-thinking resiliency concepts such as elevating structures above base flood elevation, reinforcing foundations, and using flood-resistant materials.
- Projects will align with regional hazard mitigation plans and adopt building and zoning codes that address climate change impacts.
- Applications must include a hazard risk analysis using local data and planning tools to identify vulnerabilities and mitigation strategies.

**How Resilience Performance Measures Will Be Implemented:**

- All CDBG-DR investments will incorporate adaptable and reliable technologies to prevent premature failure and ensure long-term functionality.
- Projects will be designed to withstand chronic stresses (e.g., aging infrastructure) and extreme weather events (e.g., flooding, severe storms) by integrating features such as improved drainage systems, stormwater management, and energy-efficient systems.
- Resilience performance measures will be documented in DRGR, including elevation standards, floodproofing techniques, and compliance with adopted hazard mitigation strategies.

#### **Mitigation Set-Aside Activities:**

- Infrastructure and public facility projects funded under the mitigation set-aside will increase resilience to disasters or eliminate long-term risk of loss of life, injury, property damage, and hardship by lessening the impact of future disasters.
- Examples include upgrading sewer and water systems to prevent flood damage and constructing facilities outside flood-prone areas.

#### **Flood Insurance (NFIP / Section 582)**

- For CDBG-DR public facilities and infrastructure projects located within a FEMA-designated Special Flood Hazard Area (SFHA), IGD/CD verifies compliance with flood insurance requirements under Section 582 of the National Flood Insurance Reform Act (NFIRA) and applicable HUD guidance. Where required, flood insurance must be obtained and maintained for insurable structures for the life of the improvement. Compliance documentation retained in the project file may include: SFHA determinations Flood Insurance Rate Map (FIRM) panels, evidence of community National Flood Insurance Program (NFIP) participation, and proof of flood insurance coverage (policy declaration or binder).
- CDBG-DR assistance is not provided contrary to NFIP requirements or HUD prohibitions related to failure to maintain flood insurance. If project scope or location changes affect flood risk or SFHA status, IGD/CD reassesses flood insurance applicability and updates the file prior to approving payment.

#### **Elevation Requirements**

- Where applicable, public facilities and infrastructure projects must comply with elevation and flood-resistant construction standards established in the applicable Federal Register Notice(s) for the County's 2022 and 2024 CDBG-DR allocations. These standards include elevating structures above Base Flood Elevation (BFE) or implementing floodproofing measures. IGD/CD documents elevation determinations and compliance in the project file, including engineer/architect certification.

### **Section 4: Program Awareness**

Information about the CDBG-DR Public Facilities and Infrastructure program is made available through multiple channels to ensure transparency and community engagement. These include:

- The St. Clair County IGD website: [St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)
- Direct outreach and correspondence with city and township leadership

- Public hearings and informational meetings
- The Citizen Participation Plan (CPP) adopted for CDBG-DR

#### 4.1 Citizen Participation Plan

In accordance with 24 CFR 91.115 and applicable Federal Register notices governing CDBG-DR, St. Clair County IGD/CD ensures robust public involvement in the planning, implementation, and evaluation of disaster recovery activities. The CPP outlines procedures for engaging residents and stakeholders throughout the lifecycle of CDBG-DR projects.

#### Public Participation Opportunities Include:

- **Hearings & Meetings:** Solicit input on recovery priorities, infrastructure needs, and program performance.
- **Public Comment Periods:** Invite feedback on the Action Plan, substantial amendments, and performance reports. *While public comment periods are not required under CDBG-DR regulations or the Universal Notice, St. Clair County will follow its adopted Citizen Participation Plan, which includes public hearings and comment opportunities for transparency and community input.*
- **Community Outreach:** Engage residents in disaster-impacted areas, with a focus on low- and moderate-income households and historically underserved populations.

Notices for hearings, meetings, and public comment periods are published in accessible formats, including online postings on the St. Clair County IGD website. Additional outreach efforts may include translated materials, ADA-accessible formats, and coordination with local organizations to ensure inclusive participation.

All outreach and engagement activities will comply with the Universal Notice requirements published in the applicable Federal Register notices for CDBG-DR allocations. Notices will be accessible, translated as needed, and posted in accordance with HUD guidance.

### Section 5: Application Review and Process Selection

#### 5.1 Who Can Apply

Eligible applicants include:

- Units of local government
- Quasi-government entities
- Non-profit organizations

All applicants must serve areas within the HUD-identified Most Impacted and Distressed (MID) area, which for this allocation is St. Clair County. Applicants may submit more than one application if they have multiple eligible projects. Awards for multiple projects are permitted, subject to funding availability and compliance with program priorities.

#### 5.2 Selection Process

Once an activity has been determined eligible and included in the CDBG-DR Action Plan, IGD/CD follows a structured process to finalize project selection and funding allocation.

- 1) Threshold Criteria
  - Demonstrate disaster tie-back.

- Meet the LMI national objective.
  - Be located within the designated disaster impact area.
  - Comply with all federal, state, and local requirements (environmental, procurement, labor).
  - Include a completed Duplication of Benefits (DOB) analysis.
- 2) Application Review and Scoring
- Applications will be reviewed by at least three IGD/CD staff members, including one compliance officer and one program manager.
  - Staff recommendations are submitted to the Community Development Coordinator and IGD Executive Director for review.
  - Recommendations may be modified based on County priorities.
  - Final approval by the County Board Chairman; recommendations may also be presented to the County Board Grants Committee.
  - Impact on vulnerable populations and Most Impacted and Distressed (MID) areas.
  - Alignment with mitigation and resilience goals (minimum 15% mitigation activities required).
  - Cost reasonableness and leveraging of other funds.
  - Financial need and capacity to complete the project within required timelines.
- 3) Award Notification
- After HUD approves the Action Plan and releases the Request for Funds (ROF), IGD/CD issues formal award letters to all subrecipients.
  - Award letters include:
  - Award amount and anticipated start date.
  - Pre-award conditions (e.g., environmental clearance, procurement documentation, DOB verification).
  - No costs may be incurred prior to contract execution and clearance of all conditions.

### **5.3 Project Agreement Process**

The written agreement specifies what the subrecipient must do in exchange for receiving CDBG-DR funds, including reporting requirements to demonstrate compliance.

#### ***Purpose***

- Ensure all necessary documentation is referenced in the agreement.
- Verify compliance with HUD regulations and County obligations.
- Serve as a management tool for monitoring performance and expenditures.

#### ***Agreement Requirements***

Along with the award letters, St. Clair County IGD staff will prepare written agreements for each funded CDBG-DR activity. These agreements communicate all applicable federal, state, and local requirements to subrecipients and municipal departments implementing CDBG-DR projects. Under 24 CFR 570.501 the grantee (St. Clair County IGD) remains responsible for ensuring that all projects comply with applicable CDBG-DR requirements, regardless of any written agreement.

As set forth in 24 CFR 570.503 , a written agreement must be in place with each project before any CDBG-DR funds are disbursed. This agreement remains in effect until project completion, including any program income. IGD prepares Subrecipient Agreements for all CDBG-DR funds awarded to subrecipient organizations.

### ***Amendments and Modifications***

Agreements must be amended as needed to reflect:

- Changes in funding amounts.
- Revised project timelines or completion dates.
- Updated HUD or local requirements.

All amendments must be authorized by IGD/CD prior to implementation.

### ***Payment and Drawdown Process***

Payments are initiated only after a fully executed agreement is in place and IGD/CD verifies compliance with applicable requirements, including environmental clearance, procurement documentation, and Duplication of Benefits (DOB) for CDBG-DR projects. All drawdowns for CDBG-DR activities are processed through HUD's Disaster Recovery Grant Reporting (DRGR) system and must be supported by documentation demonstrating eligibility, cost reasonableness, and alignment with the approved scope of work.

IGD/CD reviews invoices, supporting documentation, and construction progress reports prior to approving reimbursement requests. Supporting documentation is retained in the project file in accordance with HUD recordkeeping requirements and applies to both the County's 2022 and 2024 CDBG-DR allocations. For additional guidance, refer to the *St. Clair County Intergovernmental Grants Department Financial Policies and Procedures Manual* and the County's published risk assessments available at [St. Clair County > Departments> Intergovernmental Grants](#) .

### ***Change Orders***

All proposed change orders for CDBG-DR public facilities and infrastructure projects must be reviewed and approved by IGD/CD prior to the start of any additional work. Change orders are evaluated for eligibility, cost reasonableness ([2 CFR 200.404](#)), procurement compliance ([2 CFR Part 200 Subpart D](#)), consistency with environmental clearance, and potential Duplication of Benefits (DOB) implications.

Supporting documentation must identify the reason for the change, associated cost impacts, and confirmation from the project's architect or engineer that the change is necessary. Material changes to scope, budget, or timeline may require amendments to the written agreement and updates in DRGR before payment is approved.

Work associated with a change order may not proceed until written approval is issued by IGD/CD.

### **5.4 Duplication of Benefits (DOB)**

As provided by the [Stafford Act](#) (42 U.S.C. 5121-5207, Section 31), duplication of benefits is prohibited. IGD/CD will continuously monitor for compliance with this requirement. FEMA, NFIP, private insurers, SBA, U.S. Army Corps of Engineers, and other agencies will be contacted, and data-sharing agreements established to ensure no duplication occurs.

CDBG-DR funds will not be used for activities for which funds have been received (or will be received) from FEMA, NFIP, private insurers, SBA, U.S. Army Corps of Engineers, or other sources. Assistance may only be provided to the extent that a disaster recovery need remains unmet. Applicants must disclose all sources of assistance applied for, received, or anticipated on the Duplication of Benefits Form (see DOB Policies and Procedures at:

*St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development*). All applicants will sign an application and contract verifying sources and agreeing to repay any duplicative assistance received during or after the contract term

The County will verify application information before award or contract execution using data from FEMA, SBA, private insurance, and other sources. IGD/CD will also review local and state capital improvement plans to confirm whether funds were previously designated for the activity. If such funds are no longer available, IGD/CD will document this in the project file.

### **DOB Framework for Infrastructure Activities**

IGD/CD will follow the process outlined in Appendix C of the Universal Notice for each applicant:

1. **Assess Applicant's Total Need**  
Determine the full cost to complete the infrastructure project, including eligible expenses.
2. **Identify Total Assistance**  
Document all sources of assistance received or anticipated (FEMA, SBA, insurance, state/local funds, etc.).
3. **Exclude Non-Duplicative Amounts**  
Remove assistance that does not duplicate CDBG-DR eligible costs (e.g., funds for unrelated activities).
4. **Exclude Funds for a Different Purpose**  
Deduct assistance used for purposes unrelated to the infrastructure project.
5. **Exclude Funds for Same Purpose, Different Allowable Use**  
Deduct assistance applied to infrastructure but for costs not eligible under CDBG-DR.
6. **Identify Final DOB Amount and Calculate CDBG-DR Award**  
Subtract all duplicative assistance from total need to determine unmet need and award amount.
7. **Reassess Unmet Need When Necessary**  
If additional assistance is received after award, IGD/CD will recalculate and recapture funds as needed.

## **Appendix I: Additional Resources**

To access the following policies and procedures, along with other helpful information, please visit the St. Clair County website:

[St. Clair County Illinois > Departments > Intergovernmental Grants > Community Development](#)

- St. Clair County Intergovernmental Grants Department Financial Policies and Procedures.
- St. Clair County IGD Environmental Policies and Procedures
- St. Clair County New Construction Policies and Procedures
- St. Clair County CDBG-DR Policies and Procedures
- St. Clair County Lead Policies and Procedures Manual
- St. Clair County Duplication of Benefits Policies and Procedures
- St. Clair County Anti-Displacement and Relocation Policies and Procedures
- St. Clair County IGD Anti-Fraud, Waste, and Abuse Policies and Procedures
- St. Clair County IGD-CD Section 504 Policy
- St. Clair County IGD Compliance Monitoring Policies and Procedures Manual

## **Appendix II: CBDG Public Facilities and Infrastructure Program Flow**

### **PART 1: SURVEYS**

#### **1) SURVEYS.**

Annually, May or June survey letters will be sent to each Village/Township. The letter requests each Mayor/Supervisor to verify that the project they will be applying for in January will be in the low-moderate income area using the Census Data. If the project is not in an eligible census tract, they are to notify IGD Public Facility to request a survey packet. The packet will include a letter describing the survey, what IGD will require, a sample letter, a survey form, and a sample of the return envelope. Each community is responsible for mailing the survey letters, forms, and envelopes to the residents in the area that the project will be located. The residents will then mail the survey directly to IGD. Once IGD receives all the surveys on the list provided by the community or the deadline (third Friday in December), IGD will then use the HUD approved income survey methodology to determine eligibility of the project area. After the methodology configuration has been completed, IGD will mail out approval/denial letters to that community. See attached survey methodology.

### **PART II: PROJECT PROCUREMENT**

#### **1) PUBLIC FACILITIES APPLICATION FORMS REVIEWED.**

In late fall (October-November), IGD staff will review application and grading sheets, making necessary modifications. The funding application process is for funds that will not be received until the next program year (beginning October 1st).

#### **2) PUBLIC FACILITIES APPLICATIONS MAILED.**

In mid-to-late December of the prior program year, applications are mailed via Certified Mail (return receipt requested) to all communities/townships in the Entitlement Area. Applications may also be provided to engineering firms that service the communities. Applications may be e-mailed, mailed, or picked up at the IGD Belleville office. IGD staff will periodically check return mail receipts and contact those communities/townships for whom no receipt was received. Additional applications will be sent if necessary.

#### **3) APPROXIMATE FUNDING WILL BE DECIDED UPON.**

Based on HUD estimates, the County will estimate a CBDG Public Facility Grant allocation for planning purposes for the coming Program Year

#### **4) TECHNICAL ASSISTANCE MEETING HELD.**

IGD staff will notify communities, townships, and their engineering firms of a technical assistance meeting via email. Each community engineer can respond via phone or email. Meetings are held via zoom or as a one-on-one meeting. The meeting will be held approximately four weeks after the application mailing. IGD staff will discuss any changes or answer questions regarding the applications. The County requires a minimum 15% Minority Business Enterprise (MBE) participation in every project, if feasible.

- 5) COMPLETED APPLICATIONS RETURNED TO IGD.  
Communities/Townships will be given approximately 9 to 10 weeks to complete and return applications (usually Late- March). A deadline is included in the application. Applications received after the deadline will be held but will not be reviewed or considered for award. When applications are received and date stamped, they are to be given to the Program Specialist. Program Specialists will collect, log the applications, submit to Budget Analyst, confirm low/moderate income percentages, and prepare the review cover sheet for each application.
- 6) COMPLETED APPLICATIONS REVIEWED.  
IGD staff will review applications for eligibility and will score them based on a rating sheet that uses factors including community need, past performance, and percentage of low/mod income population. All projects must be eligible under Code of Federal Regulations (24CFR, 570.200(a) (2); 570.201; 570.207 & 570.208). Only eligible projects will be reviewed and ranked. The scoring is only a general indication of the critical need to fund the project, and highest-scoring projects may not necessarily be recommended. Only communities or townships are eligible to submit an application. Other entities, eligible entities/activities IGD may fund are listed in the public facilities application may seek support from a community/township in which they are located to submit an application on their behalf. The staff recommendations are given to the Community Development Coordinator and IGD Executive Director for their review. They may modify the staff recommendations of eligible projects, regardless of scoring, based on their knowledge of County needs. The highest-scoring eligible projects may not necessarily be recommended. The Executive Director will review the projects with the County Board Chairman for approval. Recommendations may be submitted to the County Board Grants Committee (usually in May or June) for approval. He may also modify staff recommendations, based on his knowledge of County needs. The highest-scoring projects may not necessarily be selected for County Board approval.
- 7) COUNTY BOARD APPROVES ACTION PLAN AND BUDGET.  
IGD will prepare ranking sheets, budget and action before sending to the County Board Chairman for approval.
- 8) CONGRATULATORY LETTERS SENT.  
IGD staff will prepare letters for the County Board Chairman's signature to send to communities/townships receiving funding recommendations for the next program year, pending the County receiving CDBG funds. This is not an "Authorization to Proceed Letter". It states that IGD will be in contact with funded communities.
- 9) REGRET LETTERS SENT.  
IGD staff will prepare letters for the IGD Executive Director's signature to send to those communities whose project applications were not funded, including applications submitted after the date/time deadline. Again, if required information is not provided by the specified deadlines the application will be denied. Extensions of time are only granted for extenuating circumstances and must be approved by the CDBG Coordinator. There are no exceptions/appeals if the file is denied for inadequate documentation. Any other appeals must be submitted in writing within 20 days of the date of the regret letter.

10) RESULTS ADDED TO DRAFT ANNUAL ACTION PLAN.

The proposed projects/funding amounts will be available for public review and comment.

**PART III: PUBLIC FACILITIES CONTRACT ADMINISTRATION**

1) ENVIRONMENTAL REVIEWS COMPLETED

IGD staff will complete environmental forms/process for each proposed project. Budget Analyst completes Request for Release of Funds which must be signed by the County Board Chairman.

2) PROJECT BUDGET PREPARED

The Program Specialist prepares budget/job costs on each contract

3) CONTRACTS WRITTEN

Specific project information supplied by project application or preparer with specific geographic location, project description, and budget information is added to complete the contract. Contract to include compliance with all applicable federal/state regulatory requirements.

4) IN-HOUSE REVIEW BEGINS

IGD staff to confirm CDBG funds are in St. Clair County letter of credit.

- i. Contract submitted to CD Programs Coordinator and County Board Chairman before being sent to community to check for accuracy.
- ii. The document is then sent to the community for authorized signatures with cover letter requesting signature, attested and return to IGD. Communities are also asked to make copies of project contracts for their own records.
- iii. When returned, cover sheet, contract, and “Authorization to Proceed” letter sent for in-house signoff by CD Programs Coordinator and IGD Executive Director, then to County Board Chairman with tabs where his signature is required. Contracts must be attested by County Clerk and returned to IGD.

5) CONTRACTS ARE SENT TO COMMUNITIES

An email is sent to communities with notice to proceed once signed contract is received and executed. The original contract is kept in IGD/CD Division files.

6) IDIS SET-UP

The IGD staff assigned to each community completes HUD Integrated Disbursement Information System (IDIS) set-up sheets. Budget Analyst inputs project information in IDIS online.

7) IGD BID REQUIREMENTS PACKAGE PREPARED

IGD staff assembles a “Project Bid Package”, which should include Davis-Bacon (Prevailing Wage) Wage Decisions, and IGD Bid Specification Requirements (Front-end Documents). The package is sent to the community engineering firm responsible for the project. The

“Project Bid Package” will be included in the community bid package, following federal, state and local procurement requirements.

8) PLANS AND SPECIFICATIONS REVIEWED

One set of “Project Plans and Specifications” are submitted to IGD for review by IGD staff. If approved, an Authorization to Advertise for Bids is issued. One set of plans/specs is forwarded to Southern Illinois Builders Association (SIBA), along with a bid opening date from the Engineer. Community engineers must include any project addendums. In addition, notice of the bid opportunity shall be published in a newspaper of general circulation, such as the Belleville News-Democrat (BND). All bids submitted for projects must be opened publicly, with IGD staff present if possible. A sign-in sheet is required to document attendance.

9) IGD reviews bids to ensure figures match application and that all IGD front-end documents are present and properly completed. IGD also verifies MBE and Section 3 compliance before issuing a Notice of Award.

10) PRE-CONSTRUCTION CONFERENCE SCHEDULED

After bids are tabulated, the tabulations along with copies of letters to unsuccessful bidders, an award letter from the community and contractor, and certified advertisement for bids, are provided to IGD staff. Contractors must submit Certificate of Insurance (COI) to IGD for approval. A preconstruction conference date is set and held where the original bonds contracts are given to IGD, and a construction start date is set and a Notice to Proceed from the Engineer and County is issued.

11) PROJECT IS MONITORED

IGD staff will:

- i. Maintain a ledger for each contract, showing original amount of funds available, any funds added, and any payments made, with date of each transaction noted, along with back-up documentation.
- ii. Receive photographs taken during construction and after construction, provided by Engineer
- iii. Interview project workers to assure wage and job assignments are correct
- iv. Review requests for payment/ invoices from general contractors. Requests must be accompanied by original documentation of work performed and paystubs. Payroll records must be sent even if no work was performed. Payroll records must be received and checked before making any payouts.
  - a. If applicable, Minority Business Enterprise (MBE) contractors must submit invoices and weekly payroll records.
  - b. If applicable, Section 3 and BABA information must be submitted with payrolls.
  - c. All municipal match must be expended by the point that the awarded project reaches completion.
  - d. Proof of municipal payment must accompany the CDBG request.

- v. Section 3: The Grantee/project if applicable, must comply with Section 3 of the HUD Act of 1968, wherever HUD financial assistance is expended for housing or community development to the greatest extent feasible, economic opportunities will be given to Section 3 residents and businesses in that area. Section 3 residents are; public housing residents, low and very low-income persons who live in the metropolitan area or non-metropolitan county where the HUD assisted project is located.
- vi. Buy America Build America (BABA): The Grantee/project must comply with the requirements of the Build America, Buy America (BABA) Act, 41 USC 8301 note, and all applicable rules and notice, as may be amended, if applicable to the Grantee's infrastructure project. Pursuant to HUD's Notice, "Public Interest Phased Implementation Waiver for FY and 2023 of Build America, Buy America Provisions as Applied to Recipients of HUD Federal Financial Assistance" (88 FR 17001), any funds obligated by HUD on or after the applicable listed effective dates, are subject to BABA requirements, unless excepted by a waiver. Communities must ensure all contractors will be required to adhere to the build America/buy America Act, Public Law 117-58, Title IX, Subtitle A, Part 1 enacted November 15, 2021.
- vii. CERTIFICATION REGARDING DEBARMENT, SUSPENSION, INELIGIBILITY AND VOLUNTARY EXCLUSION--LOWER TIER COVERED TRANSACTIONS. A person who is debarred or suspended shall be excluded from Federal financial and nonfinancial assistance and benefits under Federal programs and activities. The undersigned representatives of the BORROWER each certify, to the best of its knowledge and belief, that:
  - a) Neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this contract; and
  - b) It will include the following clause without modification, in all proposals, agreements, contracts, proposals, or other lower tier covered transactions: "Certification Regarding Department, Suspension, Ineligibility and Voluntary Exclusion--Lower Tier Covered Transaction: (1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department. (2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal."
  - c) HOME Funds may not be used to directly or indirectly employ, award contracts to, or otherwise engage the services of any contractor or subrecipient during any period of debarment, suspension, or placement of ineligibility status. Prior to entering into any HUD-funded agreement, the County will be provided status of all known contractors, subcontractors (including sub-tier contractors), consultants, and subrecipients for registration and UEI numbers in the System for Award Management (SAM), found at <https://www.sam.gov>.

The debarment/suspension status will be checked in the SAM system for the

following entities:

1. Contractors
2. Subcontractors
3. Suppliers

## 12) PROJECT COMPLETION

When IGD funding is spent and IGD-funded construction is complete, IDIS setup/completion form will be submitted to the Budget Analyst, who will enter the project in IDIS as “complete”. Multi-year projects will be considered as a single project and will not be considered “complete” until all years funding is spent, and IGD-funded construction finished. All final billing must be sent via certified mail and marked as “FINAL BILLING”.

- i. All pay request signed by chief elected official of community submitted to IGD for payment. This must have final lien waivers and engineer written approval accompanying financial documentation.
- ii. When a project is entered in IDIS as “complete” (using CDBG funds) but continues with other sources of funds, monitoring will continue until the entire project is complete.

Anything out of the routine paper trail should be brought to the attention of the CD Program Coordinator for approval.

## **PART IV: CHANGE ORDERS/CONTRACT AMENDMENTS**

### CHANGE ORDERS

IGD requires written authorization to any project Change Order calling for an increase or decrease in the original project contract bid price with no additional CDBG funds BEFORE the proposed additional work starts. IGD staff person administering that contract will distribute a Change Order form to the project Architect or Engineer at all Pre-construction Conferences. If there is an increase in cost of project over \$1,000.00 that the municipality will be responsible for, a new resolution must accompany the change order as documentation the council is aware and approves of the additional cost the municipality will be responsible for. Proof of funds available from the municipality is required if municipal responsibility increases over \$1,000.00 from the original application.

It remains the responsibility of the monitoring Engineer or Architect to complete the form and seek approval of all parties, such as (city/village/township, architect/engineer, contractor, and IGD) BEFORE performing any Change Order work. The IGD Program Specialist and CD Programs Coordinator must approve Change Orders in writing.

It is IGD policy to pay all project vendors directly, rather than to reimburse municipalities. This policy has been in effect for several years. IGD will not honor requests for reimbursements.

### TIME EXTENSION REQUESTS

Time extension requests will be submitted by the community (or engineer in behalf of the municipality) in writing for approval by the Community Development Coordinator. The request

should contain the reason for the extension request.

Contract amendments for “time extension only” do not have to be reported to HUD or to the public but will still go through a review and signature process thru CDBG Program Coordinator.

#### SCOPE OR LOCATION

Communities may submit a written request to change a project scope or location. If the change is considered “less than substantial”, and IGD approves, an amendment will be written and will go thru review and sign process of CDBG Program Coordinator. It should also be supported by municipality Resolution of Support by the governing body. The change will be noted in the Consolidated Annual Performance Evaluation Report (CAPER) for that year, complying with the requirements of the revised Final Rule 91.520(g). The County will describe why the original goals and objectives have changed, and the progress made toward meeting the new goals and objectives.

#### SUBSTANTIAL CHANGES

A “substantial change” is defined in the St. Clair County Citizen Participation Plan as:

A Substantial Amendment is defined as a change in the use of CDBG or HOME funds from one eligible activity to another, if the change involves an amount greater than twenty percent of the total County CDBG and HOME Investment Partnership grants for the year in which the change is being made, if there is a meaningful change in the geographic location, or if the change in location would result in a substantial decrease in the number of low or moderate-income persons benefiting from the activity.

Substantial changes will follow the same flow for review as the original contract. The changes must be supported by a Resolution of Support from the municipality. A detailed written notice (newspaper ad) must be available for public review and comment for at least 15 days. Then the substantial changes will be reported to HUD as a Substantial Amendment to the most recent HUD –approved Consolidated Plan. In preparing the amendment, careful consideration will be given to all views expressed by the public.

All substantial changes will also be added to the Consolidated Annual Performance Evaluation Report (CAPER) for that year.

#### AUDITOR REQUESTS FOR INFORMATION

When staff receives requests from community auditors for grant information, including amount and grant numbers, staff will forward the request, and the grant number, to the IGD Fiscal Division.

#### CLOSEOUT

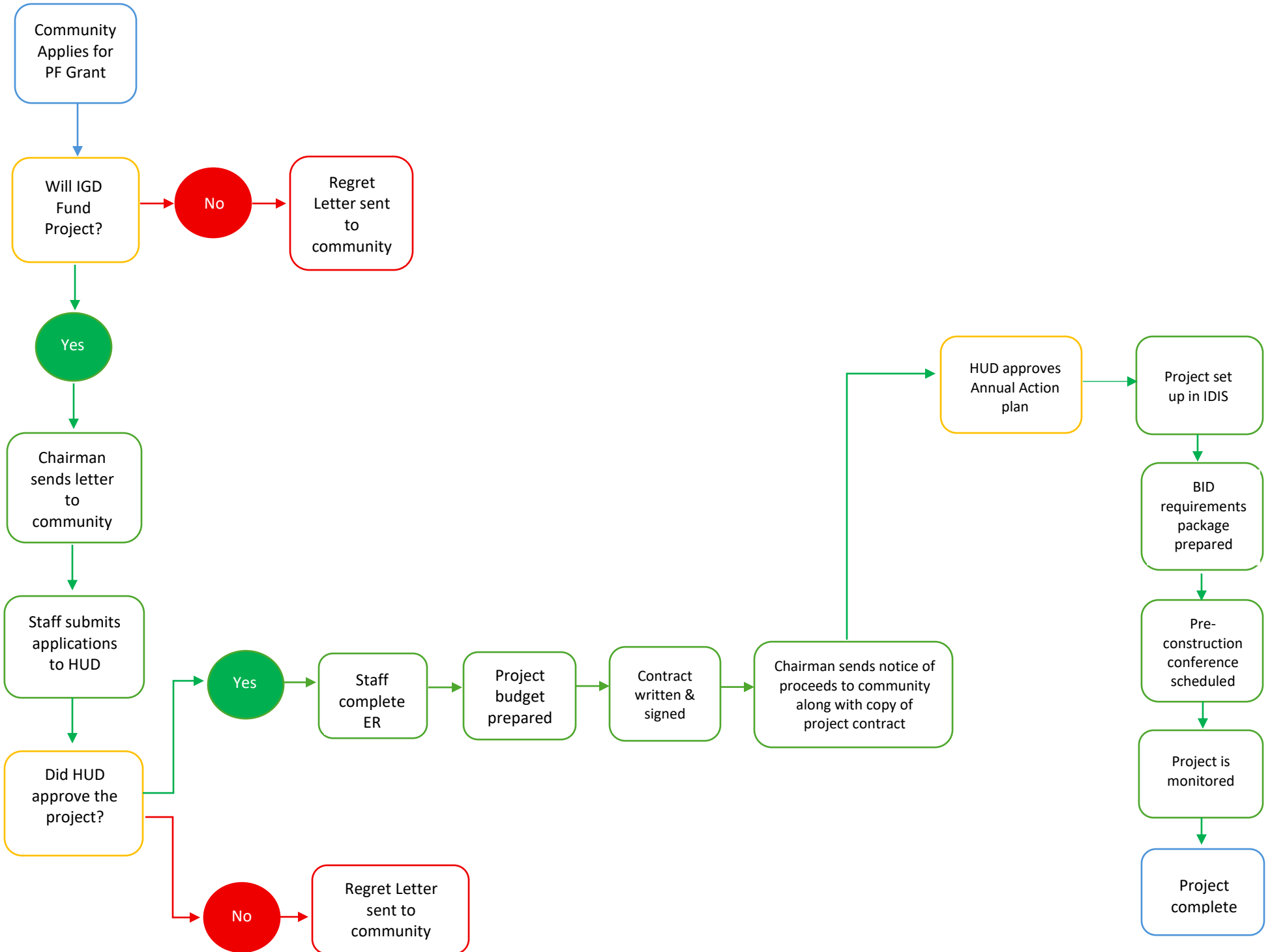
Program Specialist will complete IDIS closeout and provide to budget analyst. Assure file is complete and in compliance with HUD rules and requirements, including but not limited to all reports required and all documentation. All excess funds will be deobligated in IGD system and IDIS.

## **Appendix III: Phases For Public Infrastructure Projects Involving CDBG Funding**

- 1) **The municipality will enter into a Public Facility contract with St. Clair County.** No activity/action on the said project shall begin until the contract has been executed between both the municipality and the County.
- 2) **The municipality will notify St. Clair County IGD of their engineer for the project and will forward a copy of the executed engineering agreement to IGD before engineering work begins on the project.**
- 3) **The engineer will contact IGD for most recent IGD/HUD related forms and obtain latest federal wage decision for placement in the project bid documents.**
- 4) **The engineer will forward to IGD a complete set of plans and specifications, including the advertisement, for IGD to review prior to the project being let.** IGD will review the plans and specs, and providing they are in accordance with federal regulations and IGD requirements, IGD will issue to the engineer a letter of Authorization to Advertise for Bids. The engineer or municipality will publish the advertisement at least once in a newspaper of general circulation (such as the Belleville New Democrat or East St. Louis Monitor). In addition, the engineer or municipality will supply Southern Illinois Builders Association (SIBA) with a full set of plans and specs.
- 5) **IGD will attend the Bid Opening and will review the required the IGD documents contained in the bid documents.** Once the documents have been reviewed by both IGD and the engineer, IGD will provide to the engineer a letter of Authorization to allow a Notice of Award to be issued for the municipality. *NOTE: if a bidder fails to complete and submit the IGD documents, the bid will be marked incomplete and the municipality will not be able to issue a Notice of Award without possible loss of CDBG funds.*
- 6) **The engineer will provide IGD copies of a project bid tab, letters of non-award to other bidders, recommendation letter to municipality, signed Notice of Award, and certification of publication.**
- 7) **Once a Notice of Award is provided to the contractor, the engineer will schedule and notify all parties of a pre-construction meeting between the municipality, engineer, contractor, and IGD.** IGD will collect copies of performance/payment bonds, certificates of insurance, and other pertinent documents related to the project. Following review and approval by the County of all the pertinent documents, including insurance requirements, IGD will issue a Notice of Authorization to engineer for the Execution of Contract and the Notice to Proceed.
- 8) **The engineer will notify IGD of the state date of construction, when there are any breaks in construction, and change orders being implemented, and when the project is finished.** IGD will monitor the project by collecting site photos, on site employee interviews, and review change orders for approval.

- 9) **The engineer will forward any interim payments by the contractor or engineer to the municipality for approval.** Once approved by the municipality, the original invoice with all payment documents including the signed IGD Disbursement Authorization will be forwarded to IGD to be processed and paid. The municipality should not pay invoices for the purpose of being reimbursed by IGD.
- 10) **Following project completion, the engineer will forward a copy of the engineer certificate of approval and final invoice for payment to the municipality of approval.** IGD will release remaining grant funds once the municipality has expended the amount provided on the project as stated in their grant application and IGD has received all certified payroll and other documents related to payment.
- 11) Annually, May or June survey letters are mailed to every City/Village/Township in St. Clair County. This is to determine the project that they will be applying for in a low-moderate census area. If it not they are to send letters to the homeowners that are in the area stating what they propose to do, an income sheet to fill out at return to IGD in a seal confidential envelope. The community is to send IGD a sample letter, map of area, and all names and addresses so we can track it.
- 12) October/November CDBG public facility staff and coordinator review the application, to ensure that is updated.
- 13) Mid- December the applications are certified mailed to all supervisors/mayors of the communities in St. Clair County, unless have opted out of our program. Applications are due back to our office mid-March, must be dated stamped.
- 14) IGD offers a technical assistance meeting if needed or they can email us with questions.
- 15) A cover letter is prepared which lists information regarding scoring.
- 16) 3-4 staff members will score the applications that are returned on time.
- 17) After the scoring has been completed, the results will be put into 4 different sheets we use. Then the staff will hold a meeting to discuss the spreadsheets.
- 18) The coordinator will take all the complied spreadsheets to the executive director, then to the Chairman for approval.
- 19) St. Clair County IGD's environmentalist will start the environmental review, then it is to be approved by HUD. HUD will send a ROF when they approve.
- 20) Once HUD has released the ROF, I will mail the award letter to the successful community with the contract to be signed and returned. I will send letters of unsuccessful application to those not awarded.

# Appendix IV: CDBG Project Flowchart



# Appendix V: CDBG Public Facilities and Infrastructure Scoring Sheet

**COMMUNITY** \_\_\_\_\_

**PROJECT TYPE** \_\_\_\_\_

**REVIEWED BY** \_\_\_\_\_

**PART A. PROJECT BENEFIT**

- 1. Project need \_\_\_\_\_ (15 max)
- 2. Number of persons to benefit \_\_\_\_\_ ( 6 max)
- 3. Elimination of slums/blight \_\_\_\_\_ ( 3 max)
- 4. Removal of architectural barriers \_\_\_\_\_ ( 2 max)
- 5. Historic preservation project \_\_\_\_\_ ( 1 max)
- 6. Is there an acquisition needed \_\_\_\_\_ ( 1 max)

POSSIBLE POINTS: 28

**EARNED POINTS:** \_\_\_\_\_

**PART B. LOW/MOD INCOME BENEFIT**

- 1. Census tract (or) \_\_\_\_\_ (10 max)
- 2. Block group LMI percentage (or) \_\_\_\_\_ (10 max)
- 3. HUD-approved documented survey (or) \_\_\_\_\_ (10 max)
- 4. Limited clientele \_\_\_\_\_ (8 max)

POSSIBLE POINTS: 10

**EARNED POINTS:** \_\_\_\_\_

**PART C. FINANCIAL NEED**

- 1. Local capacity \_\_\_\_\_ (10 max)

POSSIBLE POINTS: 10

**EARNED POINTS:** \_\_\_\_\_

**PART D. RESOURCE LEVERAGING**

- 1. Local match \_\_\_\_\_ (6 max)
- 2. Resolution of Support \_\_\_\_\_ (2 max)
- 3. Letter of commitment \_\_\_\_\_ (4 max)

POSSIBLE POINTS: 12

**EARNED POINTS:** \_\_\_\_\_

**PART E. LOCAL BONUS POINTS**

POSSIBLE POINTS: 15

\_\_\_\_\_ (15 max)

**EARNED POINTS:** \_\_\_\_\_

**PART F. EFFORT AND CAPACITY**

- 1. Project readiness(5)/completion (5) \_\_\_\_\_ (5 max)
- 2. Community history/past performance \_\_\_\_\_ (10 max)
- 3. Application Completeness \_\_\_\_\_ (5 max)
- 4. Application Requested Amount \_\_\_\_\_ (5 max)

POSSIBLE POINTS: 25

**EARNED POINTS:** \_\_\_\_\_

**MAXIMUM POSSIBLE POINTS: 100**

**TOTAL:** \_\_\_\_\_ **(100 max)**

# Appendix VI: CDBG-DR Public Facilities and Infrastructure Program Flow

## PART I: APPLICATION PREPARATION

- 1) APPLICATION RELEASE
  - IGD/CD mails CDBG-DR infrastructure applications to all eligible municipalities by certified mail and posts them on the County website.
  - Applications are also available via email upon request.
- 2) TECHNICAL ASSISTANCE
  - IGD/CD offers technical assistance meetings (virtual or in-person) approximately four weeks after application release.
  - Staff provides guidance on disaster tie-back documentation, mitigation requirements, and compliance areas (DOB, NEPA, Davis-Bacon, Section 3).
- 3) APPLICATION DEADLINE
  - Completed applications must be received by IGD/CD no later than 4:00 PM on the published deadline date.
  - Late applications will not be considered for funding.

## PART II: REVIEW AND SCORING

- 1) THRESHOLD REVIEW
  - IGD/CD staff verifies:
    - Disaster tie-back to the 2022/2024 flood event.
    - Compliance with the LMI national objective (51% benefit).
    - Location within the designated disaster impact area.
    - Completed Duplication of Benefits (DOB) analysis.
    - Environmental review requirements and procurement documentation.
- 2) SCORING
  - Eligible applications are scored based on:
    - Impact on vulnerable populations and MID areas.
    - Alignment with mitigation and resilience goals (minimum 15% mitigation).
    - Cost reasonableness and leveraging of other funds.
    - Financial need and capacity to complete the project.
- 3) STAFF RECOMMENDATIONS
  - Reviewed by the Community Development Coordinator and IGD Executive Director.
  - Recommendations may be adjusted based on County priorities.
- 4) COUNTY APPROVAL
  - Final recommendations submitted to the County Board Chairman and Grants Committee for approval.
  - Approved projects incorporated into the CDBG-DR Action Plan.

### **PART III: HUD APPROVAL AND AWARD**

#### **1) ACTION PLAN SUBMISSION**

- County submits the final Action Plan to HUD for review and approval.
- HUD issues Request for Funds (ROF) upon approval.

#### **2) AWARD NOTIFICATION**

- IGD/CD sends award letters to successful applicants, including:
  - Award amount and anticipated start date.
  - Pre-award conditions (environmental clearance, DOB verification, procurement compliance).

#### **3) REGRET LETTERS**

- Sent to applicants whose projects were not funded.

### **PART IV: AGREEMENT EXECUTION**

#### **1) SUBRECIPIENT AGREEMENT**

- IGD/CD prepares written agreements per 24 CFR 570.503.
- Agreements include scope of work, budget, compliance provisions, and reporting requirements.
- No costs may be incurred prior to contract execution and clearance of all conditions.

### **PART V: IMPLEMENTATION & PROCUREMENT**

#### **1) PRE-CONSTRUCTION CONFERENCE**

- IGD/CD holds a pre-construction meeting with the implementing entity, engineer/architect, and contractor to review scope, schedule, reporting, labor standards, Section 3, BABA (if applicable), and documentation requirements for reimbursement and DRGR.

#### **2) PROCUREMENT COMPLIANCE**

- Implementing entity completes procurement consistent with 2 CFR 200 Subpart D and the County's Financial Policies. IGD/CD confirms the procurement method, bid/award documentation, contract form, wage decision (if applicable), and required contract provisions are in the file before construction costs are eligible for reimbursement.

#### **3) NOTICE TO PROCEED**

- Issued by the engineer/owner after contracts, insurance/bonds, environmental clearance, and pre-construction requirements are confirmed. IGD/CD files the authorization to proceed.

#### **4) CONSTRUCTION DOCUMENTATION**

- The contractor/engineer submits periodic progress reports, pay applications, certified payrolls (as applicable), inspection reports, and photographs. The engineer/architect certifies work in place for payment consideration.

## **PART VI: DRAW REQUESTS (REIMBURSEMENTS) & DRGR**

### **1) INVOICE SUBMISSION**

- Implementing entity submits pay applications/invoices with supporting documentation (e.g., contracts, procurement records, progress certifications from the engineer/architect, delivery tickets as applicable, certified payrolls if applicable, and proof of any required local cost share).

### **2) IGD/CD REVIEW**

- IGD/CD verifies eligibility, environmental clearance alignment, procurement compliance, cost reasonableness, and scope consistency; confirms that no duplication of benefits (DOB) has occurred; and confirms alignment with the written agreement budget and milestones.

### **3) DRGR DRAW**

- IGD/CD enters approved draws in DRGR and retains documentation in the project file consistent with HUD recordkeeping requirements. Draws are reimbursement-based; pre-conditions (executed agreement, environmental clearance, and initial DOB verification) must be met prior to the first draw.

### **4) FUNDING RELEASE**

- Funds are released after internal approvals and DRGR processing are completed. IGD/CD maintains a ledger of draws and reconciles DRGR activity.

## **PART VII: MONITORING & CHANGE ORDERS**

### **1) ONGOING MONITORING**

- IGD/CD uses a risk-based approach to monitor DR projects via desk reviews and on-site visits. Monitoring verifies: tie-back and unmet need documentation; DOB; environmental review compliance and avoidance of choice-limiting actions; procurement; labor standards (if applicable); construction progress; and DRGR accuracy.

### **2) PROGRESS INSPECTIONS**

- Construction is verified through periodic inspections and engineer/architect certifications. Documentation is filed to support progress payments and DRGR accomplishments.

### **3) CHANGE ORDERS**

- No change order work may proceed without prior written approval from IGD/CD. Change orders are reviewed for:
  - Eligibility and scope consistency

- Cost reasonableness (2 CFR 200.404)
- Procurement compliance (2 CFR 200 Subpart D)
- Environmental clearance consistency
- DOB implications
- Material changes (scope/budget/schedule) may require agreement amendment and DRGR updates before related costs are reimbursed.

#### 4) **ISSUE RESOLUTION**

- IGD/CD issues monitoring letters for findings/concerns and establishes corrective action timelines. Documentation of resolution is maintained in the project file.

### **PART VIII: CLOSEOUT & RECORDKEEPING**

#### 1) **SUBSTANTIAL COMPLETION & FINAL PAYMENT**

- The implementing entity submits final pay application with: engineer/architect completion certification, final inspection and punch list resolution, lien waivers, as-built documentation (as applicable), and required project reports.

#### 2) **DRGR ACTIVITY COMPLETION**

- After verifying completion, IGD/CD updates accomplishments and status in DRGR and flags the activity as complete, consistent with DRGR guidance.

#### 3) **PROJECT FILE CLOSEOUT**

- IGD/CD confirms that the project file includes: eligibility and tie-back documentation, environmental review record, procurement and contract documents, construction and inspection records, DOB analyses and updates, draw documentation, and closeout certifications.

#### 4) **RECORD RETENTION**

- Records are retained for at least three (3) years after HUD issues grant closeout for the overall CDBG-DR grant in DRGR, or longer if required due to audit/litigation/other applicable requirements.

## **Appendix VII: Phases For Public Infrastructure Projects Involving CDBG-DR Funding**

### **1) Contract Execution**

The municipality enters into a CDBG-DR Subrecipient Agreement with St. Clair County. No activity or expenditure may occur until the agreement is fully executed and all pre-award conditions are satisfied.

### **2) Engineer Selection and Documentation**

The municipality must notify IGD/CD of its selected engineer and provide a copy of the executed engineering agreement. Procurement must comply with 24 CFR 85 and DR-specific requirements

### **3) Compliance and Bid Preparation**

The engineer obtains the most recent IGD/HUD forms and federal wage decision for inclusion in bid documents. Section 3 language and reporting requirements must be incorporated.

### **4) Plan Review and Authorization to Advertise**

The engineer submits complete plans and specifications to IGD/CD for review. Upon approval, IGD/CD issues a Letter of Authorization to Advertise for Bids. Advertisement must meet federal and local requirements.

### **5) Bid Opening and Review**

IGD/CD attends the bid opening and reviews all required CDBG-DR compliance documents. Bids missing required documentation will be deemed incomplete and cannot be awarded.

### **6) Notice of Award and Pre-Construction Meeting**

After IGD/CD approval, the municipality issues a Notice of Award. The engineer schedules a pre-construction meeting with IGD/CD, the contractor, and municipal representatives. IGD/CD collects performance bonds, insurance certificates, and other required documents.

### **7) Notice to Proceed**

IGD/CD issues written authorization for contract execution and Notice to Proceed after verifying compliance with all requirements, including environmental clearance and DOB verification.

### **8) Construction and Monitoring**

The engineer notifies IGD/CD of the start date, any breaks in construction, and change orders. IGD/CD monitors the project through site visits, photo documentation, and labor interviews to ensure Davis-Bacon and Section 3 compliance.

### **9) Payment Requests**

Interim payment requests must be submitted to IGD/CD with supporting documentation, including certified payroll and Section 3 labor hour reports. Municipalities should not pay invoices for reimbursement purposes.

**10) Project Completion and Closeout**

Upon completion, the engineer provides a certificate of approval and final invoice.

IGD/CD releases remaining funds after verifying:

- All CDBG-DR funds were used for eligible costs.
- Local match requirements were met.

All compliance documentation (including DOB certification) is complete.

**11) Environmental Review and HUD Authority to Use Grant Funds (AUGF)**

IGD/CD completes the environmental review process and obtains HUD’s Authority to Use Grant Funds (AUGF) before any construction begins. Projects requiring an Environmental Assessment must submit documentation early to avoid delays.

**12) Mitigation and Reporting**

Subrecipients must demonstrate that at least 15% of project costs are allocated to mitigation activities and report compliance with Section 3 and minority business utilization goals.

## Appendix VIII: CDBG-DR (2022/2024) Public Facilities and Infrastructure Scoring Sheet

COMMUNITY \_\_\_\_\_

PROJECT TYPE \_\_\_\_\_

REVIEWED BY \_\_\_\_\_

- PART A. PROJECT BENEFIT**
- 7. Project need \_\_\_\_\_ (25 max)
  - 8. Number of persons to benefit \_\_\_\_\_ ( 10 max)
- POSSIBLE POINTS: 35      **EARNED POINTS:** \_\_\_\_\_
- PART B. LOW/MOD INCOME BENEFIT**
- 5. Census tract (or) \_\_\_\_\_ (10 max)
  - 6. Block group LMI percentage (or) \_\_\_\_\_ (10 max)
- POSSIBLE POINTS: 10      **EARNED POINTS:** \_\_\_\_\_
- PART C. FINANCIAL NEED**
- 2. Local capacity \_\_\_\_\_ (10 max)
- POSSIBLE POINTS: 10      **EARNED POINTS:** \_\_\_\_\_
- PART D. RESOURCE LEVERAGING**
- 4. Local match \_\_\_\_\_ (9 max)
  - 5. Resolution of Support \_\_\_\_\_ (2 max)
  - 6. Letter of commitment \_\_\_\_\_ (4 max)
- POSSIBLE POINTS: 15      **EARNED POINTS:** \_\_\_\_\_
- PART E. LOCAL BONUS POINTS**
- \_\_\_\_\_ (5 max)
- POSSIBLE POINTS: 5      **EARNED POINTS:** \_\_\_\_\_
- PART F. EFFORT AND CAPACITY**
- 5. Project readiness/completion \_\_\_\_\_ (5 max)
  - 6. Community history/past performance \_\_\_\_\_ (5 max)
  - 7. Application Completeness \_\_\_\_\_ (10 max)
  - 8. Application Requested Amount \_\_\_\_\_ (5 max)
- POSSIBLE POINTS: 25      **EARNED POINTS:** \_\_\_\_\_

<b>MAXIMUM POSSIBLE POINTS: 100</b>	<b>TOTAL: _____ (100 max)</b>
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## Revision History

Event	Date
Adopted	5/27/25
Adopted revisions	3/26/26
Adopted Revisions (3.3 Professional Service Costs added)	5/27/26